# CEQA ANALYSIS - COSTCO

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*Prepared for:*

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## INTRODUCTION

This document provides an analysis of the proposed Brentwood Costco (Project) with respect to the project's consistency with the Priority Area 1 (PA-1) Specific Plan, the analysis contained in the PA-1 Specific Plan Environmental Impact Report (EIR), and any site-specific environmental impacts or cumulative impacts that may result from project implementation.

As explained in the following pages, the proposed project is consistent with the City's PA-1 Specific Plan, for which an EIR was prepared and certified, and there are no site-specific or cumulative impacts associated with the proposed project that have not been fully addressed in a previous environmental document, or that cannot be reduced to a less than significant level through the application of uniformly applied development policies and/or standards. The findings presented below demonstrate that no additional environmental analysis/review is required under the California Environmental Quality Act (CEQA) prior to approval of the proposed project.

## STUDIES AND REPORTS.

This document includes references to several reports that were prepared for the proposed project, and are provided in the following reference materials (included as attachments):

- Attachment A. Air Quality/Health Risk Technical Report Prepared by: Ramboll US Consulting, Inc. Irvine, California. Project Number 1690022489. April 2023.
- Attachment B. Geotechnical Study Prepared by: Kleinfelder Project No. 20220773.001A. February 22, 2022
- Attachment C. Greenhouse Gas Emissions Technical Report. Prepared by: Ramboll US Consulting, Inc. Project Number 1690022489, January 2023.
- Attachment D. Phase I Environmental Site Assessment Prepared by: Kleinfelder Project No. 20220783.001A. June 22, 2021.
- Attachment E. Limited Phase II Environmental Site Assessment Report Prepared by: Kleinfelder Project No. 20220783.001A. September 28, 2021.
- Attachment F. Acoustical Assessment Prepared by: Kimley-Horn and Associates, Inc. May 2023
- Attachment G. Traffic Impact Analysis (TIA) Prepared by: Kittelson & Associates, Inc. Project Number 26600. March 21, 2023.

## PROJECT OVERVIEW

### *PROJECT LOCATION*

The project site is located within the Lone Tree Plaza shopping center in west Brentwood near the Antioch/Brentwood city limits. The project's regional location is shown on Figure 1. The project site is composed of approximately 23.06 acres (1,004,494 square feet) and includes two

parcels: assessor's parcels numbers (APNs) 019-020-073 and 019-020-055, both of which are located directly south of Lone Tree Plaza Drive and to the east of Heidorn Ranch Road.

The Costco Site and the majority of Costco's associated facilities and site improvements would be located exclusively on APN 019-020-073 on the eastern half of the project site (referred to as the "Costco Site"). The parcel to the west, APN 019-020-055, would include some roadway improvements to improve access to the Costco Site (referred to as the "out parcel"). The two parcels described above are shown on Figure 3.

### *Existing Site and Surrounding Land Uses*

The existing project site is currently undeveloped and largely covered in bare dirt, with sparse growths of grasses and shrubs. An existing PG&E overhead power transmission line traverses the site in a northeastern-southwestern direction, and one large tower is located in the southern portion of the project site. The alignment of the PG&E overhead lines traverses the proposed parking lot. The project site is surrounded by commercial uses (the entirety of the Lone Tree Plaza shopping center) to the north, residential uses to the west (west of Heidorn Ranch Road in the City of Antioch), agricultural uses to the south, and Highway 4 to the east.

### *General Plan and Zoning Designations*

As shown on Figure 4, the City of Brentwood General Plan designates the site as Priority Area 1 (PA-1) Specific Plan and does not include a use-specific land use designation with more specificity than the Specific Plan designation. Instead, the General Plan defers to the PA-1 Specific Plan and its associated land use designations. Within the PA-1 Specific Plan, the project site is designated Regional Commercial (RC), which allows uses including, but not limited to, retail, institutional, utilities, automobile-related, and a wide array of commercial uses. The proposed project is an allowed use within the RC Land Use designation in the PA-1 Specific Plan. The PA-1 Specific Plan also serves as the applicable zoning document for the project site. The PA-1 Specific Plan was adopted on November 13, 2018 and amended in October 2022.

The out parcel is designated Transit Village (TV) and would include roadway improvements to improve access to the Costco Site. No other development is proposed on this parcel.

## *PROJECT DESCRIPTION*

The proposed project would include the development of a new 152,000-square-foot Costco Wholesale warehouse and various site circulation, surface parking, and landscaping improvements, as shown on Figure 3. The following commercial activities are proposed:

- warehouse retail center
- tire sales and installation
- optical exams and optical sales
- hearing aid testing and sales
- food service prep and sales
- meat preparation and sales
- bakery and sales of baked goods
- alcohol sales
- fuel facility

It should be noted that although Costco controls both the project site and the out parcel, development of the out parcel is not proposed at this time and would require a separate development and environmental review process(es) should development be proposed in the future.

### Fuel Facility

The project includes a members-only Costco fuel facility, which includes a +/-11,500 square-foot canopy and a +/-125 square-foot controller enclosure located at the northwestern portion of the Costco Site. The controller enclosure would be built with steel walls and finished with paint to match the warehouse building colors. There would be four covered fueling bays, each with four two-sided fuel dispensers so as to provide for the fueling of eight vehicles at each island for a total of 32 fueling positions. The fuel station would have eight stacking lanes, allowing up to approximately 40 vehicles to wait in queue, in addition to the 32 vehicles at the dispensers. The dispensers would be fully automated and self-service. A trained Costco employee would be present at all times of operation to oversee operations and assist members. Four underground fuel tanks would also be installed at the southern edge of the fuel station. Lights would be recessed into the canopy to provide both lighting during operating hours and a lower level of security lighting after hours.

### Site Access

The Costco Site will have a total of five vehicle access points. The main access point will be the existing intersection at Lone Tree Plaza Drive and Cañada Valley Road. Four additional driveways will be provided along Lone Tree Plaza Drive. The driveway to the west of the main access and two to the east will primarily be used for delivery trucks. The fifth access point will also be

constructed along Lone Tree Plaza Drive and traverse through the out parcel to provide access to the southwest of the Costco Site.

The project applicant is working with the City of Antioch to potentially implement improvements to the intersection at Heidorn Ranch Road and Lone Tree Plaza Drive.

Consistent with the vision of the PA-1 Specific Plan, and specifically Goal LU-5, the project would provide a 10-foot wide multi-use trail connecting the Mokelumne Trail to the project site, as well as the northwestern portion of the Specific Plan area.

**Parking**

The Costco Site will provide a total of 850 parking stalls, all of which would be surface parking and located to the west and south of the warehouse.

**Loading & Truck Circulation**

The receiving docks for the warehouse are located on the north side of the warehouse, which has been designed to accommodate truck movements and meet setback requirements. The bay doors will be equipped with sealed gaskets to limit noise impacts. A transformer and two trash compactors will be located to the north of the warehouse.

**General Operations**

General elements of Costco's operations are listed below:

- Approximately 250 to 300 employees.
- Customers are members as Costco is a member-only retail/wholesale business.
- Hours for the warehouse are anticipated to be Monday through Friday from 9:00 am to 8:30 pm, and Saturday and Sunday from 9:00 am to 7:00 pm.
- The fuel station will operate from 5:00 am to 10:00 pm daily.

**Deliveries**

The receiving docks for Costco are at the northwest corner of the building. Costco anticipates approximately 10 large trucks with double-axle trailers and approximately 15-20 smaller box trucks or trucks with single-axle trailers delivering goods on a typical weekday. The trucks range in size from 26 feet long for single-axle trailers to 70 feet long for double-axle trailers. Receiving time is from 2:00 a.m. to 1:00 p.m., averaging 2 to 3 trucks per hour, with most of the deliveries completed before the warehouse opens.

The tire center, located on the south side of the building, typically will receive shipments of tires one to two times per week in single or double-axle trailer trucks of up to 70 feet in length. The

same delivery truck will pick up old tires for recycling. Deliveries to and pickups from the tire center will be scheduled before the warehouse opens, typically around 6:00 a.m.

**Building Design**

The warehouse entrance is located at the southwest of the warehouse. The building orientation and design avoids any operations being along the rear of the building adjacent to Highway 4's 60-foot no build zone. The receiving area faces west. The tire center will be located along the southern elevation of the warehouse.

As noted above, the proposed fuel facility includes a +/-11,500 square-foot canopy and a +/-125 square-foot controller enclosure located at the northwestern portion of the Costco Site. The controller enclosure would be built with steel walls and finished with paint to match the warehouse building colors. There would be four covered fueling bays, each with four two-sided fuel dispensers so as to provide for the fueling of eight vehicles at each island for a total of 32 fueling positions. The canopy over the fuel bays would be built with metal columns and vertical ribbed panels along the facia edge, both painted to match the warehouse building colors.

**Costco Sustainability Features**

The Costco Site will incorporate sustainability features per the California Title 24 energy requirements. In addition, to reduce energy consumption and promote sustainability, according to Costco the building and site plan would incorporate many energy saving measures. Below are some of the significant practices that Costco currently incorporates into new buildings that help conserve energy and other natural resources that are expected to be used in connection with the development of the site. It is noted that these proposed conservation measures have not been guaranteed by the City of Brentwood and have not been assumed to be implemented in the following CEQA analysis.

