

PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

SUBJECT: Bridle Gate - Revised Environmental Impact Report, Vesting Tentative Subdivision Map, and Design Review

DEPARTMENT: Community Development

STAFF: Erik Nolthenius, Planning Manager
Cindy Gnos, Contract Planner (Raney Planning & Management)

TITLE/RECOMMENDATION

Staff recommends that the Planning Commission adopt the attached Resolutions, thereby certifying the Revised EIR and making CEQA findings, and approving a Vesting Tentative Subdivision Map and Design Review for the Bridle Gate Project proposed by WCHB Development, LLC. Consideration of this project was continued to a date uncertain at the Planning Commission meeting on September 5, 2023.

A Revised Final Environmental Impact Report (RFEIR) has been prepared for this project pursuant to the California Environmental Quality Act, and the Planning Commission will consider whether to certify the document and make required findings.

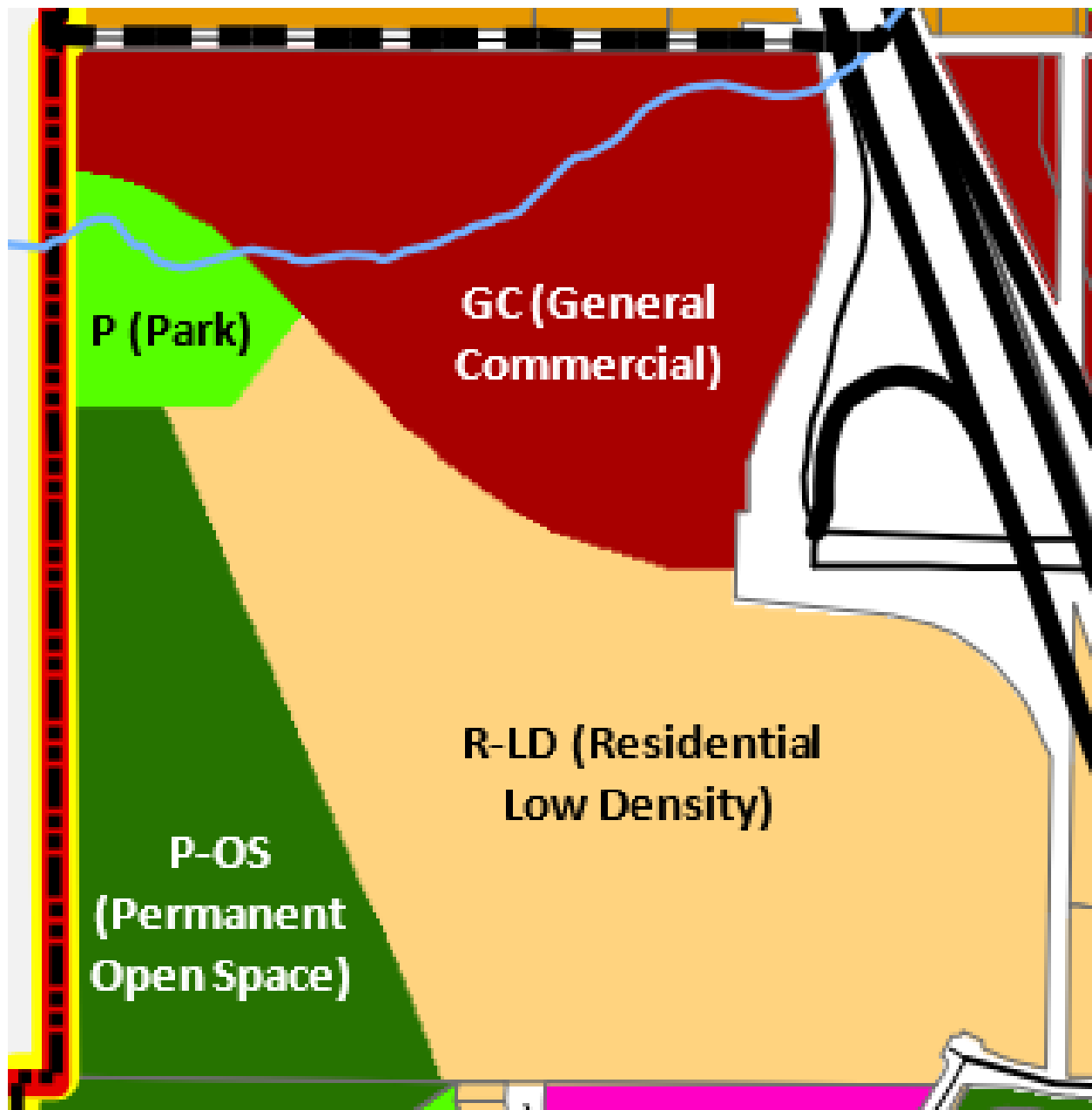
OWNER/APPLICANT

WCHB Development, LLC

GENERAL PLAN

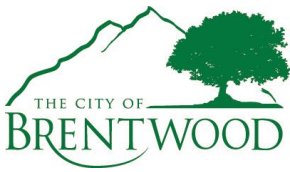
As shown in Figure 1 below, the General Plan designates the overall project site for a variety of land uses, including Residential Low Density (R-LD) on the majority of the site and south of Sand Creek Road, which allows for development between 1.1 and 5.0 dwelling units per gross acre. The northern portion of the site, which includes a single parcel of 36.82 acres, is shown on the vesting tentative subdivision map as a designated remainder with no specific development proposed as part of this application (the applicant has filed separate preliminary applications under [SB 330](#) for development of this area, but no formal development applications have been submitted to date.) The General Plan also designates approximately six acres of the site as Park and approximately 25 acres of the site as Permanent Open Space, all of which are located south of Sand Creek Road along the western boundary of the site.

Figure 1: General Plan Land Use Designations



ZONING/SURROUNDING LAND USES

The zoning for the project site is PD-36, which is set forth in Brentwood Municipal Code (BMC) [Chapter 17.486](#) and includes a map that does not show any subarea boundaries. [Chapter 17.486](#) does; however, include objective zoning standards for PD-36 that are consistent with the General Plan designation. The fact that the map for PD-36 does not include locations for the various subareas was one of the subjects of a lawsuit concerning this application. In that lawsuit, the City took the position



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

that the appropriate residential development standards are those in [BMC Section 17.486.004](#), referring to Subarea C. This conclusion was consistent with the property's General Plan designation of Residential Low Density, which allows for residential development densities ranging from 1.1 to 5.0 units per acre. The court hearing the lawsuit did not raise concerns with using these objective standards to review the subject application, and so these have been applied.

The minimum lot size for PD-36, Subarea C is 5,000 sf. The applicant thus provided a revised VTSM on August 4, 2023 to comply with [BMC Section 17.486.004](#), including a minimum lot size of 5,000 sf, which resulted in a reduction in the number of lots from 286 (October 2021) to 272, remaining consistent with the density identified in the General Plan designation of Residential Low Density. The project also complies with the PD-36 development standards pertaining to open space and recreation.

It should be noted that the City cannot impose certain PD-36 standards that are inconsistent with State law (e.g., Subarea C's requirements regarding a housing cap or the requirement to obtain a CUP for residential units over a certain density). Furthermore, the only other residential subarea in PD-36 is Subarea D, which requires a minimum lot size of 10,000 sf, which, if applied to this project, would substantially decrease the density such that it would also be inconsistent with State law.

Surrounding Land Uses

North – vacant land within the Priority Area 1 (PA-1) Specific Plan area identified for future Employment Center/Light Industrial development (ECLI)

East – State Route 4, with The Streets of Brentwood and vacant commercial property beyond

South – two City-owned parcels for permanent open space and a water tank, as well as single-family homes in the Brentwood Hills subdivision

West – city limits, with the city of Antioch beyond

Figure 2: Aerial Photograph of Project Site and Surrounding Area



PREVIOUS ACTION(S)

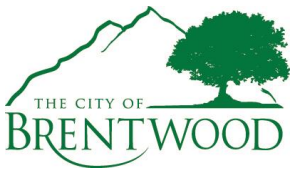
See attached.

BACKGROUND

The applicant, WCHB Development, LLC, seeks to subdivide the Bridle Gate site to allow for a variety of uses, notably 272 single-family homes.

PREVIOUS PLANNING COMMISSION ACTION

On September 5, 2023, the Planning Commission held a public hearing on the proposed Bridle Gate project and took testimony from the applicant, as well as 11



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

members of the public. After noting several concerns about the project (most notably traffic and specifically the intersection of St. Regis Avenue/San Jose Avenue) and a lengthy deliberation, the Commission ultimately adopted the following motion by a 4-0 vote to continue the item (Chairperson Roberts was absent):

Continue the item to a date uncertain and direct staff to work with the applicant to evaluate the intersection of St. Regis Avenue/San Jose Avenue for a possible gate or emergency vehicle access only, with the understanding that staff will evaluate any other viable solution that would lessen the impact of traffic on the existing residential areas to the south (i.e., Brentwood Hills and Shadow Lakes).

Since that time, staff has been working with the applicant pursuant to the Planning Commission's direction and has been addressing issues that arose from a change in the parties representing the applicant.

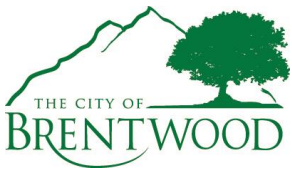
In addition, it is important to note that state law, namely [SB 330](#), only allows a maximum of five public hearings on a project that does not require legislative approvals, such as this project. A hearing includes any public hearing, continuances of a hearing, workshop, or similar meeting, including any appeal. This meeting represents the second public hearing on the project, leaving only three other public hearings available, including any subsequent consideration by the City Council by way of a call for review or an appeal.

PRIOR APPLICATIONS

This application represents the latest in a long series of land use applications submitted for this site (see the attached list of Previous Actions).

