

MEMORANDUM

DATE June 24, 2020

TO Attn: Yolande Barial Knight, Clerk of the Board
East Bay Regional Park District, Board of Directors
Robert E. Doyle, General Manager
2950 Peralta Oaks Court
Oakland, California 94605

FROM PlaceWorks

SUBJECT Errata to the Concord Hills Land Use Plan Final EIR

This Errata to the Concord Hills Land Use Plan Final Environmental Impact Report (EIR) is provided in response to late public comments. This Errata further documents and explains the trip generation calculations supporting the air quality, GHG, and traffic analysis in the EIR. It also includes revisions to the EIR.

Addition - Trip Generation Data

DRAFT EIR TRIP AND VISITOR ESTIMATES

Draft EIR Trip Estimates

Trip estimates for the proposed project were calculated based off of the visitor estimate prepared for the project and reflects the assumption that 10 percent of visitors would walk or bike to the site. Table 1 presents the trip estimates utilized in the Draft EIR analysis.

As reflected in the sections below, the trip data utilized in the Draft EIR (and shown in Table 1) are based on conservative (i.e., high) visitor estimates and are higher than trip data based on the Institute of Transportation Engineers (ITE) Trip Generation Manual. Therefore, the trip data used in the Draft EIR analysis is considered to be robust and more than reasonable to support the conclusions in the Draft EIR, and no revisions to the Draft EIR are required.

TABLE 1 DRAFT EIR TRIP GENERATION

	Number		Trip Generation			
	Weekday	Weekend	Weekday Daily	AM Peak		Typical Weekend Trips
				Hour	PM Peak Hour	
Employees	52	52	104	6	14	104
Visitors	686^a	1,932	483	29	63	1,199
Family/Group ^b	--	--	113	7	15	638
Bus ^c	--	--	6	0	1	6
Non-Family/Group ^d	--	--	364	22	47	555
Total	--	--	587	35	77	1,303

Notes:

a. Visitor data in the Draft EIR (966 weekday, 2,398 weekend) reflected total site usage of all facilities and did not account for visitors who would utilize more than one facility. For the purposes of trip generation, the visitor number assumes the following visitors are making internal trips (i.e. they are accessing another on-site use during their visit): Small Picnic, Group Picnic (weekend only), Group Campsite, Backcountry Campsite, and Phase 3 Increased Joint Visitor Center.

b. Assumes one third of weekday visitors and two thirds of weekend visitors are families and/or group carpoolers (i.e. 4 visitors per car).

c. Assumes three buses or school buses will visit the site daily (accommodating approximately 100 people).

d. Assumes 2 people per car for all other visitors.

Source: PlaceWorks, ESA, 2020.

Visitor Estimates

The visitor estimates on which the Draft EIR trip estimates are based are in Table 4 at the end of this Errata. The visitor estimates are conservatively high, as described further below. By using the visitor estimates as the basis of trip calculations, the EIR reflects a conservative approach.

The assumption that 10 percent of park visitors at full buildout would walk or bike to the Regional Park is conservative, in that a higher percentage of visitors can be reasonably expected to walk or bike to the park. As stated on page 3-39 of the Draft EIR:

While the majority of visitors would be expected to arrive by car, some visitors, especially those from adjoining residential neighborhoods, would arrive by bike or by walking. . . . Based on use patterns at existing regional parks with similar surroundings, the District anticipates that 20 percent, and ultimately as many as 50 percent, of visits would arrive on foot or on bikes. However, for the purposes of the analysis in this EIR, it is assumed that 10 percent of trips at full buildout are expected to arrive via transit or on bikes or on foot.

Visitor estimates were developed for each phase of the project buildout based on the anticipated demand and capacity of the proposed access features (including trail mileage and number of picnic

areas and other access features). Estimates considered visitation data from the National Park Service's nearby sites, District staffing projections for Land Bank Status and Phase 1, National Recreation and Park Association standards for estimating visitation, and visitation at other District facilities. All estimates were intentionally conservative (i.e. representing a "worst-case" scenario). For example, trail capacity was assumed to be 90 users per day per mile, based on National Recreation and Park Association standards for urban trails, rather than the standards for rural trails (the National Recreation and Park Association standard is 90 users per day per mile on urban trails and 40 users per day per mile on rural trails). Estimates for the Regional Park visitor center considered National Park Service data for visitation at nearby sites (ranging from 45,000 to 75,000 annual visitors) and assumed over 40,000 in Phase 2 and over 60,000 in Phase 3 for the visitor center alone. Estimates were also considered against visitation rates at other District parks. Based on 2016 visitation data, annual park visitation ranges from approximately 60,000 to over 1 million annually for parks with more amenities and attractions that are located in proximity to higher density areas. Concord Hills Regional Park will have important destinations such as the Joint Use Visitor Center but will primarily be used for passive recreation, and therefore would be expected to have visitation rates similar to other passive recreation areas such as Anthony Chabot Regional Park which received 419,000 visitors in 2016.