- Parking lot light standards will be designed to provide even light distribution, and utilize less energy compared to a greater number of fixtures at lower heights. The use of LED lamps can provide a higher level of perceived brightness with less energy than other lamps such as high-pressure sodium. Additionally, the LED fixtures that Costco will be using on the light poles are full cutoff to eliminate light being aimed skyward.
- New and renewable building materials are typically extracted and manufactured within the region. When masonry and concrete are used, the materials purchased are local to the project, minimizing the transportation distances and impact to local road networks.
- The use of pre-manufactured building components, including structural framing and metal panels, helps to minimize waste during construction.
- Pre-manufactured metal wall panels with insulation carry a higher R-Value and greater solar reflectivity to help conserve energy as compared to other materials. Building heat

absorption is further reduced by a decrease in the thermal mass of the metal wall when compared to a typical masonry block wall.

- A substantial amount of the proposed plant material for the project site is climate adapted to the region and will use less water than other common species.
- The irrigation system includes the use of deep root watering bubblers for parking lot trees to minimize usage and ensure that water goes directly to the intended planting areas.
- Storm water management plans are designed to maintain quality control and storm water discharge rates based on the County requirements.
- High-efficiency restroom fixtures can achieve a 40% decrease and water savings over U.S. standards.
- Commissioning of mechanical systems will occur to ensure that the HVAC systems are preforming as designed. HVAC comfort systems can be controlled by a computerized building management system to maximize efficiency HVAC units planned for the site are high efficiency direct ducted units, which have phased out the use of HCFC's completely, long before the Montreal Protocol timeline.
- Parking lot and exterior lights can be controlled by a photo sensor and time clock.
- Lighting is controlled by the overall project energy management system.
- Energy efficient Transformers (i.e., Square D Type EE transformers) are planned to be used.
- Variable speed motors will be used on make-up air units and booster pumps.
- Gas water heaters are direct vent and 94% efficient or greater.
- Reclaim tanks are used to capture heat released by refrigeration equipment to heat domestic water in lieu of venting heat to the outside.
- The Main Building structure is a pre-engineered system that uses 100% recycled steel materials and is designed to minimize the amount of material used.
- Construction waste is recycled whenever possible.
- Floor sealant is No-VOC and represents over 80% of the floor area.
- CO2 is monitored throughout the warehouse.
- Extensive recycling/reuse program is implemented for warehouse and office space including tires, cardboard, grease, plastics, and electronic waste.
- Use of plastic shopping bags is avoided.
- Suppliers are required to reduce packaging and consider alternative packaging solutions.
- Distribution facilities are strategically located to minimize miles traveled for delivery.
- Deliveries are made in full trucks.
- All Costco trucks are equipped with an engine idle shut off timers.

**Signage**

The Costco Site's proposed signage includes the Costco warehouse typical signage that consists of the signature Costco red and blue corporate colors. The signage is scaled appropriately to the mass of the building elevation. The project is proposing a Master Sign Program that includes specific details about the project's sign plan.

**Landscaping**

The proposed landscape design at the Costco Site features a planting layout consisting of colorful accent trees, diverse shade tree species and sweeping drifts (massing) of understory plant species at vehicular and pedestrian entryways, parking lot islands, and street frontages. The overall intent is to create a unifying landscape appearance to the site, as well as achieving a supportive relationship between building and landscape. In addition, the proposed landscape design will comply with the City's approved plant list.

Selective plant materials will enhance pedestrian wayfinding and scale, while trees and understory plant selections feature year-long interest and seasonal color. Plant materials with neutral and vivid bloom colors, and various leaf textures and patterns provide harmony through variety. Large canopied deciduous and broadleaf evergreen trees are integrated into parking lots, pedestrian walkways and along the street frontages. These trees will, in time, provide shade and reduce ambient heat during times of the year when solar exposure is intense.

Selected plant species provide reliable screening at above grade utility locations, and to soften the northern building facade.

The planting design consists predominantly of sustainable drought-tolerant species adapted to both local and regional climate conditions. Once established, the majority of selected plant species will require low water and landscape maintenance. In addition, understory plant materials are spaced to allow plants to grow and pleat together naturally, minimizing the need for extensive pruning maintenance such as shearing and hedging, thus reducing long-term landscape waste.

The site irrigation design will consist of an efficient low flow, point of source system designed to provide adequate watering to support plant growth and ensure deeply rooted plant material while avoiding excess water application. The system will be programmable, allowing operation during late night and/or early morning hours, with multiple start times and cycles.

**Lighting**

The site's parking lot will be illuminated with standard downward LED fixtures affixed to a 36.5-foot-tall light pole. The lighting fixtures are of a "shoe-box" style. The use of LED lamps can provide a higher level of perceived brightness with less energy than other lamps such as high-

pressure sodium. Parking lot light standards are designed to provide even light distribution for vehicle and pedestrian safety. The parking lot lights will be timer controlled to limit lighting after the warehouse has closed and most employees are gone from the warehouse. Parking lot lighting will only remain on to provide security and emergency lighting only along the main driveways.

Downward facing security lighting will be located on the exterior of the building on all sides. Lighting fixtures will also be located on the building approximately every 40 feet around the exterior of the building to provide safety and security. Parking and site lighting will incorporate the use of cutoff lenses to keep light from overflowing beyond the Costco site boundaries.

**Utility Infrastructure**

Costco will construct utility improvements within the site to service the proposed uses and connect to existing available utilities adjacent to the project site. Water and sewer service will be provided by the City of Brentwood via existing facilities.

No utilities connections are currently proposed at the out parcel.

**Storm Drainage**

The Project will comply with City, State, and Federal stormwater runoff mandates. The City operates under the Municipal Regional Stormwater NPDES Permit (MRP). The MRP provisions set for development projects will be implemented through a combination of site design (quantity control), source control, and water quality treatment.

Site design measures will include protecting existing trees where possible, planting trees adjacent to and in parking areas, and reducing existing impervious surfaces. Source control measures will include beneficial landscaping, labeling storm drains, and routine maintenance. Water quality treatment for the site will be provided through multiple bioretention cells around the site. The design and sizing guidelines for the bioretention areas are based off the Santa Clara Valley Stormwater Handbook. A Stormwater Control Plan (SCP) will be included with the Grading and Drainage Plans.

The proposed project is subject to the requirements of the countywide NPDES permit. Known as the "C.3 Standards," new development and redevelopment projects that create or replace an acre or more of impervious surface area must contain and treat stormwater runoff from the site. The proposed project is a C.3 regulated project and is required to include appropriate site design measures, source controls, features and facilities for hydromodification management (HM) and hydraulically-sized stormwater treatment measures. These measures would include underground storage facilities for HM and biorention areas to treat stormwater runoff before allowing it to proceed into the public storm drain system.

**Other Out Parcel Site Improvements**

The project includes minor improvements to the out parcel to the west on APN 019-020-055. These improvements include installation of one driveway access point along the boundary of the two parcels that runs North/South. No other development is currently proposed on this portion of the site. Future development of the out parcel beyond these improvements is speculative at this time. If any development is proposed in the future it will be submitted to the City as a separate independent development application.

## PROJECT OBJECTIVES

The following are the objectives for the project:

- Construct and operate a new Costco warehouse that serves the local community with competitively priced goods and services from both nationally known businesses as well as regional and local businesses.
- Provide a state-of-the-art Costco warehouse to better serve the membership in the greater East Contra Costa County area in a location that is convenient for its members, the community, and employees to travel to shop and work.
- Provide a Costco warehouse in a location that is serviced by adequate existing infrastructure including roadways and utilities.
- Improve the Lone Tree Plaza shopping center to support the development and operation of the Costco Site.
- Enhance the area with a warehouse that is architecturally designed to be responsive to the City of Brentwood area design context and sensitive to the adjacent community, future development(s) and compatible with the need for a new warehouse in this market area.
    - Develop a high-quality planned commercial development.
    - Employ architectural and landscaping designs that soften the scale and mass of the buildings, create a pleasant and attractive appearance, and complement the surrounding area.
    - Reduce energy consumption by incorporating sustainable design features and systems with enhanced energy efficiencies meeting State and federal code requirements.
    - Minimize potential site access and on-site circulation conflicts between drivers and pedestrians.
- Promote economic growth and diverse new employment and retail/service opportunities for Brentwood residents.
    - Increase the number of jobs in Brentwood and contribute to the local job/housing balance.
    - Contribute to the City's sales tax base.

- Develop a Costco warehouse that is large enough to accommodate all the uses and services Costco provides to its members elsewhere.

## REQUESTED ENTITLEMENTS AND OTHER APPROVALS

**Conditional Use Permit (CUP):** The PA-1 Specific Plan RC land use designation allows for Retail-General, Large format uses as a permitted use (the proposed Costco Warehouse). A CUP is required for a Service Station, Accessory to a Retail-General, Large format use (the proposed fuel facility).