2006 Project

On June 6, 2006, the Planning Commission approved the first version of the Bridle Gate project. Commensurate with that approval, an Initial Study/Mitigated Negative Declaration (IS/MND) was adopted, which identified that all impacts resulting from the project could be reduced to a less-than-significant level with implementation of mitigation measures. The 2006 project included the following approvals by the City Council: (1) a General Plan Amendment to modify the text of the existing Special Planning Area E land use designation; (2) a Rezone of the project site to establish standards and subareas for the Planned Development No. 36 (PD-36) zoning designation; and (3) a Development Agreement. The approved Tentative Subdivision Map for the project was never finalized or recorded and ultimately expired. The



**PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024**

Development Agreement also subsequently expired. The General Plan and zoning changes, however, remain generally in place, except as modified in 2014.

2014 General Plan Update

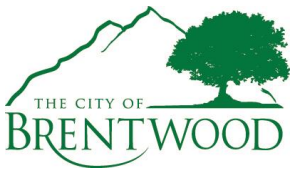
In 2014, the City adopted a comprehensive update to the General Plan and revised certain land use designations applicable to the Bridle Gate project site. These changes included the designation of the entire project site to Residential Low-Density, which was requested by the project applicant. Further, the zoning for the project site was amended to include a PD map that encompassed the entire site and did not include mapped boundaries for the various Subareas that were previously identified in the zoning for PD-36 in 2006.

2020 Project

A revised version of the Bridle Gate Project was proposed in 2020 (the 2020 Bridle Gate Project), and, due to substantial changes to the project, an EIR was prepared. The requested entitlements included:

- A General Plan Amendment to (1) change the land use designation for the northwesterly 13.98 acres of the site from Regional Commercial (RC) to Planned Development (PD) to allow for up to 258 multi-family units; (2) change the land use designation for 4.3 acres of the site south of the Sand Creek Road alignment to Park (P) to allow for two public parks associated with the single-family units; and (3) revise the planned alignment of the proposed San Jose Avenue extension in the Circulation Element;
- A Rezone of the site to modify the existing development standards for PD-36 to accommodate the single-family and multi-family portions of the site;
- A Development Agreement between the City of Brentwood and the project applicant;
- A Vesting Tentative Subdivision Map (VTSM) to subdivide the approximately 137.3-acre project site into 4.3 acres for public parks, 13.98 acres for up to 258 multi-family units, approximately 28.35 acres for permanent open space, 252 single-family units, an 11.35-acre elementary school site (or alternatively, a residential overlay that could accommodate an additional 63 single-family units if the school was not constructed), and 19.59 acres for future commercial development; and
- A Design Review for the single-family and multi-family portions of the site.

The project included the development of 252 single-family residences and the dedication of two parcels to the City of Brentwood for use as public parks. The project



PLANNING COMMISSION AGENDA ITEM NO. E.1 07/16/2024

also included an 11.35-acre parcel to be sold to the Brentwood Union School District for development as an elementary school or, alternatively in the event the school construction did not proceed, development with an additional 63 single-family residences. As of the date the Planning Commission considered the proposed project, the project included future development of a 258-unit apartment complex, as well as one parcel designated for future Regional Commercial development. However, subsequent to the Planning Commission hearing on the proposed project, the applicant notified the City that it wished to modify the project to no longer include the 258-unit apartment complex. The applicant ultimately submitted a revised proposed VTSM on January 29, 2021, formally amending the application for the 2020 Bridle Gate Project. As a result of the project amendment, the requested General Plan Amendment, Rezoning, and Design Review requests were also modified to eliminate the multi-family component. The City Council denied the modified project on March 9, 2021, and the 2020 EIR that analyzed the 2020 Bridle Gate Project was not certified.

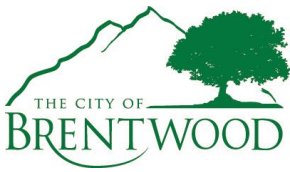
Current 2021 Application

A third application for the project, which is currently under consideration, was submitted to the City of Brentwood in late 2021 and was deemed complete in June 2022. This application differs from the prior applications in that, unlike the prior applications, the applicant is not seeking any legislative or discretionary entitlements. Rather, the developer is seeking only vesting tentative subdivision map and design review approvals since the proposed project would be consistent with the General Plan and zoning for the site, as discussed in more detail below. As such, the Planning Commission is limited in its decision-making to determining whether the findings for approval of the vesting tentative subdivision map and design review can be made. There are also state law limitations on the Planning Commission's discretion, as described in more detail below.

APPLICABLE STATE HOUSING LAW

The applicant submitted a preliminary application for this project under [SB 330 \(Government Code § 65941.1\)](#). By submitting a preliminary application and complying with the timelines set forth in the law, applicants can vest or "lock in" the City ordinances and regulations, including zoning and objective design standards, in effect at the time of application ([Government Code § 65589.5\(o\)](#)). In this case, the application must be processed under the City ordinances and regulations in effect as of submittal of the preliminary application, October 22, 2021.

Review of the application must also comply with [SB 330](#). Most importantly, if the application complies with the applicable objective general plan, zoning, and



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

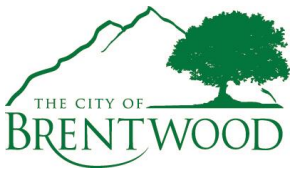
subdivision standards and criteria, including design review standards, the City cannot deny or condition the project in a manner that would lessen the intensity of housing, such as decreasing the density or number of units ([Government Code § 65589.5\(j\)](#)). Therefore, the City cannot require compliance with the City's General Plan "mid-range" policy or require that the applicant obtain conditional use permits for any units over a certain density. The "mid-range" policy requires that applicants meet subjective criteria to develop above the mid-point of the applicable General Plan density range, and is, therefore, contrary to the requirement that cities cannot limit density through subjective criteria. The BMC also requires that residential projects obtain CUPs for units over a certain density range, for PD-36 over 3.5 units per gross acre (see [BMC §§ 17.130\(B\)](#), [17.486.004\(B\)\(1\)](#)). This provision is also contrary to current state law and therefore cannot be imposed. Further, the City cannot impose the maximum number of primary dwelling units set forth in PD-36 (see [BMC § 17.486.004\(C\)\(12\)](#)), as it is directly contrary to [SB 330](#), which states that a city may not impose a housing cap ([Government Code § 66300\(b\)\(1\)\(D\)\(ii\)](#)).

PROJECT DESCRIPTION

The project site is bounded by Old Sand Creek Road to the north, State Route (SR) 4 to the east, a single-family residential development (Brentwood Hills) to the south, and the edge of the Brentwood Planning Area and the City of Antioch's city limits to the west. A small segment of existing San Jose Avenue bounds the project site at its farthest southeastern corner. The western terminus of Sand Creek Road, constructed as part of the interchange with SR 4, is located adjacent to the eastern site boundary.

The proposed project would include subdivision of the site for development of 272 single-family detached residences, as well as associated improvements within the project site, including two parks, open space, stormwater detention and treatment areas, utility connections, and construction of an internal roadway network on approximately 92.96 acres. The 36.82 acres of land located north of the future Sand Creek Road extension are on a separate legal parcel shown as a designated remainder on the vesting tentative subdivision map (VTSM), and are therefore not proposed to be developed as part of this application.

The single-family residential area would be developed with lot sizes ranging from 5,000 to 15,930 square feet (sf). The application proposes one- to three-story residences ranging from 1,808 sf to 3,222 sf. As noted below, staff is recommending a condition to limit the residences to two stories consistent with Planned Development (PD) 36 Subarea C standards. Overall, a total of 67.96 acres of the project site would be developed with residential uses. Therefore, buildout of the single-family residential development would result in a density of approximately 4.0 dwelling units per acre



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

(du/ac). The density calculation included here is based only on the portions of the site dedicated to residential use and not designated as Permanent Open Space, consistent with the City's General Plan.

One parcel totaling six acres (northwest portion of the site) and a second parcel totaling 2.49 acres (southeast portion of the site), respectively, would be dedicated to the City of Brentwood for use as public parks. The parks would provide recreational amenities for residents of the proposed single-family subdivision. Landscaping elements would be provided throughout the proposed park areas and all other developed portions of the site consistent with City requirements. An additional 25 acres of permanent open space would be located within the southwestern portion of the site. Sand Creek currently flows from west to east through the northern portion of the proposed project site, and primarily through the 36.82-acre designated remainder.

The proposed project would include water, sewer, and stormwater utility improvements. Stormwater draining off impervious surfaces within the site would be directed to two bio-retention basins located in the northwestern portion of the site, southeast of the proposed six-acre park (Parcel B), and along the southeast boundary of the site (Parcel E), respectively. Water and sewer service for the proposed project would be provided by the City of Brentwood.

In accordance with State law, the City can only require that impacts related to schools be mitigated by the applicant's payment of fees, prior to any building permit issuance. Impacts related to fire protection services would be mitigated by the requirement to annex into the current Emergency Medical and Fire Protection Service Funding Community Facilities District (CFD).

