

**[DRAFT] ADDENDUM TO
BUTTERFIELD – MWEST
GENERAL PLAN AMENDMENT PROJECT GPA 14-04
ENVIRONMENTAL IMPACT REPORT**

(State Clearinghouse No. 2014072009)

April 2015

I. Introduction

In July 2014, pursuant to the California Environmental Quality Act (Pub. Res. Code § 21000 *et seq.*) (“CEQA”), the City of Morgan Hill (“City”) issued a Notice of Preparation (“NOP”) for a full Environmental Impact Report (“EIR”) for the General Plan Amendment (File No. GPA-14-04) (“GPA”) from *Industrial to MF Medium Residential (14 – 21 du/acre)* for a 19.5 acre portion of the 58-acre property located at Butterfield Boulevard and Jarvis Drive in the City of Morgan Hill, California (*State Clearinghouse No. 20144072009*). The City then circulated the Draft EIR for public comment in August 2014 and published the Final EIR in November 2014.

On February 4, 2015, the City Council voted to table the consideration of applicant MWest’s GPA request, and directed staff to consider the proposal as part of the City’s pending General Plan Update. On February 18, 2015, at MWest’s request and in light of a commitment to bring back a revised proposal to address the specific concerns raised during the process, the City Council directed staff to schedule a reconsideration hearing (scheduled for May 6, 2015).

On February 18, 2015, the City Council gave direction for the Preferred Land Use Plan to be studied in the City’s 2035 General Plan Update (“GPU”) EIR. On February 23, 2015, the City issued a NOP for a program EIR for the GPU.

On April 7, 2015, MWest submitted an amendment to the application for GPA 14-04 (“Reconfigured GPA 14-04”), which presented two alternatives: **Alternative A** remains 19.5 acres and would accommodate the same total (up to 409) residential units but in the reconfigured area shown on **Attachment A**. **Alternative B** is also 19.5 acres and would accommodate the same total (up to 409) residential units but, as shown on Attachment B, would be reconfigured to include a portion of the City’s existing detention pond if confirmed under GPA 14-04 EIR Mitigation Measure SM HYD-1.1 that such detention pond is no longer needed for flood control purposes and if a land exchange or acquisition is approved by the City Council.

Therefore, in light of the City Council’s direction for analysis of the Preferred Land Use Plan in the GPU EIR and MWest’s application amendment proposing the Reconfigured GPA 14-04 project, this addendum has been prepared (1) to provide additional analysis of the consistency of GPA 14-04 and Reconfigured GPA 14-04 and the Preferred Land Use Plan being analyzed in the GPA EIR, and (2) to demonstrate that neither Reconfigured GPA 14-04 Project (Alternative A) or Reconfigured GPA 14-04 Project (Alternative B) would result in any new significant impacts or impacts that would be substantially more severe than identified in the GPA 14-04 EIR according to the triggers detailed in CEQA Section 21166 and CEQA Guidelines Section 15162.

II. CEQA Requirements

Under CEQA, the City as lead agency must conduct environmental review on public and private development projects. Pursuant to CEQA Guidelines Section 15164(a), the City shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. Section 15164(c) states that an addendum does not need to be circulated for public review. Section 15164(d) provides that the decision-making body shall consider the addendum

in conjunction with the EIR prior to making a decision on the project. Section 15164(e) requires documentation of the decision not to prepare a subsequent EIR pursuant to Section 15162.

Under CEQA Section 21166 and CEQA Guidelines Section 15162(a), once an EIR has been certified, no subsequent EIR shall be prepared unless the lead agency determines, on the basis of substantial evidence, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum has been prepared to satisfy the requirements of CEQA Guidelines Sections 15164(a), 15164(d), and 15164(e).

III. Analysis of Impacts

Under CEQA Guidelines Section 15164(a), the City shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. As discussed above, on

February 18, 2015, the City Council gave direction for the Preferred Land Use Plan to be studied in the GPU EIR. Because the adoption of the Preferred Land Use Plan occurred after the GPA 14-04 EIR was circulated, the GPA 14-04 EIR did not address consistency with the Preferred Land Use Plan. Accordingly, this section of the addendum provides an analysis of land use impacts to determine whether new or more severe effects would occur or new mitigation measures should be required. Additionally, Exhibit 1 to this addendum provides an analysis of each environmental issue identified in the GPA 14-04 Project EIR to determine whether new or more severe effects would occur or new mitigation measures should be required for reconfiguration of the General Plan Amendment area proposed by Reconfigured GPA 14-04.

