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San Mateo County Parks Department  
455 County Center, Number 4  
Redwood City, California, 94063  
Via email: [ncalderon@smcgov.org](mailto:ncalderon@smcgov.org)

**Subject:**

**Flood Park Landscape Plan Revisions Noise Analysis**

Dear Mr. Calderon:

This letter presents Rincon's analysis of noise impacts from revisions to the Flood Park Landscape Plan for the 24.5-acre Flood Park located in Menlo Park, in San Mateo County, California. An updated Landscape Plan ("2022 Landscape Plan") was compared with the Plan as analyzed in the certified Final EIR + Errata that was certified by the Board of Supervisors in 2020. CEQA Guidelines Section 15162 states that no additional CEQA review is required for project changes for which do not result in a new significant impact or a substantial increase in the severity of an identified significant impact.

## Project Background

Environmental review for the Flood County Park Landscape Plan began in 2017 with the original Preferred Alternative Landscape Plan. During the comment period for the Draft EIR there was public concern regarding the proximity of the soccer/lacrosse sports field to the park boundary and residences on Del Norte Avenue. To address these concerns, the location of the soccer/lacrosse field was moved closer to Bay Road in the southern portion of the park and the baseball field was expanded to include a multi-use field. The 2020 Landscape Plan was adopted, and the associated Final EIR was certified, by the County Board of Supervisors in November 2020. The adopted 2020 Landscape Plan is shown in attached Figure 1.

## Project Description

San Mateo County Parks Department is proposing a second revision to the Flood Park Landscape Plan (2022 Landscape Plan) to relocate the soccer/lacrosse field from outside of the oak woodland to east of the proposed baseball/multi-use field. The tennis courts and sand volleyball courts would be moved to the southern portion of the Park and the basketball court would be moved to the east. The baseball outfield would also be reduced to 315 feet allowing the soccer/lacrosse field to be used concurrent with the baseball field. Relocating the recreational facilities would preserve native trees and create better flow by grouping similar amenities. The 100-foot buffer for recreational facilities along the eastern edge of the Park would be maintained. The 2022 Landscape Plan is shown in attached Figure 2.



## Noise Analysis

As analyzed in the Final EIR for the project, the operation of recreational facilities proposed in the 2020 Landscape Plan would add new sources of noise at Flood County Park. Specifically, the sports fields would include organized practice and games that generate noise. This analysis compares the findings of the noise analysis in the Final EIR and Errata to the noise that would result from the revised 2022 Landscape Plan to determine if there would be new or substantially elevated noise impacts. This analysis focuses on noise from the athletic fields, which would have higher noise levels than the relocated tennis courts, sand volleyball courts, and basketball court.

### 2020 Landscape Plan Noise

The 2020 Landscape Plan included two athletic fields: (1) a multi-use field for baseball/softball, soccer, and lacrosse, and (2) a separate soccer/lacrosse field. Noise levels from the multi-use/baseball field and soccer/lacrosse field, as described in the Final EIR and Errata, are shown in Table 1. The distance of 150 feet to the nearest residences was representative of the nearest activity on the proposed field with respect to these residences, as well as of spectators around the field.

**Table 1 2020 Landscape Plan Athletic Field Noise Levels**

Noise Receiver	Distance	Noise Level at Receivers (L <sub>eq</sub> )
<b>Multi-Use/Baseball Field</b>		
Residences on Hedge Road	175 feet	59
Haven House Residences	240 feet	56
Residences on Del Norte Avenue	300 feet	54
<b>Soccer/Lacrosse Field</b>		
Residences on Del Norte Avenue	350 feet	53
Haven House Residences	475 feet	50
Residences on Bay Road	150 feet	61

Source: Final EIR and Errata for the Flood Park Landscape Plan

In addition, the Final EIR and Errata for the 2020 Landscape Plan determined that combined noise levels from soccer or lacrosse at both fields would exceed existing ambient noise levels at surrounding residences by up to 4 dBA. Impacts were determined to be less than significant with implementation of Mitigation Measures N-3(A) and N-3(B) to restrict the hours of operation for the fields and the use of instantaneous noise sources, such as air horns.



## 2022 Landscape Plan Noise

Under the proposed 2022 Landscape Plan, the soccer/lacrosse field would be located closer to residences than in the approved 2020 Plan, as shown in Table 2. Therefore, a distance of 100 feet to the nearest residences is representative of the nearest activity on the proposed athletic fields with respect to these residences, as well as of spectators around the field.