ANALYSIS

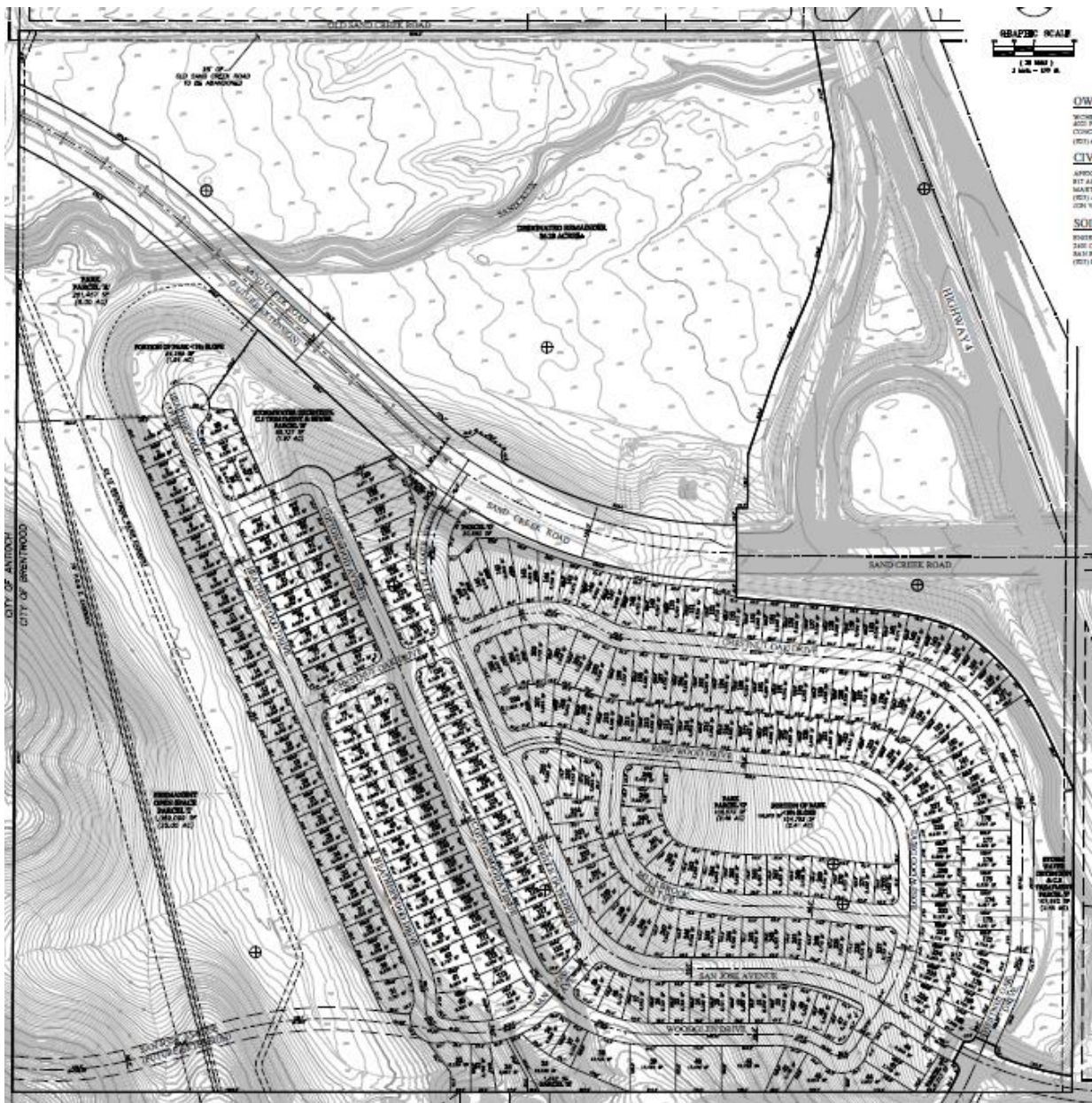
VESTING TENTATIVE SUBDIVISION MAP

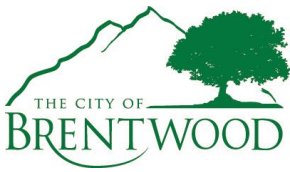
The project site consists of a total of 135.31 acres. Of this acreage, 25 acres (Parcel I) are preserved as permanent open space, the majority of which is located along the western property line corresponding to hillside ridgelines. The remaining acreage located south of Sand Creek Road includes a ten-foot trail connection (Parcel H) to the Brentwood Hills subdivision to the south, two park locations (6.0 acre Parcel A and 2.49 acre Parcel G), per the Parks, Recreation and Trails Master Plan, and the 272 single-family residential lots. The trail connection is clarified in draft condition of approval #12b on the tentative map resolution. The single-family lot sizes would range from 5,000 sf to 15,930 sf. The remaining parcels are to be utilized for

landscaping or bioretention areas for stormwater treatment. Along the northern property line and north of Sand Creek is a 36.82-acre designated remainder parcel (formerly the proposed multi-family site as part of the prior development application), which is not proposed to be developed as part of this project.

Access to the single-family development would be through a signalized intersection with Sand Creek Road from the north (located just west of the SR 4 interchange) and another via the extension of San Jose Avenue from the south.

Figure 3: Proposed Vesting Tentative Subdivision Map





PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

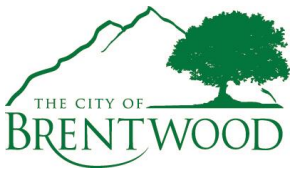
[BMC Section 16.050.040\(B\)](#) identifies seven findings applicable to a decision to approve or deny a subdivision map. In the interest of space, each of these findings is analyzed in the attached draft tentative map resolution. In sum, each of the required findings can be made. Recommended conditions of approval are also attached to the draft resolution to mitigate the impacts of the project.

Roadway Improvements and Frontage

The proposed project would include construction of new internal roadways and the extension of San Jose Avenue to the west. It should be noted that a separate City-initiated capital improvement project, Sand Creek Road Extension, is currently underway that will extend two lanes of Sand Creek Road from the westerly existing terminus of SR 4 to Heidorn Ranch Road to the northwest. The City project is on schedule for completion in September 2024 and will extend along the northern boundary of the proposed single-family residential portion of the project and connect to one of the new internal roadways (Bridle Gate Drive) to provide site access. Site access would also be provided by the proposed extension of San Jose Avenue. The proposed internal circulation system would be located throughout the proposed single-family residential subdivision, and would be designed to meet current City standards and would include sidewalks on both sides. Pedestrian access would be provided in the form of sidewalks and trails throughout the proposed development, in conformance with City standards.

As proposed, lots 237 through 257 are considered double frontage lots, with frontage along San Jose Avenue/Bridle Gate Drive and Mill Brook Drive, respectively. Lots 47 through 59 and lots 115 through 133 are also double frontage lots, with frontage along San Jose Avenue/Bridle Gate Drive and Woodglen Drive/Cottonwood Avenue, respectively. A draft condition of approval is included to prohibit vehicular access to the double frontage lots from Bridle Gate Avenue and San Jose Avenue. Access to double frontage lots would be provided by the more interior roadway, such as Millbrook Drive and Cottonwood Avenue. In addition, a draft condition of approval requires the frontage along San Jose Avenue/Bridle Gate Avenue to include a sidewalk and landscaping for the double frontage lots.

Landscaping of the frontage along San Jose Avenue and Bridle Gate Drive would be privately maintained through a perpetual funding mechanism such as a homeowners' association, which will be required in a draft condition of approval.



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

The City received several comment letters on the Draft REIR from residents of the neighborhood to the south of the project expressing concern about the extension of San Jose Avenue and the project’s impacts to increased traffic volumes for San Jose Avenue. The extension of San Jose Avenue was also a significant topic of discussion at the September 5, 2023 Planning Commission hearing. It should be noted that the extension of San Jose Avenue is included in the General Plan Circulation Element. The proposed circulation would be beneficial to both the proposed homes and existing neighborhoods, as it would provide a direct vehicular connection to Sand Creek Road for more efficient access to PA-1 (the Innovation Center), emergency health services at Kaiser Hospital, and State Route 4. In addition, as determined in the Bridle Gate REIR, with incorporation of mitigation measures, the proposed project would result in a less-than-significant impact for transportation.

St. Regis Avenue and San Jose Avenue Circulation Options

As noted above, after the previous hearing, the Planning Commission directed staff to work with the applicant on options to address the concerns regarding traffic. Consistent with the Planning Commission’s motion, the applicant prepared a memo (dated October 12, 2023) to address the options for minimizing additional traffic on St. Regis Avenue (Attachment 11). Five options were evaluated in the memo:

Table 1: St. Regis Avenue/San Jose Avenue Intersection Options

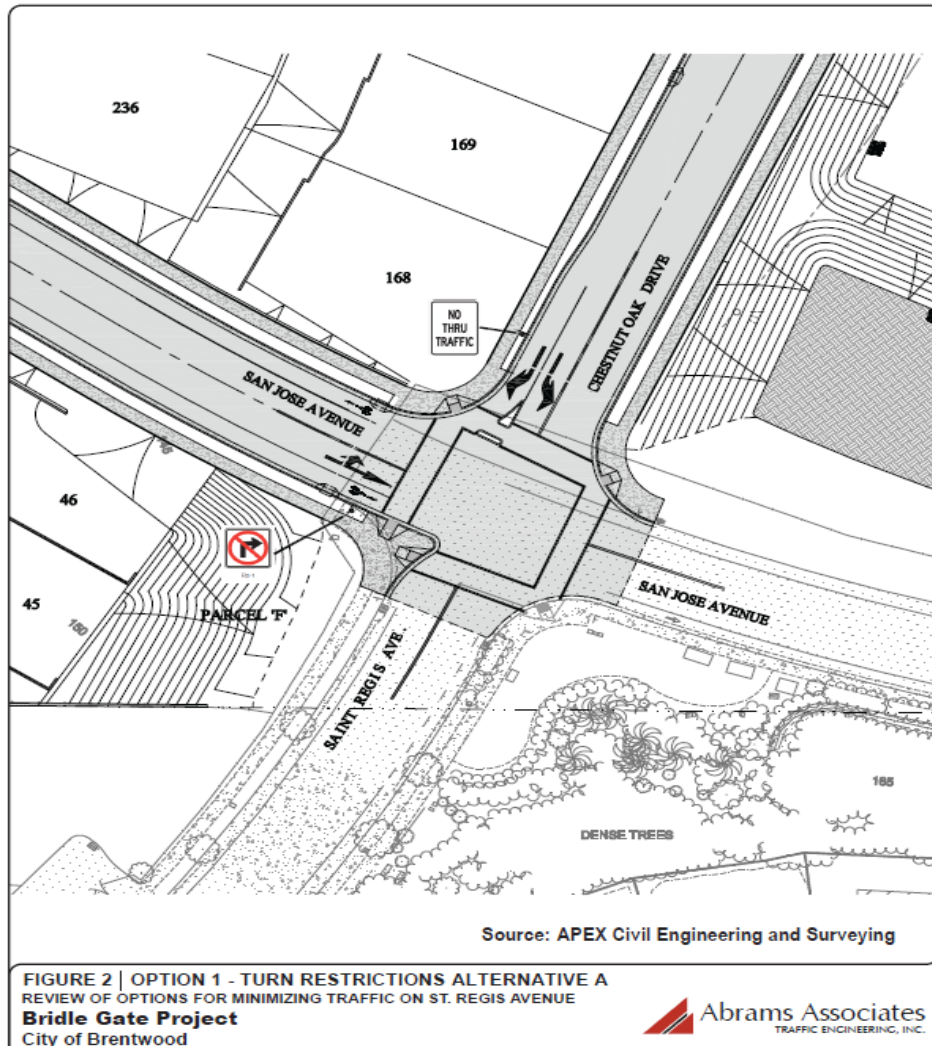
Option	Summary
Option 1	Would prohibit (a) eastbound right turns from the planned San Jose Avenue extension onto St. Regis Avenue, and (b) southbound through traffic from Chestnut Oak Drive onto St. Regis Avenue
Option 2	Like Option 1, would prohibit (a) eastbound right turns from the planned San Jose Avenue extension onto St. Regis Avenue, and (b) southbound through traffic from Chestnut Oak Drive onto St. Regis Avenue, but would additionally prohibit (c) southbound left-turns from Chestnut Oak Drive to eastbound San Jose Avenue
Option 3	Would restrict a one-block section of the San Jose Avenue extension (immediately west of St. Regis Avenue) to one-way westbound traffic flow only and prohibit southbound left-turns from Chestnut Oak Drive to eastbound San Jose Avenue
Option 4	Full or partial closure at the south end of Chestnut Oak Drive
Option 5	Would include an additional access point from the Bridle Gate Project to Sand Creek Road