**Tentative Parcel Map:** The project is requesting to divide the existing two parcels into four separate parcels.

- The first parcel would contain the Costco warehouse, surface parking lot, and access road (labeled as "Parcel A" on the tentative parcel map).
- The second parcel would contain the fuel facility (labeled as "Parcel B" on the tentative parcel map).
- The third parcel would contain the portion of the out parcel between the newly created access road and the area between the fuel facility (labeled as "Parcel C" on the tentative parcel map).
- The fourth parcel would include the remainder of the out parcel (labeled as "Parcel D" on the tentative parcel map).

**Master Sign Program:** The project is submitting a Master Sign Program which establishes guidelines to ensure a consistent design is achieved at the site and is architecturally compatible with the surrounding area.

**Design Review:** The project is subject to design review by the Brentwood Planning Commission to ensure consistency with the applicable guidelines and standards for design contained in the PA-1 Specific Plan.

**Adoption of the CEQA Exemption** (Guidelines Section 15183).

The following agencies are considered Responsible or Trustee Agencies for this project, and may be required to issue permits or approve certain aspects of the project;

- California Department of Fish and Wildlife (CDFW);
- Central Valley Regional Water Quality Control Board (CVRWQCB);
- East Bay Municipal Utility District (EBMUD);
- East Contra Costa County Habitat Conservancy;
- Contra Costa Water District (CCWD).

## PREVIOUS ENVIRONMENTAL ANALYSES OF THE PROPOSED PROJECT

Previous environmental analysis has been prepared and certified which is applicable to the proposed project. On November 13, 2018, the City of Brentwood adopted the PA-1 Specific Plan and certified the associated PA-1 Specific Plan EIR (State Clearinghouse (SCH) #2018042064). Cumulative impacts associated with full development and buildout of the Specific Plan Area, including the proposed project site, were fully addressed in the PA-1 Specific Plan EIR. In October 2022 the City approved an update to the PA-1 Specific Plan and completed additional environmental review of the update. An Addendum to the PA-1 Specific Plan EIR was adopted by the City in October 2022 (State Clearinghouse (SCH) #2018042064).

The proposed project would be consistent with the PA-1 Specific Plan's designation of Regional Commercial (RC) for the Costco site. Additionally, the PA-1 Specific Plan EIR assumed full development and buildout of the Specific Plan Area with the types of uses and development standards proposed by the project. As such the cumulative impacts associated with buildout of the PA-1 Specific Plan, including the project site, were fully addressed in the PA-1 Specific Plan EIR.

### *CEQA GUIDELINES SECTION 15183 EXEMPTIONS*

CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an EIR was certified. As noted above, the proposed project is consistent with the land use designation and densities established by the PA-1 Specific Plan, for which an EIR was certified. The provisions contained in Section 15183 of the CEQA Guidelines are presented below.

**15183. Projects Consistent with a Community Plan or Zoning**

*(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.*

*(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:*

> *(1) Are peculiar to the project or the parcel on which the project would be located,*
> *(2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,*

*(3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or*
*(4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

*(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.*

*(d) This section shall apply only to projects which meet the following conditions:*

*(1) The project is consistent with:*

*(A) A community plan adopted as part of a general plan,*
*(B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or*
*(C) A general plan of a local agency, and*

*(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.*

*(e) This section shall limit the analysis of only those significant environmental effects for which:*

*(1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and*
*(2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.*

*(f) An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the City or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR. Such development policies or standards need not apply throughout the entire City or county, but can apply only within the zoning district in which the project is located, or within the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance. Where a City or county, in*

*previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the City or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the City or county decides to apply the standards or policies as permitted in this section.*

*(g) Examples of uniformly applied development policies or standards include, but are not limited to:*

*(1) Parking ordinances.*
*(2) Public access requirements.*
*(3) Grading ordinances.*
*(4) Hillside development ordinances.*
*(5) Flood plain ordinances.*
*(6) Habitat protection or conservation ordinances.*
*(7) View protection ordinances.*
*(8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.*

*(h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.*

*(i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.*

*(1) "Community plan" is defined as a part of the general plan of a City or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.*
*(2) For purposes of this section, "consistent" means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.*

*(j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.*

## PROJECT-SPECIFIC ENVIRONMENTAL REVIEW

The attached Environmental Analysis includes a discussion and analysis of any peculiar or site-specific environmental impacts associated with construction and operation of the proposed project. The Environmental Analysis identifies whether or not each CEQA Appendix G environmental checklist question, and its corresponding impacts, were adequately addressed in the PA-1 Specific Plan EIR, if there is a significant impact due to new information, or if the project would result in a significant impact peculiar to the project site that was not adequately addressed in the PA-1 Specific Plan EIR. The Environmental Analysis identifies the applicable City of Brentwood development standards and policies that would apply to the proposed project during both the construction and operational phases, identifies applicable mitigation measures from the PA-1 Specific Plan EIR that must be implemented, identifies applicable state-level standards and requirements, and explains how the application of these uniformly applied standards and policies would ensure that no peculiar or site-specific environmental impacts would occur. Examples of uniformly applied standards and requirements include, but are not limited to, compliance with the California Building Code (to reduce impacts associated with seismic hazards) and preparation of a Stormwater Pollution Prevention Plan (to reduce impacts associated with surface water pollution during construction activities).

## CONCLUSION

As described above, the proposed Project (project) is consistent with the land uses and development intensities assigned to the project site by the PA-1 Specific Plan. Impacts from buildout of the PA-1 Specific Plan including cumulative impacts associated with development and buildout of the project site, as proposed, were fully addressed in the PA-1 Specific Plan EIR, inclusive of all Specific Plan updates and Addendum to the Environmental Impact Report (EIR) prepared for the Priority Area 1 Specific Plan (State Clearinghouse No. 2018042064), and implementation of the proposed project would not result in any new or altered impacts beyond those addressed in the Specific Plan EIR.

The analysis in the attached CEQA Environmental Checklist demonstrates that there are no site-specific or peculiar impacts associated with the project, and identifies uniformly applied standards and policies that would be applied to the project. The Project Requirements identified in the attached environmental analysis include requirements that must be implemented by the proposed project in order to ensure that any site-specific impacts or construction-related impacts are not significant. All Project Requirements identified in the attached Environmental Checklist shall be made a condition of project approval and shall be implemented within the timeframes identified. In addition, the project would also be subject to all applicable requirements identified under the PA-1 Specific Plan and EIR.

Figure 1 - Regional Location Map

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Figure 2 - Site Plan (TPM)

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Figure 3 - Aerial View of Project Site

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Figure 4 - Land Use and Zoning Designations

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# ENVIRONMENTAL CHECKLIST

## *I. AESTHETICS -- WOULD THE PROJECT:*

| | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Have a substantial adverse effect on a scenic vista? | | | X | |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | | | X | |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with the applicable zoning and other regulations governing scenic quality? | | | X | |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Response a): Adequately addressed in Specific Plan EIR.** A scenic vista is an area that is designated, signed, and accessible to the public for the express purposes of viewing and sightseeing. This includes any such areas designated by a federal, State, or local agency. Federal and State agencies have not designated any such locations within the City of Brentwood for viewing and sightseeing.

While Brentwood contains numerous areas and viewsheds with relatively high scenic value, there are no officially designated scenic vista points in Brentwood. Therefore, implementation of the proposed project would not result in substantial adverse effects on a scenic vista.

Implementation of the proposed project would introduce new commercial development to the project area, and would be consistent with the surrounding uses anticipated by the PA-1 Specific plan and EIR. As such, the proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** As described in the PA-1 Specific Plan EIR**,** there are no officially designated scenic highways located in the vicinity of Brentwood. There is, however, one Eligible State Scenic Highway Corridor that runs through the Specific Plan Area that has not yet been officially designated. State Route 4, west of the junction with Byron Highway to the junction with State Route 160 in Antioch is designated as an Eligible State Scenic Highway Corridor.

There are no locally identified scenic resources adjacent to the project site nor is the project site within a special planning area protected for its scenic resources. The City of Brentwood General Plan does outline a policy to preserve and protect scenic vistas (Policy COS-7-3) that specifically identifies Mount Diablo and local hills and ridgelines as potential scenic resources. The PA-1 Specific Plan does not designate scenic vistas. With implementation of the proposed project, the project site would be converted from vacant undeveloped land to a commercial development with building heights at 36' 6'' at the entrance cornice coping. The proposed building heights are consistent with existing commercial development located immediately north of the project site. Mount Diablo and prominent local hillsides are located at a fair distance to the west of the project.

According to the PA-1 Specific Plan EIR and the California Scenic Highway Mapping System, administered by Caltrans, the City of Brentwood does not contain officially designated State Scenic Highways. However, it should be noted that the segment of State Route 4 (SR 4) located to the east of the project site is listed as an Eligible State Scenic Highway, but has not yet been officially designated. The project site and proposed development would be visible from this location.

As described in the PA-1 Specific Plan EIR, implementation of the PA-1 Specific Plan would facilitate future urban development within the Plan Area, consistent with the assumptions and analysis contained in the Brentwood General Plan EIR (SCH #2014022058). When the Brentwood City Council certified the General Plan EIR, the Council also adopted Findings of Fact and a Statement of Overriding Conditions related to significant impacts associated with visual and scenic resources.