Whereas visitor data is calculated for park planning purposes based on anticipated visitor demand for planned features and amenities (e.g., anticipating the number of trail users, the number of parking spaces needed throughout the site at various facilities, the number and location of restrooms needed, etc), the trip data is calculated based on anticipated mode share and mobility patterns. As noted in Table 1, whereas visitor estimates reflect the total number of users of all facilities at the Regional Park, trip estimates account for the expectation that many visitors will utilize more than one facility during their visit. For example, a person using a campsite or picnic area will also utilize a trail during their visit. As mentioned in the notes in Table 1, for the purposes of trip generation, it was assumed that the following visitors are making internal trips (i.e., they are accessing another on-site use during their visit): Small Picnic, Group Picnic (weekend only), Group Campsite, Backcountry Campsite, and Phase 3 Increased Joint Visitor Center. (These visitor categories align with the categories used in the visitor estimates in Table 4 of this Errata.)

As further noted the references in Table 1, trip estimates also reflect that many visitors will travel to the site as groups or as families. It is assumed that one third of weekday and two thirds of weekend visitors will be making group trips. All other park visitors arriving via car are assumed to travel with two persons per vehicle. Many of the park facilities will be geared toward families and groups, such as the Visitor Center Complex multi-purpose room for community gatherings, amphitheater for outdoor programming, reservable group picnic areas and smaller informal picnic areas, and the proposed Diablo Center.

Additionally, trip estimates reflect that up to three buses will access the site daily. As shown on Figure 3-3 of the Draft EIR, the Regional Park is located in close proximity to many schools. As described above, the Regional Park would include many facilities geared toward and reservable for groups. In addition to the facilities noted above, the Regional Park would include many educational facilities and would be a desirable location for field trips. The proposed Visitor Center Complex would provide

information about the park and historic information about the Port Chicago Naval Magazine National Memorial. In addition, the Regional Park would provide magazine exhibit space, a War and Peace Interpretive Trail, outdoor classrooms, trails along historic rail corridors, overlooks, and a community orchard with educational programming.

Trip estimates also reflect the assumption that 10 percent of park visitors will walk or bike to the site. As described on page 3-39 of the Draft EIR, this assumption is conservatively low, as the District anticipates that up to half of visitors may ultimately walk or bike to the site. Moreover, trip estimates do not assume that any users will access the site via transit, despite the Land Use Plan's proposed connection to the Mount Diablo Creek Trail that is planned as a greenway to connect to North Concord/Martinez BART station. Again, this means the visitor and trip generation rates are remarkably conservative.

Lastly, the total visitation estimate for Phase 3 (560,909 total annual visitors) assumes that visitation will be greater than visitation to Anthony Chabot Regional Park, even though Chabot is located in much closer proximity to dense Bay Area communities and has numerous attractions compared to the Regional Park being analyzed in this EIR.

INSTITUTE OF TRANSPORTATION ENGINEERS TRIP GENERATION MANUAL

Trip generation calculations presented below that use the Institute of Transportation Engineers (ITE) Trip Generation Manual are based on the Land Use Plan's Recreation/Staging Units area of 126 acres.¹ Because land use categories for parks were revised in the 10th edition of the ITE Trip Generation Manual, the information below presents trip generation calculations for both the 9th and 10th editions.

ITE Trip Generation Manual, 10th Edition

Using standard trip rates from the most recent ITE Trip Generation Manual, 10th Edition, for a Public Park (land use category 411), which is defined in the manual as public parks owned by a municipal, county, State, or federal agency, the proposed project could be expected to generate 98 weekday daily trips (i.e., approximately six times lower than the trip data utilized for the Draft EIR and shown in Table 1). Please see Table 2.