A summary of the options from the memo is provided below.

Option 1: Turn Restrictions Alternative A

Two components make up Option 1. The first component is a prohibition of eastbound right turns from the planned San Jose Avenue extension onto St. Regis Avenue. A preliminary design for this is presented in Figure 3. This plan would include an extension of the curb on the southwest corner to not allow right turns and increase compliance with the prohibition on right turns from eastbound San Jose Avenue onto southbound St. Regis Avenue. The second component of Option 1 is a prohibition to southbound through traffic from Chestnut Oak Drive onto St. Regis Avenue. With the turn restrictions at the St. Regis Avenue/San Jose Avenue intersection, traffic on southbound Chestnut Oak Drive would only be able to turn left or right onto San Jose Avenue and southbound through traffic onto St. Regis Avenue would be prohibited. In addition to signage, all-way stop control, and pavement markings, this plan would include a splitter island on the southbound Chestnut Oak Drive approach that would preclude through traffic onto St. Regis Avenue.

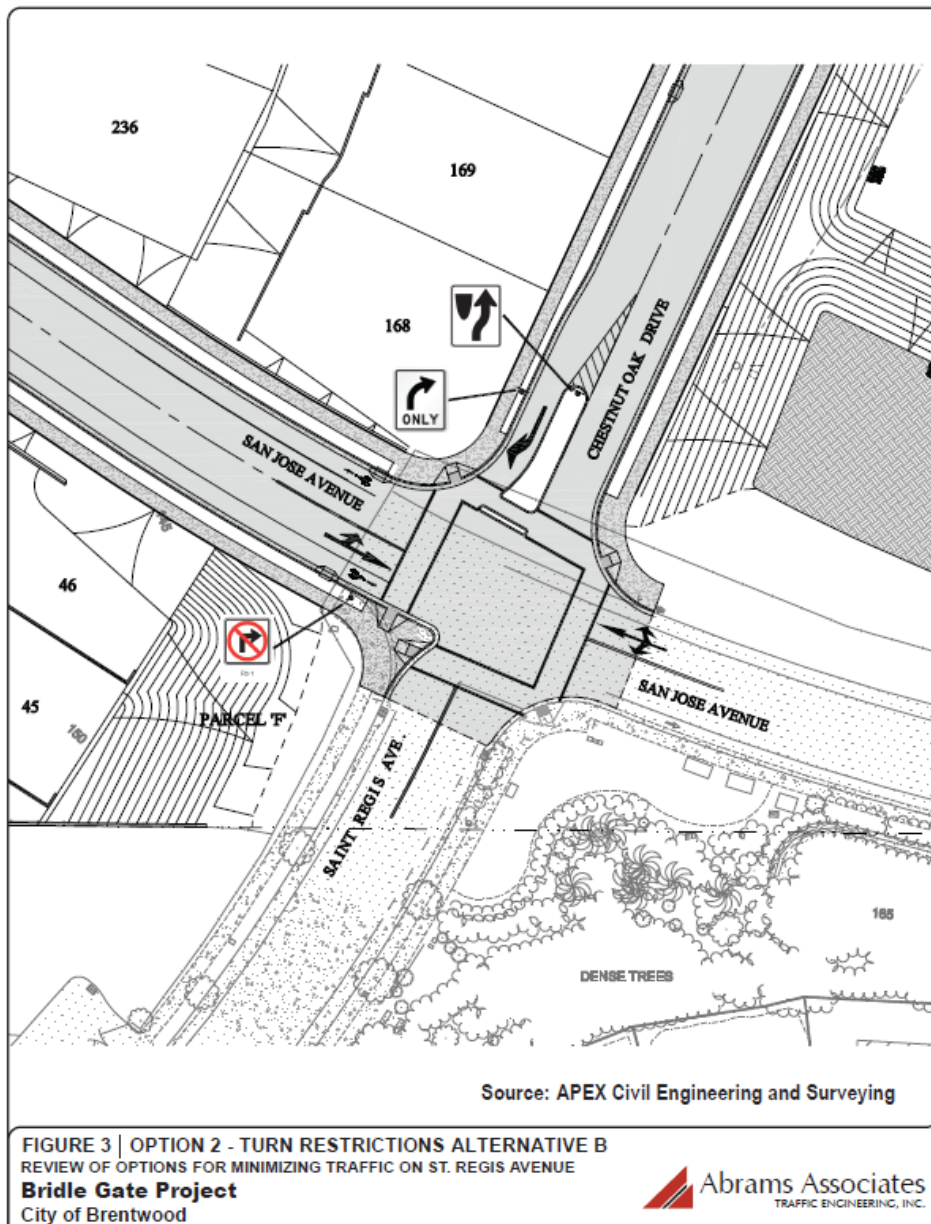
Figure 4: Turn Restrictions Alternative A



Option 2: Turn Restrictions Alternative B

Option 2 is essentially the same as Option 1, with the exception that southbound left-turns from Chestnut Oak Drive to eastbound San Jose Avenue would also be prohibited. A preliminary design for accomplishing this is presented in Figure 4. This plan would include the same extension of the curb on the southwest corner of the intersection to not allow right turns and increase compliance with the prohibition on right turns from eastbound San Jose Avenue onto southbound St. Regis Avenue. However, under this option on the northern side of the intersection all southbound traffic would be required to turn right onto San Jose Avenue. Left turns onto San Jose Avenue and southbound through traffic onto St. Regis Avenue would both be prohibited.

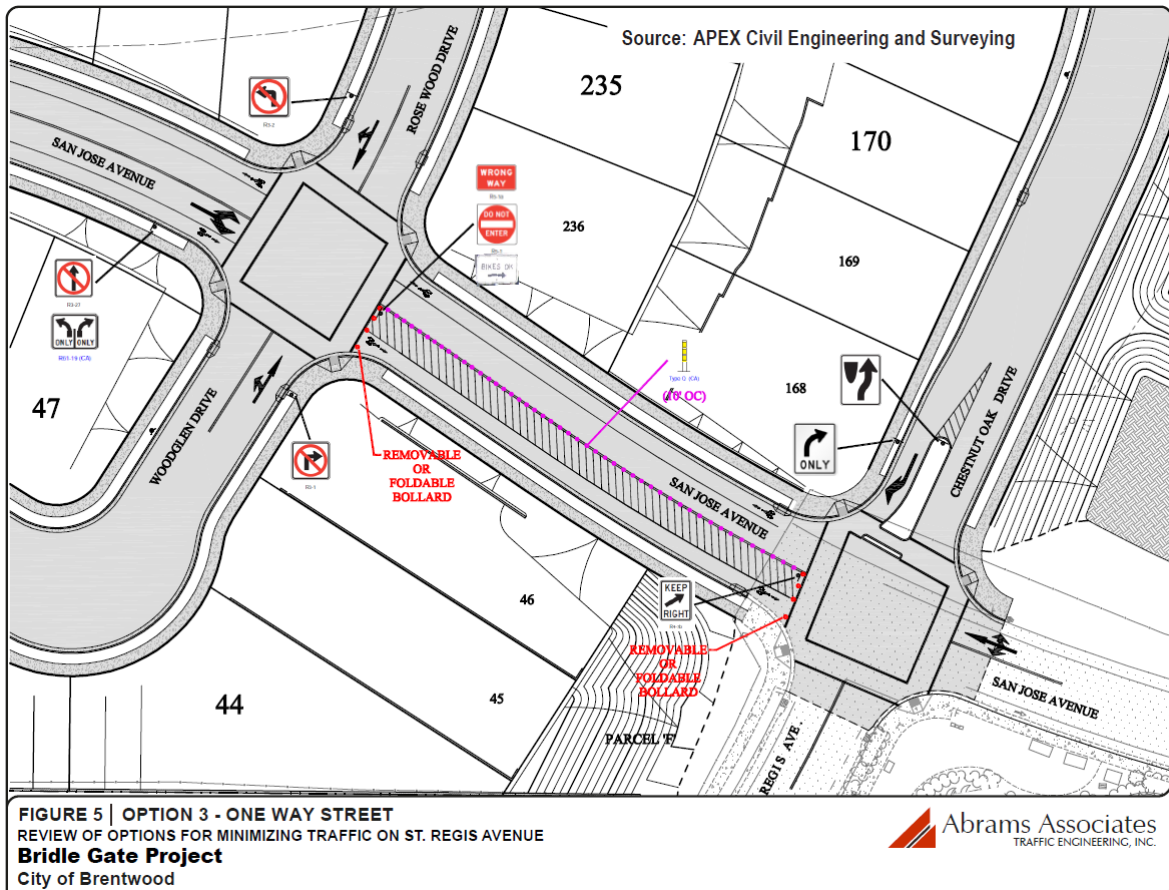
Figure 5: Turn Restrictions Alternative B