As described in the PA-1 Specific Plan EIR, the PA-1 Specific Plan would not result in any new or increased impacts associated with visual resources, beyond those that were already addressed in the General Plan EIR. Additionally, the proposed project would not remove trees, rock outcroppings, and historic buildings within a state scenic highway.

As such, the proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts associated with visual resources, beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response c): Adequately addressed in Specific Plan EIR.**

The project site is located in an area predominately containing commercial, residential, public, and agricultural uses. The proposed project would be consistent with all building design guidelines for the design review process established by the PA-1 Specific Plan. The proposed structures and building architectural theme (elevations, materials, building form, and color) would be related to adjacent development and Brentwood's community character.

While development of the proposed project would change and alter the existing visual character of the project site, these changes would not degrade the visual quality of the site or the surrounding areas. The proposed building incorporates a mix of materials, architectural features, and landscaping, and would be consistent with Brentwood design standards. Development of the site would also be subject to the PA-1 Specific Plan Design Guidelines.

Various temporary visual impacts could occur as a result of construction activities as the project develops, including grading, equipment and material storage, and staging. Though temporary, some of these impacts could last for several weeks or months during any single construction phase. Because impacts would be temporary and viewer sensitivity in the majority of cases would be slight to moderate, significant impacts are not anticipated.

The final project design would be approved by the City through its design review process. Through this process, the Planning Commission would ensure the design meets the criteria set forth in the PA-1 Specific Plan. As a result, development of the project site would not substantially degrade the existing visual character or quality of the site and its surroundings.

The project is consistent with the Regional Commercial zoning designation and will comply with City standards, including, but not limited to, the City's Design Goals the PA-1 Specific Plan Design Guidelines, which would ensure that the exterior facades of the proposed commercial structures, streetscape improvements and exterior lighting improvements are compatible with the surrounding land uses.

As such, the proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts associated with visual resources, beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response d): Adequately addressed in Specific Plan EIR.**

The proposed project will create new sources of light and glare. Examples of lighting would include construction lighting, exterior building lighting, interior building lighting, and automobile and parking lighting. Examples of glare would include reflective building materials and automobiles. Development of the project site would be subject to all applicable local regulations and standards related to lighting.

The site's parking lot will be illuminated with standard downward LED fixtures affixed to a 36.5-foot-tall light pole. The lighting fixtures are of a "shoe-box" style. The use of LED lamps can provide a higher level of perceived brightness with less energy than other lamps such as high-pressure sodium. Parking lot light standards are designed to provide even light distribution for vehicle and pedestrian safety. The parking lot lights will be timer controlled to limit lighting after the warehouse has closed and most employees are gone from the warehouse. Parking lot lighting will only remain on to provide security and emergency lighting along the main driveways.

Downward facing security lighting will be located on the exterior of the building on all sides. Lighting fixtures will also be located on the building approximately every 40 feet around the exterior of the building to provide safety and security. Parking and site lighting will incorporate the use of cutoff lenses to keep light from overflowing beyond the Costco site boundaries.

The PA-1 Specific Plan includes lighting and design guidelines that would reduce potential adverse impacts associated with light and glare. The lighting guidelines require the use of non-reflective building materials, and light shielding fixtures. The project would be subject to the lighting and design guidelines, which are verified via the City's design review and approval process. As stated in the Specific Plan:

> *"Future development projects proposed within Priority Area 1 shall be reviewed for consistency with the design and policy standards established by this Specific Plan. Future projects shall also be reviewed for consistency with the adopted Brentwood General Plan, as the General Plan includes numerous policies and actions to ensure that future development within Brentwood minimizes potential environmental impacts and contributes to the quality of life envisioned by the General Plan."*

Implementation of the lighting and design standards in the Specific Plan would ensure that project lighting features do not result in light spillage onto adjacent properties and do not significantly impact views of the night sky. Adherence to the design requirements would ensure that excessively reflective building materials are not used, and that the proposed project would not result in significant impacts related to daytime glare.

The proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *II. AGRICULTURE AND FOREST RESOURCES: WOULD THE PROJECT:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | | | X | |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | X | |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)? | | | X | |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | | | X | |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Response a): Adequately addressed in Specific Plan EIR.** According to the California Department of Conservation Farmland Mapping and Monitoring Program the project site is designated as Farmland of Local Importance. The project site has been previously used for agricultural production. However, the site is not currently used for agricultural purposes.

Development of the site for urban uses and the subsequent removal of Farmland of Local Importance was taken into consideration in the PA-1 Specific Plan and PA-1 Specific Plan EIR.

Additionally, Section 17.730.020 of the City of Brentwood's Agricultural Preservation Program states that, "agricultural land" requiring mitigation, includes: "*those land areas of Contra Costa County specifically designated as agricultural core (AC) or agricultural lands (AL) as defined in the Contra Costa County general plan; those land areas near the city designated as agricultural conservation (AC) as defined in the Brentwood general plan; and/or other lands upon which agricultural activities, uses, operations or facilities exist or could exist that contain Class I, II, III or IV soils as defined by the United States Department of Agriculture Natural Resource Conservation Service*."

The proposed project is identified for urban land uses in the PA-1 Specific Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the PA-1 Specific Plan EIR, nor significantly change previously identified impacts. However, the site currently consists of land previously used for agricultural purposes, and contains Farmland of Local Importance. The proposed project is therefore subject to compliance with Chapter 17.730, Agricultural Preservation Program, of the Brentwood Municipal Code, as required by Mitigation Measure 3.2-1 in the PA-1 Specific Plan EIR.

*Project Requirement(s)*

***Requirement AG-1:*** *Implement PA-1 Specific Plan EIR Mitigation Measure 3.2-1:*

*As future development projects within the PA-1 Specific Plan Area are approved by the City, the Project applicant(s) must preserve agricultural lands by one of the following mechanisms, consistent with Chapter 17.730 of the Brentwood Municipal Code (Ord. 877 § 2, 2010):*

1. *Granting an agricultural conservation easement to or for the benefit of the city and/or a qualified land trust approved by the city on agricultural land deemed acceptable by the city. The easement shall encumber the exact acreage of the proposed entitlement, including any land used for park and recreation purposes and may encumber land acquired by the city and/or qualified land trust in fee; or*

2. *Payment of an in-lieu fee established by city council resolution. The fee may be adjusted annually but may not be increased by more than ten percent during any twelve-month period.*

The proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan and zoning code, and would not result in any new or increased impacts beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was potentially significant, but would be reduced to a less than significant level following implementation of EIR mitigation measure 3.2-1. As noted above, the project is required to implement mitigation measure 3.2-1 from the EIR. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** The project site is not under a Williamson Act Contract, nor are any of the parcels immediately adjacent to the project site under a Williamson Act Contract, or designated by the General Plan or Zoning Maps for agricultural uses. Therefore, implementation of the proposed project would not conflict with a Williamson Act Contract, and would not conflict with any agricultural zoning.

The proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Responses c) and d): Adequately addressed in Specific Plan EIR.** The project site is located in a vacant urban area. There are no forest resources on the project site or in the immediate vicinity of the project site.

The PA-1 Specific Plan EIR (EIR) determined that there was no impact related to this environmental topic. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response e): Adequately addressed in Specific Plan EIR.** As described under Responses (a) above, the project site is designated as Farmland of Local Importance. The project site has been previously used for agricultural. However, the site is not currently used for agricultural purposes.

Development of the site for urban uses and the subsequent removal of Farmland was taken into consideration in the PA-1 Specific Plan and PA-1 Specific Plan EIR. Additionally, Section 17.730.020 of the City of Brentwood's Agricultural Preservation Program states that, "agricultural land" requiring mitigation, includes: "those land areas of Contra Costa County specifically designated as agricultural core (AC) or agricultural lands (AL) as defined in the Contra Costa County general plan; those land areas near the city designated as agricultural conservation (AC) as defined in the Brentwood general plan; and/or other lands upon which agricultural activities, uses, operations or facilities exist or could exist that contain Class I, II, III or IV soils as defined by the United States Department of Agriculture Natural Resource Conservation Service."

The proposed project is identified for urban land uses in the PA-1 Specific Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the PA-1 Specific Plan EIR, nor significantly change previously identified impacts. However, the site currently consists of land previously used for agricultural purposes, and contains Farmland of Local Importance. The proposed project is therefore subject to compliance with Chapter 17.730, Agricultural Preservation Program, of the Brentwood Municipal Code, as described in greater detail above.

The proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *III. AIR QUALITY -- WOULD THE PROJECT:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | | | X | |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | | | X | |
| c) Expose sensitive receptors to substantial pollutant concentrations? | | | X | |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | | | X | |

### *EXISTING SETTING*

The project site is located within the boundaries of the Bay Area Air Quality Management District (BAAQMD). This agency is responsible for monitoring air pollution levels and ensuring compliance with federal and state air quality regulations within the San Francisco Bay Area Air Basin (SFBAAB) and has jurisdiction over most air quality matters within its borders.

Information included in the section is further detailed in Attachment A. Air Quality/Health Risk Technical Report Prepared by: Ramboll US Consulting, Inc. May 2023.