Analysis of the GPU Preferred Land Use Plan

The Preferred Land Use Plan that City Council directed to be studied in the GPU EIR¹ will maintain the existing General Plan land use designation of Industrial for the proposed GPA 14-04 project site. The Preferred Land Use Plan includes the conversion of 60 acres of currently designated industrial land within the existing General Plan to support additional residential development within the City limits. The 19.5-acre industrial conversion proposed on the MWest site was not included on the Preferred Land Use Plan, but was to be studied at the City Council's direction as a project option in the GPU EIR. If the GPA 14-04 is approved by the City Council and the City Council directs the modification of the Preferred Land Use Plan to include this 19.5 acres, and if the City Council does not elect to offset the re-designation by retaining an equivalent amount of industrial land elsewhere within the City in the GPU, it would increase the amount of industrial-to-residential conversion to 79.5 acres.

The February 18, 2015 report describing the Preferred Land Use Alternative recommended to be analyzed in the GPU EIR states that “[t]he draft Land Use Plan would retain approximately 1,070 acres (approximately 150 acres unincorporated) of land designated Industrial to support future job growth.” (p. 4) If the MWest GPA is approved, and the City Council does not elect to offset the re-designation by retaining an equivalent amount of industrial land elsewhere in the City in the GPU, the total acreage of industrial lands that would be retained in the City would be slightly lower (1,050.50) than included in the GPU Preferred Land Use Plan. The 19.5 acres represents a 1.8 percent reduction in the total acreage proposed to be retained for industrial use, and a 2 percent reduction in the acreage proposed to be retained for industrial use within the city limits, a de minimis reduction in the overall inventory of industrial lands that would not cause new or more severe land use impacts or require additional mitigation measures, as further described below.

Analysis of City's Overall Industrial Lands Inventory

A primary objective of the *Economic and Fiscal Impact Analysis of Proposed Industrial Land Conversion in Morgan Hill Final Report September 21, 2012*, attached as Exhibit 2, was to evaluate the potential impacts of industrial land conversion within the broader context of Morgan

¹ See City Council Staff Report, 2/18/15, Item #16, available online at <http://www.morgan-hill.ca.gov/DocumentCenter/View/15551>.

Hill's industrial land supply and real estate market.² One of the key findings of the economic study is that the City's current supply of lands designated for industrial use exceeds projected long-term demand (i.e. General Plan build-out). Based on the assumptions used for the report, the 284 acres of currently vacant industrial land within the City limits, combined with the existing inventory of vacant built space are sufficient to accommodate projected demand for approximately 40-100 years. Therefore, as the City concluded in its August 28, 2013 Staff Report for GPA-12-02 for the Cochrane-South Bay Development project, located across the street from the MWest site on Jarvis Drive, "the conversion of the project site to residential use is not anticipated to negatively affect the City's long term supply of industrial land".³

This conclusion that the City has a strong inventory of vacant industrial land continues to be supported by current market conditions. Historic market data show that industrial/R&D/office land absorption in town occurs at a pace of about 2.6 acres/year.⁴ The City's existing building base (currently 5.6 million sq.ft.), combined with the 284+/- acres of vacant land (about 4,329,000 sq.ft. at build-out), can accommodate a total build-out of over 9.93 million sq.ft., giving the City a superior economic base for its size. Moreover, there are 229 additional acres in reserve within the City's sphere of influence. At historic average absorption levels of 2.6 acres per year, the 284 acres of currently designated vacant industrial land would take nearly 110 years to absorb.

