Lillian Commons Medical Campus Project

File Numbers: GPA2019-0005, ZA2019-0016, SD2019-0007 and EA2019-0023

Initial Study/Mitigated Negative Declaration

RESPONSES TO PUBLIC COMMENTS

September 2020

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SECTION 1 SUMMARY OF COMMENTS

The 30-day Initial Study/Mitigated Negative Declaration (IS/MND) public review period for the Lillian Commons Medical Campus project started June 29, 2020 and ended July 29, 2020. The following pages contain responses to comments submitted by agencies, organizations, and individuals during the IS/MND public review period. Copies of the comment letters are attached to this document.

In summary, the comments received on the Initial Study/MND did not raise any new issues about the project's environmental impacts, or provide information indicating the project would result in new environmental impacts or impacts substantially greater in severity than disclosed in the Initial Study/MND. CEQA does not require formal responses to comments on an Initial Study/MND, only that the lead agency consider the comments received [CEQA Guidelines §15074(b)] to determine whether a 'fair argument' has been made that the project could result in a significant impact on the environment to warrant preparation of an Environmental Impact Report (EIR), or whether any of the conditions identified in CEQA Guidelines §15073.5 are present to warrant substantial revision and recirculation of the MND. Upon review of the issues raised in the comments, the City has determined that no fair argument is present in the record to require an EIR and revision and recirculation of the MND is not required. Nevertheless, responses to the comments are included in this document to provide a complete environmental record.

The following pages contain a list of the agencies and persons that submitted comments on the Initial Study/MND and the City's responses to comments received on the Initial Study/MND. The specific comments have been excerpted from the letter and are presented as "Comment" with each response directly following ("Response"). Copies of the actual letter submitted to the City of Morgan Hill is attached to this document.

SECTION 2 LIST OF AGENCIES AND PERSONS COMMENTING ON THE IS/MND

Letter Number	Commenter	Date Received	Page Number
1	Caltrans	July 23, 2020	4
2	EMC Planning Group	July 14, 2020	5
3	County of Santa Clara Roads and Airports Department	August 20, 2020	12
4	Deborah Baker	July 13, 2020	13
5	Jeff Salem	July 27, 2020	14
6	Sheryl Schenkman	July 21, 2020	17
7	Robert Benich	June 29, 2020	20
8	Marianne Knight	July 30, 2020	20
9	Joe Baranowksi	July 31, 2020	21
10	Robert Rodrigues	August 3, 2020	27

SECTION 3 RESPONSES TO COMMENTS ON THE IS/MND

This memo responds to comments on the Initial Study/MND as they relate to the potential environmental impacts of the project under CEQA. Numbered responses correspond to comments in each comment letter. Copies of the comment letters are attached.

1. RESPONSE TO COMMENT LETTER 1 FROM CALTRANS, DATED JULY 23, 2020.

Comment 1.1: The project applicant shall perform a queuing analysis for the on/off ramps in both directions at US-101/Tennant Avenue and US-101/Dunne Avenue, which are the nearest ramp terminal intersections to the project site. Vehicle queues due to the project added traffic shall be accommodated within the ramps and mainline freeway traffic shall not be impacted. If the project generates impact(s) on ramp operations, the impact(s) shall be mitigated or fair share fees shall be allocated for mitigation.

Response 1.1: The City and its traffic consultant, Hexagon Transportation Consultants, Inc., did not complete a ramp queueing analysis for the Lillian Commons project. Due to the current effects of COVID-19, Hexagon was unable to complete a field observation of the queues; instead, Hexagon developed a rough projection of queues based on the traffic volumes used in the study. The analysis indicates that project traffic will not lengthen the projected 15-minute interval queue lengths at either of the subject Tennant Avenue ramps under near-term conditions. Short vehicle queues, less than five vehicles, currently occur at the ramps; however, the queues dissipate during the 15-minute intervals because the demand volume is less than the service rate of the freeway ramp meters. The projected queues on the metered northbound loop on-ramp can be accommodated entirely on the ramp. The analysis also indicates that the queues on each of the U.S. 101 off-ramps to Tennant Avenue are projected to be accommodated entirely on the ramps and will not extend back and disrupt the freeway mainline. A copy of the analysis is attached as Appendix B to this document.

Comment 1.2: Please ensure that no water from the project site drains into the State Highway Drainage facilities, including the highway slope ditch along the highway off-ramp.

> **Response 1.2:** Grading and drainage plans will be required to be submitted upon submittal of a Site Review and Design Review application; such plans will be subject to the City's drainage standards.

Comment 1.3: As the Lead Agency, the City of Morgan Hill is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

> **Response 1.3:** This comment is noted. The comment does not refer to any specific CEQA issues or inadequacies of the IS/MND. The comment will be taken into account by City staff.

Comment 1.4: Please be advised that any permanent work or temporary traffic control that encroaches onto the Right of Way (ROW) requires a Caltrans-issued encroachment permit. If any

Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application, six (6) sets of plans clearly delineating the State ROW, six (6) copies of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement.

> **Response 1.4:** This comment is noted. The comment does not refer to any specific CEQA/NEPA issues or inadequacies of the IS/MND. The comment will be taken into account by City staff.

2. RESPONSE TO COMMENT LETTER 2 FROM EMC PLANNING GROUP, DATED JULY 14, 2020.

Comment 2.1: In Section 3.3.3 Site Access, Circulation, and Parking, there is mention of the two driveways to Barrett Avenue being limited to emergency vehicle access only. The applicant understands the City would like the driveways to be emergency access only, but the applicant never agreed to this change. Nevertheless, this change is presented as though it is proposed by the applicant in the project description. In the response to the comments letter to the City, after review of the project, it was the intent of the applicant that this 'emergency access only' driveway issue be discussed with the Planning Commission and City Council. The applicant has not agreed to the change and feels full access drives onto Barrett Avenue are necessary to provide sufficient site access and adequate circulation and that both driveways meet the intent of General Plan policies as stated below:

> Policy CNF-8.2: Design Features. Encourage design features and amenities in new development and redevelopment, including but not limited to: Highly connected street layouts, supporting multiple paths of travel for all modes.
>
> Policy CNF-11.5: Outside Connections. Require new subdivisions to provide multiple connections to the surrounding community. Methods to achieve this may include:
>
> - Providing multiple points of entry into the project for motorists; bicyclists and pedestrians;
> - Extending the existing street pattern at the edges of the subdivision into the site. Extended streets should match the type and scale of the streets to which they connect;
> - Installing landscaping and street improvements at the edge of the subdivision that appear as common amenities shared with adjacent neighborhood;
> - Minimizing the use of gates, fences and walls that separate the subdivision from the surrounding community; and
> - Planning for future connections to adjacent undeveloped property.
>
> Policy CNF-12.2: Well-connected Neighborhood Centers. Provide for safe and convenient pedestrian and bicycle connections as well as transit access to support existing neighborhood

centers, including shopping centers, medical office, sports fields, and the Centennial Recreation Center.

If both driveways are limited to emergency access only, an additional right-in / right-out driveway added to Juan Hernandez Drive is necessary. This would not provide the ideal traffic circulation and does not meet the intent of the City policies cited above, but could alleviate departure congestion at the main driveway.

Though we see where the City Engineer may have concerns about the traffic interaction with the Barrett Avenue Elementary School, these two access drives should remain open to Barrett Avenue to allow for neighborhood connectivity. Perhaps the driveways could be signed during school hours and for school events to limit the use of the driveways.

The applicant has been working with the school and school district to craft a circulation, parking, and access safety plan for this area along Barrett Avenue adjacent to the elementary school. The applicant would like to have the opportunity to discuss this driveway configuration at public hearings to get feedback from the Planning Commission, City Council, and the neighborhood, and not have the City or environmental document assume that the two driveways on Barrett Avenue will be emergency access only and that the applicant agrees with that direction. Please remove this from the IS/MND as an assumed part of the project description provided by the applicant.

Response 2.1: In addition to analyzing project operations under the assumption that Barrett Avenue would be used strictly as an emergency access street, the Transportation Impact Analysis (TIA) included an alternative evaluation in the case that site access is provided via all four proposed driveways. The analysis showed that project traffic utilizing the Barrett Avenue driveways would experience short delays during the adjacent school's peak 15-minute period, as students are dropped-off at the school across from the project site. Outside of the school's peak 15-minute period, traffic conditions and access along Barrett Avenue would be adequate. Traffic conditions at all study facilities outside of the immediate project site area would not be affected if access to the project site is provided via Barrett Avenue. Traffic impacts would not be considered significant if Barrett Avenue was emergency access or if site access was provided through Barrett Avenue.

It is noted that the applicant plans to work with the school, school district, Planning Commission, City Council, and neighborhood to discuss and finalize the driveway design. However, the City recommends adding a condition to the list of Standard Conditions for the proposed project limiting access onto Barrett Avenue to emergency vehicle access only due to safety concerns and conflicts with automotive and pedestrian traffic to and from Barrett Elementary. Refer to Section 4: Text Amendments for changes to the IS clarifying and discussing both scenarios for Barrett Avenue.

Comment 2.2: Construction phasing is planned in three phases, which for this project is described by Parcel development, as: Parcel D (existing medical), Parcels B & C (commercial and residential) and Parcel A (hospital). The IS Project Description states that the project would begin with Parcels B & D, followed by Parcel C then Parcel A.

It is likely Parcel B, the commercial Retail/Restaurant development, will be built along with or just after the Parcel C, residential, since the commercial development would be supported by the several years as a result of having to implement state regulations for hospitals. Though phasing will likely be market driven, the Project Description within the Initial Study is not consistent with the applicant's phasing plan.

> **Response 2.2:** It is noted that construction is anticipated to be completed in order of the following three phases: Parcel D, Parcels B and C, and Parcel A. This will be edited; refer to Section 4: Text Amendments.
>
> The change in the order of the phases could potentially result in a change in the results of the construction Health Risk Assessment that was completed as part of Illingworth & Rodkin's Air Quality Assessment. However, mitigation measure MM AIR-3.1 would suffice in keeping air quality construction impacts at a less-than-significant level because it requires the use of construction equipment that meets U.S. EPA Tier 4 particulate matter emissions standards, which reduces diesel particulate matter exhaust emissions. The conclusions and mitigation in the IS would remain the same for air quality impacts.
>
> The change would have negligible effects on the noise analysis, since Illingworth & Rodkin assumes no attenuation from intervening buildings in their construction noise assessments. The conclusions and mitigation in the IS would remain the same for noise impacts.

Comment 2.3: Discussion of the transportation facilities, based on the Transportation Impact Analysis, includes the relocation of the existing driveway in the southeast corner of the project site.

> Impact TRN-3: The project would not substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment). (Less than Significant Impact)

It appears as part of the direction to the transportation consultant in preparation of the Initial Study, the City Staff is recommending driveway 1 to be relocated to align with St. James Drive. Why is this the first time the applicant and its consultants have been made aware of the request from the City Public Works Department? Nothing about this was mentioned during plan review. Relocating driveway 1 would cause undue burden on the developer and on streets in the surrounding neighborhood. Driveway 1 is described as "the existing driveway that provides access to the current uses on the site." Relocating this driveway, which is within 10 feet of meeting the City's driveway separation requirements and is considered a less than significant impact in the traffic report, would cause impacts to the project as a whole. If this driveway were to be relocated to align with St. James Drive, it could encourage cut through traffic within the adjacent residential neighborhood. Relocating the driveway would cause many issues for the developer and the surrounding neighborhood, including:

1. Existing driveway provides access to existing medical buildings and has done so for many years. The property located to the south of this parcel could benefit from joint use of the driveway. Relocating the driveway removes this potential;

2. Cause possible cut through traffic for the adjacent residential neighborhood with vehicle headlights creating glare at adjacent homes;
3. Affect pedestrian circulation by creating more traffic through the middle of the non-residential portion of the project;
4. Force circuitous access to the parking area at the southeast corner of the project and to the proposed parking structure;
5. Cause loss of building square footage and parking due to redesign to meet City street design standards;
6. Jeopardize the existing patient drop-off / pick-up lane, which requires passenger side exit;
7. Force relocating utilities (light pole at Juan Hernandez Drive and other utilities under the existing driveway); and
8. Disrupt existing medical facility function during driveway construction.

Response 2.3: As expressed in the comment, the applicant proposes to keep driveway 1 at its existing location, and the City staff recommends adding a condition to the list of Standard Conditions to the project to relocate the driveway to the north and aligning it with St. James Drive due to conflicts with Juan Hernandez Drive and St. James Drive. A final decision will be made by the City Council after receiving input from the applicant, City staff, and recommendation from the Planning Commission.

The TIA included evaluations of both scenarios. If driveway 1 remains as is, a queue length of no greater than one vehicle is projected at the left-turn pockets to the site and St. James Drive. There would be adequate storage for left-turning vehicles. However, as traffic volumes along Juan Hernandez Drive increase, left-turns in and out of driveway 1 and St. James Drive would experience longer delays, affecting queue lengths at both locations. This would not result in a significant impact, but could create occasional conflicts.

The TIA determined that aligning driveway 1 with St. James Drive would continue to provide left-turn access and would concentrate all movements to a single location, thereby reducing conflicting turn movements. An alternative option to realigning Driveway 1 is to restrict Driveway 1 access to right-in and right-out only turn movements. Refer to Section 4: Text Amendments for changes to the IS.

Comment 2.4: Section 3.3.5, Landscaping and Trees, indicates all 16 trees on the site would be removed.

Mitigation Measure MM BIO-5.2 states:

> The project proponent shall comply with local ordinances and submit permit applications for removal, trimming, damage, or relocation of all trees covered by the City ordinance. Any trees to be removed shall require replacement at a two-to-one ratio on a comparable ratio of size. The replacement trees shall be planted on site to the extent feasible and the project proponent shall comply with all other replacement requirements imposed by the City.

The applicant is not clear about the replacement policy listed in MM BIO-5.2. The applicant understands that some tree removal will take place as part of the development and will apply for tree removal permits as necessary. Given the number of trees to be removed, replacing at a two-to-one

ratio is achievable. However, replacement at a comparable size is not good landscape practice, if that is what is meant by comparable ratio of size. The survival rate of smaller caliper trees is greater than large caliper trees. The goal of replacing lost trees would be better met by the planting of two to four inch caliper trees at a higher ratio than two-to-one. We'd ask that mitigation measure BIO-5.2 be amended to provide for this option.

> **Response 2.4:** The requirement for replacing trees at a comparable size came from City Ordinance Section 12.32.140, which focuses on removing or trimming trees without a permit. Since the applicant will obtain a tree removal permit prior to tree removal and project construction, Mitigation Measure BIO-5.2 will be revised to allow for the project's proposed mitigation, and to be consistent with City Ordinance Section 12.32.030, which states that developments which have been reviewed and approved by the Planning Commission or Community Development Director and the tree removal conforms with the landscape plans of those developments. Refer to Section 4: Text Amendments.

Comment 2.5: Though no explanation is given for the derivation of the 660 MT CO2e bright line threshold referenced in the IS, it is assumed it is scaled down from Bay Area Air Quality Management District's (BAAQMD) 2020 bright line threshold. BAAQMD does not recommend scaling down its AB-32 based thresholds of significance for 2020 for subsequent years to derive annual progress thresholds for meeting the SB 32 target for 2030. Unless the IS is amended to provide substantial evidence for an applicable post-2020 bright line threshold (e.g. a new GHG emissions gap analysis for emissions within the air basin is prepared), there is no basis for determining the project's GHG impact to be significant with regard to a bright line threshold. The IS does not provide any discussion of the methodology for deriving the 2.8 MT CO2e service population threshold for 2030 used in the document. Nevertheless, the IS finds that project emissions are below the service population threshold. Given this fact and the fact that the bright line threshold used in the IS is not based on substantial evidence, there is no basis for determining that the project GHG impact is significant. Therefore, the IS discussion should be revised and mitigation measure GHG-1.1 should be deleted.

Note that the 2025 service population project for the project is listed at 2.56 MT CO2e on page 73, but referenced in Table 4.8-1 as 2.65 – this discrepancy should be clarified. Also note that the IS does not identify a progress threshold for 2025. Yet in Table 4.8-1, year 2025 emissions for the project are compared to the 2030 threshold only. This leads a reader to falsely assume that the 2025 project emissions of 2.65 MT CO2e are closer to the threshold of 2.8 MT CO2e than is valid – a progress threshold for 2025 would be higher than 2.8 MT CO2e and the project's 2025 emissions would be substantially below that threshold.

> **Response 2.5:** In 2010, the BAAQMD put forth thresholds for public agencies in the Bay Area to use in evaluating the GHG emissions of projects subject to CEQA. GHG emissions are acknowledged to be a cumulative impact, i.e. no individual project would have GHG emissions sufficient to cause an impact alone, the question is always whether a project's emissions constitute a cumulatively considerable contribution to the cumulative impacts from GHG emissions throughout the Bay Area (and rest of California and the world at large). Case law has established that 'cumulatively considerable' does not mean 'one molecule', and lead

agencies have discretion to determine what level of emissions would be cumulatively considerable, based on substantial evidence.

The BAAQMD's 2010 CEQA Air Quality Guidelines recommended a GHG threshold of 1,100 metric tons (MT) or 4.6 MT per capita. These thresholds were developed based on meeting the 2020 GHG targets set in the scoping plan that addressed AB 32. Since the project would be constructed post-2020, a threshold that addresses a future target is appropriate. Although BAAQMD has not yet published a quantified threshold for 2030, neither has BAAQMD issued any official guidance discouraging use of an adjusted bright-line threshold, and a lead agency has discretion under CEQA to select an appropriate threshold for a given project, based on substantial evidence. According to the City of Morgan Hill's General Plan Environmental Impact Report (EIR), the City's 2035 GHG estimated efficiency target is 3.3 MT CO_2e/year/service population based on the GHG reduction goals set forth by Executive Order B-30-15 and Executive Order S-03-05. The City's 2050 GHG target is 1.3 MT CO_2e/year/service population in accordance with the long-term GHG reduction goals of Executive Order S-03-05.

The Air Quality report used an efficiency metric of 2.8 MT CO_2e/year/service population and a bright-line threshold of 660 MT CO_{2e}/year based on the GHG reduction goals of SB 32, which set a target to reduce statewide GHG emissions to 40% below 1990 levels by 2030, as an interim step to ultimately achieve an 80% reduction by 2050. There is no target established by SB 32 for 2025. The legislation and Scoping Plan are focused on statewide emissions in 2030.

In setting the 'bright-line' GHG significance threshold of 1,100 MT CO_{2e}/year for projects operational in the year 2020, BAAQMD indicated that new land use development with emissions below 1,100 MT CO_{2e}/year would result in less than cumulatively considerable amounts of GHG, and not be subject to mitigation measures. Those that exceeded 1,100 MT would be required to mitigate below 1,100 MT to ensure they met their fair share of the emission reductions needed to address the cumulative environmental impact from GHG emissions.

BAAQMD determined the mass emissions threshold of 1,100 MT of CO2e/yr for the year 2020 would result in approximately 59 percent of all projects within the Bay Area between 2010 and 2020 being above the significance threshold (e.g., this is approximately the operational GHG emissions that would be associated with a 60 residential unit subdivision) and must implement feasible mitigation measures to meet CEQA requirements. These projects were expected to account for approximately 92 percent of all GHG emissions anticipated to occur between 2010 and 2020 from new land use development in the Bay Area.

It follows, then, that reducing by 40 percent the 1,100 MT CO_{2e}/year threshold as to what amount of GHG emissions is cumulatively considerable to 660 MT CO_{2e}/year, consistent with SB 32's 40 percent reduction from AB 32, will capture an even larger percentage of development throughout the Bay Area, which will capture an even higher percentage of GHG emissions from new development than the approximately 92 percent that was subject to the 2020-based threshold. This means that more projects in the City are subject to mitigation (i.e.

smaller projects with emissions between 660 and 1,100 MT that were previously not subject prior to 2020 to achieve AB 32 would now be required to mitigate to a level 40 percent below the 2020 threshold), and those larger projects that were subject to the 1,100 MT threshold for 2020 must now mitigate an additional 40 percent beyond what emission reduction would have been required prior to 2020. In using an adjusted bright-line threshold of 660 MT CO_{2e}/year for 2030 development, the City is both capturing an expanded group of projects that are subject to mitigation, and increasing the amount of mitigation required of projects compared to the 2020 bright-line threshold, thereby ensuring they met their fair share of the emission reductions needed to address the cumulative environmental impact from GHG emissions.