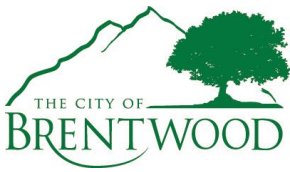


Option 3: One-Way Street

Option 3 includes two components. The first is to restrict the first segment of the San Jose Avenue extension to one-way westbound traffic only to the west of its intersection with St. Regis Avenue. The one-way section would extend from St. Regis Avenue to the first intersection within the Bridle Gate Project (Rose Wood Drive). All eastbound traffic on San Jose Avenue would then have to turn left or right at Rose Wood Drive within the Bridle Gate Project. The second component is the same as for the above-described turn restrictions option. In addition to restricting a one-block segment of San Jose Avenue to eastbound traffic only, this option would also include the same prohibition to southbound through traffic from Chestnut Oak Drive onto St. Regis Avenue. Traffic on southbound Chestnut Oak Drive would only be able to turn right onto San Jose Avenue, while left-turns and through traffic would be prohibited. A preliminary design for accomplishing this is presented in Figure 5.

Figure 6: One-Way Street





Option 4: Full or Partial Street Closure¹

This option involves a full or partial closure at the south end of Chestnut Oak Drive. A partial closure would involve closing only the southbound direction of Chestnut Oak Drive at San Jose Avenue. Under this option, traffic would still be permitted to travel northbound onto Chestnut Oak Drive from the San Jose Avenue/St. Regis Avenue intersection. In the other direction, southbound traffic would be prohibited using a design to block traffic that would be acceptable to the Fire District. The roadway would be designed to effectively block any southbound traffic from entering the intersection from Chestnut Oak Drive. A full closure would involve closing both directions of Chestnut Oak Drive just north of San Jose Avenue. Under this option Chestnut Oak Drive would become a dead end just north of the San Jose Avenue/St. Regis Avenue intersection. This would include a connection to San Jose Avenue for emergency vehicles only, designed in a manner that would be acceptable to the Fire District. The southern end of the roadway would be designed to effectively block any Chestnut Oak Drive traffic from traveling to or from San Jose Avenue or St. Regis Avenue. The intersection of St. Regis Avenue with San Jose Avenue would become a three-way intersection, with no northern leg connecting to Chestnut Oak Drive.

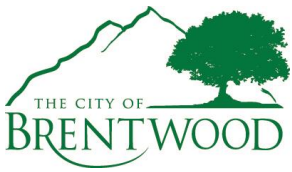
Option 5: Additional Access to Sand Creek Road¹

Option 5 would create a new right-in/right out only access point onto Sand Creek Road between Bridle Gate Drive and the intersection with the State Route 4 (SR 4) eastbound ramps. A full-access intersection is not feasible because intersection spacing standards cannot be met. In addition, there are significant topography issues, with the grade difference between the Bridle Gate roadway system and the final alignment of Sand Creek Road being substantial. Therefore, the only potential option to consider would be a new right-in/right out only access onto Sand Creek Road to the east of Bridle Gate Drive.

Staff Analysis of Options

Staff continues to recommend approval of the proposed project with full access at the St. Regis Avenue/San Jose Avenue intersection. This provides enhanced circulation for the entire area, allowing residents to the south to access Sand Creek Road and regional destinations, and is also consistent with the General Plan. However, staff is cognizant of the concerns noted by the Planning Commission and residents. If the Planning Commission decides to approve the project using one of the alternatives to full access, staff would recommend Option 2. The reduced turning

¹ There are no corresponding figures for Option 4 or Option 5



movements will slightly reduce traffic from the Bridle Gate project traveling south but will still allow residents from the south to travel north. Option 2 maintains pedestrian and bicycle connections and is still consistent with the General Plan. There is concern, however, that a significant amount of the traffic traveling south will use the Sand Creek Crossing Shopping Center as an alternative means of access or make a u-turn on San Jose Avenue, both of which are undesirable.

Option 1 would not be effective in reducing traffic to the south. Options 3 and 4 are inconsistent with the General Plan and, therefore, cannot be imposed upon the applicant. Option 5 to provide additional access on Sand Creek Road would not result in reduced traffic going south.

The proposed resolutions attached to this staff report continue to reflect approval with the proposed full access shown at the St. Regis Avenue/San Jose Avenue intersection pursuant to staff's recommendation. However, staff will be prepared with alternative language at the hearing in the event that the Planning Commission desires to approve the project with one of the options noted above.

Traffic Impact Study

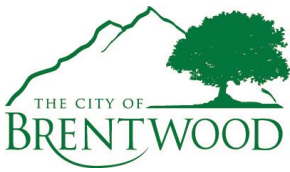
Timing of Traffic Impact Study

At the Planning Commission hearing on September 5, 2023, several comments and questions expressed concern regarding the timing of the Traffic Impact Study (TIS) prepared for the proposed project. By way of background, in April 2020, Kimley-Horn and Associates completed a TIS for an earlier iteration of the project. As set forth in the Executive Summary of the TIS, that document analyzed two potential development scenarios:

Table 2: Development Scenarios Analyzed in 2020 Traffic Impact Study

Uses	Scenario One	Scenario Two
Single Family Homes	328	265 ²
Multi-Family Units	258	258
Commercial Uses	199,940 sf	199,940 sf
Public School	None	900 student K-5 public school

² The Traffic Impact Study studied 265 units but the project was later revised to reduce the unit count to 252



**PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024**

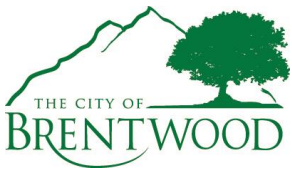
The TIS was prepared using traffic counts generated in 2017. In February 2022, Abrams Associates Traffic Engineering, Inc., and staff analyzed the TIS, and determined that it remains applicable to the proposed project for the following reasons:

- The traffic data generated from traffic counts collected in 2017 continues to represent typical conditions for the area because there has not been any new development in the TIS study area since the 2017 counts were conducted. As a result, there have not been new sources of traffic introduced into the area that would appreciably change the traffic counts collected in 2017.
- In addition, the onset of the COVID-19 pandemic in 2020 significantly changed traffic patterns and volumes throughout the Bay Area. According to the Metropolitan Transportation Commission (MTC), in 2017, when the TIS’s traffic counts were taken, only 7.5% of Contra Costa workers worked from home. By 2021, the most recent year for which comparable data is available, that number had risen to 28%.³
- Finally, the TIS analyzed two different scenarios of a project considerably larger than the current project. Therefore, the TIS reflects a very conservative analysis of the current project. Table 3 below illustrates the difference between what was originally studied in the TIS and what is now being proposed:

Table 3: Development Scenarios Analyzed in 2020 Traffic Impact Study Compared to Current Project

Uses	Scenario One	Scenario Two	Current Project	Difference
Single Family Homes	328	265 ²	272	Current Project is 56 fewer homes than Scenario One, and 7 more than Scenario Two
Multi-Family Units	258	258	-	Current Project is 258 units less than both Scenarios
Commercial Uses	199,940 sf	199,940 sf	-	Current Project is 199,940 sq ft less

³ See MTC ‘Commute Mode Choice’ report (updated February 2023), available online at: <https://vitalsigns.mtc.ca.gov/indicators/commute-mode-choice>



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

				than both Scenarios
Public School	-	900 student K-5 public school	-	Current Project includes no students

Thus, the circulation analysis within the Draft REIR is adequate for CEQA purposes.

Further, in the cumulative scenario, the TIS relies upon the Contra Costa Transportation Authority (CCTA) model for traffic volume projections. The CCTA model utilizes General Plan buildout assumptions to inform growth projections from surrounding communities, as well as the city of Brentwood. The General Plan assumptions include buildout of the Innovation Center. Thus, traffic assumptions for that area of the city are included within the TIS prepared for the proposed project.

Traffic Volume/Trip Generation Projections

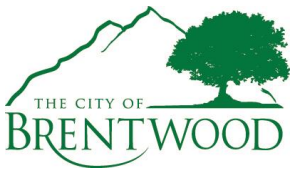
Trip generation figures in the TIS are determined based on trip generation rates provided through the Institute of Transportation Engineers (ITE) Trip Generation Manual. Planners and engineers use the trip generation rates for single-family homes to estimate traffic impacts of residential developments. The trip generation rate for a single family home is determined primarily through:

- Site Selection – ITE selects and analyzes sites of various sizes, densities, regions and regions to capture a diverse range of travel behaviors.
- Collected Data – ITE performs traffic counts that captures the number of trips and the time of day of each trip.

The collected data is then analyzed and standardized to a common unit of measurement (i.e. trips per dwelling unit) which can then be used to estimate how much traffic a project will produce.

Example trip generation rates for single family homes:

- Average Daily Trips: The ITE Trip Generation Manual provides an average daily trip rate for single-family detached housing units. For example, a typical single-family home generates around 9-10 vehicle trips per day per dwelling unit.



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

- Peak Hour Trips: During the AM peak hour, a single-family home may generate approximately 0.7 trips per dwelling unit, and during the PM peak hour, it may generate about 1.02 trips per dwelling unit.