¹ The trip generation estimates are based on the Recreation/Staging Units area of 126 acres as ITE's description of this land use category (411) acknowledged that park areas that are used more intensively varied across the studies considered and cautioned against use of acreage as an independent variable. The 126-acre area includes the area of park under trail use and expected to accommodate active and passive uses by park visitors. Given that the remaining 95 percent of the Regional Park is dedicated to conservation and is severely restricted for public access and use, applying the ITE trip generation rate to the 126 acres of park area was deemed appropriate and reasonable.

TABLE 2 TRIP GENERATION USING ITE TRIP GENERATION MANUAL, 10TH EDITION

Land Use	ITE Code	Size (Acres)	Rate per Acre			Trip Generation		
			Weekday Daily	AM Peak Hour	PM Peak Hour	Weekday	AM Peak Hour	PM Peak Hour
Public Park	411	126	0.78	0.02	0.11	98	3	14

Source: Institute of Transportation Engineers, Trip Generation Manual, 10th Edition, 2017.

ITE Trip Generation Manual, 9th Edition

Because land use categories for parks were revised in the 10th edition of the ITE Trip Generation Manual, and reflect a reduced rate per acre, the information below presents trip generation calculations for the 9th edition using two ITE land use categories.

As shown in Table 3, using standard trip rates for a Regional Park (land use category 417), the proposed project could be expected to generate 576 weekday daily trips (i.e., 10 trips fewer than the trip data utilized for the Draft EIR and shown in Table 1).

As shown in Table 3, using standard trip rates for a County Park (land use category 412), the proposed project could be expected to generate 287 weekday daily trips (i.e., less than half of the trips considered in the Draft EIR and shown in Table 1).

TABLE 3 TRIP GENERATION USING ITE TRIP GENERATION MANUAL, 9TH EDITION

Land Use	ITE Code	Size (Acres)	Rate per Acre			Trip Generation		
			Weekday Daily	AM Peak Hour	PM Peak Hour	Weekday	AM Peak Hour	PM Peak Hour
Regional Park	417	126	4.57	0.04	0.20	576	6	25
County Park	412	126	2.28	0.02	0.09	287	3	11

Source: Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, 2012.

TABLE 4 LAND USE PLAN ESTIMATE OF VISITOR USE

Phasing	Typical Visitation			Events			
	Weekday	Weekend	Annual	Event Size	Events/ Year	Annual Visitors	Annual Visitor
Land Bank Status	--	--	--	--	--	100	100
Naturalist-led Tours	--	--	--	5	20	100	100
Phase 1 – South of Baily Road	220	736	133,752	--	--	50	133,802
Trails	165	496	94,492	--	--	--	94,492
Group Picnic	25	75	14,300	--	--	--	14,300
Small Picnic	15	45	8,580	--	--	--	8,580
Group Campsite	10	100	13,000	--	--	--	13,000
Community Orchard	5	20	3,380	--	--	50	3,430
Phase 2 - Joint Visitor Center Complex and Initial Park Trails	564	1,766	330,222	--	--	2,250	332,472
Continued visitation from Phase 1	220	736	133,752	--	--	50	133,802
Trails - Phase 2	268	805	153,569	--	--	--	153,569
Joint Visitor Center and Associated Structures	75	225	42,900	--	--	--	42,900
<i>POCH Annual Commemorative Event</i>	--	--	--	1	1,000	1,000	1,000
<i>Mid-sized events</i>	--	--	--	4	300	1,200	1,200
Phase 3 - Build Out	1,074	2,665	556,309	--	--	4,600	560,909
Continued visitation from Phase 1 and Phase 2	564	1,766	330,222	--	--	--	332,472
Trails - Phase 3	200	600	114,417	--	--	--	114,417
Joint Visitor Center- Assumed increased use in Phase 3	225	56	64,350	--	--	--	65,550
POCH Annual Commemorative Event	--	--	--	1	1,000	1,000	1,000
Mid-sized events	--	--	--	4	300	1,200	1,200
Group Picnic	38	113	21,450	--	--	--	21,450
Small Picnic	18	53	10,010	--	--	--	10,010
Backcountry Campsite	13	25	5,850	--	--	--	5,850
The Diablo Center Education/Event Space	18	53	10,010	12	200	2,400	12,410

Source: Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, 2012.

Revisions to the EIR

The text below presents changes to the Draft EIR that resulted from preparation of responses to comment letters received from Farella Braun + Martel and the California Native Plant Society. In each case, the page and location on the page in the Draft EIR is presented, followed by the text revision. Underline text represents language that has been added to the EIR; text with ~~strikethrough~~ has been deleted from the EIR. The revisions in this chapter do not require recirculation of the Draft EIR because they do not constitute “significant new information” under Section 15088.5 of the CEQA Guidelines.