**Response a): Adequately addressed in Specific Plan EIR.** The SFBAAB is currently designated as a nonattainment area for State and federal ozone, State and federal particulate matter 2.5 microns in diameter ($PM_{2.5}$), and State particulate matter 10 microns in diameter ($PM_{10}$) standards. The BAAQMD, in cooperation with the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG), prepared the 2005 Ozone Strategy, which is a roadmap depicting how the Bay Area will achieve compliance with the State one-hour air quality standard for ozone as expeditiously as practicable and how the region will reduce transport of ozone and ozone precursors to neighboring air basins. The most recent State ozone plan is the 2017 Clean Air Plan (CAP), adopted on April 19, 2017. The 2017 CAP was developed as a multi-pollutant plan that provides an integrated control strategy to reduce ozone, PM, toxic air contaminants (TACs), and greenhouse gases (GHGs). Although the California Clean Air Act does not require the region to submit a plan for achieving the State $PM_{10}$ standard, the 2005 Ozone Strategy and 2017 CAP are expected to also reduce $PM_{10}$ emissions. In addition, the BAAQMD has prioritized measures to reduce PM in developing the control strategy for the 2017

CAP. The control strategy serves as the backbone of the BAAQMD's current PM control program. To fulfill federal air quality planning requirements, the BAAQMD adopted a $PM_{2.5}$ emissions inventory for year 2010, which was submitted to the U.S. Environmental Protection Agency (USEPA) on January 14, 2013 for inclusion in the State Implementation Plan (SIP).

The current plan in place to achieve progress toward attainment of the federal ozone standards is the *Revised San Francisco Bay Area Ozone Attainment Plan for the 1-Hour National Ozone Standard*. The USEPA recently revoked the 1-hour federal ozone standard; however, the region is designated nonattainment for the new 8-hour standard that replaced the older one-hour standard. Until the region either adopts an approved attainment plan or attains the standard and adopts a maintenance plan, the *Revised San Francisco Bay Area Ozone Attainment Plan for the 1-Hour National Ozone Standard* remains the currently applicable federally-approved plan.

The aforementioned applicable air quality plans contain mobile source controls, stationary source controls, and transportation control measures (TCMs) to be implemented in the region to attain the State and federal ozone standards within the SFBAAB. The plans are based on population and employment projections provided by local governments, usually developed as part of the General Plan update process. The proposed project would be considered to conflict with, or obstruct implementation of, an applicable air quality plan if the project would be inconsistent with the Ozone Attainment Plan's growth assumptions, in terms of population, employment, or regional growth in Vehicle Miles Traveled (VMT). The growth assumptions are based on ABAG projections that are, in turn, based on the City's General Plan. The proposed project is designated as PA-1 Specific Plan in the Brentwood General Plan, and is specifically identified for regional commercial uses by the PA-1 Specific Plan. As described in the PA-1 Specific Plan EIR the Specific Plan does not cause the disruption, delay, or otherwise hinder the implementation of any air quality plan or control measure.

As described in detail in the transportation and circulation portion of this report the proposed Project would not result in growth in or impacts related to Vehicle Miles Traveled (VMT). The proposed project is consistent with the General Plan land use designation, and the PA-1 Specific Plan's land use designations. Therefore, the project would be considered consistent with the growth assumptions identified by the General plan and specific plan. As a result, the proposed project would not conflict with or obstruct implementation of the applicable air quality plans.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.**

**Criteria Air Pollutant Emissions - Construction**

Grading, leveling, earthmoving and excavation are the activities that generate the most particulate emissions. Impacts would be localized and variable. The initial phase of project construction would involve grading the project site and installation of supporting underground infrastructure, such as water, sewer, storm drain, and electrical lines. The Brentwood General Plan includes Policy COS 8-5 which requires all construction projects and ground disturbing activities to implement BAAQMD dust control and abatement measures.

A quantification of the project's construction emissions has been performed using the California Emissions Estimator Model (CalEEModTM). Table 1 presents the average daily criteria air pollutant (CAP) emission estimates from Project construction for calendar year 2023. As shown in this table, the construction emissions for the proposed Project are less than the BAAQMD mass daily significance thresholds for all pollutants.

***Table 1: Average Daily Criteria Air Pollutant Emission Estimates for Project Construction***

| Scenario | Average Daily Criteria Air Pollutant Emission Estimates | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_x$ | CO | $SO_x$ | Exhaust $PM_{10}$ | Exhaust $PM_{2.5}$ |
| | (lbs/day) | | | | | |
| **Project** | 12.2 | 22.1 | 23.3 | 0.0 | 1.0 | 0.9 |
| **BAAQMD Mass Daily Significance Thresholds[4]** | **54** | **54** | **None** | **None** | **82** | **54** |
| **Exceeds Threshold for any Year of Construction?** | NO | NO | NO | NO | NO | NO |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. MAY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS. AVAILABLE AT HTTPS://WWW.BAAQMD.GOV/~/MEDIA/FILES/PLANNING-AND-RESEARCH/CEQA/CEQA_GUIDELINES_MAY2017-PDF.PDF?LA=EN. ACCESSED: DECEMBER 2022.*

Table 2 presents a maximum annual CAP emission comparison between Project construction and the PA-1 Specific Plan EIR construction. Construction emissions for the PA-1 Specific Plan EIR represent the maximum year of construction activity as provided in Appendix B of the PA-1 Specific Plan. Maximum annual construction emissions for the Project include construction of the fuel station, warehouse, and parking lot. As shown in Table 4, the construction emissions for the proposed Project are less than the construction emissions outlined in the PA-1 Specific Plan EIR.

***Table 2: Maximum Annual Criteria Air Pollutant Emission Comparison to PA-1 Specific Plan Construction***

| Scenario | Maximum Annual Criteria Air Pollutant Emission Estimates | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_x$ | CO | $SO_x$ | Total $PM_{10}$ | Total $PM_{2.5}$ |
| | (tons/yr) | | | | | |
| Specific Plan | 19.7 | 11.2 | 11.7 | 0.1 | 4.0 | 1.2 |
| Project | 1.2 | 2.2 | 2.3 | 0.0 | 0.2 | 0.1 |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. JANUARY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS.*

**Criteria Air Pollutant Emissions - Operation**

Tables 3 and 4 present the average daily and annual CAP emission estimates from Project operation. As shown in the tables, the operational emissions for the Project are less than the BAAQMD mass daily and annual significance thresholds for all pollutants. Furthermore, the Brentwood Costco Transportation Analysis prepared by Kittelson shows that the overall change in total regional daily vehicle miles traveled (VMT) is net negative. The emissions calculations were performed on a per mile basis and trip basis to determine the project mobile emissions consistent with the methodology applied in the Transportation Analysis. Thus, this analysis of criteria air pollutant emissions is conservative.

***Table 3: Average Annual Criteria Air Pollutant Emission Estimates for Project Operation***

| Emission Category | Annual Criteria Air Pollutant Emission Estimates | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| | (tons/year) | | | | | |
| Area | 0.86 | 0.01 | 0.65 | 0.01 | 0.01 | 0.01 |
| Energy | 0.01 | 0.05 | 0.05 | 0.01 | 0.01 | 0.01 |
| Mobile | 1.8 | 1.5 | 4.7 | 0.0 | -1.6 | -0.2 |
| Gasoline Dispensing Facility | 6.4 | -- | -- | -- | -- | -- |
| **Total Emissions** | **9.1** | **1.6** | **5.4** | **0.0** | **-1.6** | **-0.2** |
| **BAAQMD Significance Thresholds** | **10** | **10** | **None** | **None** | **15** | **10** |
| **Exceeds Threshold?** | NO | NO | NO | NO | NO | NO |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. MAY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS.*

***Table 4: Average Daily Criteria Air Pollutant Emission Estimates for Project Operation***

| Emission Category | Average Daily Criteria Air Pollutant Emission Estimates | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| | (lbs/day) | | | | | |
| Area | 4.7 | 0.1 | 3.6 | 0.0 | 0.0 | 0.0 |
| Energy | 0.0 | 0.3 | 0.3 | 0.0 | 0.0 | 0.0 |
| Mobile | 10.0 | 8.4 | 25.6 | 0.0 | -8.8 | -1.2 |
| Gasoline Dispensing Facility | 35.1 | -- | -- | -- | -- | -- |
| **Total Emissions** | **49.8** | **8.7** | **29.5** | **0.0** | **-8.8** | **-1.2** |
| **BAAQMD Significance Thresholds** | **54** | **54** | **None** | **None** | **82** | **54** |
| **Exceeds Threshold?** | NO | NO | NO | NO | NO | NO |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. MAY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS.*

Table 5 presents an annual CAP emission comparison between Project operation and the PA-1 Specific Plan EIR operation.