For these reasons, the use of a 'substantial progress' threshold of 660 MT CO_{2e}/year for 2030 is appropriate given it is derived from the 2020 threshold and adjusted to reflect the goals of SB 32, and CEQA provides broad discretion for the City as lead agency to determine what amount of GHG emissions are cumulatively considerable, absent the availability of an updated recommended threshold from BAAQMD. Additionally, the project's GHG emissions align with the analysis and conclusions set forth by the City of Morgan Hill's General Plan EIR.

The per capita significance threshold metric of 2.8 was calculated for 2030 based on the 40 percent reduction target from the 1990 GHG emissions inventory and the projected 2030 statewide population and employment levels.

The correct number for the GHG emissions per service population is 2.65. not 2.56, MT CO2e. Given the project would not exceed the 2030 service population target, the project would not require mitigation to be consistent with statewide SB 32 targets. This typo will be revised; refer to Section 4: Text Amendments.

Comment 2.6: If and only if the Initial Study is amended to provide substantial evidence for a finding of significant impact with regard to a GHG bright line threshold as described above, would mitigation measure GHG-1.1 possibly apply.

Mitigation measure GHG-1.1 is too restrictive with regards to the locational "preference" criteria from which the applicant should purchase carbon offsets. Availability and cost of offsets can be strongly influenced by the offset project type and location. Clearly, it is highly unlikely that one or more offset project exists within the city. Offsets created by offset projects in the Bay Area (if any) and California are less plentiful and often more expensive than those created outside the state. Further, since climate impacts are global, the applicant should not be constrained from purchasing offsets that are derived from international projects, provided the offsets are verified and registered through a CARB approved registry. Provided the City does not render the applicant's GHG reduction plan inadequate based solely on source of offsets, the mitigation is acceptable.

Response 2.6: The use of the GHG bright line threshold of 660 MT CO2e was explained and clarified under Response 2.5. However, the commenter is correct that mitigation measure GHG-1.1 is not necessary for the Lillian Commons project. In order for a project to have a significant impact, the project must exceed both the bright-line threshold and the service

population significance threshold. Since the project only exceeds the bright-line threshold, its impact would be less than significant, given the project would be emitting GHG on a per resident and employee basis at levels consistent with SB 32 for the year 2030. Therefore, impact GHG-1 will be revise to state project emissions are less than significant, and mitigation measure GHG-1.1 will be deleted from the IS. Refer to Section 4: Text Amendments.

Comment 2.7: The mitigation is unclear as to how the traffic impact fee charged to the applicant will be derived (traffic impact fee "as determined by City staff"). Since the impact to the subject intersection is significant under cumulative conditions without the project, the proposed project is not responsible for generating the impact. However, the project would worsen the cumulative impact. Therefore, the applicant must pay a fee that mitigates the project contribution to the cumulative impact.

The City's most recent fee schedule is dated January 15, 2020. The applicant should only be responsible for paying the traffic impact fees as described in that fee schedule based on the project description. No other traffic impact fees "as determined by City staff" appear to be warranted. IF this is not the case, the applicant must be made aware prior to the Planning Commission hearing whether City staff is being given discretion to charge other traffic impact fees.

Response 2.7: The current traffic impact fee schedule is dated January 15, 2020 and is updated annually. The applicant would be responsible for paying the traffic impact fee from the year the project becomes operational.

3. RESPONSE TO COMMENT LETTER 3 FROM COUNTY OF SANTA CLARA ROADS AND AIRPORTS DEPARTMENT, DATED AUGUST 20, 2020.

Comment 3.1: The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the Notice of Intent to adopt a mitigated negative declaration for the Lillian Commons Medical Campus, and is submitting the following comments:

- Under GP 2035 mitigation at Tennant and Condit, the decision to install a traffic signal should not be based solely on satisfying one traffic signal warrant. Instead, intersections that meet the peak-hour signal warrant should be subject to further analysis before determining that a traffic signal is necessary. Thus, the project impact at this intersection would be mitigated with payment of the traffic impact fee, as determined by City staff.
- Please coordinate with County for the proposed signal installation at Tennant and Condit.

Response 3.1: Mitigation Measure TRN-1.1 states the following:

"Improvements to mitigate the impact at this intersection consist of the implementation of a traffic signal. However, the decision to install a traffic signal is not be based solely on satisfying one traffic signal warrant. Instead, intersections that meet the peak-hour signal warrant shall be subject to further analysis before determining that a traffic signal is necessary. Thus, the project impact at this intersection shall be mitigated with payment of the traffic impact fee, as determined by City staff."

Therefore, the mitigation measure in the IS is consistent with the County's comments.

4. RESPONSE TO COMMENT LETTER 4 FROM DEBORAH BAKER, DATED JULY 13, 2020.

Comment 4.1: I am a long-term resident of Morgan Hill. I have lived here since 1990. I currently have owned my house for 15 years and I live next to Barrett Elementary School. I have some concerns regarding the Lillian Commons project cited for development directly across the street from my home. My first concern is the building of new housing (high-density apartments) across from St. John Ave. and Barrett Ave. The addition of new housing and the projected extension of St. John Ave. drawn on the architectural plans will cause an additional and possibly excessive amount of new traffic flowing onto Barrett Ave. Currently Barrett elementary school, when in regular session, has considerable traffic congestion from families parking cars to drop off (7:45am) and pickup (1:50pm) children every day from August to June. By adding new apartment residences through the "new" St. John extension will add to higher traffic and congestion on Barret Ave.

Response 4.1: A Transportation Impact Analysis (TIA) was prepared for the project to address the potential increase in traffic as a result of project implementation. The TIA included evaluations for two scenarios regarding Barrett Avenue: one scenario in which Barrett Avenue remains open to project traffic through full-access driveways, and one scenario in which Barrett Avenue would be used as an emergency access with driveways only available to emergency vehicles needing to access the site using this street.

If Barrett Avenue remained open with project driveways accessible at all times for all vehicles, the project traffic utilizing Barrett Avenue would experience short delays during the school's peak 15-minute period. Outside of the school's peak 15-minute period, traffic conditions and access along Barrett Avenue would be adequate. Traffic conditions at all study facilities outside of the immediate project site area would not be affected if access to the project site is provided via Barrett Avenue. If Barrett Avenue was used only by emergency vehicles utilizing an emergency access driveway, no additional traffic would be added to Barrett Avenue since a limited amount of cars would be using it.

As discussed in *Section 4.17 Transportation* of the IS, traffic impacts resulting from the proposed project would be less than significant in either scenario.

Comment 4.2: A second concern is the addition of shopping, eating and possibly a bar in close proximity to an elementary school. Many students walk to school down Juan Hernandez and use the four-way crosswalk for crossing into the school grounds. Students located in the neighborhood off Juan Hernandez, and walking to school, potentially could be harmed by the additional number of cars coming and going out of the "new" shopping area as well as driving down Barrett and running through the four-way stop (there are no stop lights here). This is a neighborhood with high pedestrian traffic and many parents park and walk their students across Barrett to get to the school grounds. Adding more cars by building more apartments and shopping areas will turn both Barrett Ave and Juan Hernandez into busy city-like streets.

Response 4.2: Impacts to pedestrian facilities are discussed in *Section 4.17 Transportation* of the IS. Although the project would generate new pedestrian traffic, improvements such as additional sidewalks connecting the project to existing sidewalks on Barrett Avenue would allow for continuous, safe access between the project site and Barrett Elementary School. As discussed in the IS, impacts to pedestrian, bicycle, and transit facilities from the proposed project were found to be less than significant.

Furthermore, the TIA projected that since Driveways 2, 3, and 4 would serve the residential areas of the project, project traffic at these driveways would be minimal. The TIA estimated that approximately three inbound and eight outbound trips during the AM peak-hour, and eight inbound and six outbound trips during the PM peak-hour, would utilize Driveways 3 and 4 combined. This represents a total of 11 AM peak-hour and 14 PM peak-hour new trips along Barrett Drive. Project trips at Driveway 1 are anticipated to remain unchanged. With these minimal increases to AM and PM peak-hour traffic, impacts to Barrett Avenue are considered to be less-than-significant.

5. RESPONSE TO COMMENT LETTER 5 FROM JEFF SALEM, DATED JULY 27, 2020.

Comment 5.1: Regarding Air Quality Standard Condition AIR-1:

Who enforces exposed surface area being watered twice a day? Will there be scheduled times each work day? Does that include weekend?

Where does the publicly visible sign with telephone number for POC of Lead Agency regarding dust complaints get posted?

Response 5.1: The measures described in Standard Condition AIR-1 would be enforced by the City and the Project Contractor, consistent with City policies and the Municipal Code. Exposed surfaces would be watered once in the morning and once in the afternoon every day of construction. Consistent with the Municipal Code requirements, project construction would take place between 7:00 AM and 8:00 PM Monday through Friday, and 9:00 AM to 6:00 PM on Saturday. Construction is prohibited on Sundays and federal holidays.

The sign for dust complaints would be visibly posted on the fence around the perimeter of the construction site.

Comment 5.2: Regarding Transportation Impacts

The following mitigation measure shall be implemented by the proposed project to reduce impacts to a less-than-significant level.

MM TRN-1.1: Improvements to mitigate the impact at this intersection consist of the implementation of a traffic signal. However, the decision to install a traffic signal is not based solely on satisfying one traffic signal warrant. Instead, intersections that meet the peak-hour signal warrant shall be

subject to further analysis before determining that a traffic signal is necessary. Thus, the project impact at this intersection shall be mitigated with payment of the traffic impact fee, as determined by City staff.

Is this for a traffic signal at the intersection of Barrett and Juan Hernandez Drive?

Who is responsible for the traffic signal cost and construction? Developer or City of MH?

Will there be a dedicated construction entrance and exit for construction vehicles, contractors, and construction supply trucks/vehicles that is away from the existing neighborhoods as to not obstruct everyday neighborhood access routes, streets, and parking and/or cause traffic delays? If so is there a map of this/these construction entrances and exits?

Will the street(s) Juan Hernandez Dr. or Barrett Ave. need to be widened for thru and turn lanes? If so will the existing residents with homes on either Juan Hernandez Dr. or Barrett lose street parking in front of their homes? If so what address will be affected?

Will the Juan Hernandez Dr. Barrett Elementary School student drop off driveway entrance and exit be impacted and/or modified as result of this project being approved? It is already bad enough during school hours that vehicles stop/park in the middle of Juan Hernandez Dr. trying to get in or out of an already highly congested school student driveway drop-off and pickup. Often during school hours the front of my house at 16313 Juan Hernandez Dr. which is three homes to the North of the Barrett / Juan Hernandez Intersection is blocked with vehicles during school drop off and pickup hours of the day.

Will the Barrett Ave. Barrett Elementary School teacher and Bus parking lot and driveway entrance's and exit's be impacted and/or modified as a result of this project being approved? It is already bad enough during school hours that vehicles stop/park on Barrett Ave. on the east side and west sides of the Juan Hernandez Dr. / Barret Ave. intersection trying to drop off or pick up their students. Again, often during school hours these described locations are lined with vehicles causing vehicle and foot traffic congestion at the described intersection.

> **Response 5.2:** Mitigation measure TRN-1.1 refers to the traffic signal at Tennant Avenue and Condit Road. This mitigation is required because the intersection is projected to operate at an unacceptable level of service (LOS F) that warrants the installation of a signal.
>
> The applicant/developer would be responsible for the payment of a traffic impact fee, and the City of Morgan Hill would be responsible for the collection of fees and the ultimate construction.
>
> At this time, the exact location of the entrance/exit for construction vehicles has not been determined, thus no map is available. This will be finalized prior to the start of construction with City approval. The City will take this comment into consideration.
>
> Juan Hernandez Drive and Barrett Avenue are not planned to be widened as part of the proposed project, and so no loss of on-street parking would occur.

The student drop-off entrance located on Juan Hernandez will not be altered or impacted as a result of the project, nor will the teacher and bus parking lot and driveway entrances and exits.

Comment 5.3: We are all in favor of medical expansion of Morgan Hill. A 55 bed hospital does not seem to be very large as compared to the proposed 200 unit high density apartment complex's and commercial retail being proposed. Seems like a very unbalanced use of the land. That many apartment units with more than likely twice the number of tenants and vehicles vs. the number hospital beds/rooms will cause a lot of foot and vehicle traffic close to the existing neighborhoods and elementary school campus.

Why doesn't the proposed parcel that is trying to be re-zoned for housing be used for single family home lots to better blend in with the existing housing tracks already established.

If a 24/7 Emergency room or Urgent care operation goes into place that will bring in a lot of 24/7 traffic and ambulance / emergency vehicle (siren) noise to the surrounding neighborhoods. Will any additional sound barriers / proofing such as sound walls be constructed to help cut down on the noise pollution? As it is already the senior living center located at the intersection of Barrett Ave. and Butterfield Blvd. has siren Emergency vehicles of at least one per day or every other day on the average. Sometimes multiple times per day. The emergency vehicles can be heard all hours of the day/night which causes a lot of noise pollution already. The addition of a 24/7 Emergency room or an Urgent Care center will increase that noise pollution severely on a regular basis. Has there been an impact study or assessment written to having multiple establishments close in proximity only a mile or less apart from each other with the same type of noise traffic?

This proposed multi zoned lot with four separate parcels, one for high density housing (Apartments), Commercial (Retail and/or Parking Garage) and Industrial (Hospital/Medical Center) on slightly less than 20 acres appears to be very congested for the diverse amount of development that would transpire with the currently proposed Lillian Commons Project. The surrounding neighborhood(s) are mostly comprised of single families homes about 90% with some duplex's and rental properties sprinkled in and an elementary school. The Lillian Commons project doesn't seem to fit in with the existing developed properties. It is more suited to a city or downtown setting instead of a single family/elementary school setting.

As neighboring home owner, we are not in favor of four multi use parcel zoning on a ~20 acre property. If this project is to move forward as is the developer should have to develop the medical parcel first, retail/commercial parking structure second and third. Apartments last. That way the city and existing surrounding home owners know the land owner and developer are committed to bringing in medical to Morgan Hill. We attended the Planning Commission meeting in early February 2020 before the COVID shutdown and listened to the land owner's pitch for wanting better medical in Morgan Hill. We also listened to the developer's pitch that the apartments and other money revenue parcels would be developed first, no guarantee the medical will ever get developed. Is there a time limitation as to when each parcel's development has to be completed upon approval of the proposed Lillian Commons project?

We truly believe the land owner and developer want to re-zone for the four proposed parcel types so they can sell each one off individually for personal economic gain without any consideration for the existing neighborhoods or the homeowners.

We are original property owners. Bought our house in 1999 and have been residents of Morgan Hill ever since and still occupy the property as our primary residence. If the Lillian Commons Project is to move forward as proposed with a high density apartment complexes, retail, parking structure, and hospital increasing both vehicle and foot traffic and eliminating our open space and obstructing our views to the South East of our property we will sell the property and move out of Morgan Hill.

The proposed project will bring way too much congestion to this part of Morgan Hill where families reside and Elementary school children, parents and teachers already add to the neighborhood vehicle and foot traffic. Being an eyewitness to the school traffic as it is already, we're surprised that more accidents haven't already occurred with Barrett Elementary school participants not following traffic and parking rules as they currently exist. It will only get worse to an already overcrowded uncontrolled area. A traffic signal won't solve the problem that exists today, or one would have already been put in place.

Response 5.3: As discussed in the IS/MND, the hospital would not be an emergency type hospital; rather, it would provide general healthcare services and would not require a frequent use of ambulances, including late night or early morning activity. Therefore, the noise assessment determined that there would not be a significant increase in noise levels while the project is operational.

The opinion of the commenters as to whether the rezoning should be approved is acknowledged. The project's traffic effects have been studied in accordance with City methodologies and the project has been conditioned to conform to City level of service standards. The comment does not refer to any specific CEQA issues or inadequacies of the IS/MND. The comment will be considered by decision makers as part of the public record.

6. RESPONSE TO COMMENT LETTER 6 FROM SHERYL SCHENKMAN, DATED JULY 21, 2020.

Comment 6.1: Do not subdivide and rezone the property.

- Honor the existing Morgan Hill Plan. The property is not zoned for housing and despite the Morgan Hill community plan I see very undesirable dense housing on ½ the lot and it provides insufficient parking for the apartments it plans to have that will result in parking problems.
- Juan Hernandez is already used as overflow parking for residents in the area and for families picking up and dropping off children at Barrett Elementary. These planned apartments with insufficient parking will create a huge parking problem.
- This property needs to be saved for what is in the Morgan Hill Plan.

Response 6.1: The opinion of the commenters as to whether the rezoning should be approved is acknowledged. The issue of parking is a planning matter, and parking stalls are not environmental resources to be protected under CEQA. The adequacy of the proposed parking will be addressed separately in the staff report. The comment does not refer to any specific CEQA issues or inadequacies of the IS/MND. The comment will be considered by decision makers as part of the public record.

Comment 6.2: Cancer data uses false information.

- Children live and go to school in the impacted area noted on the map, and will be in the area nearly 100% of the time.
- The data is projecting a person is only impacted for about 75% of the time. This is false, especially with our most vulnerable school children.

Response 6.2: The cancer data uses correct information per BAAQMD requirements and did not assume people were impacted 75 percent of the time. The construction and operational project toxic air contaminant (TAC) sources were modeled with the appropriate averaging times and exposure duration as required by the BAAQMD guidance for cancer risk modeling. The increased cancer risk calculations for the residential receptors also accounted for the fact that a school is within the project area, so children living in the adjacent residences would attend the nearby school and be exposed to emissions for the entire duration, i.e. both while at home and at school.

It is not clear how the commenter's calculations for the 75 percent assumption were determined. The cancer risk calculations were based on a 30-year exposure period. Construction was modeled as occurring from 7 AM to 8 PM over approximately four years. Operational calculations were modeled for the generator running 24 hours for 365 days for 26 years.

Comment 6.3: Traffic hazards especially for school children.

- Small children walk on Barrett and Juan Hernandez to reach their school and the projected increase in traffic and danger it causes is unacceptable (200 trips increasing to 4100 trips).
- Honoring the zoning will eliminate the apartments and that traffic.
- The proposed hospital should mitigate the traffic dangers and use the driveway entrance from Tennant Avenue.

Response 6.3: The Transportation Impact Analysis prepared for the project found that two of the 19 study intersections (Monterey Road and Watsonville Road/Butterfield Boulevard, and Monterey Road and Tennant Avenue/Edmundson Avenue) operate at a level of service (LOS) D under existing conditions. Under background plus project conditions (existing traffic volumes plus traffic added by nearby approved projects plus project traffic), these two intersections would continue to operate at LOS D. The City of Morgan Hill requires intersections to meet a standard of LOS D. This standard is met by all study intersections under background plus project conditions.

Additionally, improvements would be made that would allow for continuous, safe access between the project site and Barrett Elementary School. These improvements include additional sidewalks connecting the project to existing sidewalks on Barrett Avenue would allow for continuous, safe access between the project site and Barrett Elementary School. As discussed in the IS, impacts to pedestrian, bicycle, and transit facilities from the proposed project were found to be less than significant. Furthermore, for clarification, the project would create 3,884 net new trips, not 4,100 as noted in the comment. The TIA analyzed traffic impacts for two scenarios regarding Barrett Avenue: one scenario in which Barrett Avenue would be used to access full service driveways open to all vehicles, and one scenario in which Barrett Avenue would be accessed by emergency vehicles using project driveways restricted solely to emergency vehicles.

If Barrett Avenue remained available to all project traffic, the project traffic utilizing Barrett Avenue would experience short delays during the school's peak 15-minute period. Outside of the school's peak 15-minute period, traffic conditions and access along Barrett Avenue would be adequate. Traffic conditions at all study facilities outside of the immediate project site area would not be affected if access to the project site is provided via Barrett Avenue.

If Barrett Avenue were used solely for emergency access, conditions would be safe for children and other pedestrians since cars would not be using the street regularly.