Although vacancy rates for industrial space are quite low (less than 3 percent), the industrial market is cyclical. The last time vacancy rates were at the same level was during the economic boom of the late 1990s; vacancy rates increased to over 20% within two years following the "dot.com" bust. A more predictable driver of near term land absorption is rent levels, according to local market specialists; rent levels for industrial space will need to increase by over 30% to justify the cost of new speculative construction.⁵

Development of the entire 58-acre site in a manner consistent with the *Industrial* land use designation proposed under the GPU Preferred Land Use Plan would yield an estimated 884,000 sq. ft. of industrial space and about 1,768 jobs⁶. The development of 19.5 acres for residential use would result in a net reduction of 284,000 sq.ft. and 500 fewer jobs when compared to the GPU Preferred Land Use Plan. However, if the GPA 04-14 is approved, the remaining 38.5 acres would remain available for future industrial use, with the potential to support approximately 1,200 jobs and up to 600,000 sq. ft. of industrial space, which would add over 10% to the City's existing industrial base. Thus, the above data continue to support the conclusion that the City has a sufficient supply of industrial land to meet projected demand over the long term (the next 100

² See City Council Staff Report 8/28/13, GPA-12-02, Cochrane-South Bay Development, available online at <http://www.morganhill.ca.gov/DocumentCenter/View/11042>

³ Ibid. Excerpted from 8/23/13 Staff Report. See also *Economic and Fiscal Impact Analysis Industrial Land Morgan Hill*, Sept. 21, 2012, Strategic Economics, available on City's General Plan website at: <http://morganhill2035.org/wp-content/uploads/2013/05/Final-ILS-Report-09-21-2012.pdf>

⁴ Historic Market Data for Morgan Hill and Market Update, Colliers International, Jan. 2015, attached as Exhibit 3.

⁵ Ibid.

⁶ Assuming an average FAR of .35 for Industrial uses and average square feet per employee of 500.

years), and the conversion of 19.5 acres to residential use on the MWest site would not have a significant impact on the City's economic base.

Analysis of Industrial Lands within City's Core Employment Centers

The *Economic and Fiscal Analysis* concluded that the Cochrane Road area business parks and the Morgan Hill Ranch Business Park (MHBP), in particular, are in the most competitive position to attract new large-scale industrial development, primarily due to location and transportation access advantages, as well as the availability of large vacant parcels of land. While the MWest site is within the MHBP, converting a 19.5-acre portion of the site to a MF Medium density residential designation may increase the likelihood of attracting new industrial users who demand local rental housing supply to attract and retain employees.

The *Economic and Fiscal Impact Analysis* found a lack of apartment housing in the City as confirmed by the consistent, very low vacancy rates and rising rents in the existing rental housing stock. The Report concludes the City currently has a shortage of multi-family rental housing, as expressed by the current vacancy rate of only 1%. A 5% vacancy rate is considered healthy. Only about 12% of the City's existing housing units are multi-family, compared to an average of 30 – 40 percent within the County, region and state.⁷ According to the Silicon Valley Leadership Group, a diversity of housing types, including the availability of rental housing, is considered a key factor among top Silicon Valley CEO's when making locational decisions and is critical to their ability to attract and retain talent. The MWest site has convenient access and adequate infrastructure exists adjacent to the property to accommodate both residential and industrial development.⁸ Further, this large vacant 58-acre property presents a unique opportunity in the City to develop a project with integrated industrial and higher density housing within walking distance of the City's core employment center.

The Economic and Fiscal Impact Analysis concluded that industrial lands located east of Butterfield Boulevard are higher value than those located west of Butterfield Boulevard. This is evidenced in part by the fact that the 58-acre MWest site – located west of Butterfield Boulevard - has been vacant for decades. Based on employer location preferences and the critical need for housing in the Bay Area, the addition of up to 409 apartments on 19.5 acres could serve to benefit businesses within the existing MHBP, many of whose workers commute to work from outside the City. In addition to relieving congestion on local roads by allowing employees within the MHBP to walk or bike to work, the addition of rental housing is anticipated to accelerate the timing of future industrial development within the MWest site. The proposed conversion of this particular 19.5 acres of industrial land to residential use is therefore not considered significant relative to the City's core employment centers, and would not negatively impact the City's economic development strategy.

⁷ See *City of Morgan Hill Population and Housing White Paper*, May 16, 2013, Bay Area Economics, available online at: http://morganhill2035.org/wp-content/uploads/2013/05/2_Pop_Housing.pdf

⁸ See *Economic and Fiscal Impact Analysis of Proposed Industrial Land Conversion Cochrane Road Site*, Aug. 8, 2013, Strategic Economics.