During the Planning Commission meeting, there was significant discussion with regard to southbound traffic from the proposed project. As detailed in the TIS, the estimated southbound volume at the St. Regis Avenue and San Jose Avenue intersection is 59 vehicles during the busiest one-hour period in the AM and 177 vehicles during the busiest one-hour period in the PM. These figures represent the anticipated vehicle count, for either Scenario One or Two of a larger project (as described above), that could be expected during the busiest single hour of an average day, when congestion is projected to be at its highest. These estimates do not reflect the total number of trips to be generated on a daily basis.

As detailed previously, if the Planning Commission chooses to restrict southbound traffic then the traffic is expected to be split heading east on San Jose Avenue if similarly allowed by Planning Commission or north onto Sand Creek Road.

Vehicle Miles Traveled Analysis

It should also be noted that traffic congestion can no longer be considered part of CEQA review. Subsequent to preparation of the original TIS, the CEQA statute was amended to require analysis of vehicle miles traveled (VMT) only. Thus, for the purposes of CEQA analysis, a VMT analysis was prepared for the current project, based on the metrics adopted by CCTA. VMT is a metric that captures the total amount of vehicular travel by estimating the number of vehicle trips generated and the length or distance of those trips. VMT is usually measured on a typical weekday, and can be expressed in several ways, such as total VMT, total VMT per service population, home-based VMT per resident, and home-based work VMT per employee.

In compliance with Senate Bill (SB) 743 and following the Governor's Office of Planning and Research (OPR) guidance, CCTA implemented VMT analysis methodologies. CCTA's methodology uses the Home-Based VMT per capita metric for residential projects. Home-based VMT is the VMT for trips that begin and end at the residence. The recommended threshold of significance is that the project generated home-based VMT not exceed 85% of the same in the city. The city of Brentwood has a citywide average of 29.6 VMT per capita, which results in a 25.2 VMT per capita threshold to achieve the 15% reduction (i.e., to not exceed 85% of the average).

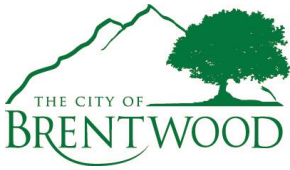


Table 4: Project VMT Analysis Results

City of Brentwood		Proposed Project Before Mitigation
VMT/Resident	Threshold of Significance	VMT/Resident
29.6	25.2	27.0

The project meets the VMT threshold with the implementation of mitigation measures identified in the REIR. Further, an analysis was done to determine if any of the circulation options described above would affect the VMT analysis in the REIR (Attachment 13). According to the analysis, none of the options would be expected to cause significant increases in VMT. Therefore, any additional CEQA analysis of the circulation options above cannot be required.

Other Roadway Issues

The proposed VTSM indicates that the applicant plans for Old Sand Creek Road (located along the north boundary of the overall project site) to be abandoned. A draft condition of approval is included; however, indicating that Old Sand Creek Road is a portion of a collector street in the Innovation Center Specific Plan and shall not be abandoned.

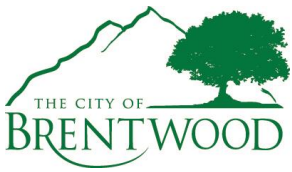
In addition, consistent with [BMC Section 12.04.040](#), a draft condition of approval is included to require the applicant to construct sidewalk, frontage, and median island landscaping and irrigation, and a second westbound vehicle travel lane along the Sand Creek Road project frontage. The City is currently constructing two lanes of Sand Creek Road, but the ultimate width of the road is four lanes, with two lanes in each direction. The applicant is required to add one additional eastbound lane to this route and is eligible for reimbursement for these improvements per the City’s Development Fee Program.

CONSISTENCY WITH GENERAL PLAN REQUIREMENTS

All proposed subdivisions must be consistent with the City’s General Plan in order to be approved. The proposed project demonstrates this consistency in various ways, including:

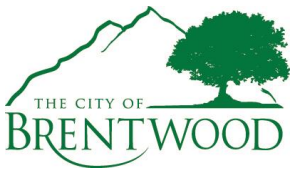
Table 5: Consistency with General Plan Requirements

General Plan Provision	Project Implementation	Consistent?
Land use designations: <ul style="list-style-type: none"> • Residential Low Density 	Project as proposed:	Yes



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

General Plan Provision	Project Implementation	Consistent?
<ul style="list-style-type: none"> • Regional Commercial • Park • Permanent Open Space 	<ul style="list-style-type: none"> • Low density, single-family residential use • Regional commercial to remain undeveloped • Two neighborhood parks (8.49 acres total) • Permanent open space (25 acres) 	
Density: 1.1-5.0 units/acre	Density: 4.0 units/acre	Yes
<p>Goals and Policies:</p> <ul style="list-style-type: none"> • Policy LU 2-1: Maintain Brentwood’s predominant land use of single family residential, while providing for a mix of housing types throughout the community, in accordance with the Housing Element • Goal LU-4: Maintain a high quality natural environment and recreational opportunities in and around Brentwood • Policy IF 1-7: Require the payment of impact fees for all new development. 	<ul style="list-style-type: none"> • The project proposes to build 272 single-family homes • The project includes 25 acres of permanent open space, 8.49 gross acres of neighborhood parkland, and is conditioned to provide approximately 2,500 linear feet of improved trail to augment Sand Creek Trail and Black Gold Trail • The project is conditioned to pay all relevant impact fees, including those pertaining to water, wastewater, roadways, parks and trails. It is also required to annex into both the City CFD and the CFD 	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>



**PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024**

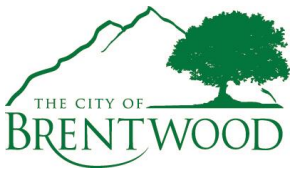
General Plan Provision	Project Implementation	Consistent?
	established for fire and emergency medical services	

ZONING

As noted above, the project’s residential component is subject to the development standards set forth in Subarea C of Planned Development No. 36 ([BMC Section 17.486.004](#)). The project meets these requirements as demonstrated below.

Table 6: Consistency with PD, Subarea C Standards

	Requirement	Proposed	Consistent?
Minimum lot size	5,000 sq. ft.	5,000-15,863 sq. ft.	Yes
Minimum lot width	50’	50’ – 160’	Yes
Minimum lot frontage	35’ at the front property line for lots on culs-de-sac, knuckles, or curvilinear street	35’ minimum	Yes
Minimum front yard setback	20’ for front-facing garages; fifteen feet for building walls and porches	Minimum 20’ for front-facing garages and minimum 15’ for building walls and porches	Yes
Minimum side yard setback	5’, with the sum of both sides 12’; corner lots shall maintain a minimum setback of 10’ on the street side yard	Minimum 5’ on one side and 7’ on other side with 10’ on street side for corner lot	Yes
Minimum rear yard setback	15’, with an average of 20’	15’ minimum with average of 20’	Yes
Maximum building height	2 stories, not to exceed 30’	As conditioned, the project will include homes of no more than 2 stories, ranging in height from 22’11”-30’	Yes, with conditions



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

	Requirement	Proposed	Consistent?
Corner lot fence setback	5' from the street side property line; all other fence regulations must meet BMC Chapter 17.660	Dimension not shown, but conditioned to meet standard	Yes, with conditions
Lots adjacent to open space	Shall utilize a 6' open space fence along the common property line(s), as approved through VTSM 8506	Not shown	Yes, with conditions
Accessory structures	Prohibited in side or rear yards for areas exceeding a 3:1 slope	No accessory structures are proposed at this time	Yes
Maximum lot coverage	40% for two-story homes and 45% for single-story homes	10-45% (all lots over 40% are single-story)	Yes

According to [BMC Section 17.486.006](#), which governs the uses and development standards applicable to the project, open space (as a reserve for fire protection, etc.) and parks, playgrounds, and recreational trails, are permitted uses in the "open space" area. The applicant proposes to leave this area undeveloped, except for the trail improvements discussed above. As such, this is consistent with the regulations for this open space area.

AFFORDABLE HOUSING

Under [SB 330](#), the project must comply with the affordable housing ordinance in place at the time of application submission. Ordinance No. 1014 was in place at the time of project application and requires 10% of the total units within a project to be affordable to various income categories. The applicant originally proposed less than the required number of affordable units, but has since agreed to comply with Ordinance No. 1014. A condition of approval is included to require the Applicant to enter into an Affordable Housing Agreement with the City to provide a minimum of 27 affordable units at the required affordability levels. Compliance with this condition, per the City's Affordable Housing Ordinance, is required prior to final map approval and will ensure, among other things, that the affordable units are spaced appropriately throughout the subdivision. The affordability levels for the 27 units are broken down as follows:

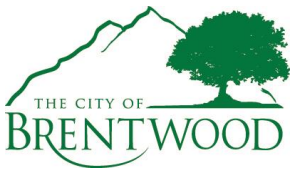


Table 7: Affordable Housing Fulfillment

Affordability Level	Requirement	Complies?
Very Low Income	3% of 272 = 8 units	Yes, as conditioned
Low Income	4% of 272 = 11 units	Yes, as conditioned
Moderate Income	3% of 272 = 8 units	Yes, as conditioned

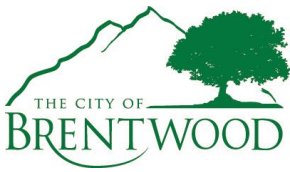
DESIGN REVIEW

The applicant seeks design review approval for the single-family development on the site. This design review is subject to the approval criteria set out in [BMC Section 17.820.007](#) and the PD-36 standards for Subarea C found in [BMC Section 17.486.004](#). The project’s conformance to those criteria is analyzed in the attached resolution for the design review, with various design elements also evaluated further below.