The opinion of the commenters as to whether the rezoning should be approved is acknowledged. The comment does not refer to any specific CEQA issues or inadequacies of the IS/MND. The comment will be considered by decision makers as part of the public record.

Comment 6.4: Saint James Place PUD is negatively impacted and should receive funds to reduce the negative impact. We will need to improve the existing wall/fence on Juan Hernandez to reduce the noise, cancer hazards, and lost parking.

Response 6.4: The Noise and Vibration Assessment completed for the project determined that the project would not cause a substantial permanent noise level increase along Juan Hernandez Drive. The existing noise level along Juan Hernandez is 67 dBA Ldn and is expected to increase by two dBA Ldn, which is considered less than significant, in that a two dBA increase is not perceptible. Additionally, the Air Quality Analysis found that cancer risks from construction and operation would be less-than-significant with mitigation measures and condition approvals. For these reasons, it is not necessary for the project to be required to improve the wall/fence along Juan Hernandez, as noise and health risk impacts are considered to be less-than-significant.

Comment 6.5: Parking permits need to be issued to residents living in the Saint James PUD, for parking on Juan Hernandez to avoid problems and reduce resentment for lowering our quality of life.

Response 6.5: The comment does not refer to any specific CEQA issues or inadequacies of the IS/MND. As noted above, the issue of parking is a planning matter, and parking stalls are not environmental resources to be protected under CEQA. The adequacy of the proposed

parking will be addressed separately in the staff report. The comment will be considered by decision makers as part of the public record.

Comment 6.6: Landscape buffer on Juan Hernandez is needed.

- Juan Hernandez needs the same landscape buffer that I see on Barrett.

Response 6.6: This comment is noted. The comment does not refer to any specific CEQA issues or inadequacies of the IS/MND. The comment will be considered by decision makers as part of the public record.

7. RESPONSE TO COMMENT LETTER 7 FROM ROBERT BENICH, DATED JUNE 29, 2020.

Comment 7.1: Finally, the City of Morgan Hill is on track to get a new modern hospital. This is a good location due to its proximity to the Tennant Avenue freeway exit. Not being on a contaminated building site is also a plus. I wholeheartedly support this project. The current DePaul Health Center can be rezoned, and the property used for a better use. The building itself may have to be demolished but that's OK. It has served its purpose and now it's the time to move on as our city population will soon increase to over 50,000 residents. I sincerely hope you can help guide this project to a speedy conclusion.

Response 7.1: This comment is noted. No additional response is required as the comment does not raise environmental issues or questions about the adequacy of the Initial Study.

8. RESPONSE TO COMMENT LETTER 8 FROM MARIANNE KNIGHT, DATED JULY 30, 2020.

Comment 8.1: YES! YES! YES! Please build this complex and make it happen sooner rather than later! We have lived in MH for 16 years and have spent the better part of that time driving up and down the San José and San Francisco Bay Areas going to doctors and hospitals. It is exhausting and doesn't provide a cohesive plan for the future. We long for the day, once again, when all the doctors who treated us were on the same hospital staff and were of the highest caliber in their specialty fields. Other communities have this luxury. We in Morgan Hill deserve the same. Its time has come.

As we age in place as 75 year old active citizens we have reluctantly considered leaving this beautiful community because of its limited access to competent hospital facilities and doctors. Yes, we have St. Louse but our few experiences there have shown us that it is available locally and pray each day that we stay healthy because the alternative is awful if you don't belong to Kaiser, which we don't. We have private Anthem PPO group policy with dental, so we are in exceptionally good care with insurance, if we only had a place to use it.

Please consider the growing community in all age groups. Morgan Hill, open our welcoming doors to young doctors wishing to make a professional life here, and possibly to move to our beautiful and diverse community. This facility with its state-of-the-art hospital, medical offices and limited housing is the perfect solution. PLEASE, PLEASE, PLEASE make it happen!

Response 8.1: This comment is noted. No additional response is required as the comment does not raise environmental issues or questions about the adequacy of the Initial Study.

9. RESPONSE TO COMMENT LETTER 9 FROM JOE BARANOWSKI, DATED JULY 31, 2020.

Comment 9.1: Pursuant to the Notice of Intent to Adopt A Mitigated Negative Declaration for the Lillian Commons Medical Campus Project (also referred to as Juan Hernandez – MH Medical Properties) this letter is to provide comments concerning the project and to advise that I have objections to the basis of determination set forth in the Initial Study (IS). The specific concerns and factual basis, as governed by the California Environmental Quality Act (CEQA) settled law is as follows:

Does the City of Morgan Hill, acting as Lead Agency believe that the CEQA process for this project, including the IS, should be conducted in a way to ensure transparency in decision making, encourage public participation, and promote public confidence which are among the stated purposes of CEQA?

Response 9.1: The question in this comment touches on the overarching goals of CEQA and does not raise specific environmental issues or questions about the adequacy of the Initial Study. No additional response is required.

Comment 9.2: The Planning and Conservation League (PCL) a strong advocate for CEQA notes that:

As with any law, CEQA can be improved to more effectively achieve its core purposes of environmental protection, public participation, and government agency accountability.

The PCL goes on to discuss known issues with CEQA including:

Currently, project proponents may pay for the consultants who prepare the EIRs, thus asserting control over what should be an impartial analysis. To promote unbiased reviews, project proponents could pay into a fund at a public agency and the agency could then contact the environmental reviewers preparing the EIR, thus reducing public concern about undue influence.

To promote transparency, there should be a mandatory waiver of confidentiality with all consultants and contractors who have performed studies for the applicant prior to this application.

Who paid for the Initial Study and how much to date?

Did the applicant assert control over the Initial Study? Do all of the assumptions, methods used, and conclusions of the IS represent an impartial and unbiased analysis?

Did the City of Morgan Hill receive or will they receive payments for managing, writing or otherwise participating in the Initial Study and if so, how much to date? Where will any such payments be allocated and what are the funds allowed to be used for?

> **Response 9.2:** The CEQA consultant, under contract with the City of Morgan Hill, had no contact with the project applicant in preparing the Initial Study, nor any prior association with the project applicant. The City selected the CEQA consultant, oversaw the consultant's work, and in releasing the IS/MND, asserted that the document reflects the independent judgment and analysis of the City as lead agency. These questions do not raise any environmental issues; thus no further response is required.

Comment 9.3: Appendix E of the Initial Study, "Transportation Impact Analysis" ("TIA") was written by Hexagon Transportation Consultants, Inc ("Hexagon").

How much was Hexagon paid for their contributions of the Initial Study for this project?

What is the total amount of money that Hexagon has been paid, directly or through third-parties, for services provided to the City of Morgan Hill from the time period of January 1, 2018 to date?

> **Response 9.3:** No response is required as the comment does not raise environmental issues or questions about the adequacy of the Initial Study. The consultant contract for this project is a public record available on file with the City, as are all prior and current consultant contracts.

Comment 9.4: Page ii of the TIA states that: Through empirical research, data have been collected that correlate to common land uses their propensity for producing traffic. Thus, for the most common land uses there are standard trip generation rates that can be applied to help predict the future traffic increases that would result from a new development. Trip generation estimates for each component of the proposed project are based on trip generation rates obtained from the Institute of Transportation Engineers' (ITE's) Trip Generation Manual, Tenth Edition, 2017.

Using ITE Trip Generation data for reasons described above, is both common and best practice around the world. In the 2018 IS for the Shoe Palace Expansion project, a 503,000 square foot warehouse and distribution facility with 64 truck docks, for which the city of Morgan Hill was the lead agency, Hexagon was also responsible for the TIA. In that case, Hexagon ignored best practice and based the project Trip Generation on the assumption that the massive facility with 64 truck docs will result in a daily number of truck trips of EIGHT. This was done despite receiving public comments from an experienced licensed Traffic Engineering expert that showed Hexagon's analysis was negligent. Hexagon also ignored California Department of Transportation concerns that the resulting project traffic would result in Cochrane Road / Highway 101 exchanges being backed up onto 101 mainline during peak hours.

Given residents of Morgan Hill are fully aware of Hexagon's 2018 TIA for the Shoe Palace Expansion Project which ignored common sense, best practice and professional standards why were they selected for this project? Why should the public have confidence in the TIA created for this IS?

Response 9.4: The commenter references a previous project that is not relevant to the current project. Those concerns were addressed in the Shoe Palace Expansion Project Responses to Comments memorandum, and this current comment assumes that the Lillian Commons TIA is inaccurate based on previous misunderstandings about Hexagon's reports.

The Lillian Commons TIA evaluated impacts following the standards required by the City of Morgan Hill and the Santa Clara Valley Transportation Authority, and the work was performed under the direction of the City's traffic engineering staff, according to City transportation policies for the evaluation of new development. The commenter mentions that trip generation rates from the ITE are common and best practice, which is what Hexagon used on this project. The trip generation rates for each component of the Lillian Commons project were based on calculations completed using the ITE trip generation rates.

Comment 9.5: Page 17 of the "TIA" says Existing peak-hour traffic volumes were obtained from recently completed traffic studies and supplemented with manual turning-movement counts (conducted in February 2020) at intersections where counts were either unavailable or outdated (more than 2 years old).

There are a very substantial number of projects that have either been recently approved, are in the approval process, have started or even finished construction in Morgan Hill that individually and cumulatively will impact "existing" traffic conditions including peak-hour traffic volumes.

What specific "recently completed traffic studies" are being referred to above? What specific peak-hour traffic volumes have been included in the "existing" volumes from:

a) Shoe Palace Expansion project?
b) Morgan Hill Technology Center project?
c) Evergreen Village Shopping Center?
d) Sunsweet Mixed-Use project?
e) Granada Hotel and Market Hall project?
f) AU Energy (gasoline tanker truck terminal) project?
g) Cochrane Commons Shopping Center Phase II project?
h) Techcon project?
i) Carpenter's Training Center project?
j) Applied Motion Products project?
k) Butterfield Technology Park project?
l) Golden State Assembly Expansion project?
m) City Ventures Monterey Gateway project?
n) Braddock and Logan Morgan Hill Apartments project?
o) Crossings at Watsonville Road project?
p) Beacon MH Senior Apartments project?
q) Crosswinds Half-Dividend project?

Response 9.5: The commenter incorrectly assumes that Hexagon's TIA included traffic volumes from other development projects. The TIA's existing traffic volumes did not include traffic associated with nearby projects, as those projects which are approved but not yet

constructed would not yet place new trips on surrounding roadways, only existing occupied uses would be reflected in current intersection counts. The traffic counts were obtained from the traffic studies completed for other projects.

Typically, traffic reports evaluate existing, existing plus project, and 2025/2030 without and with project scenarios. For projects that require a General Plan Amendment (GPA), such as the Lillian Commons project, the following scenarios are evaluated: existing, existing plus project, and General Plan Buildout without and with project GPA. Since the project requires a GPA, the traffic report looked at Year 2035 General Plan conditions, which include forecasted growth through 2035, which encompasses a much longer timeframe and amount of growth than represented by the list of projects noted in the comment. Relying on the list of projects provided in the comment would not serve to fully account for buildout conditions in 2035, and lead to an underestimation of future conditions. The traffic analysis did not need to include growth associated with specific approved or pending projects, because the forecasted growth takes those projects into account, in addition to planned future development included in buildout of the General Plan growth by the year 2035. Therefore, for a proper analysis of the Lillian Commons Project, which involves a General Plan Amendment, it would be inaccurate to include traffic volumes from specific projects, since this would not include enough of the planned growth over the next two decades.

Comment 9.6: CEQA requires that a project's impact on emergency services response times and public safety must be adequately analyzed. Just because CEQA does not shift any financial responsibility of providing adequate fire and emergency response services that may arise due to a project's impact from the City to the applicant, does not remove or reduce the requirement that the Initial Study must analyze response times and their impact on public safety. A concerned citizen reading the Initial Study should be able to understand the impacts the proposed project will have on emergency services in the area.

The Planning Department KNOWS this is an especially germane point for Morgan Hill residents in 2020.

During the January 24th, 2020 City Council Goal Setting Workshop, the Morgan Hill Chief presented a slide showing the following:

The Fire Chief commented on this slide saying:

Keep in mind that the reason we have a 7 minute 30 second timeframe is, when someone's not breathing their pulse is an apneic, right around the 8 minute mark is when you have brain tissue and brain deaths start to kick in, as well as that's when fires can start to propagate pretty significantly in a significant fire incident…

The Mayor of Morgan Hill suggested:

Jake, you might want to describe what apneic means.

And the answer was given:

Apneic, so pulseless, apneic means they're not breathing, so you have a member of the public, or even a visitor in the area that is pulseless and apneic, we need to get an engine company there prior to them going and having some brain tissue death, as there's a whole guiding spirit behind having that 7 minute 30 second response time.

Note that the response times on the slide are referenced to a 3 year study from 2016 to 2018. In 2019, a Standards of Coverage Assessment was completed, and the report released. On November 23, 2019 the following summary of that Coverage Assessment was presented in the "Engage Morgan Hill Public Safety" presentation. The document can be found here: https://www.morgan-hill.ca.gov/DocumentCenter/View/35810/Public-Safety-Presentation-112319-vs-PDF.

Standards of Coverage Assessment (slide 36):

- Completed November 2019 by Citygate Associtcs, LLC.
- Three-department assessment and study (Morgan Hill, Gilroy, and South Santa Clara County Fire District)

Highlights of the 31 findings and 7 recommendations that apply to Morgan Hill (slide 37)

- Not enough firefighters in the City to address a single serious incident (structure fire, multi-casualty incident or address multiple incidents)
- Morgan Hill is dependent on South Santa Clara County Fire District to provide an effective response force to achieve needed staffing at a single residential structure fire the City relies on other fire departments

Highlights of SOC (continued, slide 38):

- Traffic congestion affects response times in core areas of the City
- Need a third staffed fire station and the staffing and resources to meet current demand and generally accepted response time standards

Highlights of SOC (continued, slide 39)

- Average Unit travel times are 2-3 minutes slower than generally accepted standards
- The cooperative service model is the best alternative going forward for cost-effective delivery of fire services in South County

Additional Challenges (slide 40)

- Continued increase in calls for service

As a result of the current situation and the key findings from the 2019 Standards of Coverage Assessment the City has stated in multiple documents that:

A third fire station has been recommended per the City's Standards of Coverage Assessment (2019) and the Public Safety Master Plan (2016). During the dissolution of the Redevelopment Agency, the settlement agreement provided for the City to retain property on Butterfield Boulevard for this third Fire Station. However, the agreement requires the property to be constructed by 2024. In addition to the cost of the construction of the building, there will be approximately $2.3 million in required staffing and $1.5 million in new equipment costs associated with outfitting the station.

Source: https://www.morgan-hill.ca.gov/DocumentCenter/View/35889/Engage-Morgan-Hill-key-topic-flyers?bidID=

However, as the City Manager said at the January 24th, 2020 Goal Setting Workshop "we're talking about 2.3 million dollars. We don't have any of that."

As noted above, one of the key findings in the Standards of Coverage Assessment was that "Traffic congestion affects response times in core areas of the City." What is meant by core areas of the City? The Coverage Assessment using actual location data includes maps showing "congested vs non-congested" streets.

"Core areas" includes major portions of the City including the location of the proposed project.

CEQA requires that a project's impact on emergency services response times and public safety must be adequately analyzed. What does the Initial Study say?

On page 119, the Existing Conditions for Fire Protection states "In general, the response time meets the current standard of eight minutes 95 percent of the time. Based on estimated driving times provided by Google Map, the project site is located within three minutes driving distance of the 15670 Monterey Street Fire Station."

What is the reference for the above Existing Conditions given on page 119 of the IS?

Why wasn't a reference included in the IS?

Many other environmental reviews (IS's and EIR's) approved by the MH Planning Department and David J. Powers and involving Hexagon use the exact same phrase, "In general, the response time meets the current standard of eight minutes 95 percent of the time" and reference it to language from a 2012 proposal. Is the language used above to represent the Existing Conditions (in 2020) also from that 2012 proposal?

At what time of day and over how many measurements was the "estimated driving times provided by Google Maps" determined? Was the estimated driving time just literally taken from Google Maps directions?

How was the additional traffic that will be generated by the proposed project factored into the KNOWN EXISTING CONDITION that "traffic congestion affects response times in core areas of the City"?

How will peak AM and PM traffic generated by the project impact the Average Unit travel time which are KNOWN to be currently 2-3 minutes slower than generally accepted standards?

Why should the public have ANY TRUST in this Initial Study when it states a set of existing conditions for Fire Protection that are knowingly false and ignores the CEQA requirement to adequately study the project's impact on emergency services response time when a delayed response could literally mean the difference between life and death for residents of Morgan Hill?

Response 9.6: The commenter has taken the Standards of Coverage Study (SOC) out of context. Cal Fire's Chief Jake Hess has clarified that the City of Morgan Hill Fire Department meets the eight minute response standard, as required by the City's agreement with Santa Clara County Emergency Medical Services. The joint SOC with Morgan Hill Fire, Gilroy Fire, and the South County Fire Protection District is unrelated to the City of Morgan Hill's contractual agreement for EMS response times with Santa Clara County EMS.

Regarding the commenter's question about measurements and driving times, those were taken using Google Maps. The reference for the Existing Conditions on page 119 is the Fire Operational and Administrative Analysis for the Morgan Hill Fire Department and South Santa Clara County Fire District, found at the following link: https://www.morgan-hill.ca.gov/DocumentCenter/View/35069/Center-for-Public-Safety-Management-Report---Fire-PDF.

As discussed in the TIA, all study intersections would operate at acceptable levels of service (LOS D or better) with the peak AM and PM traffic generated by the project.

For these reasons, the Initial Study meets all CEQA requirements in analyzing response times.

10. RESPONSE TO COMMENT LETTER 10 FROM ROBERT RODRIGUES, DATED AUGUST 3, 2020.

Comment 10.1: The purpose of this letter is to speak out against the Lillian Commons proposed project. My family and I have lived in the neighborhood since 2009 and have seen the traffic cause by both Barrett elementary and the Kingdom Hall church. I don't believe the current traffic study is an accurate reflection of our neighborhood and according to the study this project could increase traffic by 200% on and around surrounding streets.

As you know our wonderful city has access to two county hospitals and I question the need for a third private for profit hospital. As the developer stated in a previous city meeting it can not sustain itself without another source of income. I don't believe that allowing them to build a massive apartment complex and restaurant is the answer. I believe this would be a huge eye sore to our neighborhood. However I know that housing is a huge issue in our city and would love to see the proposed rezoning allow for more single family homes. We hope the city will keep our wonderful, peaceful neighborhood calm and beautiful.

Response 10.1: The TIA prepared by Hexagon followed all required City policies and standards. The TIA used ITE trip generation rates to determine trip generation estimates and used accurate traffic counts, taken during normal traffic conditions prior to the County shelter in place order. The opinion of the commenter as to whether the rezoning should be approved is acknowledged. The comment does not refer to any specific CEQA issues or inadequacies of the IS/MND. The comment will be considered by decision makers as part of the public record.

SECTION 4 TEXT AMENDMENTS

This section contains revisions to the text of the Lillian Commons Initial Study dated June 2020. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Initial Study, Page 9 Section 3.3.3 Site Access, Circulation, and Parking, the following information will be REVISED as follows:

Vehicle access to the project site would be provided by four driveways. The existing driveway to the medical office would be retained and extended to provide secondary access to the medical/hospital facility and cancer center. An additional private driveway would be added to provide primary access through the center of the site. The project proposes to retain site access through Barrett Avenue. The City recommends adding a condition to the list of Standard Conditions for the proposed project limiting access onto Barrett Avenue to emergency vehicle access only due to safety concerns and conflicts with automotive and pedestrian access to Barrett Elementary. ~~two additional driveways to Barrett Avenue that would be limited to emergency vehicle access only.~~ Sidewalks would be extended into the property from the existing sidewalks along Juan Hernandez Drive and Barrett Avenue.

Initial Study, Page 9 Section 3.3.7 Construction and Phasing, the following information will be REVISED as follows:

The proposed project is anticipated to be constructed in three phases starting with the development of Parcel D~~Parcels B and D~~, followed by the development of Parcels B and C, and closing with the development of Parcel A. Full buildout of the project site is expected in 2025.