Multi-Family Housing is a Suitable Transition to Industrial Uses and is More Appropriate Opposite the Existing Jarvis Neighborhood

The site is of sufficient size to allow the development of an integrated industrial and residential project that could be considered a neighborhood. The site is bounded by public streets on three sides and so has distinct edges. Butterfield Boulevard, a 90 foot wide street, would provide a significant physical separation from the existing industrial uses, which are set back an additional 150 feet from the roadway. As a practical matter, multi-family residential is a more appropriate land use along the south side of Jarvis Drive, as potential future industrial uses could be perceived by existing residents as undesirable and/or incompatible. Multi-family medium density housing is considered an appropriate transitional use between residential and non-residential uses. It is easier to address potential compatibility concerns with the site design opportunities of multi-family attached units. The Multi-Family Medium designation provides greater flexibility in designing a clustered project that will better interface with industrial or residential.⁹

One of the primary attributes of the project site is that, at 19.5 acres, it is large enough to allow the creation of a complete neighborhood, including up to 5 acres of parks and open space, a central community building with amenities for all ages, and a mix of product types to meet the diverse needs of renters in the marketplace. The project would be designed to integrate with the Jarvis residences such that the two neighborhoods could be combined in to a livable residential area west of Butterfield. This can be accomplished through site circulation, positioning of homes along Jarvis, architecture, landscaping, and pedestrian and bike connections.

Services in the vicinity of the project are sufficient to create a complete neighborhood as well. The site is an excellent location for renters, who can walk or bike to work, to transit, and to any number of commercial/retail establishments in Downtown and in the Cochrane Road area. Existing infrastructure is adequate to serve the project (including potable water supply, sanitary sewer lines, and storm drainage systems on Butterfield and Jarvis). The site's close proximity to transportation arterials and close freeway access could be considered assets equally for either future employees or residents of the proposed site.

SUMMARY

The conversion of the land use designation of a 19.5-acre portion of this larger 58-acre vacant industrial site to residential use will not adversely affect the City's ability to meet the projected demand for vacant industrial land within the General Plan time horizon, i.e. "long term," as documented in the *Economic and Fiscal Impact Analysis* and will not have a significant adverse effect on the GPU Preferred Land Use Alternative with respect to industrial property in the City.

⁹ Ibid. Excerpted from Report.

EXHIBIT 1: [DRAFT] ENVIRONMENTAL CHECKLIST FORM

1. Project title: Butterfield-Keenan General Plan Amendment Project (GPA-14-04)
2. Lead agency name and address: City of Morgan Hill 17575 Peak Ave. Morgan Hill, CA 95037
3. Contact person and phone number: Sheldon S. Ah Sing, Contract Planner (408) 778-6480
4. Project location: The proposed project consists of approximately 19.5 acres generally located southwest of the intersection of Butterfield Boulevard and Jarvis Drive ((APNs 726-25-061, 726-25-078 (partial), 726-25-079, 726-25-066 (partial), 726-25-067, 726-25-068 (partial)).
5. Project sponsor's name and address: MWest PropCo XXIII LLC, 3351 Olcott Street
Santa Clara, CA 95054
6. General plan designation: Industrial – proposed MFM (14-21) 7. Zoning: PUD
7. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The project is as described in Section 1 (Project Description) of the EIR prepared by the City for GPA 14-04 (SCH #2014072009) ("GPA 14-04 EIR"), except that the area of the 19.5 acres proposed to be designated *Multi-Family Medium Residential (14-21)* has been reconfigured in response to public comments to provide additional buffer to the existing neighboring industrial uses to the east of Butterfield Boulevard and continuous industrial uses along Butterfield Boulevard while still providing land use compatibility to the existing immediately adjacent residential uses to the north of Jarvis Drive. The applicant has presented the following two alternatives: **Alternative A** remains 19.5 acres and would accommodate the same total (up to 409) residential units but in the reconfigured area shown on **Attachment A**. **Alternative B** is also 19.5 acres and would accommodate the same total (up to 409) residential units but, as shown on **Attachment B**, would be reconfigured to include a portion of the City's existing detention pond if confirmed under GPA 14-04 EIR Mitigation Measure SM HYD-1.1 that such detention pond is no longer needed for flood control purposes and if a land exchange or acquisition is approved by the City Council.
8. Surrounding land uses and setting: Briefly describe the project's surroundings:
See Section 2.0 (Environmental Setting, Impacts and Mitigation) of the GPA 14-04 EIR.