Architecture

The proposed design review includes 13 distinct floor plans with four alternative elevations per plan, except for Floor Plan 13, which has two elevations. The project includes only two units to be built according to Floor Plan 13, which shows it as a three-story unit. Three of the plans, Plans 1, 2, and 3, are single-story homes, with the remaining plans all two-story homes with a two-car front-on garage. Due to the relatively small minimum lot size (5,000 sf), alternative garage configurations are difficult to accomplish; however, the homes are designed to minimize the garage by setting it back from the front plane of the living spaces, thereby minimizing its prominence in the front elevation, and all of the plans show decorative garage doors to match the architectural style of the home.

As mentioned, each plan has four distinct architectural styles, including Tuscan, Craftsman, French Cottage, and Bay Area Modern. Exterior materials, massing, roof shapes and pitches, trim shapes and materials, and colors vary by these elevation styles. The rear elevations vary by elevation style as well, with accent gable and hip roofs, accent trim, and a variety of roof pitches and massing styles. The trim around the windows is shown as being carried around all windows at the sides and street-facing rears to match the style of the window trim on the front elevation. This means that the window trim at the side and rear elevations is different by elevation style, but only if it can be viewed from an adjacent street.



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

- **Tuscan.** The Tuscan style elevations combine stucco and stone exteriors with decorative wrought iron trim elements. The rooflines feature both modified hip and gable ends and are finished with curved villa concrete tile roofing.
- **French Cottage.** The French Cottage style elevations include stucco body and trim elements with mock shutters. Stone veneer trim elements are included along the front elevations. Also included are simulated wood siding and trim elements at various locations along the front elevation. The gable roofs are finished with flat concrete tile roofing.
- **Craftsman.** The Craftsman elevations combine horizontal siding and stucco. In addition, there are stone trim elements either at the front or on the column bases on the porch posts. Front elevations feature a full grid pattern for the window fenestration, unique to this style. The gable roofs are accented with corbels and have flat concrete tile roofing.
- **Bay Area Modern.** The Bay Area Modern elevations have stucco finishes with horizontal/vertical siding, stone, and brick trim elements. Windows are both horizontal and vertical to create a varied fenestration style. This elevation includes shed, flat, and pitched roof elements.

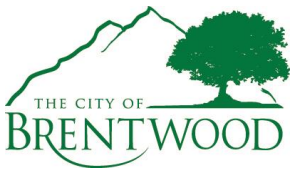
Exterior materials, massing, roof shapes and pitches, trim shapes and material, and colors vary by these elevation styles. The rear elevations vary by elevation style as well, with accent gable and hip roofs, accent trim, and a variety of roof pitches and massing styles. The plans include both villa style and flat tile roof elements. To be consistent with the high-quality of materials expected in Brentwood, all proposed roofing materials are concrete tile. In accordance with draft condition of approval #9 of the design review resolution, the accent trim around the windows and the varied window grid patterns would be carried around to windows at the sides and rears on all the homes, not just those that abut streets. The color schemes assist in further differentiating the styles. The developer has proposed a total of 24 different color schemes to be used throughout the project.

Building Design and Massing

A summary of the proposed home models is included below:

Table 8: Single-Family Home Models

Plan #	Home Size (sf)	Bed/Bath	Garage Spaces	Stories	Max. Height	Complies?
1	1,808	3/2	2	1	22' 11"	Yes
2	1,848	3/2	2	1	23' 0"	Yes
3	1,943	4/3	2	1	23' 2"	Yes



**PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024**

Plan #	Home Size (sf)	Bed/Bath	Garage Spaces	Stories	Max. Height	Complies?
4	2,223	4/3	2	2	25' 11"	Yes
5	2,292	4/3	2	2	28' 1"	Yes
6	2,439	5/3	2	2	27' 0"	Yes
7	2,644	4/3	2	2	29' 3"	Yes
8	2,772	4/3	2	2	27' 9"	Yes
9	2,787	5/4	2	2	27' 3"	Yes
10	2,788	5/4	2	2	30' 6"	No
11	2,831	5/4	2	2	30' 2"	No
12	3,100	5/3	2	2	29' 4"	Yes
13	3,222	4/3	3	3	32' 1"	No

[BMC § 17.486.004](#) outlines the standards for Subarea C of PD-36 and limits the homes to two stories and 30 feet. Therefore, Plans 10, 11, and 13 would need to be modified to meet these standards and a draft condition of approval to that effect is included.

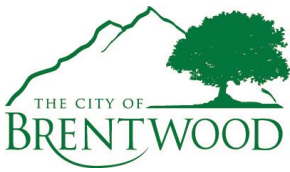
Preliminary/Master Plotting Plan

The master plotting plan depicts which home plans would be constructed on each particular lot. Each plan would be plotted between 7.4 percent and 9.1 percent of the time within the subdivision, with the exception of Plan 13, which only includes 2 units total (0.7 percent). The streetscape varies the plans fairly evenly throughout the subdivision. See discussion below under the Residential Design Guidelines section regarding compliance with the guidelines and proposed conditions of approval.

Parks, Landscaping, and Walls

Parks

The proposed subdivision includes two designated park parcels. Parcel A, located northwest of the main access at Sand Creek Road (as shown in the General Plan), is six acres and will be designed as a neighborhood park. The smaller park is Parcel G, which encompasses 2.49 acres and will also be designed as a neighborhood park. The landscape plans submitted with this application for a VTSM are preliminary only and pursuant to [BMC § 2.46.020G](#), a conceptual park plan is conditioned to be submitted to the Park and Recreation Commission for review and final approval of the park design, programming, and amenities. The Park and Recreation Commission’s approval will ensure conformance with all aspects of the Parks, Trails and Recreation Master Plan for Neighborhood Parks. As with all new projects, the final landscape



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

plans will be reviewed against the City's Water Efficient Landscape Ordinance to ensure conformance with these regulations.

Staff has calculated the required park acreage based on an expected population within the subdivision of 870 (272 units x 3.2 persons per unit). Using the City's formula of providing 5 acres of park for every 1,000 residents, a total of 4.35 acres of park is required. Parcel A is identified as a park consisting of six acres. Of this six acres, 1.94 acres will be graded to less than 3% slope, which is considered usable park land. Parcel G is identified as a park consisting of 2.49 acres, of which 2.41 acres will be graded to less than 3% slope, and thus considered usable park land. The two parks combined result in 4.35 acres, consistent with the required acreage.

Building these two parks offers the Park and Recreation Commission an opportunity to be creative with adding amenities, including those that have been previously identified in the Master Plan Update, such as sport courts, exercise stations, play structures, and trail connections to Sand Creek Road and Black Gold Park. These are recreation activities that the new residents would not have access to if the developer is not required to install these two parks.

Landscaping

The preliminary landscape plan includes conceptual plantings for the Sand Creek Road frontage, the two park parcels, street trees, and typical front yards. It also includes a conceptual design for the masonry wall. Final plans will be reviewed by staff prior to building permit issuance to ensure compliance with all City standards, including water efficiency.

Walls

The project includes a conceptual wall design for the required sound wall locations identified in the acoustical analysis done for the project (see Figure 1). These locations are adjacent to Sand Creek Road and SR 4. The wall design will be masonry block units with a wall cap and appropriately spaced columns with caps (see Figure 2). All other fencing for the project would need to adhere to the City's standard for good-neighbor fencing between lots, and enhanced good neighbor fencing between lots and City-owned open space where trails or trail connections are adjacent. Open tube steel or wire fencing will be installed by the developer between City open space parcels and lots elsewhere.