Initial Study, Page 47 Section 4.4.2 Impact Discussion, the following information will be REVISED as follows:

MM BIO-5.1: To the extent feasible, activities shall avoid impacts to any protected trees. Avoidance is considered to be completely avoiding any work or staging under the dripline of trees. The boundary of the designated avoidance buffer shall be flagged or fenced prior to initial ground disturbance. If complete avoidance is not feasible, BIO MM-5.2 shall be implemented.

MM BIO-5.2: The project proponent shall comply with local ordinances and submit permit applications for removal, trimming, damage, or relocation of all trees covered by the City ordinance. ~~Any trees to be removed shall require replacement at a two-to-one ratio on a comparable ratio of size.~~ The replacement trees shall be planted on site to the extent feasible and the project proponent shall comply with all other replacement requirements imposed by the City.

Initial Study, Page 73 Section 4.8.2 Impact Discussion, the following information will be REVISED as follows:

The proposed project would generate an estimated 2,915 MT CO_2e of annual GHG emissions under operations in ~~2023~~2025 and 2,650 MT CO_2e in 2030. The service population would be 472 employees and 1,102 residents. The service population emissions for the years 2025 and 2030 are predicted to be ~~2.56~~2.65 and 2.40 MT of CO2e annually per service population, respectively.

Initial Study, Page 74 and 75 Section 4.8.2 Impact Discussion, the following information will be REVISED as follows:

As shown in Table 4.8-1, the project's 2025 and 2030 emissions would not exceed the per service population threshold of 2.8 MT of CO_2e per year per service population. ~~However,~~ Although the project would exceed the bright-line significance threshold, impacts would be less-than-significant because a project must exceed both the per service population threshold and the bright-line significance threshold for GHG impacts to be considered significant. ~~which would be considered a significant impact and would require mitigation~~.

~~**Impact GHG-1:** Operation of the proposed project would generate GHG emissions resulting in a cumulatively considerable contribution to global climate change. **(Significant Impact)**~~

~~**Mitigation Measures:**~~

~~**MM GHG-1.1:** The following mitigation measure would reduce GHG operational emissions to a less than significant level:~~

- ~~The applicant shall develop a GHG reduction plan that includes the proper elements that would reduce emissions from project implementation and demonstrate that GHG emission from the project would be reduced by a sufficient amount to achieve the 2020 or 2030 standard, based on when the project would become operational. Elements of this plan may include, but would not be limited to, the following:~~
    - ~~Installation of solar power systems or other renewable electric generating systems that provide electricity to power on-site equipment and possibly provide excess electric power;~~
    - ~~Construct onsite or fund off-site carbon sequestration projects (such as a forestry or wetlands projects for which inventory and reporting protocols have been adopted). If the project develops an off-site project, it must be registered with the Climate Action Reserve or otherwise approved by the BAAQMD in order to be used to offset Project emissions;~~

- ~~Purchase of carbon credits to offset Project annual emissions. Carbon offset credits must be verified and registered with The Climate Registry, the Climate Action Reserve, or another source approved by the California Air Resources Board or BAAQMD. The preference for offset carbon credit purchases include those that can be achieved as follows: 1) within the City; 2) within the San Francisco Bay Area Air Basin; 3) within the State of California; then 4) elsewhere in the United States. Provisions of evidence of payments, and funding of an escrow-type account or endowment fund would be overseen by the City;~~
- ~~Develop and implement a transportation demand management (TDM) program to reduce mobile GHG emissions.~~

~~Some of the measures involve project features or operational measures that would serve to reduce project emissions. However, it may not be possible to accomplish the required reduction through the design, construction, and operation of the project, in which case the use of carbon offsets would be required. Carbon offsets, as purchased through a verified registry, are a feasible and appropriate method to reduce a project's GHG emissions and is recognized by BAAQMD and CARB. Because the project would be required to purchase whatever remaining amount of GHG reduction was required, after exhausting on-site reduction options listed above, the project's GHG emissions would be reduced to a level below the applicable threshold.~~ Therefore, ~~implementation of a GHG reduction plan, as set forth in the mitigation measure above, would reduce~~ the project's GHG emissions impact ~~to a~~ would be less than significant ~~level~~. **(Less Than Significant Impact ~~with Mitigation~~)**

Initial Study, Page 75 Section 4.8.2 Impact Discussion, the following information will be REVISED as follows:

~~Although the proposed project's operational emissions would exceed the 2030 bright-line threshold, implementation of MM GHG-1.1 would ensure that project emissions are below the 2030 threshold.~~ The project would comply with state and local plans and policies pertaining to GHG emission reductions. The project would be consistent with the greenhouse gas reduction targets of Executive Order B-30-15. Therefore, the project would not conflict with policies adopted at the state and local levels for the purpose of reducing GHG emissions. **(Less than Significant Impact)**

Initial Study, Page 137 Section 4.17.2 Impact Discussion, the following information will be REVISED as follows:

The project proposes to keep Driveway 1 at its current location ~~The proposed development would be accessed by two driveways along Juan Hernandez Drive. Driveway 1 is currently located~~ along the southern project site boundary, approximately 100 feet south of St. James Drive and 700 feet north of Tennant Avenue and is the existing driveway that provides access to the current uses on the site. The City Department of Public Works recommends adding a condition to the list of Standard Conditions

for the proposed project requiring Driveway 1 to be relocated and aligned with St. James Drive to the north due to conflicts with Juan Hernandez Drive. A final decision on driveway design will be made by the City Council after receiving input from the applicant and City staff, and a recommendation from the Planning Commission .

The Traffic Impact Analysis included an analysis of both scenarios. If Driveway 1 remains as is, a queue length of no greater than one vehicle is projected at the left-turn pockets to the site and St. James Drive. There would be adequate storage for left-turning vehicles. However, as traffic volumes along Juan Hernandez Drive increase, left-turns in and out of Driveway 1 and St. James Drive would experience longer delays, affecting queue lengths at both locations. This would not result in a significant impact, but could create conflicts.

If realigned, Driveway 1 would continue to provide access to the existing buildings on site, in addition to the proposed urgent care building, additional medical office space, second hospital drop-off area, and secondary access to the hospital parking structure. Driveway 1 would continue to provide left-turn access and would concentrate all movements to a single location, thereby reducing conflicting turn movements. The potential relocation of Driveway 1 would not result in any secondary environmental impacts, such as tree removal. An alternative option to realigning Driveway 1 is to restrict Driveway 1 access to right-in and right-out only turn movements.

Initial Study, Page 150 Section 4.21 Impact Discussion, the following information will be REVISED as follows:

The proposed project and past, present, present and future development projects worldwide contribute to global climate change. No single project is sufficient in size to, by itself, change the global average temperature. Therefore, due to the nature of GHG impacts, a significant project impact is a significant cumulative impact. As discussed in Section 4.8, Greenhouse Gas Emissions, the project's operational emissions would exceed the 660 MT of CO_2e per year bright-line threshold (for 2030) but the project would not exceed the service population threshold of 2.8 MT of CO_2e per year per service population. ~~However, implementation of MM GHG-1.1 would reduce impacts to less-than-significant levels.~~ For impacts to be considered significant, a project must exceed both thresholds. The project would, therefore, not result in significant GHG impact. For these reasons, the project would not result in a cumulatively considerable contribution to a significant cumulative GHG impact. **(Less Than Significant Cumulative Impact~~ with Mitigation Incorporated~~)**

Lillian Commons Medical Campus Project
Initial Study/Mitigated Negative Declaration
Responses to Public Comments

APPENDIX A: IS COMMENT LETTERS

Adam Paszkowski

From: Robert Benich <nucpower@me.com>
Sent: Monday, June 29, 2020 8:09 AM
To: Adam Paszkowski
Subject: Lillian Commons Medical Center

Hello Adam. Finally, the City of Morgan Hill is on track to get a new modern hospital. This is a good location due to its proximity to the Tennant Avenue freeway exit. Not being on a contaminated building site is also a plus. I wholeheartedly support this project. The current DePaul Health Center can be rezoned and the property used for a better use. The building itself may have to be demolished but that's OK. It has served its purpose and now it's time to move on as our city population will soon increase to over 50,000 residents. I sincerely hope you can help guide this project to a speedy conclusion.
Robert Benich

Sent from my iPad

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Adam Paszkowski

From: Debbie Baker <debbiebake700@msn.com>
Sent: Monday, July 13, 2020 4:03 PM
To: Adam Paszkowski
Subject: Lillian Commons Project

Dear Mr. Paszkowski,
I am a long-term resident of Morgan Hill. I have lived here since 1990. I currently have owned my house for 15 years and I live next to Barrett Elementary School.
I have some concerns regarding the Lillian Commons project cited for development directly across the street from my home.
My house is on the corner St. John and Barrett Ave. facing the field under consideration. My first concern is the building of new housing (high-density apartments) across from St. John Ave. and Barrett Ave. The addition of new housing and the projected extension of St. John Ave. drawn on the architectural plans will cause an additional and possibly excessive amounts of new traffic flowing onto
Barrett Ave. Currently Barrett elementary school, when in regular session, has considerable traffic congestion from families parking cars to drop off (7:45am) and pickup (1:50pm) children
every day from August to June. By adding new apartment residents driving through the "new" St. John extension will add to higher traffic and congestion on Barrett Ave.
A second concern is the addition of shopping, eating and possibly a bar in close proximity to an elementary school. Many students walk to school down Juan Hernandez and use the
four-way crosswalk for crossing into the school grounds. Students located in the neighborhood off Juan Hernandez, and walking to school, potentially could be harmed by the additional number of cars coming and going out of the "new" shopping area as well as driving down Barrett and running through the four-way stop (there are no stop lights here).
This is a neighborhood with high pedestrian traffic and many parents park and walk their students across Barrett to get to the school grounds. Adding more cars by building more apartments, and shopping areas will turn both Barrett Ave and Juan Hernandez into a very busy city-like streets.
Thank you for your consideration,
Deborah J. Baker
945 Barrett Ave.
Morgan Hill, Ca

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Planning for Success.

July 14, 2020

Jennifer Carman
Development Services Director
City of Morgan Hill
17575 Peak Avenue
Morgan Hill, CA 95037

Adam Paszkowski
Principal Planner

Re: Lillian Commons Mixed Use Development Project

Dear Jennifer,

EMC Planning Group would like to thank you for the City's work the Initial Study (IS) and Draft Mitigated Negative Declaration (MND). We have reviewed the IS/MND and have comments on several items that need to be addressed prior to or as part of your staff report to the Planning Commission. These items are summarized below.

Project Description

In Section 3.3.3 Site Access, Circulation, and Parking, there is mention of the two driveways to Barrett Avenue being limited to emergency vehicle access only. The applicant understands the City would like the driveways to be emergency access only, but the applicant never agreed to this change. Nevertheless, this change is presented as though it is proposed by the applicant in the project description.

In the response to comments letter to the City, after staff review of the project, it was the intent of the applicant that this 'emergency access only' driveway issue be discussed with the Planning Commission and City Council. The applicant has not agreed to the change and feels full access drives onto Barrett Avenue are necessary to provide sufficient site access and adequate circulation and that both driveways meet the intent of General Plan policies as stated below:

> Policy CNF-8.2: Design Features. Encourage design features and amenities in new development and redevelopment, including but not limited to: Highly connected street layouts, supporting multiple paths of travel for all modes.
>
> Policy CNF 11.5 Outside Connections. Require new subdivisions to provide multiple connections to the surrounding community. Methods to achieve this may include:
>
> - Providing multiple points of entry into the project for motorists, bicyclists and pedestrians;
> - Extending the existing street pattern at the edges of the subdivision into the site. Extended streets should match the type and scale of the streets to which they connect;
> - Installing landscaping and street improvements at the edge of the subdivision that appear as common amenities shared with adjacent neighborhood;
> - Minimizing the use of gates, fences and walls that separate the subdivision from the surrounding community; and
> - Planning for future connections to adjacent undeveloped property.
>
> Policy CNF- 12.2 Well-connected Neighborhood Centers. Provide for safe and convenient pedestrian and bicycle connections as well as transit access to support existing neighborhood centers, including shopping centers, medical office, sports fields, and the Centennial Recreation Center.

If both driveways are limited to emergency access only, an additional right-in / right-out driveway added to Juan Hernandez Drive is necessary. This would not provide the ideal traffic circulation and does not meet the intent of the City policies cited above, but could alleviate departure congestion at the main driveway.

Though we see where the City Engineer may have concerns about the traffic interaction with the Barrett Avenue Elementary School, these two access drives should remain open to Barrett Avenue to allow for neighborhood connectivity. Perhaps the driveways could be signed during school hours and for school events to limit the use of the driveways.

The applicant has been working with the school and school district to craft a circulation, parking, and access safety plan for this area along Barrett Avenue adjacent to the elementary school. The applicant would like to have the opportunity to discuss this driveway configuration at public hearings to get feedback from the Planning Commission, City Council, and the neighborhood, and not have the City or environmental document assume that the two driveways on Barrett Avenue will be emergency access only and that the applicant agrees with that direction. Please remove this from the IS/MND as an assumed part of the project description provided by the applicant.

Project Phasing

Construction phasing is planned in three phases, which for this project is described by Parcel development, as: Parcel D (existing medical), Parcels B & C (commercial and residential) and Parcel A (hospital). The IS Project Description states the project would begin with Parcels B & D, followed by Parcel C then Parcel A.

It is likely Parcel B, the commercial Retail/Restaurant development, will be built along with or just after the Parcel C, residential, since the commercial development would be supported by the residential development. The Hospital, Parcel A, could lag behind by several years as a result of having to implement state regulations for hospitals. Though phasing will likely be market driven, the Project Description within the Initial Study is not consistent with the applicant's phasing plan.

Existing Driveway Relocation

Discussion of the transportation facilities, based on the Transportation Impact Analysis, includes the relocation of the existing driveway in the southeast corner of the project site.

Impact TRN-3: The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). (Less than Significant Impact)

It appears, as part of the direction to the transportation consultant in preparation of the Initial Study, the City staff is recommending driveway 1 be relocated to align with St. James Drive. Why is this the first time the applicant and its consultants have been made aware of the request from the City Public Works Department? Nothing about this was

mentioned during plan review. Relocating driveway 1 would cause undue burden on the developer and on streets in the surrounding neighborhood. Driveway 1 is described as "the existing driveway that provides access to the current uses on the site". Relocating this driveway, which is within 10 feet of meeting the City's driveway separation requirements and is considered a less than significant impact in the traffic report, would cause impacts to the project as a whole. If this driveway were to be relocated to align with St. James Drive, it could encourage cut through traffic within the adjacent residential neighborhood. Relocating the driveway would cause many issues for the developer and the surrounding neighborhood, including:

1. Existing driveway provides access to existing medical buildings and has done so for many years. The property located to the south of this parcel could benefit from joint use of the driveway. Relocating the driveway removes this potential;
2. Cause possible cut through traffic for the adjacent residential neighborhood with vehicle headlights creating glare at adjacent homes;
3. Affect pedestrian circulation by creating more traffic through the middle of the non-residential portion of the project;
4. Force circuitous access to the parking area at the southeast corner of the project and to the proposed parking structure;
5. Cause loss of building square footage and parking due to redesign to meet City street design standards;
6. Jeopardize the existing patient drop-off / pick-up lane, which requires passenger side exit;
7. Force relocating utilities (light pole at Juan Hernandez Drive and other utilities under the existing driveway); and
8. Disrupt existing medical facility function during driveway construction.

MND

B. Biological Resources

Tree Removal

Section 3.3.5, Landscaping and Trees, indicates all 16 trees on the site would be removed.

Mitigation Measure MM BIO-5.2 states:

> The project proponent shall comply with local ordinances and submit permit applications for removal, trimming, damage, or relocation of all trees covered by the City ordinance. Any trees to be removed shall require replacement at a two-to-one ratio on a comparable ratio of size. The replacement trees shall be planted on site to the extent feasible and the project proponent shall comply with all other replacement requirements imposed by the City.

The applicant is not clear about the replacement policy listed in MM BIO-5.2 The applicant understands that some tree removal will take place as part of the development and will apply for tree removal permits as necessary. Given the number of trees to be removed, replacing at a two-to-one ratio is achievable. However, replacement at a comparable size is not good landscape practice, if that is what is meant by comparable ratio of size. The survival rate of smaller caliper trees is greater than large caliper trees. The goal of replacing lost trees would be better met by the planting of two to four inch caliper trees at a higher ratio than two-to-one. We'd ask that mitigation measure BIO-5.2 be amended to provide for this option.

E. Green House Gas Emissions

Threshold of Significance

Though no explanation is given for the derivation of the 660 MT CO2e bright line threshold referenced in the IS, it is assumed it is scaled down from BAAQMD's 2020 bright line threshold. BAAQMD does not recommend scaling down it's AB-32 based thresholds of significance for 2020 for subsequent years to derive annual progress thresholds for meeting the SB 32 target for 2030. Unless the IS is amended to provide substantial evidence for an applicable post-2020 bright line threshold (e.g. a new GHG emissions gap analysis for emissions within the air basin is prepared), there is no basis for determining the project's GHG impact to be significant with regard to a bright line threshold.

The IS does not provide any discussion of the methodology for deriving the 2.8 MT CO2e service population threshold for 2030 used in the document. Nevertheless, the IS finds that project emissions are below the service population threshold. Given this fact

and the fact that the bright line threshold used in the IS is not based on substantial evidence, there is no basis for determining that the project GHG impact is significant. Therefore, the IS discussion should be revised and mitigation measure GHG-1.1 should be deleted.

Note that the 2025 service population projection for the project is listed at 2.56 MT CO2e on page 73, but referenced in Table 4.8-1 as 2.65 – this discrepancy should be clarified. Also note that the IS does not identify a progress threshold for 2025. Yet in Table 4.8-1, year 2025 emissions for the project are compared to the 2030 threshold only. This leads a reader to falsely assume that the 2025 project emissions of 2.65 MT CO2e are closer to the threshold of 2.8 MT CO2e than is valid – a progress threshold for 2025 would be higher than 2.8 MT CO2e and the project's 2025 emissions would be substantially below that threshold.

Carbon Offset Criteria

If and only if the Initial Study is amended to provide substantial evidence for a finding of significant impact with regard to a GHG bright line threshold as described above, would mitigation measure GHG-1.1 possibly apply.

Mitigation measure GHG-1.1 is too restrictive with regards to the locational "preference" criteria from which the applicant should purchase carbon offsets. Availability and cost of offsets can be strongly influenced by the offset project type and location. Clearly, it is highly unlikely that one or more offset projects exists within the city. Offsets created by offset projects in the Bay Area (if any) and California are less plentiful and often more expensive than those created outside the state. Further, since climate impacts are global, the applicant should not be constrained from purchasing offsets that are derived from international projects, provided the offsets are verified and registered through a CARB approved registry. Provided the City does not render the applicant's GHG reduction plan inadequate based solely on source of offsets, the mitigation is acceptable.

H. Transportation

Mitigation Measure TRN-1.1

This mitigation is unclear as to how the traffic impact fee charged to the applicant will be derived (traffic impact fee "as determined by City staff"). Since the impact to the subject intersection is significant under cumulative conditions without the project, the proposed project is not responsible for generating the impact. However, the project would worsen the cumulative impact. Therefore, the applicant must pay a fee that mitigates the project contribution to the cumulative impact.

The City's most recent fee schedule is dated January 15, 2020. The applicant should only be responsible for paying the traffic impact fees as described in that fee schedule based on the project description. No other traffic impact fees "as determined by City staff" appear to be warranted. If this is not the case, the applicant must be made aware prior to the Planning Commission hearing whether City staff is being given discretion to charge other traffic impact fees.

Thank you again for your time and effort to move the CEQA and entitlement processes forward. Please let me know if you would like to discuss any of the above items further as you prepare your recommendations for the Planning Commission and City Council.