***Table 5: Annual Criteria Air Pollutant Emission Comparison to PA-1 Specific Plan Operation***

| Emission Category | Annual Criteria Air Pollutant Emission Estimates[1] | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_x$ | CO | $SO_x$[3] | $PM_{10}$ | PM |
| | (tons/year) | | | | | |
| **Specific Plan - Overall Operational** | | | | | | |
| Area | 31.6 | 0.3 | 21.6 | 0.0 | 1.0 | 1.0 |
| Energy | 0.5 | 4.8 | 3.6 | 0.0 | 0.4 | 0.4 |
| Mobile | 7.6 | 40.2 | 85.6 | 0.4 | 50.7 | 13.7 |
| **Total Emissions** | **39.7** | **45.3** | **110.8** | **0.5** | **52.1** | **15.1** |
| **Project** | | | | | | |
| Area | 0.86 | 0.01 | 0.65 | 0.01 | 0.01 | 0.01 |
| Energy | 0.01 | 0.05 | 0.05 | 0.01 | 0.01 | 0.01 |
| Mobile | 1.1 | 1.1 | 2.6 | 0.0 | -1.6 | -0.2 |
| Gasoline Dispensing Facility | 6.4 | -- | -- | -- | -- | -- |
| **Total Emissions** | **8.4** | **1.2** | **3.3** | **0.0** | **-1.6** | **-0.2** |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. MAY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS.*

Total operational emissions for the Project were estimated using CalEEMod and compared to the sum of all operational activity as provided in Appendix B of the PA-1 Specific Plan. As shown in Table 5, the operational emissions for the Project are less than the operational emissions outlined in the PA-1 Specific Plan EIR.

The BAAQMD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SFBAAB. Below is a list of key BAAQMD rules relevant to the Project:

Regulation I: General Provisions and Definitions

Regulation I (Rules 1-2) covers emission standard requirements within the BAAQMD. BAAQMD regulations require any person that is subject to more than one emission standard for the same air contaminant to comply with the most stringent standard.

Regulation II: Permits

Regulation II contains a series of rules (Rules 1-10) covering permitting requirements within the BAAQMD. BAAQMD regulations require any person constructing, altering, replacing, or operating any source which emits, may emit, or may reduce emissions to obtain an Authority to Construct or a Permit to Operate.

Regulation III: Fees

This regulation requires the applicant to submit an environmental documentation fee in addition to the fees required for new and modified sources (Rule 3-302) and the applicable fee schedules (Rule 3-600). The purpose of this fee is to recover the BAAQMD's cost for reviewing these plans and conducting compliance inspections.

Regulation VI: Particulate Matter

Regulation VI contains a series of rules (Rules 1-6) to reduce emissions of particulate matter from commercial and industrial sources. This regulation limits the quantity of particulate matter in the atmosphere by controlling emission rates, emission concentrations, visible emissions, and opacity.

Rule 6: Visible Particles

This rule applies to any source operation that emits or may emit air contaminants. The purpose of this rule is to prohibit the emissions of visible air contaminants to the atmosphere. In the event that the Project or construction of the Project creates a public nuisance, it could be in violation and be subject to BAAQMD enforcement action.

Regulation VIII: Organic Compounds

Regulation VIII contains a series of rules (Rules 1 through 53) that limits the release of organic pollutants into the atmosphere.

Rule 3: Architectural Coatings

This rule limits VOC content in architectural coatings supplied, sold, applied, or manufactured for use within the BAAQMD. This rule also contains requirements for architectural coatings storage, clean up and labeling.

Rule 7: Gasoline Dispensing Facilities

This rule applies to any gasoline storage and dispensing operation or mobile fueler from which gasoline is transferred into motor vehicle fuel tanks. The purpose of this rule is to limit emissions of organic compounds from gasoline dispensing facilities.

Rule 15: Emulsified and Liquid Asphalts

The purpose of this rule is to limit the emissions of volatile organic compounds caused by using emulsified and liquid asphalt in paving materials and paving and maintenance operations.

The land uses assumed for development of the proposed Project are consistent to those assumed in the PA-1 Specific Plan in terms of potential mobile source emissions that may be generated by these land uses. The mobile emissions are the dominant source of emissions. The square footage of the proposed Project would be less than the corresponding square footage assumed for retail development for this portion of the PA-1 Specific Plan, and thus, it is expected that the proposed Project would have similar if not lower emissions for this portion of the PA-1 Specific Plan. The construction activities for the proposed Project is also expected to be similar for the land uses as assumed in the PA-1 Specific Plan given that similar site preparation and building construction is expected to occur.

Additionally, the proposed project would further the fundamental goals of the BAAQMD in reducing emissions of criteria pollutants associated with vehicle miles traveled, and would be required to comply with all District Rules and Regulations (as describe above) and included in Requirement AQ-2 to further limit criteria pollutants.

*Project Requirement(s)*

***Requirement AQ-1:*** *Implement General Plan Policy COS 8-5:*

*Continue to require all construction projects and ground disturbing activities to implement BAAQMD dust control and abatement measures.*

***Requirement AQ-2:*** *Implement and comply with BAAQMD district rules and regulations including but not limited to: Regulation II: Permits; Regulation III: Fees; Regulation VI: Particulate Matter; Rule 6: Visible Particles; Regulation VIII: Organic Compounds, Rule 3: Architectural Coatings; Rule 7: Gasoline Dispensing Facilities; Rule 15: Emulsified and Liquid Asphalts.*

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response c): Adequately addressed in Specific Plan EIR.** A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic non-cancer health effects. A toxic substance released into the air is considered a toxic air contaminant (TAC). Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, waste processing facilities and laboratories; mobile sources such as automobiles; and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and non-carcinogenic effects. Non-carcinogenic effects typically affect one or more target organ systems and may be experienced either on short-term (acute) or long-term (chronic) exposure to a given TAC. Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. CARB classified "particulate emissions from diesel-fueled engines" (DPM;17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars, and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM. To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000.

The proposed project would introduce a new a commercial facility which includes a gasoline service station that would have associated toxic air contaminants (TACs) emissions. Particulate matter PM2.5 and Benzene are primary TACs associated with gasoline storage and refueling at gasoline stations. The land uses surrounding the Project site are primarily a mix of developed residential and commercial areas. The Brentwood General Plan Action COS 8a requires the review of all new industrial and commercial development projects for potential air quality impacts to residences and other sensitive receptors.

The BAAQMD has established thresholds of significance to which proposed project emissions are compared to determine the level of significance. The BAAQMD has established TAC-related emissions thresholds of significance as follows: < 10 per million for Cancer Risk, < 100 per million for cumulative Cancer Risk, and less than 1 per million for Chronic (non-cancer) and Acute (non-cancer) Risk. If the proposed project's emissions will exceed the BAAQMD's threshold of significance for TAC emissions, the proposed project will have a significant impact on sensitive receptors by exposing them to substantial pollutant concentrations.

A summary of the maximum health risk impacts and annual PM2.5 concentration increases for the Project is shown in Table 6 for project construction and Table 7 for project operation. Health risk results for all receptors are shown and further detailed in Attachment A.

As shown in Table 6, the maximum estimated cancer risk is less than the BAAQMD significance threshold, and the acute and chronic hazard index, and annual PM2.5 concentration increases are less than the BAAQMD significance thresholds.

***Table 6: Construction Health Risk Assessment Results***

| Receptor Type | Maximum Estimated Cancer Risk (in a million) | Maximum Estimated Chronic Hazard Index | Maximum Estimated Acute Hazard Index | Annual $PM_{2.5}$ Concentration ($\mu g/m^3$) |
|---|---|---|---|---|
| Residential | 0.0 | 0.0 | 0.0 | 0.01 |
| Sensitive | 0.0 | 0.0 | 0.0 | 0.00 |
| Worker | 0.0 | 0.0 | 0.0 | 0.02 |
| Daycare | 0.0 | 0.0 | 0.0 | 0.01 |
| **BAAQMD Threshold** | **10.0** | **1.0** | **1.0** | **0.3** |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. MAY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS.*

As shown in Table 7, the health risks and chronic and acute hazard index, and annual PM2.5 concentration increases associated with Project operation are less than the BAAQMD significance thresholds.

***Table 7: Operational Health Risk Assessment Results***

| Receptor Type | Maximum Estimated Cancer Risk (in a million) | Maximum Estimated Chronic Hazard Index | Maximum Estimated Acute Hazard Index | Annual $PM_{2.5}$ Concentration ($\mu g/m^3$) |
|---|---|---|---|---|
| Residential | 2.7 | 0.0 | 0.2 | 0.04 |
| Sensitive | 0.9 | 0.0 | 0.1 | 0.02 |
| Worker | 2.6 | 0.0 | 0.6 | 0.10 |
| Daycare | 7.1 | 0.0 | 0.5 | 0.11 |
| **BAAQMD Threshold** | **10.0** | **1.0** | **1.0** | **0.3** |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. MAY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS.*

A summary of the cumulative health risk impacts to the maximally impacted receptors is presented in Table 8. As shown in the table, the cumulative health risk impacts are less than significant for cancer and the non-cancer chronic hazard index. The cumulative annual PM2.5 concentration is also less than the cumulative threshold.