9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

See Section 1.6 (Subsequent Environmental Review) of the GPA 14-04 EIR

I. Analysis of Impacts

Under CEQA, a subsequent or supplemental EIR is not required unless: (1) substantial changes are proposed in the project which will require major revisions of the EIR; (2) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the EIR; or (3) new information, which was not known and could not have been known at the time the EIR was certified as complete, become available. (Cal. Pub. Res. Code § 21166; CEQA Guidelines § 15162). This checklist provides an analysis of each environmental issue identified in the GPA 14-04 Project EIR to determine whether new or more severe effects would occur or new mitigation measures should be required for the proposed reconfiguration of the General Plan Amendment area.

Note: in this analysis the original GPA 14-04 Project is referred to as the “GPA 14-04 Project” and the modified project is referred to, respectively, as the “Reconfigured GPA 14-04 Project (Alternative A)” and Reconfigured GPA 14-04 Project (Alternative B)”

In the following evaluation each topic section includes the following sub-sections:

1. Environmental Checklist. Contains a modified form of the Appendix G Initial Study environmental checklist. Each checklist question has been modified to characterize the potentially significant impact, less than significant impact, no impact and other categories in the context of whether or not the reconfiguration proposed would result in new significant impacts or substantially more severe impacts when compared to the EIR and the CEQA Section 21166 and CEQA Guidelines Section 15162 triggers as follows:
 - a. Would the project result in substantial changes which will require major revisions of the previous EIR due to new significant environmental effects or a substantial increase in the severity of previously identified effects;
 - b. Would the project result in substantial changes with respect to the circumstances in which the project is undertaken which will require major revisions of the EIR due new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - c. Would the project have one or more significant effects not discussed in the EIR or that will be substantially more severe than shown in the EIR, or are there mitigation measures or alternatives previously found not to be feasible or that are considerably different, that would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternatives.

The checklist presented in the following analysis classifies impacts in one of four ways:

- a. Potentially Significant New Impact — This category is for any potentially significant impact that was not analyzed in the EIR.
- b. Less than Significant New Impact with Mitigation Incorporated — This category is for any impacts which were not analyzed or found in the EIR, but are nonetheless found to be less than significant with mitigation incorporated.
- c. Less than Significant New Impact — This category is for any impacts which were not analyzed or found in the EIR, but which are nonetheless less than significant.
- d. Impacts Fully Analyzed in the EIR — This category is for impacts which are equal to or less than the impacts found and analyzed in the EIR.

2. Environmental Checklist Responses. Provides a response and explanation to each environmental checklist question. This sub-section also identifies mitigation measures that would be necessary to reduce the potential level of impact to less-than-significant.

3. Conclusions. Provides a conclusion as to each checklist question regarding whether the proposed reconfiguration would result in any new significant impacts or impacts that would be substantially more severe than identified in the GPA 14-04 EIR according to the triggers detailed in CEQA § 21166 and CEQA Guidelines § 15162.

SUMMARY CONCLUSION: For the reasons described below, we conclude that neither Reconfigured GPA 14-04 Project (Alternative A) or Reconfigured GPA 14-04 Project (Alternative B) would result in any new significant impacts or impacts that would be substantially more severe than identified in the GPA 14-04 EIR according to the triggers detailed in CEQA § 21166 and CEQA Guidelines § 15162. In summary, for all impacts that relate to project nature and intensity (e.g. traffic, air quality, water quality, noise, greenhouse gas emissions, public services, utilities, and energy), the project (both Alternative A and Alternative B) is exactly the same size and density so there is no change in impacts. For all impacts that are footprint related (e.g., cultural, biology, hazardous materials, aesthetics, hydrology), the nature of the resources on the reconfigured property (for both Alternative A and Alternative B) is essentially the same as the original project site, so that there is no change in impacts.