Sincerely,

Michael J. Groves
Senior Principal

Cc: Cecily Murray

Adam Paszkowski

From: Sheri Schenkman <sherischenkman@gmail.com>
Sent: Tuesday, July 21, 2020 5:25 PM
To: Adam Paszkowski
Subject: Lillian Commons Medical Campus Project

Hello Adam,

My name is Sheryl Schenkman and I own a house located at 743 Saint Michael Place, Morgan Hill, California. Per the letter I recently received I am emailing my concerns

Here are some of my concerns:
1. Do not subdivide and rezone the property.
- Honor the existing Morgan Hill Plan. The property is not zoned for housing and despite the Morgan Hill community plan I see very undesirable dense housing on 1/2 the lot and it provides insufficient parking for the apartments it plans to have that will result in parking problems.
-Juan Hernandez is already used as overflow parking for residents in the area and for families picking up and dropping off children at Barrett Elementary. These planned apartments with insufficient parking will create a huge parking problem.
- This property needs to be saved for what is in the Morgan Hill Plan.
2. Cancer data uses false information
- Children live and go to school in the impacted area noted on the map, and will be in the area nearly 100% of the time.
- The data is projecting a person is only in the impacted area for about 75% of the time. This is false, especially with our most vulnerable school age children.
3. Traffic hazards especially for school children
- Small children walk on Barrett and Juan Hernandez to reach their school and the projected increase in traffic and danger it causes is unacceptable (200 trips increasing to 4100 trips).
- Honoring the zoning will eliminate the apartments and that traffic.
- The proposed hospital should mitigate the traffic dangers and use the driveway entrance from tennant avenue.
4. Saint James Place PUD is negatively impacted and should receive funds to reduce the negative impact. We will need to improve the existing wall/fence on Juan Hernandez to reduce the noise, cancer hazzards, and lost parking.
5. Parking permits need to be issued to residents living in the Saint James PUD, for parking on Juan Hernandez to avoid problems and reduce resentment for lowering our quality of life.
6. Landscape Buffer on Juan Hernandez is needed.
- Juan Hernandez needs the same landscape buffer that I see on Barrett.

I have many more concerns. I am writing my initial concerns via this email.

Sheryl Schenkman
Homeowner/ 743 Saint Michael Place; Morgan Hill, CA
408-406-1250- cell

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DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

July 23, 2020

SCH # 2020060601
GTS # 04-SCL-2020-00769
GTS ID: 19977
PM: SCL-101-R15.287

Adam Paszkowski, Principal Planner
City of Morgan Hill
17575 Peak Avenue
Morgan Hill, CA 95037

Lillian Commons Medical Campus Project – Initial Study/Mitigated Negative Declaration (IS/MND)

Dear Adam Paszkowski,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Lillian Commons Medical Campus Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the June 2020 IS/MND.

Project Understanding

The proposed project would construct a 4,500 square feet (s.f.) urgent care facility, 10,000 s.f. medical building, 100,000 s.f. medical office/hospital with 55 beds, three-story parking garage with 500 spaces, 10,000 s.f. commercial retail/restaurant building, and a maximum 200-unit multi-family residential development on a 19.67-acre largely vacant site.

The project site is currently designated as Commercial. The proposed project includes a request for a General Plan Amendment (GPA), Zoning Amendment (ZA), Planned Development Master Plan. The GPS requests GP Land Use designation change from Commercial to Mixed-Use Flex. The ZA requests to amend the zoning district from Service Commercial and Planned Development to Mixed-Use Flex with a Planned Development Combining District.

The project site is located at the southeast corner of the intersection of Juan Hernandez Drive and Barrett Avenue in the City of Morgan Hill, directly adjacent to US-101.

Highway Operations
The project applicant shall perform a queuing analysis for the on/off ramps in both directions at US-101/Tennant Avenue and US-101/Dunne Avenue, which are the nearest ramp terminal intersections to the project site. Vehicle queues due to the project added traffic shall be accommodated within the ramps and mainline freeway traffic shall not be impacted. If the project generates impact(s) on ramp operations, the impact(s) shall be mitigated or fair share fees shall be allocated for mitigation.

Hydraulics
Please ensure that no water from the project site drains into the State Highway Drainage facilities, including the highway slope ditch along the highway off-ramp.

Lead Agency
As the Lead Agency, the City of Morgan Hill is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Encroachment Permit
Please be advised that any permanent work or temporary traffic control that encroaches onto the Right of Way (ROW) requires a Caltrans-issued encroachment permit. If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application, six (6) sets of plans clearly delineating the State ROW, six (6) copies of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement.

To download the permit application and to obtain more information on all required documentation, visit https://dot.ca.gov/programs/traffic-operations/ep/applications.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Yunsheng Luo at Yunsheng.Luo@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov.

Sincerely,

Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

cc: State Clearinghouse

Adam Paszkowski

From: Jeff Salem <jeffsalem12@verizon.net>
Sent: Monday, July 27, 2020 9:06 PM
To: Adam Paszkowski
Cc: laurasalem03@verizon.net
Subject: Lillian Commons project comments

To: Adam Paszkowski; Morgan Hill Planning Commission

Subject: Lillian Commons Project – Environmental Review

Here are our Questions and Comment wrt the Lillian Commons Project environmental review.

Mitigated Negative Declaration report:

1.
   I. A. Air Quality:

   Standard Condition AIR-1:

      i. Q: Who enforces exposed surface area being watered twice a day? Will there be scheduled times each work day? Does that include weekend?
      ii. Q: Where does the publically visible sign with telephone number for POC of Lead Agency regarding dust complaints get posted?

H. Transportation Impact TRN-1: Mitigation Measures:

The following mitigation measure shall be implemented by the proposed project to reduce impacts to a less-than-significant level.

MM TRN-1.1: Improvements to mitigate the impact at this intersection consist of the implementation of a traffic signal. However, the decision to install a traffic signal is not be based solely on satisfying one traffic signal warrant. Instead, intersections that meet the peak-hour signal warrant shall be subject to further analysis before determining that a traffic signal is necessary. Thus, the project impact at this intersection shall be mitigated with payment of the traffic impact fee, as determined by City staff.

Q: Is this for a traffic signal at the intersection of Barrett and Juan Hernandez Dr.?

Q: Who is responsible for the traffic signal, cost and construction? Developer or City of MH?

Q: Will there be a dedicated construction entrance and exit for construction vehicles, contractors and construction supply trucks/vehicles that is away from the existing neighborhoods as to not obstruct everyday neighborhood access routes, streets and parking and/or cause traffic delays? If so is there a map of this/these construction entrances and exits?

Q: Will the street(s) Juan Hernandez Dr. or Barrett Ave. need to be widened for thru and turn lanes? If so will the existing residents with homes on either Juan Hernandez Dr. or Barrett lose street parking in front of their homes? If so what addresses will be affected?

Q: Will the Juan Hernandez Dr. Barrett Elementary School student drop off driveway entrance and exit be impacted and/or modified as result of this project being approved? It is already bad enough during school hours that vehicles stop/park in the middle of Juan Hernandez Dr. trying to get in or out of an already highly congested school student driveway drop-off and pickup. Often during school hours the front of my house at 16313 Juan Hernandez Dr. which is three homes to the North of the Barrett / Juan Hernandez Intersection is blocked with vehicles during school drop off and pickup hours of the day.

Q: Will the Barrett Ave. Barrett Elementary School teacher and Bus parking lot and driveway entrance's and exit's be impacted and/or modified as result of this project being approved? It is already bad enough during school hours that vehicles stop/park on Barrett Ave. on the east side and west sides of the Juan Hernandez Dr. / Barrett Ave. intersection trying to drop off or pick up their students. Again, often during school hours these described locations are lined with vehicles causing vehicle and foot traffic congestion at the described intersection.

Comments / General Questions:

_____

_____

Comment: We are all in favor of medical expansion Morgan Hill. A 55 bed hospital does not seem to be very large as compared to the proposed 200 unit high density apartment complex's and commercial retail being proposed. Seems like a very unbalance use of the land. That many apartment units with more than likely twice the number of tenants and vehicles vs. the number hospital beds/rooms will cause a lot of foot an vehicle traffic close the existing neighborhoods and elementary school campus.

Q: Why doesn't the proposed parcel that is trying to be re-zoned for housing be used for single family home lots to better blend in with the existing housing tracks all ready established?

Q: If a 24/7 Emergency room or Urgent care operation goes into place that will bring in a lot of 24/7 traffic and ambulance / Emergency vehicle (Siren) noise to the surrounding neighborhoods. Will any additional sound barriers / proofing such as sound walls be constructed to help cut down on the noise pollution? As it is already the senior living center located at the intersection of Barrett Ave. and Butterfield Blvd. has siren Emergency vehicles of a least one per day or every other day on the average. Sometimes multiple times per day.

The emergency vehicles can be heard all hours of the day/night which causes a lot of noise pollution already. The addition of a 24/7 Emergency room or an Urgent Care center will increase that noise pollution severely on a regular basis. Has there been an impact study or assessment wrt to having multiple establishments close in proximity only a mile or less apart from each other with the same type of noise traffic?

Comment: This proposed multi zoned lot with four separate parcels, one for high density housing (Apartments), Commercial (Retail and or Parking Garage) and Industrial (Hospital / Medical center) on slightly less than 20 acres appears to be very congested for the diverse amount of development that would transpire with the currently proposed Lillian Commons Project. The surrounding neighborhood(s) are mostly comprised of single families homes about 90% with some duplex's and rental properties sprinkled in and an elementary school. The Lillian Commons project doesn't seem to fit in with the existing developed properties. It is more suited to a city or downtown setting instead of a single family/elementary school setting.

Q: As neighboring home owner, we are not in favor of four multi use parcel zoning on a ~20 acre property. If this project is to move forward as is the developer should have to develop the medical parcel 1st, retail/commercial parking structure 2nd and 3rd. Apartments last. That way the city and existing surrounding homeowners know the land owner and developer are committed to bringing in medical to Morgan Hill. We attended the Planning Commission mtg. in early Feb. 2020 before the COVID shutdown and listened to the land owner's pitch for wanting better medical in Morgan Hill. We also listened to the developer's pitch that the apartments and other money revenue parcels would be developed first, no guarantee the medical will ever get developed. Is there a time limitation as to when each parcel's development has to be completed upon approval of the proposed Lillian Commons project?

We truly believe the land owner and developer want to re-zone for the four proposed parcel types so they can sell each one off individually for personal economic gain without any consideration for the existing neighborhoods or the homeowners.

We are original property owners. Bought our house in 1999 and have been residents of Morgan Hill ever since and still occupy the property as our primary residence. If the Lillian Commons Project is to move forward as proposed with a high density apartment complex's, retail, parking structure and Hospital increasing both vehicle and foot traffic and eliminating our open space and obstructing our views to the South East of our property we will sell the property and move out of Morgan Hill.

The proposed project will bring way too much congestion to this part of Morgan Hill where families reside and Elementary school children, parents and teachers already add to the neighborhood vehicle and foot traffic. Being an eye witness to the school traffic as it is already, we're surprised that more accidents haven't already occurred with Barret Elementary school participants not following traffic and parking rules as they currently exist. It will only get worse to an already over crowded uncontrolled area. A traffic signal won't solve the problem that exists today or one would of already been put in place.

Jeff and Laura Salem

408-430-9850

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Adam Paszkowski

From: Marianne Knight <marianneknight@charter.net>
Sent: Thursday, July 30, 2020 4:24 PM
To: Adam Paszkowski
Subject: Comment about hospital, et al.

Dear Adam,

YES! YES! YES! Please build this complex and make it happen sooner rather than later! We have lived in MH for 16 years and have spent the better part of that time driving up and down the San Jose and San Francisco Bay Areas going to doctors and hospitals. It is exhausting and doesn't provide a cohesive plan for the future. We long for the day, once again, when all the doctors who treated us were on the same hospital staff and were of the highest caliber in their specialty fields. Other communities have this luxury. We in Morgan Hill deserve the same. It's time has come.

As we age in place as 75 year old active citizens we have reluctantly considered leaving this beautiful community because of its limited access to competent hospital facilities and doctors. Yes, we have St. Louise but our few experiences there have shown us that it is inferior to what we experienced in the Peninsula of SF before moving here. We are discouraged with what is available locally and pray each day that we stay healthy because the alternative is awful if you don't belong to Kaiser, which we don't. We have private Anthem PPO group policy with dental, so we are in exceptionally good care with insurance, if we only had a place to use it.

Please consider the growing community in all age groups. Morgan Hill, open our welcoming doors to young doctors wishing to make a professional life here, and possibly to move to our beautiful and diverse community. This facility with its state- of- the- art hospital, medical offices and limited housing is the perfect solution. PLEASE, PLEASE, PLEASE make it happen!

Thank you.

Sincerely,

Dr. Robert and Marianne Knight
16920 Zinfandel Circle
Morgan Hill, CA 95037

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Adam Paszkowski

From: Robert Rodriguez <RLRodriguez@rosendin.com>
Sent: Monday, August 03, 2020 4:39 PM
To: Adam Paszkowski
Subject: Comments on Lillian commons

Thank you for your patients I hope this this version finds you.,

July 28,2020

City of Morgan Hill principal planner Attn: Adam Paszkowski.

The purpose of this letter is to speak out against the Lillian Commons proposed project . My family and I have lived in the neighborhood scene 2009 and have seen the traffic caused by both Barrett elementary and the Kingdom Hall church . I don't believe the current traffic study is an accurate reflection of our neighborhood and according to the study this project could increase traffic by 200% on and around surrounding streets.

As you know our wonderful city has access to two county hospitals and I question the need for a third private for profit hospital . As the developer stated in a previous city meeting it can not sustain its self with out another source of income . I don't believe that allowing them to build a massive apartment complex and restaurant is the answer . I believe this would be a huge eye sore to our neighborhood. However I know that housing is a huge issue in our city and would love to see the proposed re zoning allow for more single family homes . We hope the city will keep our wonderful ,peaceful neighborhood calm and beautiful Thank you .

Regards ,
Robert and Isabel Rodriguez

Thank you
Robert Rodriguez
408 478-5629
ROSENDIN ELECTRIC

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VIA EMAIL (adam.paszkowski@morganhill.ca.gov)

Adam Paszkowski
Principal Planner
City of Morgan Hill Development Services Department
17575 Peak Avenue
Morgan Hill, CA 95037

Re: Lillian Commons Medical Campus Project Initial Study and Notice of Intent

To Whom It May Concern:

Pursuant to the Notice of Intent to Adopt A Mitigated Negative Declaration for the Lillian Commons Medical Campus Project (also referred as Juan Hernandez – MH Medical Properties) this letter is to provide comments concerning the project and to advise that I have objections to the basis of determination set forth in the Initial Study (IS) . The specific concerns and factual basis, as governed by California Environmental Quality Act (CEQA) settled law is as follows:

1) Does the City of Morgan Hill, acting as Lead Agency believe that the CEQA process for this project, including the IS, should be conducted in a way to ensure transparency in decision making, encourage public participation, and promote public confidence which are among the stated purposes of CEQA?

2) The Planning and Conservation League (PCL) https://www.pcl.org/campaigns/ceqa/ceqa-faqs/ a strong advocate for CEQA notes that:

   As with any law, CEQA can be improved to more effectively achieve its core purposes of environmental protection, public participation, and government agency accountability.

   The PCL goes on to discuss known issues with CEQA including:

   Currently, project proponents may pay for the consultants who prepare the EIRs, thus asserting control ***over what should be an impartial analysis. To promote unbiased reviews****, project proponents could pay into a fund at a public agency and the agency could then contact the environmental reviewers preparing the EIR, thus reducing public concern about undue influence.*

   To promote transparency, there should be a mandatory waiver of confidentiality with all consultants and contractors who have performed studies for the applicant prior to this application.

   a) Who paid for the Initial Study and how much to date?

   b) Did the applicant assert control over the Initial Study? Do all of the assumptions, methods used, and conclusions of the IS represent an impartial and unbiased analysis?

   c) Did the City of Morgan Hill receive or will they receive payments for managing, writing or

otherwise participating in the Initial Study and if so, how much to date? Where will any such payments be allocated and what are the funds allowed to be used for?

d) Appendix E of the Initial Study, "Transportation Impact Analysis" ("TIA") was written by Hexagon Transportation Consultants, Inc. ("Hexagon").

How much was Hexagon paid for their contributions of the Initial Study for this project?

What is the total amount of money that Hexagon has been paid, directly or through third-parties, for services provided to the City of Morgan Hill from the time period of January 1, 2018 to date?

d) Page ii of the TIA states that: *Through empirical research, data have been collected that correlate to common land uses their propensity for producing traffic. Thus, for the most common land uses there are standard trip generation rates that can be applied to help predict the future traffic increases that would result from a new development. Trip generation estimates for each component of the proposed project are based on trip generation rates obtained from the Institute of Transportation Engineers' (ITE's) Trip Generation Manual, Tenth Edition, 2017*.

Using ITE Trip Generation data for reasons described above, is both common and best practice around the world. In the 2018 IS for the Shoe Palace Expansion project, a 503,000 square foot warehouse and distribution facility with 64 truck docks, for which the City of Morgan Hill was lead agency, Hexagon was also responsible for the TIA. In that case, Hexagon ignored best practice and based the project Trip Generation on the assumption that the massive facility with 64 truck docs will result in a daily number of truck trips of EIGHT. This was done despite receiving public comment from an experienced licensed Traffic Engineering expert that showed Hexagon's analysis was negligent. Hexagon also ignored California Department of Transportation concerns that the resulting project traffic would result in the Cochrane Road / Highway 101 exchanges being backed up onto 101 mainline during peak hours.

Given residents of Morgan Hill are fully aware of Hexagon's 2018 TIA for the Shoe Palace Expansion project which ignored common sense, best practice and professional standards why were they selected for this project? Why should the public have confidence in the TIA created for this IS?

3) Page 17 of the "TIA" says: ***Existing*** *peak-hour traffic volumes* ***were obtained from recently completed traffic studies*** *and supplemented with manual turning-movement counts (conducted in February 2020) at intersections where counts were either unavailable or outdated (more than 2 years old).*

There are a very substantial number of projects that have either been recently approved, are in the approval process, have started or even finished construction in Morgan Hill that individually and cumulatively will impact 'existing' traffic conditions including peak-hour traffic volumes.

What **specific** "recently completed traffic studies" are being referred to above? What specific peak-hour traffic volumes have been included in the 'existing' volumes from:

a) Shoe Palace Expansion project?

b) Morgan Hill Technology Center project

c) Evergreen Village Shopping Center?

d) Sunsweet Mixed-Use project?

e) Granada Hotel and Market Hall project?

f) AU Energy (gasoline tanker truck terminal) project?

g) Cochrane Commons Shopping Center Phase II project?

h) Techcon project?

i) Carpenter's Training Center project?

j) Applied Motion Products project?

k) Butterfield Technology Park project?

l) Golden State Assembly Expansion project?

m) City Ventures Monterey Gateway project?

n) Braddock and Logan Morgan Hill Apartments project?

o) Crossings at Watsonville Road project?

p) Beacon MH Senior Apartments project?

q) Crosswinds Half-Dividend project?

4) **CEQA requires that a project's impact on emergency services response times and public safety must be adequately analyzed.** Just because CEQA does not shift any financial responsibility of providing adequate fire and emergency response services that may arise due to a project's impact from the City to the applicant, does not remove or reduce the requirement that the Initial Study must analyze response times and their impact on public safety. A concerned citizen reading the Initial Study should be able to understand the impacts the proposed project will have on emergency services in the area.

The Planning Department KNOWS this is an especially germane point for Morgan Hill residents in 2020.

During the January 24th, 2020 City Council Goal Setting Workshop , the Morgan Hill Fire Chief presented the following slide:

CITY OF MORGAN HILL

Where are we now?

From 911 call to engine company arrival at scene.
(3-year study 2016 to 2018)

Dunne Hill Station:
9 mins 51 seconds

El Toro Station:
8 mins 31 seconds

Morgan Hill Station: (shared Engine 67)
9 mins 25 seconds

NOTE: 7 mins 30 seconds is the performance standard. Brain death generally occurs at 8 mins as well as fire propagation

The Fire Chief commented on this slide saying:

"Keep in mind that the reason we have a 7 minute 30 second timeframe is, when someone's not breathing their pulse is in apneic, right around the 8 minute mark is when you have brain tissue and brain deaths start to kick in, as well as that's when fires can start to propagate pretty significantly in a significant fire incident....."

The Mayor of Morgan Hill suggested:

"Jake, you might want to describe what apneic mean."