***Table-8: Cumulative Health Risk Assessment Results***

| Emission Source | Cancer Risk Impact (in one million) | Chronic Non-Cancer Hazard Index | Acute Non-Cancer Hazard Index | Annual $PM_{2.5}$ Concentration ($ug/m^3$) |
|---|---|---|---|---|
| Project Construction Impacts[1] | 0.0 | 0.0 | 0.0 | 0.01 |
| Project Operational Impacts[1] | 7.1 | 0.0 | 0.5 | 0.11 |
| **Subtotal, Project Impacts** | 7.1 | 0.0 | 0.5 | 0.12 |
| Existing Stationary Sources[2] | -- | -- | -- | -- |
| Major Roadways[3] | 0.4 | NA | NA | 0.01 |
| Major Highways[3] | 0.8 | NA | NA | 0.02 |
| Railways[3] | 0.3 | NA | NA | 0.00 |
| Subtotal, Background Sources | 1.5 | 0.0 | 0.0 | 0.02 |
| **Total Cumulative Impact** | **9** | **0.0** | **0.5** | **0.15** |
| BAAQMD Significance Threshold | 100 | 10.0 | 10.0 | 0.8 |

*SOURCES: AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. MAY 2023; BAAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS.*

The BAAQMD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SFBAAB. Key BAAQMD rules relevant fuel dispensing facilities to the project include:

- Rule 7: Gasoline Dispensing Facilities: This rule applies to any gasoline storage and dispensing operation or mobile fueler from which gasoline is transferred into motor vehicle fuel tanks. The purpose of this rule is to limit emissions of organic compounds from gasoline dispensing facilities. This rule requires compliance with numerous best practices and requirements related to fuel storage, equipment, monitoring, inspection, and vapor recovery system requirements.

Additionally, the Brentwood General Plan includes Policy COS 8-2 which aims to minimize exposure of sensitive receptors to concentrations of air pollutant emissions and toxic air contaminants. This is implemented through General Plan Action COS 8b, which requires the review of development, infrastructure, and planning projects for consistency with BAAQMD requirements during the CEQA review process, and requires project applicants to prepare air quality analyses to address BAAQMD and General Plan requirements, which include analysis and identification of:

1. Air pollutant emissions associated with the project during construction, project operation, and cumulative conditions;
2. Potential exposure of sensitive receptors to toxic air contaminants;
3. Significant air quality impacts associated with the project for construction, project operation, and cumulative conditions; and

4. Mitigation measures to reduce significant impacts to less than significant or the maximum extent feasible where impacts cannot be mitigated to less than significant.

As described above, the proposed project would not generate significant emissions of toxic air contaminates and would not result in substantial pollutant concentrations. Future development, infrastructure, and planning projects would also require review for TACs consistent with Action COS 8b. Additionally the project would be subject to BAAQMS Rules and Regulations related to Gasoline Dispensing Facilities as required by Requirement AQ-2.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response d): Adequately addressed in Specific Plan EIR.** Offensive odors rarely cause any physical harm; however, they still can be very unpleasant, leading to considerable distress among the public, and often generate citizen complaints to local governments and regulatory agencies. Major sources of odor-related complaints by the general public commonly include wastewater treatment facilities, landfill disposal facilities, food processing facilities, agricultural activities, and various industrial activities (e.g., petroleum refineries, chemical and fiberglass manufacturing, painting/ coating operations, landfills, and transfer stations).

According to the CARB's Handbook, some of the most common sources of odor complaints received by local air districts are sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, auto body shops, coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations. The project does not propose any of the aforementioned uses.

The proposed project would include a gasoline refueling station. Gasoline refueling is unlikely to cause a substantial odor issue for nearby areas. The BAAQMD significance threshold for odor impacts are qualitative in nature. An odor source with five or more confirmed complaints per year averaged over three years is considered to have a significant impact. Additionally, BAAQMD presents odor screening distances recommended for a variety of land uses, however this list provides guidance for uses that are likely to have odor impacts and doesn't not provide guidance related to gas stations and retail facilities. The project does not propose any of the uses which require screening distances to be met. As described previously, the project would also be subject to BAAQMD Rule 7 which aims to limit emissions of organic compounds from gasoline dispensing facilities.

Additionally, the California Air Resources Control Board has stringent requirements for the control of gasoline vapor emissions from gasoline-dispensing facilities through its Vapor Recovery Program. This program controls vapor emissions from gasoline marketing operations (gasoline dispensing facilities or service stations, tanker trucks (cargo tanks), bulk plants, and

terminals), where gasoline vapor is a precursor to the formation of ozone and contains benzene, a constituent of gasoline vapor that has been identified as a toxic air contaminant.

Compliance with these rules would ensure that potential odors generated at the project site result in a less than significant impact.

*Project Requirement(s)*

> ***Requirement AQ-3:*** *Compliance with the California Air Resources Control Board Vapor Recovery Program requirements for fuel dispensing facilities.*

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *IV. BIOLOGICAL RESOURCES -- WOULD THE PROJECT:*

| | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | | | X | |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | | | X | |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | | | X | |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | | | X | |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | | | X | |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a, e): Adequately addressed in Specific Plan EIR.**

The project site consists of Dryland Grain Crops, Deciduous Orchard and Urban cover types. As described in the PA-1 Specific Plan EIR the following describes the Specific Plan area and the special-status species known to occur within the region.

INVERTEBRATES

Special-status invertebrates that occur within the 9-quad region (which includes the following USGS quadrangles: Antioch North, Jersey Island, Bouldin Island, Antioch South, Brentwood,

Woodward Island, Tassajara, Byron Hot Springs, and Clifton Court Forebay) for the Specific Plan Area include: Conservancy fairy shrimp, longhorn fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp. As described in the PA-1 Specific Plan EIR the Specific Plan Area does not contain suitable habitat for these special-status invertebrate species. As a result, subsequent development under the proposed PA-1 Specific Plan would not result in any substantial adverse effects to these species. Therefore, impacts associated with special-status invertebrate species would be **less than significant**.

AMPHIBIANS & REPTILES

Special-status reptiles and amphibians that occur within the 9-quad region for the Specific Plan Area include: Alameda whipsnake, California glossy snake, California tiger salamander, California red-legged frog, coast horned lizard, foothill yellow-legged frog, giant garter snake, northern California legless lizard, San Joaquin coachwhip, and western pond turtle.

An infrastructure canal is located along the project site that could provide limited habitat.

FISH

Special-status fish that occur within the 9-quad region for the Specific Plan Area include: Delta smelt, eulachon, longfin smelt, Sacramento perch, and steelhead - Central Valley DPS. The project site does not contain suitable habitat for these special-status fish species. As such development would not result in any substantial adverse effects to these species. Therefore, impacts associated with special-status fish species would be **less than significant.**

BIRDS

Special-status birds that occur within the 9-quad region for the Specific Plan Area include: American peregrine falcon, bank swallow, burrowing owl, California black rail, California horned lark, double-crested cormorant, ferruginous hawk, golden eagle, grasshopper sparrow, great blue heron, loggerhead shrike, northern harrier, prairie falcon, saltmarsh common yellowthroat, song sparrow ("Modesto" population), Suisun song sparrow, Swainson's hawk, tricolored blackbird, and white-tailed kite. Because of the high mobility of these species, most of them have the potential to pass through the site from time to time. Burrowing owls have been documented within the OPA-1 Specific Plan Area. Additionally, it is anticipated that the raptor species would frequent the site for foraging. There is limited to no potential for nesting in the undeveloped site.

Indirect impacts to special-status bird species could occur from increased human presence, and the loss of foraging habitat. The PA-1 Specific Plan EIR determined this was a potentially significant impact.

MAMMALS

Special-status mammals that occur within the 9-quad region for the Specific Plan Area include: American badger, pallid bat, salt-marsh harvest mouse, San Francisco dusty-footed woodrat, San

Joaquin kit fox, and western red bat. Of these species, the following have the potential to occur on-site: American badger, pallid bat, San Joaquin kit fox and western red bat.

The undeveloped project site provides very limited to no potential for special status species mammals, except for movement and foraging. As described in the PA-1 Specific Plan EIR subsequent development under the proposed PA-1 Specific Plan could result in the direct loss of habitat areas associated with these special-status mammal species, since suitable habitat for these species does occur in the region. Additionally, indirect impacts to special-status mammal species could occur with implementation of the PA-1 Specific Plan. Indirect impacts could include habitat degradation, increased human presence, and the loss of foraging habitat. The PA-1 Specific Plan determined this is a potentially significant impact.

PLANTS

The CNDDB search included in the PA-1 Specific Plan EIR identified 37 documented special-status plant species within the 9-quad region for the Specific Plan Area. The developed and agricultural areas within the Specific Plan Area provide very limited to no potential for special status species reptile and amphibians. The tilled lands are regularly disturbed and do not have the potential for these plants. The drainage/irrigation ditches are the only areas within that have some potential for presence of native plants, although the potential for presence is very low. The portion of the project site with the highest potential for presence of any special status plant species is along the drainage feature along the eastern portion of the project site.