A. AESTHETICS

<i>Aesthetics</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.6; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.6 of the GPA 14-04 EIR (Visual and Aesthetics) concludes that the GPA 14-04 Project, with implementation of the General Plan policies (listed on pages 86-87) would not have a significant impact on aesthetics with no mitigation required.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the EIR with respect to the thresholds of significance and would remain subject to the same General Plan policies.

Finding: No supplemental analysis required.

B. AGRICULTURE AND FOREST RESOURCES

<i>Agriculture and Forest Resources</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR- No Impact</i>
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR and Notice of Preparation (Appendix A).

This topic was scoped out of the GPA 14-04 EIR, and nothing about the proposed reconfigurations would cause any different impacts to agricultural or forest resources.

C. AIR QUALITY

<i>Air Quality</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.4 and Air Quality and Greenhouse Gas Analysis (Appendix D); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.4 of the GPA 14-04 EIR (Air Quality) identifies the only sensitive receptors in the location are the existing residential uses north of Jarvis Drive, and identifies mitigation measures to reduce all impacts related to air quality, including temporary construction activities, to less than significant level.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) and the total number of units/density remains the same, and the reconfiguration does not change with respect to the distance from the only sensitive receptors to the north of Jarvis Drive. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

D. BIOLOGICAL RESOURCES

Biological Resources	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through {direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.7 and Biological Evaluation (Appendix E); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.7 of the GPA 14-04 EIR (Biological Resources) identifies impacts to nesting birds, burrowing owls, and special status plant species and identifies mitigation measures to reduce all impacts related to biology to less than significant level. The Biological Evaluation prepared by Live Oak Associates, Inc. (Appendix E) analyzed not only the project site for the GPA 14-04 Project, but the eight surrounding quadrangles, including the adjacent City-owned detention pond. (See Appendix E at page 3).

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) remains the same, and the reconfiguration would not impact any new type of biological resource or increase the severity of any impact identified in the GPA 14-

04 EIR. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

E. CULTURAL RESOURCES

Cultural Resources	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.8; City’s Archaeological Sensitivity Map; Phase I (Appendix F); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.8 of the GPA 14-04 EIR (Cultural Resources) concludes the project site does not contain any historic resources, and only a potential for discovery of subsurface archeological resources during construction, and identifies mitigation measures to reduce any potential impact related to any potential subsurface cultural resources to less than significant level.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) remains the same, and the reconfiguration would not impact any new type of cultural resource or increase the severity of any impact identified in the GPA 14-04 EIR. Neither the City’s Archaeological Sensitivity Map nor the Phase I (Appendix F), which analyzed a larger 88.5 acre area, identify any cultural resources on the area proposed to be included in the reconfiguration. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

F. GEOLOGY AND SOILS

<i>Geology and Soils</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.9; City’s Geology, Geologic, and Geological Hazards Maps; California Department of Conservation, Special Studies Zones (Alquist-Priolo Earthquake Fault Zones Act), Morgan Hill, Revised Official Map (January 1982), available online at <http://gmw.consrv.ca.gov/shmp/download/ap/pdf/MORGANHILL.PDF> (accessed 4/2/15); <http://resilience.abag.ca.gov/earthquakes/> (access 4/2/15); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.9 of the GPA 14-04 EIR (Geology and Soils) concludes the project site is not within any landslide area, any liquefaction hazard zone, or any earthquake fault zone but

is in a seismically active area and identifies a mitigation measure to reduce any potential impact related to any geology and soils to less than significant level, as well as a mitigation measure to reduce impacts related to soil erosion during construction.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) remains the same, and the soil conditions are the same or increase the severity of any impact related to geology and soils identified in the GPA 14-04 EIR. The reconfigured areas are similarly not in any landslide, fault zone, or liquefaction hazard zone. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

G. GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.5 and Air Quality and Greenhouse Gas Analysis (Appendix D); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.5 of the GPA 14-04 EIR (Greenhouse Gas Emissions) identifies the applicability of certain General Plan policies, Morgan Hill Municipal Code Chapter 15.65 and 18.73, and Title 24, and analyzed the operation and construction emissions from the GPA 14-04 Project. The GPA 14-04 EIR concluded the project would not exceed the BAAQMD efficiency threshold of 4.6 MT CO2 per service population and therefore would have a less than significant impact related to greenhouse gas emissions.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) and the total number of units/density remain the same in both Alternative A and Alternative B. Therefore, there would be no change in the modeling assumptions or results with respect to greenhouse gas operational or construction emissions and the conclusions reached in the GPA 14-04 EIR would remain the same.