And the answer was given:

"Apneic, so pulseless, apneic means they're not breathing, so you have a member of the public, or even a visitor in the area that is pulseless and apneic, we need to get an engine company there prior to them going and having some brain tissue death, as there's a whole guiding spirit behind having that 7 minute 30 second response time."

Note that the response times on the slide are referenced to a 3 year study from 2016 to 2018. In 2019, a Standards of Coverage Assessment was completed, and the report released. On November 23, 2019 the following summary of that Coverage Assessment was presented in the "Engage Morgan Hill Public Safety" presentation. The document can be found here: https://www.morgan-hill.ca.gov/DocumentCenter/View/35810/Public-Safety-Presentation-112319-v3-PDF.

Standards of Coverage Assessment (slide 36)

*Completed November 2019 by Citygate Associates, LLC

* Three-department assessment and study (Morgan Hill, Gilroy, and South Santa Clara County Fire District)

Highlights of the 31 findings and 7 recommendations that apply to Morgan Hill (slide 37)

* Not enough firefighters in the City to address a single serious incident (structure fire, multi-casualty incident or address multiple incidents)

*Morgan Hill is dependent on South Santa Clara County Fire District to provide an effective response force to achieve needed staffing at a single residential structure fire the City relies on other fire departments

Highlights of SOC (continued): (slide 38)

* **Traffic congestion affects response times in core areas of the City**

* Need a third staffed fire station and the staffing and resources to meet current demand **and generally accepted response time standards**

Highlights of SOC (continued): (slide 39)

***Average Unit travel times are 2-3 minutes slower than generally accepted standards**

* The cooperative service model is the best alternative going forward for cost-effective delivery of fire services in South County

Additional Challenges (slide 40)

* Continued increase in calls for service

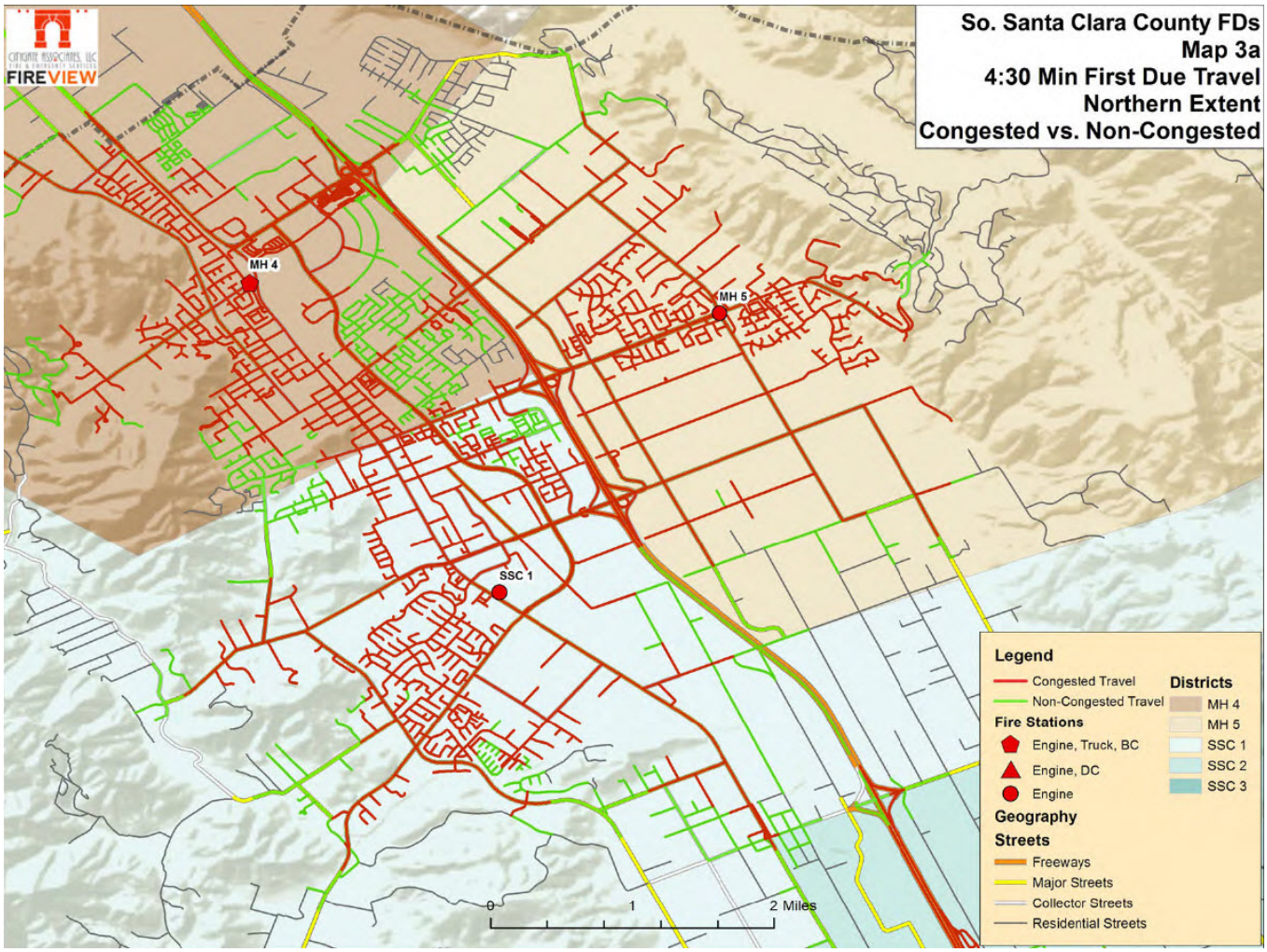
As a result of the current situation and the key findings from the 2019 Standards of Coverage Assessment the City has stated in multiple documents that:

"A third fire station has been recommended per the City's Standards of Coverage Assessment (2019) and the Public Safety Master Plan (2016). During the dissolution of the Redevelopment Agency, the settlement agreement provided for the City to retain property on Butterfield Boulevard for this third Fire Station. However, the agreement requires the property to be constructed by 2024. In addition to the cost of the construction of the building, there will be approximately **$2.3 million** in required staffing and **$1.5 million** in new equipment costs associated with outfitting the station."

(https://www.morgan-hill.ca.gov/DocumentCenter/View/35889/Engage-Morgan-Hill-key-topic-flyers?bidId=)

However, as the City Manager said at the January 24th, 2020 Goal Setting Workshop "we're talking about 2.3 Million dollars. We don't have any of that".

As noted above, one of the key findings in the Standards of Coverage Assessment was that "**Traffic congestion affects response times in core areas of the City**". What is meant by 'core areas of the City'? The Coverage Assessment using actual location data, includes maps showing "congested vs. non-congested" streets.



https://www.morgan-hill.ca.gov/DocumentCenter/View/35788/Vol-2---So-Santa-Clara-County-Fire-Departments-Standard-of-Coverage-Study-Map-Atlas---Final?bidId=

'Core areas' includes major portions of the City INCLUDING THE LOCATION OF THE PROPOSED PROJECT.

CEQA requires that a project's impact on emergency services response times and public safety must be adequately analyzed. What does the Initial Study say?

On page 119 , the Existing Conditions for Fire Protection states "*In general, the response time meets the current standard of eight minutes 95 percent of the time. Based on estimated driving times provided by Google Maps, the project site is located withing three*

minutes driving distance of the 15670 Monterey Street Fire Station"

What is the reference for the above Existing Conditions given on page 119 of the IS?

Why wasn't a reference included in the IS?

Many other environmental reviews (IS's and EIR's) approved by the MH Planning Department and David J. Powers and involving Hexagon use the exact same phrase, "in general, the response time meets the current standard of eight minutes 95 percent of the time" and reference it to language from a **2012 proposal**. Is the language used above to represent the **Existing Conditions (in 2020)** also from that 2012 proposal?

At what time of day and over how many measurements was the 'estimated driving times provided by Google Maps" determined? Was the estimated driving time just literally taken from Google Maps directions?

How was the additional traffic that will be generated by the proposed project factored into the KNOWN EXISTING CONDITION that "traffic congestion affects response times in core areas of the City"?

How will peak AM and PM traffic generated by the project impact the Average Unit travel time which are KNOWN to be currently be **2-3 minutes slower than generally accepted standards**?

Why should the public have ANY TRUST in this Initial Study when it states a set of existing conditions for Fire Protection that are knowingly false and ignores the CEQA requirement to adequately study the project's impact on emergency services response time when a delayed response could literally mean the difference between life and death for residents of Morgan Hill?

County of Santa Clara

Roads and Airports Department
Planning, Land Development and Survey

101 Skyport Drive
San Jose, CA 95110-1302
(408) 573-2460 FAX 441-0276

August 20, 2020

Adam Paszkowski,
Principal Planner
17575 Peak Avenue
Morgan Hill, CA 95037

SUBJECT: Notice of Intent to adopt a mitigated negative declaration for the Lillian Commons Medical Campus

The County of Santa Clara Roads and Airports Department (The County) appreciates the opportunity to review the : Notice of Intent to adopt a mitigated negative declaration for the Lillian Commons Medical Campus, and is submitting the following comments:

- Under GP 2035 mitigation at Tenant and Condit, the decision to install a traffic signal should not be based solely on satisfying one traffic signal warrant. Instead, intersections that meet the peak-hour signal warrant should be subject to further analysis before determining that a traffic signal is necessary. Thus, the project impact at this intersection would be mitigated with payment of the traffic impact fee, as determined by City staff.
- Please coordinate with County for the proposed signal installation at Tennant and Condit

If you have any questions or concerns about these comments, please contact me at 408-573-2462 or ben.aghegnehu@rda.sccgov.org

Thank you.

Board of Supervisors: Mike Wasserman, Dave Cortese, Susan Ellenberg, S. Joseph Simitian, Cindy Chavez
County Executive: Jeffrey V. Smith

Lillian Commons Medical Campus Project
Initial Study/Mitigated Negative Declaration
Responses to Public Comments

APPENDIX B: QUEUING ANALYSIS FOR ON/OFF RAMPS TO U.S. 101 AT TENNANT AVENUE

Tennant Off-Ramp Queue Lengths

Scenario		Queue Length[1] (feet)			
		US 101 SB Off-Ramps and Tennant Avenue		US 101 NB Off-Ramps and Tennant Avenue	
		SBL/T[2]	SBR[2]	NBL[2]	NBT/R[2]
Storage		**325**	**1,825**	**1,700**	**475**
Existing	AM	50	525	175	75
	PM	100	375	150	50
Existing + Project	AM	50	575	200	75
	PM	100	425	175	50
Year 2035 No Project	AM	150	925	275	200
	PM	150	900	225	125
Year 2035 + Project	AM	150	900	250	200
	PM	150	900	225	125
Maximum		**150**	**925**	**275**	**200**
Storage - Maximum		**175**	**900**	**1,425**	**275**

Notes:

[1]Queue lengths were obtained from Traffix assuming 25 feet per vehicle.

[2]SBL/T = southbound left/through; SBR = southbound right;
NBL = northbound left; NBT/R = northbound through/right

Tennant On-Ramp Queue Lengths

Scenario		Queue Length[1] (feet)	
		US 101 NB Loop On-Ramp from EB Tennant Avenue[2]	US 101 SB Diagonal On-Ramp at Tennant Avenue
Storage		**625**	**800**
Existing	AM	0[3]	Meter Off
	PM	Meter Off	0
Existing + Project	AM	0[3]	Meter Off
	PM	Meter Off	0
Year 2035 No Project	AM	0[3]	Meter Off
	PM	Meter Off	0
Year 2035 + Project	AM	0[3]	Meter Off
	PM	Meter Off	0
Maximum		**0**	**0**
Storage - Maximum		**625**	**800**

Notes:

[1]Queue lengths were calculated based on the meter rate and ramp volumes assuming 25 feet per vehicle. The reported queues represent the queue lengths after each of the 15-minute intervals in the peak hour.

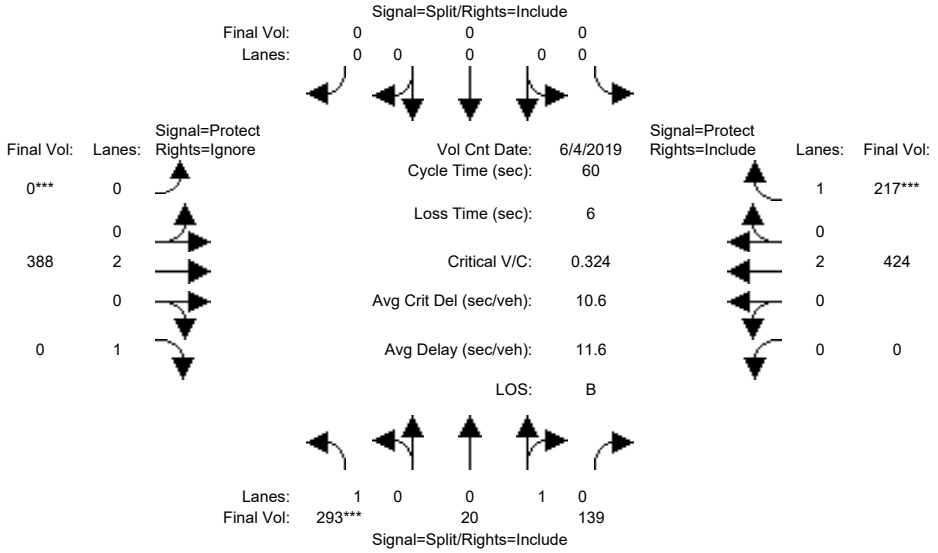
[2]NB = northbound; EB = eastbound; SB = southbound

[3]The meter was observed to be off during the AM on 08/25/2020. To be conservative, the meter was assumed to be active with the same meter rate (600 vehicles per hour) as the US 101 northbound diagonal on-ramp from westbound Cochrane Road.

City of Morgan Hill
Lillian Commons Medical Campus Development

Level Of Service Computation Report
2000 HCM Operations (Future Volume Alternative)
Existing AM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	293	20	139	0	0	0	0	388	602	0	424	217
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	293	20	139	0	0	0	0	388	602	0	424	217
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	293	20	139	0	0	0	0	388	602	0	424	217
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	293	20	139	0	0	0	0	388	0	0	424	217
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	293	20	139	0	0	0	0	388	0	0	424	217
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	293	20	139	0	0	0	0	388	0	0	424	217
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.13	0.87	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	226	1574	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.17	0.09	0.09	0.00	0.00	0.00	0.00	0.10	0.00	0.00	0.11	0.12
Crit Moves:	****						****					****
Green Time:	31.0	31.0	31.0	0.0	0.0	0.0	0.0	23.0	0.0	0.0	23.0	23.0
Volume/Cap:	0.32	0.17	0.17	0.00	0.00	0.00	0.00	0.27	0.00	0.00	0.29	0.32
Delay/Veh:	8.6	7.8	7.8	0.0	0.0	0.0	0.0	12.8	0.0	0.0	13.0	13.3
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	8.6	7.8	7.8	0.0	0.0	0.0	0.0	12.8	0.0	0.0	13.0	13.3
LOS by Move:	A	A	A	A	A	A	A	B	A	A	B	B
HCM2k95thQ:	7	3	3	0	0	0	0	5	0	0	6	6

Note: Queue reported is the number of cars per lane.

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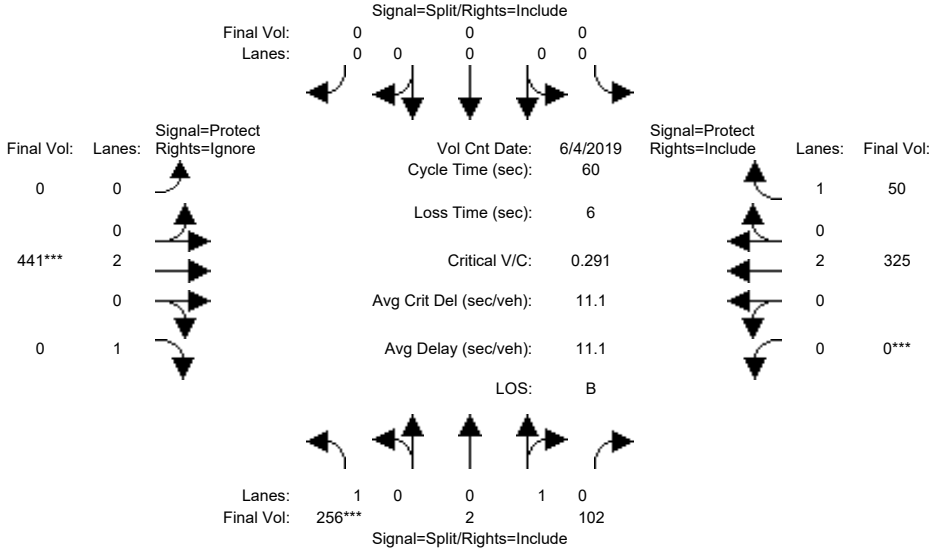
City of Morgan Hill
Lillian Commons Medical Campus Development

Level Of Service Computation Report
2000 HCM Operations (Future Volume Alternative)
Existing PM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	256	2	102	0	0	0	0	441	440	0	325	50
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	256	2	102	0	0	0	0	441	440	0	325	50
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	256	2	102	0	0	0	0	441	440	0	325	50
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	256	2	102	0	0	0	0	441	0	0	325	50
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	256	2	102	0	0	0	0	441	0	0	325	50
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	256	2	102	0	0	0	0	441	0	0	325	50
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.02	0.98	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	35	1765	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.15	0.06	0.06	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.09	0.03
Crit Moves:	****							****		****		
Green Time:	30.1	30.1	30.1	0.0	0.0	0.0	0.0	23.9	0.0	0.0	23.9	23.9
Volume/Cap:	0.29	0.12	0.12	0.00	0.00	0.00	0.00	0.29	0.00	0.00	0.21	0.07
Delay/Veh:	8.9	8.0	8.0	0.0	0.0	0.0	0.0	12.4	0.0	0.0	12.0	11.2
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	8.9	8.0	8.0	0.0	0.0	0.0	0.0	12.4	0.0	0.0	12.0	11.2
LOS by Move:	A	A	A	A	A	A	A	B	A	A	B	B
HCM2k95thQ:	6	2	2	0	0	0	0	5	0	0	4	1

Note: Queue reported is the number of cars per lane.

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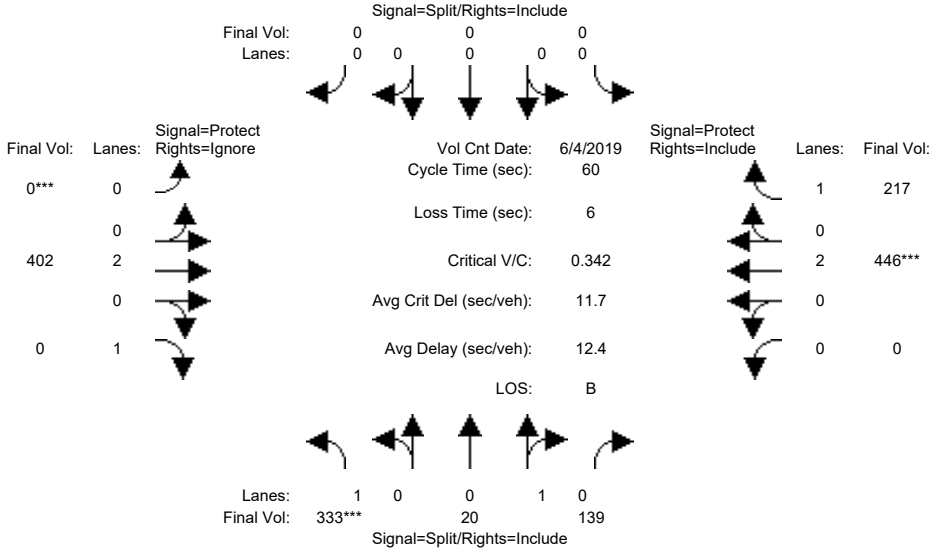
Level Of Service Computation Report
2000 HCM Operations (Future Volume Alternative)
Existing + Project AM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	293	20	139	0	0	0	0	388	602	0	424	217
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	293	20	139	0	0	0	0	388	602	0	424	217
Added Vol:	40	0	0	0	0	0	0	14	35	0	22	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	333	20	139	0	0	0	0	402	637	0	446	217
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	333	20	139	0	0	0	0	402	0	0	446	217
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	333	20	139	0	0	0	0	402	0	0	446	217
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	333	20	139	0	0	0	0	402	0	0	446	217
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.13	0.87	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	226	1574	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.19	0.09	0.09	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.12	0.12
Crit Moves:	****						****				****	
Green Time:	33.4	33.4	33.4	0.0	0.0	0.0	0.0	20.6	0.0	0.0	20.6	20.6
Volume/Cap:	0.34	0.16	0.16	0.00	0.00	0.00	0.00	0.31	0.00	0.00	0.34	0.36
Delay/Veh:	7.5	6.5	6.5	0.0	0.0	0.0	0.0	14.6	0.0	0.0	14.8	15.1
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	7.5	6.5	6.5	0.0	0.0	0.0	0.0	14.6	0.0	0.0	14.8	15.1
LOS by Move:	A	A	A	A	A	A	A	B	A	A	B	B
HCM2k95thQ:	8	3	3	0	0	0	0	5	0	0	7	7

Note: Queue reported is the number of cars per lane.