The primary athletic activities of concern with regard to noise are soccer and lacrosse due to their proximity to residences and the prevalence of impulse sounds such as whistles, shouts, and air horns. Based on noise measurements taken in 2016 at a playoff lacrosse game with 162 spectators at a representative suburban Bay Area site, Marin Catholic High School, a lacrosse game generates overall noise levels of 65-70 dBA  $L_{eq}$  at approximately 50 feet from the edge of the field while a lacrosse practice creates noise levels of 55-60 dBA  $L_{eq}$  at this distance (RGD Acoustics 2016). Noise levels from the lacrosse playoff game are also representative of noise levels from soccer games (RGD Acoustics 2016). These noise levels provide a conservative estimate of lacrosse noise of 70 dBA  $L_{eq}$  because it reflects substantially more spectator activity than anticipated at athletic events at Flood County Park. Based on a noise attenuation of 6 dBA per doubling distance, noise levels from athletic activity are estimated for lacrosse or soccer activity during games with spectators on the athletic fields as shown in Table 2.

**Table 2 2022 Landscape Plan Athletic Field Noise Levels**

Noise Receiver	Distance	Noise Level at Receivers ( $L_{eq}$ )
<b>Multi-Use/Baseball Field</b>		
Residences on Hedge Road	175 feet	59
Haven House Residences	240 feet	56
Residences on Del Norte Avenue	315 feet	50
Residences on Bay Road	500 feet	45
<b>Soccer/Lacrosse Field</b>		
Residences on Del Norte Avenue	100 feet	63
Haven House Residences	230 feet	53
Residences on Bay Road	500 feet	45
Residences on Hedge Road	550 feet	44

As shown in Table 2, noise levels from the athletic fields would be as loud as 63 dBA  $L_{eq}$  at 100 feet. Noise levels up to 63 dBA  $L_{eq}$  from soccer and lacrosse games would exceed existing noise levels by as much as 7 dBA (see Table 18 of the Final EIR for ambient noise level measurements at Flood County Park). Therefore, projected noise levels averaged over the course of individual soccer and lacrosse games and practices would exceed existing ambient noise levels.



In addition to events at the separate soccer/lacrosse field, baseball or softball games and practices at the multi-use/baseball field would generate noise. However, the multi-use/baseball field would be moved further from residences on Del Norte Avenue to accommodate the soccer/lacrosse field. Therefore, baseball noise levels would be lower than those analyzed in the Final EIR and Errata and noise from ballfield activity, in itself, would not substantially affect ambient noise levels experienced by residents.

Similar to the Final EIR and Errata, this analysis makes the conservative assumption that athletic events generating noise at the multi-use and separate soccer/lacrosse field could take place concurrently. Under this scenario, the nearest residences on Del Norte Avenue would be exposed to estimated average noise levels of up to 63 dBA  $L_{eq}$  from simultaneous soccer and lacrosse games on each field. Noise from two soccer/lacrosse games would exceed ambient noise levels next to residential streets by up to 7 dBA.

## Noise Impact Comparison

A comparison between noise levels at nearby residences for the 2020 and 2022 Landscape Plans is shown in Table 3. As shown in Table 3, 2022 Landscape Plan noise levels from the multi-use/baseball field would be reduced at residences along Del Norte. Noise levels from the soccer/lacrosse field would increase at residences along Del Norte and at Haven House and would decrease for residents along Bay Road. Combined noise from two soccer games, or a soccer game and a lacrosse game, would exceed ambient noise levels next to residential streets by up to 7 dBA. This would be 3 dBA higher than combined noise from the athletic fields under the 2020 Landscape Plan.

Similar to the 2020 Landscape Plan, noise from sporting events for the 2022 Landscape Plan would be exempt from quantitative noise standards pursuant to Section 4.88.360(c) of the County Code of Ordinances. However, the County has determined that the qualitative standard in Section 4.88.350 of disturbing the peace and quiet of neighbors would still apply to the Landscape Plan. The timing of athletic events from 9 a.m. to 8 p.m., consistent with Mitigation Measure N-3(B), would minimize disturbance to neighbors by avoiding normal sleeping hours. Perceptible athletic noise also would not necessarily disturb the peace and quiet of the surrounding neighborhood, as defined by the criteria in Section 4.88.350 of the County Code of Ordinances. The City of Menlo Park manages athletic fields located within 100 feet of nearby residences and has received few if any complaints regarding programmed athletic activities from residents since 2010 (Keith 2017). The County also would restrict the use of sound amplification equipment by athletic teams through individual agreements with teams that use the new fields, consistent with Mitigation Measure N-3(A). Specifically, Mitigation Measure N-3(A) would restrict the use of equipment that generates especially loud impulse noise during organized athletic events and performances without approval of a special event permit. Therefore, with implementation of Mitigation Measures N-3(A) and N-3(B), noise impacts from the athletic fields would be less than significant with mitigation, the same impact determination as identified in the certified EIR.