Table 3-3 on page 3-40 of the Draft EIR is hereby amended as follows:

TABLE 3-3 TOTAL PROJECTED VISITORS PER DAY BY MODE (TYPICAL DAY AT FULL BUILDOUT, 2050)

Mode	Typical Weekday Visitors	Typical Weekend Visitors
Auto	1,018	2,450
Bike or Walk	107	266
Total <u>Visitors</u> Trips	1,125	2,716

Note: These totals include staff ~~trips~~.

Source: PlaceWorks, 2018.

The last paragraph on page 4.3-39, continuing onto page 4.3-40, of the Draft EIR is hereby amended as follows:

Although no special-status plant species have been identified on the project site, there is potential for one species with a California rare plant ranking of Rank 1B (rare, threatened, or endangered in California and elsewhere), big tarplant, to be present on the site. Conservation of CRPR 1B species is important because their populations contribute to preserving the genetic resources for the species and ensuring persistence of rare species in the county and state. Thus, the proposed Land Use Plan, which has been prepared consistent with the Long-Term Management Plan (LTMP), includes a management prescription (identified as BIO 25)⁵¹ to monitor and document the presence and relative abundance of special-status species, including big tarplant, within the project site over time and inform management to aid this species.⁵² In addition, the proposed Land Use Plan includes management prescriptions BIO 17 through BIO 20 to minimize the spread of existing nonnative invasive plants and prevent the unintentional introduction and spread of invasive plant species that can degrade the value of habitat for native species (see also the discussion under Impact BIO-2).

⁵¹ Concord Hills Regional Park Land Use Plan, 2019, Table 4-1

⁵² City of Concord and East Bay Regional Park District, December 3, 2018, Concord Reuse Project Area Plan On-Site Conservation Lands Long-Term Management Plan, prepared by H.T. Harvey & Associates.

Mitigation Measure BIO-1.1a on page 4.3-40 of the Draft EIR was revised in the Final EIR; the text is hereby restored to its original language, as follows:

Mitigation Measure BIO-1.1a: Pre-Activity Survey. A focused survey for big tarplant will be conducted within suitable habitat in areas of the project site that may experience ground disturbing activities. The surveys will be conducted prior to initial ground disturbance and during the appropriate blooming period (late summer and early fall). The survey area will include all suitable habitat that may be impacted as well as a 50-foot buffer. Surveys are to be conducted in a year with near-average or above-average precipitation. The purpose of the surveys will be to assess the presence or absence of big tarplant. If this species is not found in the survey area, then no further mitigation will be warranted. If big tarplant is found in the impact area, then Mitigation Measures BIO-1.1b and BIO-1.1c will be implemented.

Mitigation Measure BIO-1.1c on page 4.3-41 of the Draft EIR is hereby amended as follows:

Mitigation Measure BIO-1.1c: ~~Implementation of Plan Management Prescriptions BIO 8 through BIO 16. Management of Existing Populations.~~ The destruction of populations of big tarplant on the project site shall be mitigated by specifically managing portions of the Regional Park's open grasslands within designated Natural Units that support for this species, or occupied habitat on other District lands. The vast majority of the Los Medanos Hills and areas located southeast of Bailey Road are not proposed for development. These same areas represent the most suitable habitat for big tarplant on the project site. A review of the regional occurrences of this species reported in various databases reveals that off-site populations generally occur on specific soil types (namely Altamont clay, Altamont-Fontana Complex, and Diablo clay). These same soil types underlie much of the Natural Units within the project boundaries. As such, in the event that big tarplant is impacted by construction activities, the species may also be present within areas that will not be impacted. Either within the project site or on other District lands that support big tarplant, the District will manage and monitor the population in perpetuity as part of the District's long-term management of the area supporting big tarplant. Such management will occur at a 2:1 (mitigation:impact) ratio in terms of the number of individual plants. ~~specific habitat management measures (i.e., Plan management prescriptions BIO 8 through BIO 16 identified in Chapter 4 of the proposed Land Use Plan) to enhance the open space for the California red legged frog, California tiger salamander, and burrowing owl, will also benefit the germination, growth, and long term viability of populations of the big tarplant, if it is present.~~

Mitigation Measure BIO-3a on page 4.3-58 of the Draft EIR is hereby amended as follows:

Mitigation Measure BIO-3a: Permitting. Prior to placing any fill in jurisdictional wetlands and/or other waters of the U.S. or state, the District will provide the necessary permit application/notification materials to the USACE for a Clean Water Act Section 404 permit, to the RWQCB for Clean Water Act Section 401 water quality certification, and to the CDFW for a Fish and Game Code Section 1602 Streambed Alteration Agreement, as applicable (e.g.,

impacts to jurisdictional wetlands that are not in a channel may not necessitate CDFW notification). The District will comply with all conditions of these permits/ agreements when performing the work; ~~for example, if any~~ At a minimum, the District shall provide compensatory mitigation at a ratio of at least 1:1 (acres lost to acres preserved or restored). Compensatory mitigation shall ensure that replacement wetlands or waters provide equal or greater habitat and aquatic function and value either on-site or off-site as required by one or more permit/agreement, then the District will provide such mitigation in accordance with permit/agreement requirements.

The section “Construction Noise and Vibration” on page 4.11-18, continuing onto page 4.11-19, of the Draft EIR is hereby amended as follows:

Like stationary-source noise, construction noise and vibration impacts are confined to a localized area of impact. Cumulative impacts would only occur if other projects were being constructed in the immediate vicinity of the project’s construction activities at the same time as the project. Construction noise and vibration associated with implementation of the proposed Plan would be phased over 31 years. Proposed project construction would involve a limited construction effort in relation to the 2,543-acre proposed project site, due both to the relatively small development area (35 acres) and because many proposed facilities would involve adaptive reuse of existing buildings or reuse of parts of existing buildings. In addition, construction sites would be scattered throughout the site. The proposed visitor center is likely to be the closest portion of the Plan that would involve the construction of buildings and grading to potential future developments under the Concord Reuse Project. As discussed above, at a distance of 100 feet from a construction or demolition site, 8-hour average noise from the various types of equipment will, at times, range from 73 to 84 dBA. At a distance of over 350 feet from potential future development under the Concord Reuse Project (and conservatively not accounting for any shielding or ground absorption), construction noise levels would range from 62 to 73 dBA and would not exceed the FTA threshold of 80 dBA. At this distance, construction noise from buildout of the proposed Regional Park would not contribute substantially to a cumulative construction noise or vibration impact.

The proposed facility closest to future residents on the Faria/Southwest Hills development (which is located within the City of Pittsburg) would be the Eagle’s Nest Backcountry Campsite. Although the specific location of the campsite has not yet been determined, based on the Land Use Plan, the campsite would be approximately 250 to 500 feet from the project site boundary. As described on page 3-31 of the Draft EIR, this campsite would be accessible only by trail. Therefore, its use would be relatively low intensity, and heavy construction equipment and visitor vehicles would not be able to access the site. Consequently, no loud construction or land use noises would occur from that site. Construction of the Eagle’s Nest Backcountry Campsite would not involve the use of a substantial number of large off-road construction equipment. Construction activities are anticipated to include a minor amount of site clearing and grading. No buildings would be created; the only structure would be a vault restroom, which is a small free-standing structure. The City of Pittsburg Municipal Code Chapter 9.44 prohibits the use of pile driving, steam shovels, pneumatic hammers, derrick, and electric hoists during the hours of 10:00 p.m. and 7:00 a.m. None of these pieces of equipment are

anticipated for construction of Eagle's Nest Backcountry Campsite and nighttime work is not proposed. Further, Section 18.82.040 of the Pittsburg Municipal Code limits construction noise to 65 decibels at the property line of the receiving sensitive use. The most noise-intensive construction equipment anticipated for use at the Eagle's Nest Backcountry Campsite is a backhoe. The reference noise level for backhoes from the Federal Highway Administration Roadway Construction Noise Model is 78 dBA Lmax (maximum A-weighted decibels) at a distance of 50 feet (FHWA 2008). At a distance of approximately 250 feet (the shortest potential distance from the campsite to the property line) from the proposed Eagle's Nest Backcountry Campsite to the proposed Faria/Southwest Hills Annexation Project, construction noise would attenuate to 64 dBA Lmax or less and would therefore not exceed the City of Pittsburg's limit of 65 decibels. This computation conservatively does not factor in the dense vegetation that exists between the proposed campsite and Faria/Southwest Hills Annexation Project or topographical features which would provide acoustical shielding and further reduce construction noise levels. Therefore, this impact is considered to be *less than significant*.