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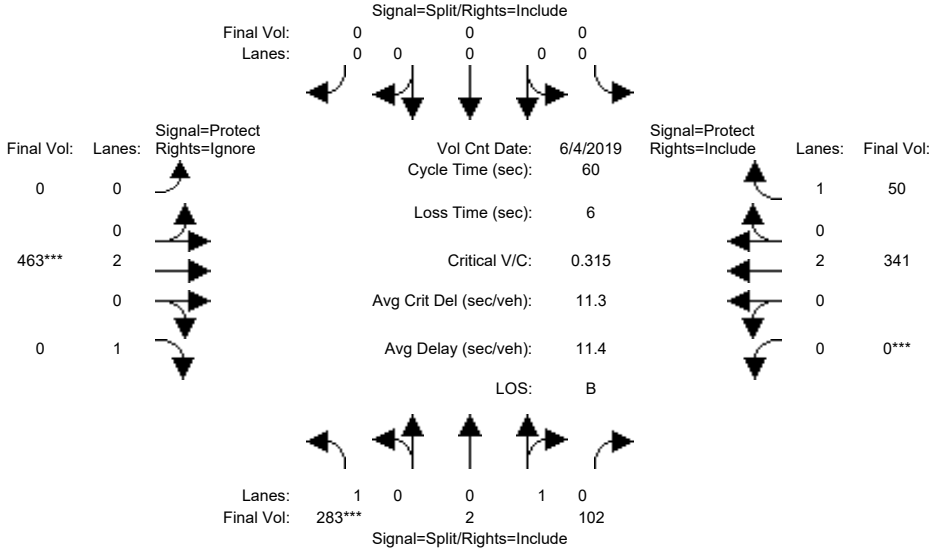
2000 HCM Operations (Future Volume Alternative)
Existing + Project PM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	256	2	102	0	0	0	0	441	440	0	325	50
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	256	2	102	0	0	0	0	441	440	0	325	50
Added Vol:	27	0	0	0	0	0	0	22	41	0	16	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	283	2	102	0	0	0	0	463	481	0	341	50
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	283	2	102	0	0	0	0	463	0	0	341	50
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	283	2	102	0	0	0	0	463	0	0	341	50
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	283	2	102	0	0	0	0	463	0	0	341	50
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.02	0.98	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	35	1765	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.16	0.06	0.06	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.09	0.03
Crit Moves:	****							****		****		
Green Time:	30.8	30.8	30.8	0.0	0.0	0.0	0.0	23.2	0.0	0.0	23.2	23.2
Volume/Cap:	0.32	0.11	0.11	0.00	0.00	0.00	0.00	0.32	0.00	0.00	0.23	0.07
Delay/Veh:	8.7	7.6	7.6	0.0	0.0	0.0	0.0	13.0	0.0	0.0	12.5	11.7
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	8.7	7.6	7.6	0.0	0.0	0.0	0.0	13.0	0.0	0.0	12.5	11.7
LOS by Move:	A	A	A	A	A	A	A	B	A	A	B	B
HCM2k95thQ:	7	2	2	0	0	0	0	6	0	0	4	1

Note: Queue reported is the number of cars per lane.

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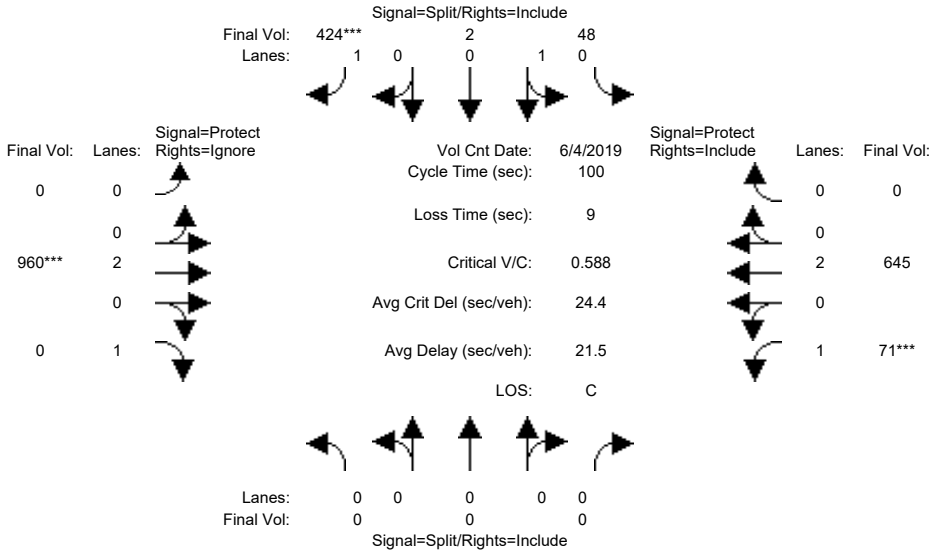
Level Of Service Computation Report
2000 HCM Operations (Future Volume Alternative)
Existing AM

Intersection #554: US 101 Southbound Ramps and Tennant Avenue



Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	48	2	424	0	960	205	71	645	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	48	2	424	0	960	205	71	645	0
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	48	2	424	0	960	205	71	645	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	48	2	424	0	960	0	71	645	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	48	2	424	0	960	0	71	645	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	48	2	424	0	960	0	71	645	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.96	0.04	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1728	72	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.03	0.03	0.24	0.00	0.25	0.00	0.04	0.17	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	41.1	41.1	41.1	0.0	42.9	0.0	7.0	49.9	0.0
Volume/Cap:	0.00	0.00	0.00	0.07	0.07	0.59	0.00	0.59	0.00	0.58	0.34	0.00
Delay/Veh:	0.0	0.0	0.0	17.9	17.9	24.2	0.0	22.4	0.0	51.9	15.2	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	17.9	17.9	24.2	0.0	22.4	0.0	51.9	15.2	0.0
LOS by Move:	A	A	A	B	B	C	A	C	A	D	B	A
HCM2k95thQ:	0	0	0	2	2	21	0	21	0	5	11	0

Note: Queue reported is the number of cars per lane.

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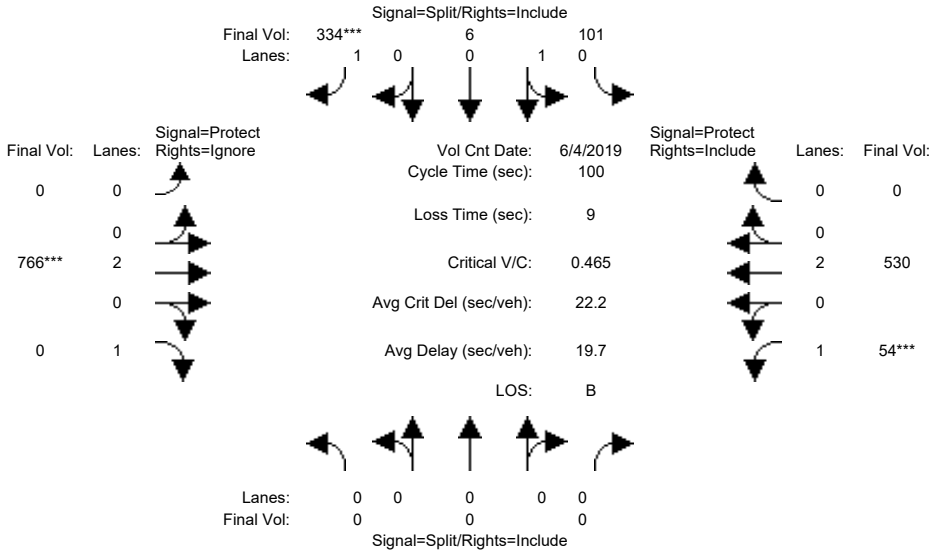
Level Of Service Computation Report
2000 HCM Operations (Future Volume Alternative)
Existing PM

Intersection #554: US 101 Southbound Ramps and Tennant Avenue



Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	101	6	334	0	766	428	54	530	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	101	6	334	0	766	428	54	530	0
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	101	6	334	0	766	428	54	530	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	101	6	334	0	766	0	54	530	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	101	6	334	0	766	0	54	530	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	101	6	334	0	766	0	54	530	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.94	0.06	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1699	101	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.06	0.06	0.19	0.00	0.20	0.00	0.03	0.14	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	40.9	40.9	40.9	0.0	43.1	0.0	7.0	50.1	0.0
Volume/Cap:	0.00	0.00	0.00	0.15	0.15	0.47	0.00	0.47	0.00	0.44	0.28	0.00
Delay/Veh:	0.0	0.0	0.0	18.7	18.7	22.1	0.0	20.5	0.0	47.1	14.5	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	18.7	18.7	22.1	0.0	20.5	0.0	47.1	14.5	0.0
LOS by Move:	A	A	A	B	B	C	A	C	A	D	B	A
HCM2k95thQ:	0	0	0	4	4	15	0	16	0	4	9	0

Note: Queue reported is the number of cars per lane.

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2000 HCM Operations (Future Volume Alternative)
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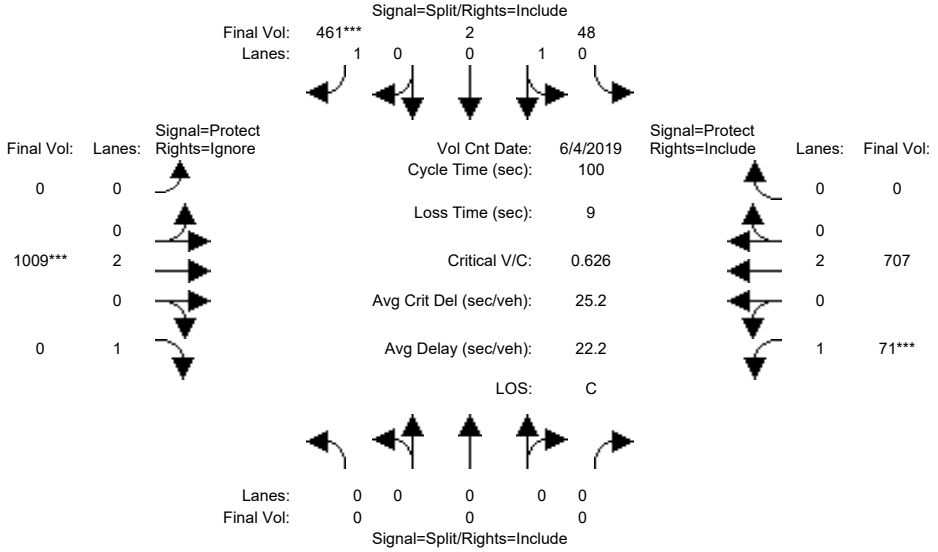
Intersection #554: US 101 Southbound Ramps and Tennant Avenue



Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	48	2	424	0	960	205	71	645	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	48	2	424	0	960	205	71	645	0
Added Vol:	0	0	0	0	0	37	0	49	24	0	62	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	48	2	461	0	1009	229	71	707	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	48	2	461	0	1009	0	71	707	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	48	2	461	0	1009	0	71	707	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	48	2	461	0	1009	0	71	707	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.96	0.04	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1728	72	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.03	0.03	0.26	0.00	0.27	0.00	0.04	0.19	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	41.8	41.8	41.8	0.0	42.2	0.0	7.0	49.2	0.0
Volume/Cap:	0.00	0.00	0.00	0.07	0.07	0.63	0.00	0.63	0.00	0.58	0.38	0.00
Delay/Veh:	0.0	0.0	0.0	17.4	17.4	24.7	0.0	23.6	0.0	51.9	16.0	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	17.4	17.4	24.7	0.0	23.6	0.0	51.9	16.0	0.0
LOS by Move:	A	A	A	B	B	C	A	C	A	D	B	A
HCM2k95thQ:	0	0	0	2	2	23	0	23	0	5	13	0

Note: Queue reported is the number of cars per lane.

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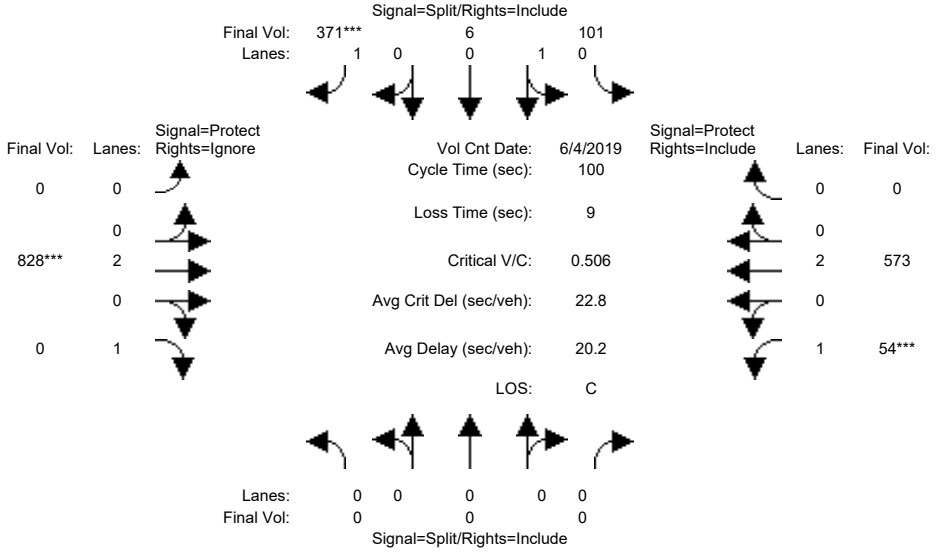
2000 HCM Operations (Future Volume Alternative)
Existing + Project PM

Intersection #554: US 101 Southbound Ramps and Tennant Avenue



Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	101	6	334	0	766	428	54	530	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	101	6	334	0	766	428	54	530	0
Added Vol:	0	0	0	0	0	37	0	62	39	0	43	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	101	6	371	0	828	467	54	573	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	101	6	371	0	828	0	54	573	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	101	6	371	0	828	0	54	573	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	101	6	371	0	828	0	54	573	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.94	0.06	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1699	101	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.06	0.06	0.21	0.00	0.22	0.00	0.03	0.15	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	41.4	41.4	41.4	0.0	42.6	0.0	7.0	49.6	0.0
Volume/Cap:	0.00	0.00	0.00	0.14	0.14	0.51	0.00	0.51	0.00	0.44	0.30	0.00
Delay/Veh:	0.0	0.0	0.0	18.3	18.3	22.4	0.0	21.4	0.0	47.1	15.1	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	18.3	18.3	22.4	0.0	21.4	0.0	47.1	15.1	0.0
LOS by Move:	A	A	A	B	B	C	A	C	A	D	B	A
HCM2k95thQ:	0	0	0	4	4	17	0	18	0	4	10	0

Note: Queue reported is the number of cars per lane.

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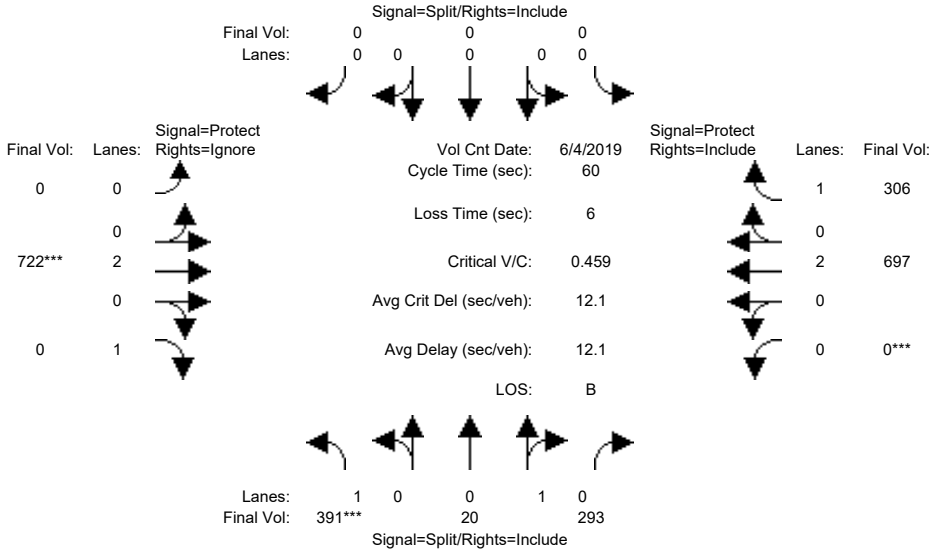
2000 HCM Operations (Future Volume Alternative)
2035 General Plan No Project AM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	391	20	293	0	0	0	0	722	602	0	697	306
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	391	20	293	0	0	0	0	722	602	0	697	306
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	391	20	293	0	0	0	0	722	602	0	697	306
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	391	20	293	0	0	0	0	722	0	0	697	306
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	391	20	293	0	0	0	0	722	0	0	697	306
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	391	20	293	0	0	0	0	722	0	0	697	306
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.06	0.94	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	115	1685	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.22	0.17	0.17	0.00	0.00	0.00	0.00	0.19	0.00	0.00	0.18	0.17
Crit Moves:	****							****		****		
Green Time:	29.2	29.2	29.2	0.0	0.0	0.0	0.0	24.8	0.0	0.0	24.8	24.8
Volume/Cap:	0.46	0.36	0.36	0.00	0.00	0.00	0.00	0.46	0.00	0.00	0.44	0.42
Delay/Veh:	10.6	9.8	9.8	0.0	0.0	0.0	0.0	12.9	0.0	0.0	12.8	12.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	10.6	9.8	9.8	0.0	0.0	0.0	0.0	12.9	0.0	0.0	12.8	12.9
LOS by Move:	B	A	A	A	A	A	A	B	A	A	B	B
HCM2k95thQ:	11	8	8	0	0	0	0	9	0	0	10	9

Note: Queue reported is the number of cars per lane.