Finding: No supplemental analysis required.

H. HAZARDS AND HAZARDOUS MATERIALS

<i>Hazards and Hazardous Materials</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.11; Phase I (Appendix F) and Hazardous Materials Survey (Appendix G); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.11 of the GPA 14-04 EIR (Hazards and Hazardous Materials) concludes the project site does not contain any recognized environmental concerns, but due to the project site’s previous agricultural uses, residual chemicals could be hazardous to future construction workers and residents. This section of the GPA 14-04 EIR identifies mitigation measures to reduce any potential impact related to any potential agricultural residual chemicals to less than significant level.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) remains the same, and the reconfiguration would not impact any new type of hazardous material or increase the severity of any impact related to potential residual agricultural chemicals identified in the GPA 14-04 EIR. The Phase I (Appendix F), which analyzed a larger 88.5 acre area, does not identify any recognized environmental concern within the area proposed to be included in the reconfiguration. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

I. HYDROLOGY AND WATER QUALITY

<i>Hydrology and Water Quality</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hydrology and Water Quality	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.10; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.10 of the GPA 14-04 EIR (Hydrology and Water Quality) concludes the project site is not within the 100 year flood zone, has no waterways, or any potential for seiche, tsunami or mudflow, and no potential to impact groundwater. GPA 14-04 Impact HYD-1 analyzes the proposed removal of the detention pond and identifies mitigation measures to reduce any potential impact related to the removal of the detention pond and impacts related to construction and post construction stormwater quality to less than significant level.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) remains the same, and the reconfiguration would not result in any new impacts related to hydrology or water quality or increase the severity of any impact related to hydrology or water quality identified in the GPA 14-04 EIR. Although Alternative B would include a portion of the City’s detention pond area, this impact has already been identified in HYD-1 and mitigated by SM HYD-1. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

J. LAND USE AND PLANNING

Land Use and Planning	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	Impacts Fully Analyzed in EIR
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.1; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015. *See also* Addendum, Section III, discussing consistency with the Preferred Land Use Plan that City Council directed to be studied in the GPU EIR.

EIR Conclusion: Section 2.1 of the GPA 14-04 EIR (Land Use) concludes that while residential is currently not allowed under the existing Industrial designation, with the approval of the proposed GPA 14-04 Project, the development of up to 409 residential units in conformance with applicable land use plans, policies, and regulations would be compatible with surrounding uses and result in less than significant land use impacts with no mitigation required.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) remains the same, and the reconfiguration has been proposed to respond to comments and increase the buffer between the existing industrial uses to the east of Butterfield Boulevard while maintaining adjacency to the existing residential uses north of Jarvis. This configuration (either Alternative A or Alternative B) would provide a substantial buffer to the proposed residential and the existing industrial uses and would also buffer the existing residential uses north of Jarvis from future industrial development on the remainder of MWest’s property. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

A discussion of consistency with the Preferred Land Use Plan that City Council directed to be analyzed in the GPU EIR is included in Addendum, Section III.

Finding: No supplemental analysis required.

K. MINERAL RESOURCES

<i>Mineral Resources</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR – No impact</i>
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR and Notice of Preparation (Appendix A).

This topic was scoped out of the GPA 14-04 EIR, and nothing about the proposed reconfigurations would cause any different impacts to mineral resources.

L. NOISE

Noise	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sources: GPA 14-04 EIR Section 2.3; Environmental Noise Assessment (Appendix C); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015; Acoustical Review of Alternate Land Use Plans prepared by Charles M. Salter Associates Inc., dated April 3, 2015.