Figure 7: Sound Wall Locations

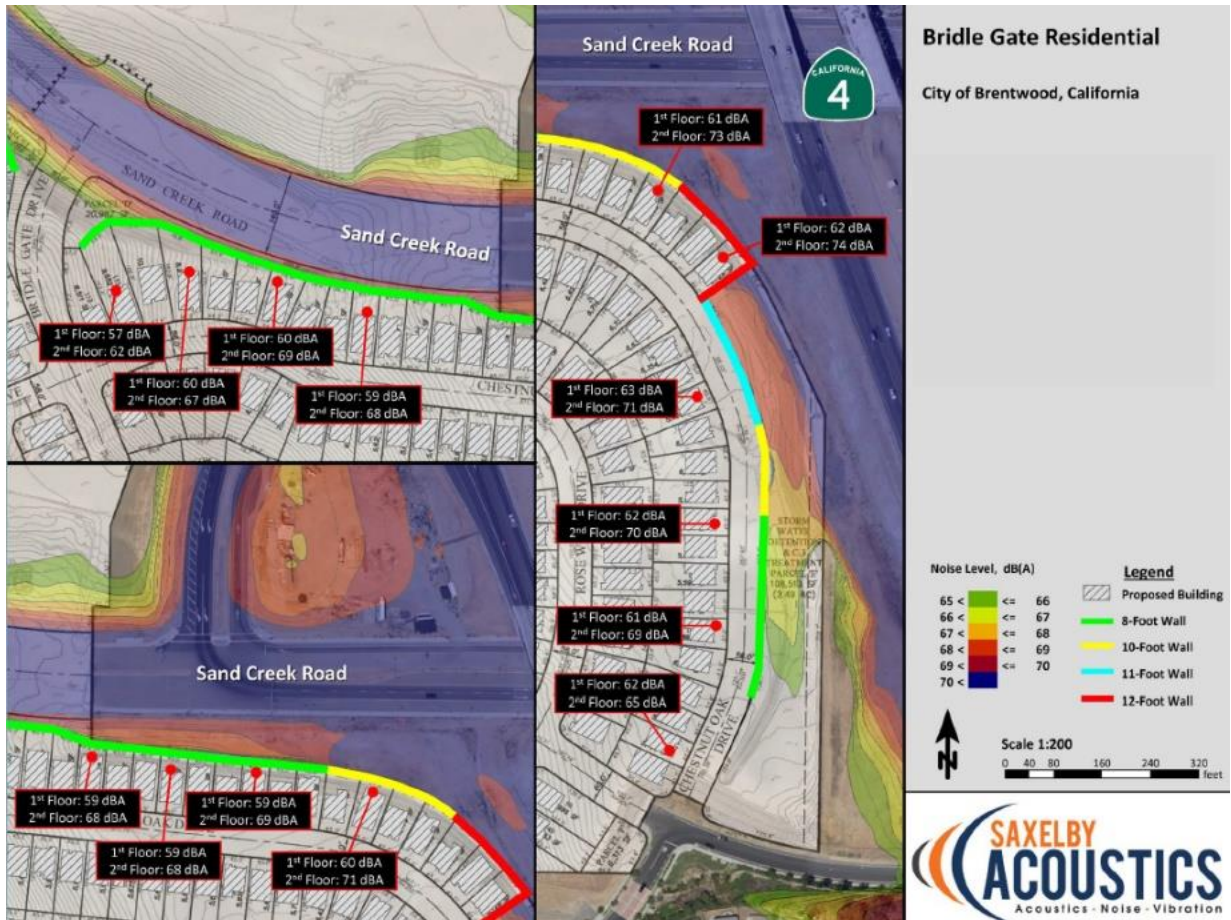
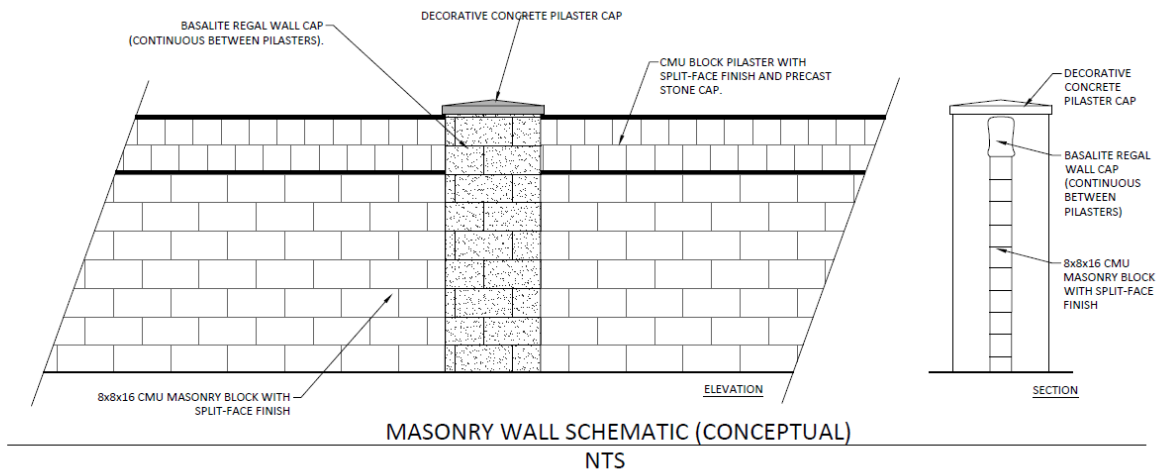
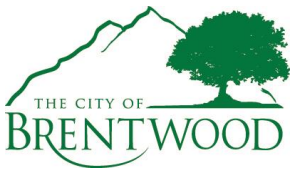


Figure 8: Conceptual Sound Wall Elevation



A draft condition of approval is included that requires dedication of Parcel I to the City for open space and trail purposes, as well as construction of a 10-foot wide



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

asphalt multi-use trail from the southern boundary of the project at the existing terminus of Black Gold Trail to the extension of Sand Creek Road or a portion of the Sand Creek Trail. This is consistent with the Parks, Trails and Recreation Master Plan and will provide trail connections called for in that Plan.

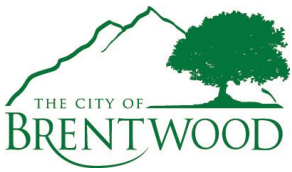
Design Guidelines

The City adopted a set of Residential Design Guidelines in 2006⁴. These address all aspects of residential design, including project layout and composition, as well as architectural design and features for a wide range of residential unit types. It is important to note that the intent of the design guidelines is not to ensure that every detail is included, but rather provide guidance to the developer regarding the types of features that should be considered when developing the project. In other words, the guidelines are generally suggestions of good design, not rules that need to be followed for every development. Further, it should be noted that, pursuant to State law, the City cannot apply non-objective design guidelines in a manner that would lessen the intensity of housing, such as by reducing density, size of units, or setbacks.

Table 9: Residential Design Guidelines Consistency

Residential Design Guideline Provision	Project Design	Consistent?
Single-family residential units must include one distinct plan with four unique elevations for every 25 units in the project	This 272-unit single-family project has proposed a total of 13 models, with four elevation styles	Yes
50% of corner lots within a development must be single-story units	Of the 26 lots that could be considered corner lots, 13 of these have been plotted with single-story plans	Yes
Garage doors with decorative features including glass windows shall be provided for 60% or more of the units	The proposed garages include decorative doors with windows	Yes

⁴ The Objective Design Standards adopted by urgency ordinance on June 27, 2023, and extended on August 8, 2023, do not apply to this project, as the applicant submitted a preliminary application that vested the standards applicable in 2021, as discussed above.



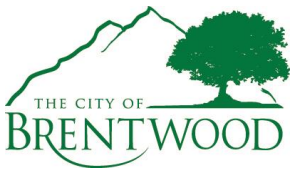
**PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024**

Residential Design Guideline Provision	Project Design	Consistent?
Front-facing garages should be set back from the front façade of the living space	The majority of plans include front-facing garages that are set back a minimum of 3 feet from the front plane of the house	Yes
Materials and detailing shall be consistently used on all sides of the structure	The plans include materials and detailing consistently on all sides as conditioned	Yes
Provide variation in roof heights	The plans include a variety of roof heights and styles, ranging from approximately 22' to 30'	Yes
Maintain architectural style integrity	The architectural style of each elevation type remains consistent with the traditional examples on which the style is based and the elements evident on the front façade are proposed to be carried around to the less-prominent side and rear elevations	Yes

OTHER ISSUES DISCUSSED AT SEPTEMBER 5, 2023 PLANNING COMMISSION

Noise

As noted in the September 5, 2023 Planning Commission staff report, a noise study was prepared for the project by the applicant. The City hired an independent third-party noise consultant to peer review the noise study. Both noise experts concluded that a combination of sound wall and STC ratings of 34 for second floor windows are adequate to reduce noise levels in compliance with the General Plan standards. This issue was raised at the Planning Commission meeting. Staff will verify compliance for specialized materials during the review of construction documents, as a matter of standard practice.



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

Park Size and Locations

The proposed 6-acre park (Parcel A) in the northwest corner of the subdivision is consistent with the location identified in the General Plan. The parcel will include a 1.94-acre portion of the park that will be graded to a less than 3% slope. An additional 2.49-acre park (Parcel G) is proposed to be located in the center of the project and will be graded such that 2.41 acres have less than a 3% slope. Previous concerns had been raised about having this park on the edge of the site and it has been located in the center to better serve the community. Park credit will only be given to those portions of the park that are less than 3% slope, which totals 4.35 acres between the two parcels. The park design elements, as is typical for all subdivisions, will be determined later by City staff and the Park and Recreation Commission.

Trail Connection to La Sata Court

The applicant agreed to eliminate the pedestrian connection (Parcel H) to La Sata Court. VTSM Condition #13b requires a multi-use trail on Parcel I from the existing terminus of Black Gold Trail to the extension of Sand Creek Road adjacent to the park Parcel A.

Architecture

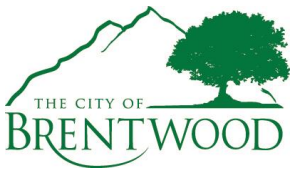
The applicant agreed to the Design Review condition #10 requiring architectural elements to be provided on all sides and rears of the homes and will update the building plans accordingly.

DATE OF NOTICE

The City published a notice of public hearing in the Brentwood Press and mailed it to property owners within 300 feet of the site on July 5, 2024. In addition, the project site is posted with the required signage along Sand Creek Road as well as San Jose Avenue/St. Regis Avenue.

ENVIRONMENTAL DETERMINATION

The Bridle Gate Project has been previously proposed and evaluated in past EIRs. A new project-level Revised EIR (REIR) has been prepared for the currently proposed project. In order to differentiate the current analysis from previous EIRs, although an REIR is not a technical CEQA term, the current analysis has been labeled as such in order to further denote that the Bridle Gate Project has been revised and is now subject to new analysis. The REIR (SCH# 2022120683) for this project was prepared in accordance with the requirements of CEQA. Several potentially significant impacts are identified; however, mitigation measures are incorporated to reduce those impacts to less-than-significant levels. All mitigation measures not addressed by the



PLANNING COMMISSION AGENDA ITEM NO. E.1
07/16/2024

standard conditions of approval are included as recommended conditions of approval. The Draft REIR was available for review and comment from May 26, 2023 to July 10, 2023. Several comments were received and addressed in the Final REIR. The Draft REIR and Final REIR may be reviewed by clicking on the link below and scrolling to "Bridle Gate:"

<https://www.brentwoodca.gov/government/community-development/planning/ceqa-documents>

In addition, the City's CEQA consultant, Raney Planning & Management, Inc., prepared a memorandum (Attachment 11), to analyze whether any of the proposed traffic calming options, which are described in detail below, would alter the conclusions of the REIR ("CEQA Traffic Options Memo"). The CEQA Traffic Options Memo concluded that none of the options alter the conclusions of the REIR.

ATTACHMENT(S)

1. Previous Actions
2. City Council Ordinance No. 1014
3. Resolution No. 23-032 certifying the Revised EIR
4. Final Revised EIR (see link embedded above)
5. Draft Revised EIR (see link embedded above)
6. Resolution No. 23-033 approving Vesting Tentative Subdivision Map No. 9586
7. VTSM 9586 & Preliminary Grading/Utility Plan
8. Resolution No. 23-034 approving Design Review No. 21-010
9. Bridle Gate design review booklet
10. Preliminary landscape plans
11. Raney Memorandum on Traffic Calming Options, dated July 9, 2024