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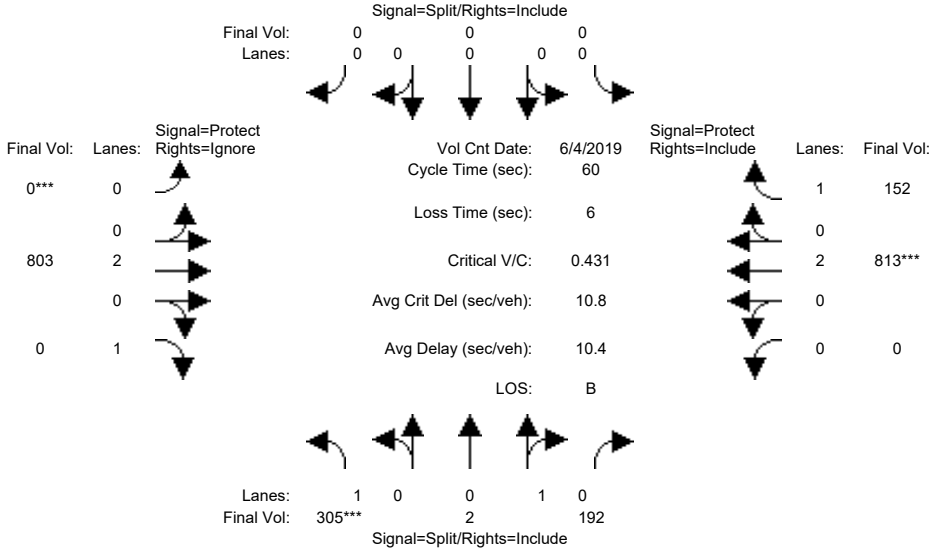
Level Of Service Computation Report
2000 HCM Operations (Future Volume Alternative)
2035 General Plan No Project PM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	305	2	192	0	0	0	0	803	440	0	813	152
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	305	2	192	0	0	0	0	803	440	0	813	152
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	305	2	192	0	0	0	0	803	440	0	813	152
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	305	2	192	0	0	0	0	803	0	0	813	152
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	305	2	192	0	0	0	0	803	0	0	813	152
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	305	2	192	0	0	0	0	803	0	0	813	152
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.01	0.99	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	19	1781	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.17	0.11	0.11	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.21	0.09
Crit Moves:	****						****				****	
Green Time:	24.2	24.2	24.2	0.0	0.0	0.0	0.0	29.8	0.0	0.0	29.8	29.8
Volume/Cap:	0.43	0.27	0.27	0.00	0.00	0.00	0.00	0.43	0.00	0.00	0.43	0.18
Delay/Veh:	13.3	12.1	12.1	0.0	0.0	0.0	0.0	9.8	0.0	0.0	9.9	8.4
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	13.3	12.1	12.1	0.0	0.0	0.0	0.0	9.8	0.0	0.0	9.9	8.4
LOS by Move:	B	B	B	A	A	A	A	A	A	A	A	A
HCM2k95thQ:	9	5	5	0	0	0	0	9	0	0	10	4

Note: Queue reported is the number of cars per lane.

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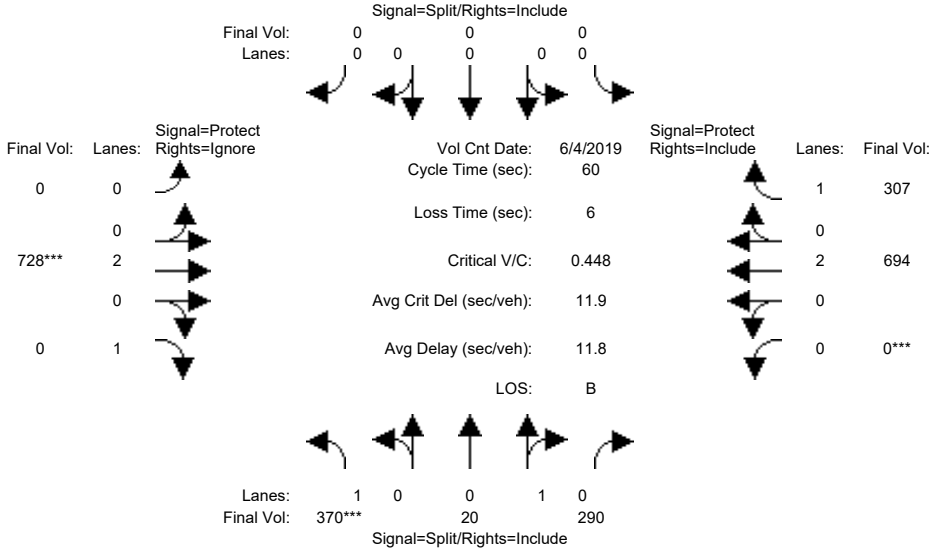
2000 HCM Operations (Future Volume Alternative)
2035 General Plan + Project AM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	370	20	290	0	0	0	0	728	602	0	694	307
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	370	20	290	0	0	0	0	728	602	0	694	307
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	370	20	290	0	0	0	0	728	602	0	694	307
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	370	20	290	0	0	0	0	728	0	0	694	307
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	370	20	290	0	0	0	0	728	0	0	694	307
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	370	20	290	0	0	0	0	728	0	0	694	307
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.06	0.94	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	116	1684	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.21	0.17	0.17	0.00	0.00	0.00	0.00	0.19	0.00	0.00	0.18	0.18
Crit Moves:	****							****		****		
Green Time:	28.3	28.3	28.3	0.0	0.0	0.0	0.0	25.7	0.0	0.0	25.7	25.7
Volume/Cap:	0.45	0.36	0.36	0.00	0.00	0.00	0.00	0.45	0.00	0.00	0.43	0.41
Delay/Veh:	11.0	10.4	10.4	0.0	0.0	0.0	0.0	12.3	0.0	0.0	12.2	12.3
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	11.0	10.4	10.4	0.0	0.0	0.0	0.0	12.3	0.0	0.0	12.2	12.3
LOS by Move:	B	B	B	A	A	A	A	B	A	A	B	B
HCM2k95thQ:	10	8	8	0	0	0	0	9	0	0	9	9

Note: Queue reported is the number of cars per lane.

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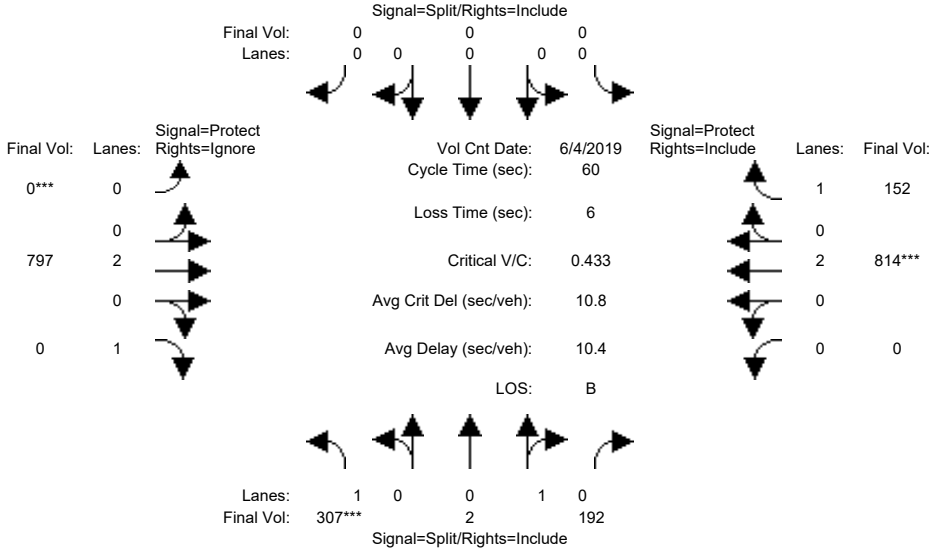
2000 HCM Operations (Future Volume Alternative)
2035 General Plan + Project PM

Intersection #344: US 101 Northbound Ramps and Tennant Avenue



Street Name:	US 101 Northbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	10	10	10	0	0	0	0	10	10	0	10	10
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	307	2	192	0	0	0	0	797	440	0	814	152
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	307	2	192	0	0	0	0	797	440	0	814	152
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	307	2	192	0	0	0	0	797	440	0	814	152
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	307	2	192	0	0	0	0	797	0	0	814	152
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	307	2	192	0	0	0	0	797	0	0	814	152
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	307	2	192	0	0	0	0	797	0	0	814	152
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	0.95	0.95	0.92	1.00	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	1.00	0.01	0.99	0.00	0.00	0.00	0.00	2.00	1.00	0.00	2.00	1.00
Final Sat.:	1750	19	1781	0	0	0	0	3800	1750	0	3800	1750
Capacity Analysis Module:												
Vol/Sat:	0.18	0.11	0.11	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.21	0.09
Crit Moves:	****						****				****	
Green Time:	24.3	24.3	24.3	0.0	0.0	0.0	0.0	29.7	0.0	0.0	29.7	29.7
Volume/Cap:	0.43	0.27	0.27	0.00	0.00	0.00	0.00	0.42	0.00	0.00	0.43	0.18
Delay/Veh:	13.3	12.1	12.1	0.0	0.0	0.0	0.0	9.8	0.0	0.0	9.9	8.5
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	13.3	12.1	12.1	0.0	0.0	0.0	0.0	9.8	0.0	0.0	9.9	8.5
LOS by Move:	B	B	B	A	A	A	A	A	A	A	A	A
HCM2k95thQ:	9	5	5	0	0	0	0	9	0	0	10	4

Note: Queue reported is the number of cars per lane.

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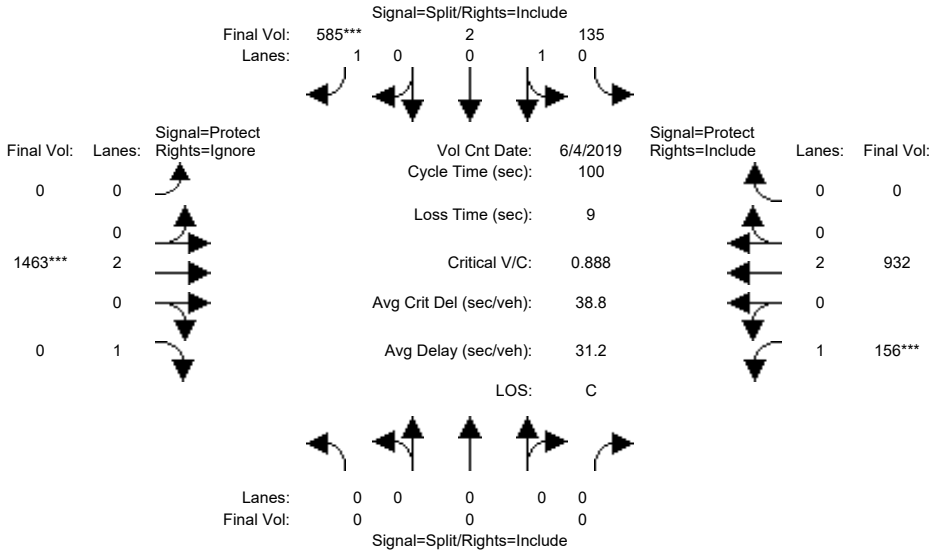
2000 HCM Operations (Future Volume Alternative)
2035 General Plan No Project AM

Intersection #554: US 101 Southbound Ramps and Tennant Avenue



Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	135	2	585	0	1463	269	156	932	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	135	2	585	0	1463	269	156	932	0
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	135	2	585	0	1463	269	156	932	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	135	2	585	0	1463	0	156	932	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	135	2	585	0	1463	0	156	932	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	135	2	585	0	1463	0	156	932	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.99	0.01	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1774	26	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.08	0.08	0.33	0.00	0.39	0.00	0.09	0.25	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	37.6	37.6	37.6	0.0	43.3	0.0	10.0	53.4	0.0
Volume/Cap:	0.00	0.00	0.00	0.20	0.20	0.89	0.00	0.89	0.00	0.89	0.46	0.00
Delay/Veh:	0.0	0.0	0.0	21.2	21.2	43.2	0.0	32.4	0.0	82.5	14.6	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	21.2	21.2	43.2	0.0	32.4	0.0	82.5	14.6	0.0
LOS by Move:	A	A	A	C	C	D	A	C	A	F	B	A
HCM2k95thQ:	0	0	0	6	6	37	0	40	0	11	16	0

Note: Queue reported is the number of cars per lane.

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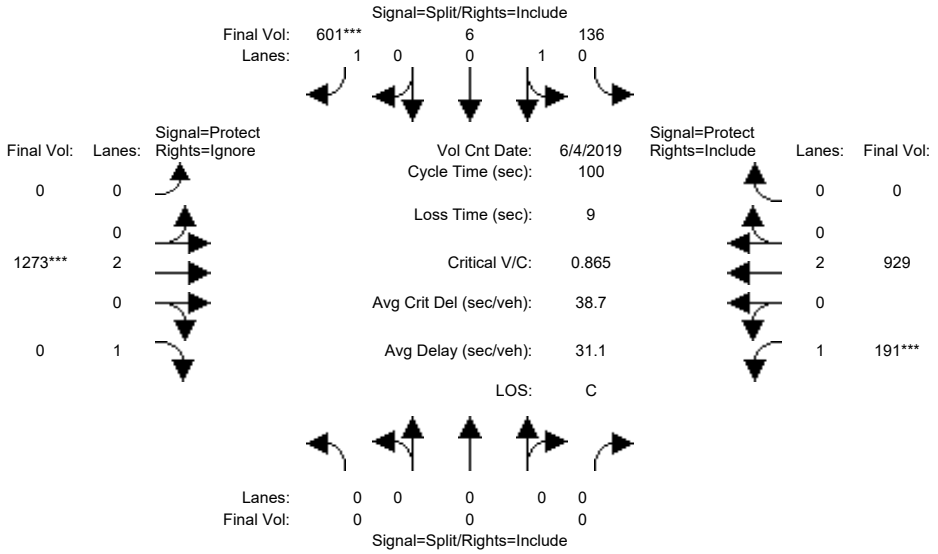
2000 HCM Operations (Future Volume Alternative)
2035 General Plan No Project PM

Intersection #554: US 101 Southbound Ramps and Tennant Avenue



Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	136	6	601	0	1273	529	191	929	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	136	6	601	0	1273	529	191	929	0
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	136	6	601	0	1273	529	191	929	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	136	6	601	0	1273	0	191	929	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	136	6	601	0	1273	0	191	929	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	136	6	601	0	1273	0	191	929	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.96	0.04	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1724	76	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.08	0.08	0.34	0.00	0.34	0.00	0.11	0.24	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	39.7	39.7	39.7	0.0	38.7	0.0	12.6	51.3	0.0
Volume/Cap:	0.00	0.00	0.00	0.20	0.20	0.87	0.00	0.87	0.00	0.87	0.48	0.00
Delay/Veh:	0.0	0.0	0.0	19.9	19.9	38.8	0.0	33.9	0.0	71.0	15.9	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	19.9	19.9	38.8	0.0	33.9	0.0	71.0	15.9	0.0
LOS by Move:	A	A	A	B	B	D	A	C	A	E	B	A
HCM2k95thQ:	0	0	0	6	6	36	0	35	0	13	17	0

Note: Queue reported is the number of cars per lane.

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2000 HCM Operations (Future Volume Alternative)
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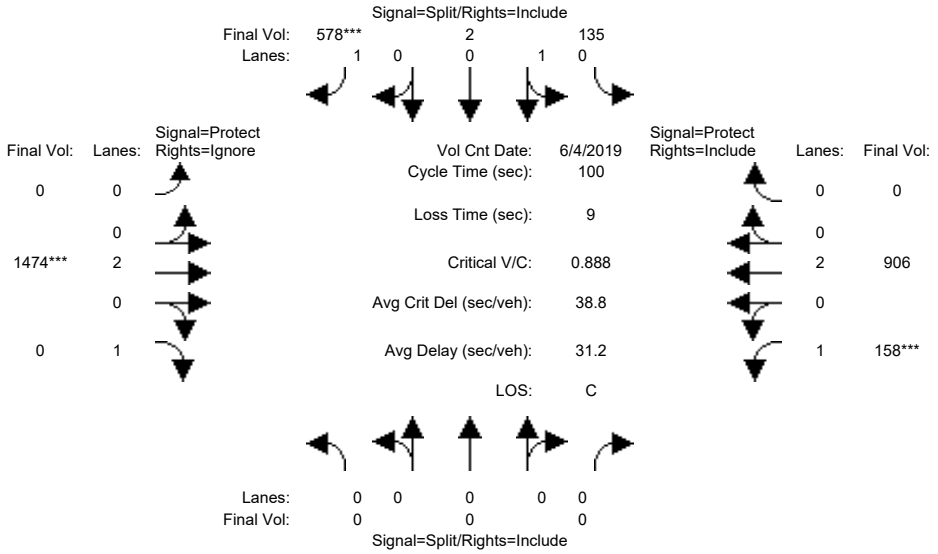
Intersection #554: US 101 Southbound Ramps and Tennant Avenue



Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	135	2	578	0	1474	277	158	906	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	135	2	578	0	1474	277	158	906	0
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	135	2	578	0	1474	277	158	906	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	135	2	578	0	1474	0	158	906	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	135	2	578	0	1474	0	158	906	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	135	2	578	0	1474	0	158	906	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.99	0.01	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1774	26	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.08	0.08	0.33	0.00	0.39	0.00	0.09	0.24	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	37.2	37.2	37.2	0.0	43.7	0.0	10.2	53.8	0.0
Volume/Cap:	0.00	0.00	0.00	0.20	0.20	0.89	0.00	0.89	0.00	0.89	0.44	0.00
Delay/Veh:	0.0	0.0	0.0	21.5	21.5	43.6	0.0	32.2	0.0	82.1	14.2	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	21.5	21.5	43.6	0.0	32.2	0.0	82.1	14.2	0.0
LOS by Move:	A	A	A	C	C	D	A	C	A	F	B	A
HCM2k95thQ:	0	0	0	6	6	36	0	40	0	12	15	0

Note: Queue reported is the number of cars per lane.

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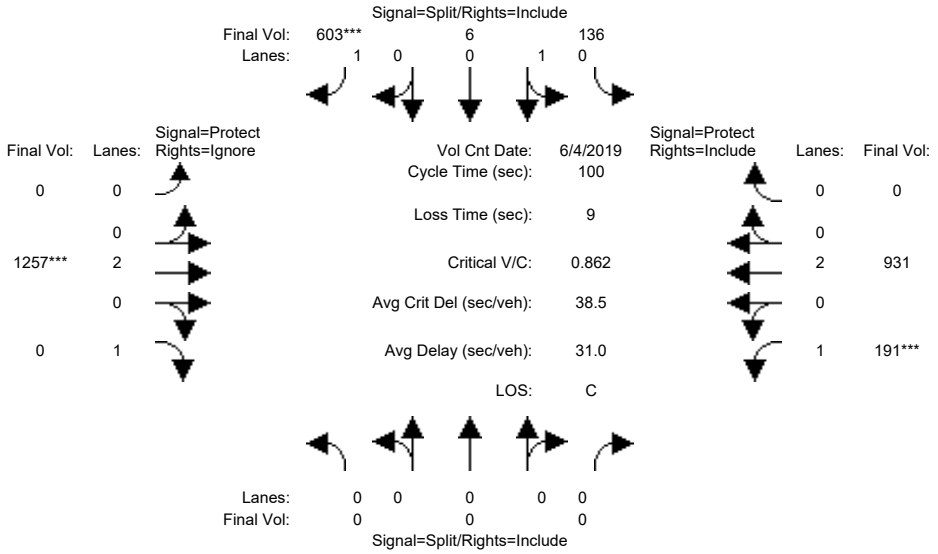

Street Name:	US 101 Southbound Ramps						Tennant Avenue					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Min. Green:	0	0	0	10	10	10	0	10	10	7	10	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Volume Module: >> Count Date: 4 Jun 2019 <<												
Base Vol:	0	0	0	136	6	603	0	1257	507	191	931	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	136	6	603	0	1257	507	191	931	0
Added Vol:	0	0	0	0	0	0	0	0	0	0	0	0
PasserByVol:	0	0	0	0	0	0	0	0	0	0	0	0
Initial Fut:	0	0	0	136	6	603	0	1257	507	191	931	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
PHF Volume:	0	0	0	136	6	603	0	1257	0	191	931	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	136	6	603	0	1257	0	191	931	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00
FinalVolume:	0	0	0	136	6	603	0	1257	0	191	931	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.92	1.00	0.92	0.95	0.95	0.92	0.92	1.00	0.92	0.92	1.00	0.92
Lanes:	0.00	0.00	0.00	0.96	0.04	1.00	0.00	2.00	1.00	1.00	2.00	0.00
Final Sat.:	0	0	0	1724	76	1750	0	3800	1750	1750	3800	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.08	0.08	0.34	0.00	0.33	0.00	0.11	0.25	0.00
Crit Moves:						****		****		****		
Green Time:	0.0	0.0	0.0	40.0	40.0	40.0	0.0	38.4	0.0	12.7	51.0	0.0
Volume/Cap:	0.00	0.00	0.00	0.20	0.20	0.86	0.00	0.86	0.00	0.86	0.48	0.00
Delay/Veh:	0.0	0.0	0.0	19.7	19.7	38.2	0.0	33.9	0.0	70.3	16.1	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	19.7	19.7	38.2	0.0	33.9	0.0	70.3	16.1	0.0
LOS by Move:	A	A	A	B	B	D	A	C	A	E	B	A
HCM2k95thQ:	0	0	0	6	6	36	0	35	0	13	17	0

Note: Queue reported is the number of cars per lane.

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