**Table 3 Athletic Field Noise Comparison**

Noise Receiver	2020 Noise Level at Receivers	2022 Noise Level at Receivers (L <sub>eq</sub> )	Difference (dBA)
<b>Multi-Use Field</b>			
Residences on Hedge Road	59	59	0
Haven House Residences	56	56	0
Residences on Del Norte Avenue	54	50	(4)
Residences on Bay Road	N/A	45	N/A
<b>Soccer/Lacrosse Field</b>			
Residences on Del Norte Avenue	53	63	10
Haven House Residences	50	53	3
Residences on Bay Road	61	45	(16)
Residences on Hedge Road	N/A	44	N/A

N/A = not applicable, noise level was not analyzed in the Final EIR or Errata

() = negative number, quieter noise level under 2022 Landscape Plan

## Conclusion

Implementation of the 2022 Landscape Plan would relocate the soccer/lacrosse field closer to residents along Del Norte Avenue, Hedge Road, and the Haven House along Van Buren Road. Similar to the 2020 Landscape Plan, noise from athletic events would exceed measured noise levels near surrounding residents. The 2022 Landscape Plan would be subject to Mitigation Measures N-3(A) and N-3(B) from the Final EIR that would reduce noise levels from athletic events by restricting when games can occur and restricting the use of equipment that generates especially loud impulse noise during organized athletic events and performances without approval of a special event permit. Therefore, noise impacts from athletic events would remain less than significant with mitigation, similar to the findings in the Final EIR and Errata. The revised Landscape Plan **would not result in a new significant impact** that was not identified in the certified EIR, as noise levels from park activities at sensitive receivers was analyzed in the EIR and the resulting impacts would be less than significant after mitigation, the same conclusion for this impact that was disclosed in the certified EIR.

Combined noise from two soccer games, or a soccer game and a lacrosse game, would exceed ambient noise levels next to residential streets by up to 7 dBA, as compared to the 2020 Landscape Plan where noise from two games would exceed ambient noise levels by 4 dBA. Mitigation Measures N-3(A) and N-



3(B) would restrict timing on sports events to daytime and prevent the use of amplified equipment and impulsive noise (i.e., air horns). Games would not occur daily, and two simultaneous sporting events would occur less frequently. Therefore, noise from sporting events on two fields would be considered a periodic increase in noise. Periodic noise increases are considered to be significant if there is an increase in 10 dBA or higher and the 2022 Landscape Plan would result in a 7 dBA increase over existing ambient noise levels. In addition, the reference noise levels used in this report provide a conservative estimate of noise because they reflect substantially more spectator activity than anticipated at athletic events at Flood County Park. In actuality, noise from games on the two sports fields would likely be less than analyzed herein. Because the timing of games would be restricted to daytime hours, amplified devices would be prohibited, and games would not occur daily, the 2022 Landscape Plan would not disturb the peace and quiet of neighborhoods. Additionally, the 2022 Landscape Plan would be exempt from quantitative noise standards pursuant to Section 4.88.360(c) of the County Code of Ordinances. Therefore, the revised Landscape Plan would **not represent a substantial increase in the severity** of the operational noise impact disclosed in the certified EIR.

## **Attachments**

Figure 1 2020 Landscape Plan

Figure 2 2022 Landscape Plan



## References

- California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. (CT-HWANP-RT-13-069.25.2) September.  
[http://www.dot.ca.gov/hq/env/noise/pub/TeNS\\_Sept\\_2013B.pdf](http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf)
- Keith, Kirsten. 2017. City of Menlo Park. Re: Flood Park Landscape Plan, Draft Environmental Impact Report Comments. November 15, 2017.
- RGD Acoustics. 2016. *Marin Catholic High School Field Lighting Project Environmental Noise Impact Report*. August 2016.



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Figure 1 2020 Landscape Plan



Source: Gates + Associates, 2020.

Not to Scale

Figure 2 2022 Landscape Plan