EIR Conclusion: Section 2.3 of the GPA 14-04 EIR (Noise and Vibration) concludes that the existing noise environment on the project results primarily from vehicular traffic along Butterfield Boulevard and Monterey Road, as well as intermittent railroad noise along the UPRR rail corridor to the west of Monterey Road. The GPA 14-04 EIR identified significant impacts related to interior noise exposure for the residential units adjacent to Butterfield Road and the UPRR rail corridor, and related to exterior noise impacts for the residential units adjacent to Butterfield Road, Monterey Road and the UPRR rail corridor. The GPA 14-04 EIR also identified short term construction noise impacts. The GPA 14-04 EIR identified mitigation measures to reduce all impacts related to interior, exterior, and construction noise to a less than significant level.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

Alternatives A and B include the same general area designated for residential development as the GPA 14-04 EIR, with the setback along Jarvis Drive (adjacent to the existing residential) unchanged. The development area is further setback from Butterfield Boulevard, which is a source of existing interior and exterior noise impacts. Alternative B slightly decreases the setback distance from the UPRR which is also a source of interior and exterior noise impacts. As described in more detail in the attached *Acoustical Review of Alternate Land Uses* prepared by Charles M. Salter Associates, reconfigured Alternative A and Alternative B both increase the distance from Butterfield Boulevard and therefore result in lower impacts from Butterfield Boulevard. Only Alternative B slightly decreases the distance to the UPRR rail corridor, which would result in slightly higher noise levels but the impacts would nonetheless be reduced to less than significant with the same mitigation proposed in the GPA 14-04 EIR. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

M. Population and Housing

<i>Population and Housing</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR Section 3.0 (Growth-Inducing Impacts); Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: This topic was addressed under Growth-Inducing Impacts in Section 3.0 of GPA 14-04 EIR. Nothing about the proposed reconfigurations would cause displacement of housing or people. And, because the Reconfigured GPA 14-04 Projects retains the same acreage and number of units, nothing would change the assumptions regarding population growth.

Finding: No supplemental analysis required.

N. Pubic Services

Public Services	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR Section 2.14; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.14 of the GPA 14-04 EIR (Public Services) concludes that the GPA 14-04 will not result in a significant impact to any public services.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) and total number of units (409) remains the same. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

O. RECREATION

Recreation	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR Section 2.14.2.5; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.14 of the GPA 14-04 EIR (Public Services) concludes that the GPA 14-04 will not result in a significant impact to parkland.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) and total number of units (409) remains the same. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

P. TRANSPORTATION/TRAFFIC

<i>Transportation/Traffic</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR Section 2.2; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.2 of the GPA 14-04 EIR (Transportation) identifies certain impacts to transportation facilities and includes mitigation measures that reduce all impacts to a less than significant level, with the exception of a PM peak hour freeway segment on Southbound Highway 101 from Burnett Avenue to Cochrane Road. The analysis, as a General Plan Amendment, is not based on any specific site plan so does not analyze site layout, driveways or site circulation.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) and total number of units (409) remains the same. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the total

trip or distribution conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance for traffic impacts and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

Q. UTILITIES AND SERVICE SYSTEMS

<i>Utilities and Service System</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR Section 2.12; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.12 of the GPA 14-04 EIR (Utilities and Service Systems) concludes that the GPA 14-04 will not result in a significant impact to any utilities or service systems.

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) and total number of units (409) remains the same. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the

conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

R. ENERGY

Energy	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>Impacts Fully Analyzed in EIR</i>
a) Would the project result in a wasteful, inefficient, and unnecessary consumption of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project result in a substantial increase in demand upon energy resources in relation to projected supplies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Would the project result in longer overall distances between jobs and housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source: GPA 14-04 EIR Section 2.13; Letter from MWest to City Manager Steve Rymer regarding the reconfigured project area dated April 7, 2015.

EIR Conclusion: Section 2.13 of the GPA 14-04 EIR (Energy) identifies a significant unavoidable impact related to annual increase in Vehicle Miles Traveled (VMT).

Discussion of the Reconfigured GPA 14-04 Project Alternatives:

The total acreage (19.5 acres) and total number of units (409) remains the same. Therefore, the proposed reconfiguration (either Alternative A or Alternative B) would not change the energy or VMT conclusions reached in the GPA 14-04 EIR with respect to the thresholds of significance for traffic impacts and would remain subject to the same mitigation measures.

Finding: No supplemental analysis required.

EXHIBIT 2

Economic and Fiscal Impact Analysis of Industrial Land in Morgan Hill September 21, 2012

EXHIBIT 3

Historic Market Data for Morgan Hill and Market Update, Colliers International, January 2015