The PA-1 Specific Plan EIR includes the following mitigation requirements to reduce impacts to special status species:

> ***Mitigation Measure 3.4-1:*** *Future project proponent(s) of development projects within the Specific Plan Area shall implement the following measure to avoid or minimize impacts on special-status species:*
>
> - *Preconstruction surveys for Alameda whipsnake, giant garter snake, San Joaquin coachwhip, and western pond turtle shall be conducted by a qualified biologist in all areas of suitable habitat within 500 feet of project disturbance. Surveys shall be conducted within 24 hours before project disturbance.*
>
> - *If Alameda whipsnake or San Joaquin coachwhip are found during preconstruction surveys, activities within 200 feet of the find shall cease until appropriate corrective measures have been completed or it is determined by the qualified biologist and City staff, in coordination with USFWS and CDFW, that the species will not be harmed by the continuation of activities. Any sightings or incidental take shall be reported to USFWS and CDFW immediately.*
>
> - *If giant garter snake is found during preconstruction surveys, activities within 200 feet of the find shall cease until appropriate corrective measures have been completed or it is determined by the qualified biologist and City staff, in coordination with USFWS and CDFW, that the giant garter snake will not be harmed by the continuation of activities. Any sightings or incidental take shall be reported to USFWS and CDFW immediately.*

- *If western pond turtles are found during preconstruction surveys, a qualified biologist, with approval from CDFW, shall move the turtles to the nearest suitable habitat outside the area subject to project disturbance. The construction area shall be reinspected whenever a lapse in construction activity of 2 weeks or more has occurred.*

- *Construction personnel performing activities within aquatic habitats and adjacent suitable uplands to be disturbed by project activities shall receive worker environmental awareness training from a qualified biologist to instruct workers to recognize western pond turtle, their habitats, and measures being implemented for its protection.*

- *Construction personnel shall observe a 15-miles-per-hour speed limit on unpaved roads.*

***Mitigation Measure 3.4-2:*** *Prior to any ground disturbance, a preconstruction survey of the parcel(s) to be developed shall be completed for burrowing owl in accordance with CDFW survey guidelines (California Department of Fish and Game 1995). On the parcel where the activity is proposed, the biologist shall survey the proposed disturbance footprint and a 500-foot radius from the perimeter of the proposed footprint to identify burrows and owls. Adjacent parcels under different land ownership need not be surveyed. Surveys shall take place near sunrise or sunset in accordance with CDFW guidelines. All burrows or burrowing owls shall be identified and mapped. Surveys shall take place no earlier than 30 days prior to construction. During the breeding season (February 1 to August 31), surveys shall document whether burrowing owls are nesting in or directly adjacent to disturbance areas. During the nonbreeding season (September 1 to January 31), surveys shall document whether burrowing owls are using habitat in or directly adjacent to any disturbance area. Survey results shall be valid only for the season (breeding or nonbreeding) during which the survey is conducted. If burrowing owls and/or suitable burrows are not discovered, then further mitigation is not necessary. If burrowing owls and/or burrows are identified in the survey area, Mitigation Measure 3.4-3 shall be implemented.*

***Mitigation Measure 3.4-3:*** *If burrowing owls are found during the breeding season (February 1 to August 31), the project proponent(s) shall avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young. Avoidance shall include establishment of a non-disturbance buffer zone (described below). Construction may occur during the breeding season if a qualified biologist monitors the nest and determines that the birds have not begun egg-laying and incubation or that the juveniles from the occupied burrows have fledged. During the nonbreeding season (September 1 to January 31), the project proponent(s) shall avoid the owls and the burrows they are using, if possible. Avoidance shall include the establishment of a buffer zone (described below). During the breeding season, buffer zones of at least 250 feet in which no construction activities can occur shall be established around each occupied burrow (nest site). Buffer zones of 160 feet shall be established around each burrow being used during the nonbreeding season. The buffers shall be delineated by highly visible, temporary construction fencing.*

*If occupied burrows for burrowing owls cannot be avoided, passive relocation shall be implemented. Owls shall be excluded from burrows in the immediate impact zone and within a 160-foot buffer zone by installing one-way doors in burrow entrances. These doors shall be in place for 48 hours prior to excavation. The project area shall be monitored daily for 1 week to confirm that the owl has abandoned the burrow. Whenever possible, burrows shall be excavated using hand tools and refilled to prevent reoccupation (California Department of Fish and Game 1995). Plastic tubing or a similar structure shall be inserted in the tunnels during excavation to maintain an escape route for any owls inside the burrow.*

***Mitigation Measure 3.4-4:*** *Prior to any ground disturbance conducted during the Swainson's hawk nesting season (March 15 to September 15), a USFWS/CDFW-approved biologist shall conduct a preconstruction survey for Swainson's hawk no earlier than 30 days prior to construction in order to establish whether occupied Swainson's hawk nests are located within 1,000 feet of the parcel(s) to be developed. If any potentially-occupied nests within 1,000 feet are off the project site, then their occupancy shall be determined by observation from public roads or by observations of Swainson's hawk activity (e.g. foraging) near the project site. A written summary of the survey results shall be submitted to the City of Brentwood Community Development Department. If occupied nests occur on- site or within 1,000 feet of the project site, then Mitigation Measure 3.4-5 shall be implemented. If occupied nests are not found, further mitigation is not necessary.*

***Mitigation Measure 3.4-5:*** *During the Swainson's hawk nesting season (March 15 to September 15), construction activities within 1,000 feet of occupied nests or nests under construction shall be prohibited to prevent nest abandonment. If site-specific conditions, or the nature of the covered activity (e.g., steep topography, dense vegetation, and limited activities) indicate that a smaller buffer could be used, the City of Brentwood may coordinate with CDFW/USFWS to determine the appropriate buffer size. If young fledge prior to September 15, construction activities could proceed normally. If the active nest site is shielded from view and noise from the project site by other development, topography, or other features, the project applicant can apply to the City of Brentwood for a waiver of this avoidance measure. Any waiver must also be approved by USFWS and CDFW. While nest is occupied, activities outside the buffer can take place.*

*All active nest trees shall be preserved on site, if feasible. Feasibility shall be determined in conjunction with the City of Brentwood. Nest trees, including non-native trees, lost to construction activities shall be mitigated by the project proponent according to the requirements of Mitigation Measure 3.4-6.*

***Mitigation Measure 3.4-6:*** *The loss of non-riparian Swainson's hawk nest trees shall be mitigated by the project proponent(s) by:*

- *Planting 15 saplings onsite for every tree lost with the objective of having at least 5 mature trees established for every tree lost according to the requirements below. The project proponent shall plant, maintain, and monitor 15 saplings for every tree lost at a site to be approved by the City of Brentwood, according to the requirements listed below. If onsite planting is not feasible, the applicant shall work with the City of Brentwood to provide a combination of on- and off-site plantings.*

*The following requirements shall be met for all planting options:*

  - *Tree survival shall be monitored at least annually for 5 years, then every other year until year 12. All trees lost during the first 5 years shall be replaced. Success shall be reached at the end of 12 years if at least 5 trees per tree lost survive without supplemental irrigation or protection from herbivory. Trees must also survive for at least 3 years without irrigation.*

  - *As determined by an arborist, irrigation and fencing to protect from deer and other herbivores may be needed for the first several years to ensure maximum tree survival.*

  - *Native trees suitable for this site shall be planted. When site conditions permit, a variety of native trees shall be planted for each tree lost to provide trees with different growth*

*rates, maturation, and life span, and to provide a variety of tree canopy structures for Swainson's hawk. This variety will help to ensure that nest trees will be available in the short term (5 to 10 years for cottonwoods and willows) and in the long term (e.g., Valley oak, sycamore). This will also minimize the temporal loss of nest trees.*

- *Riparian woodland restoration conducted as a result of construction activities (i.e., loss of riparian woodland) can be used to offset the nest tree planting requirement above, if the nest trees are riparian species, with City approval.*
- *As determined by the City, whenever feasible and when site conditions permit, trees shall be planted in clumps together or with existing trees to provide larger areas of suitable nesting habitat and to create a natural buffer between nest trees and adjacent development (if plantings occur on the development site).*
- *As determined by the City, whenever feasible, plantings on the site shall occur closest to suitable foraging habitat outside the Urban Development Area (UDA).*
- *Trees planted in the HCP/NCCP preserves or other approved offsite location shall occur within the known range of Swainson's hawk in the inventory area and as close as possible to high-quality foraging habitat.*

***Mitigation Measure 3.4-7:*** *Future project proponent(s) of development projects within the Specific Plan Area shall implement the following measure to avoid or minimize impacts to California horned lark, grasshopper sparrow, tricolored blackbird, and white-tailed kite that may occur on the site:*

- *Preconstruction surveys for active nests of California horned lark, grasshopper sparrow, tricolored blackbird, and white-tailed kite shall be conducted by a qualified biologist in all areas of suitable habitat within 500 feet of project disturbance. Surveys shall be conducted within 14 days before commencement of any construction activities that occur during the nesting season (February 15 to August 31) in a given area.*
- *If any active nests, or behaviors indicating that active nests are present, are observed, appropriate buffers around the nest sites shall be determined by a qualified biologist to avoid nest failure resulting from project activities. The size of the buffer shall depend on the species, nest location, nest stage, and specific construction activities to be performed while the nest is active. The buffers may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. If buffers are adjusted, monitoring will be conducted to confirm that project activity is not resulting in detectable adverse effects on nesting birds or their young. No project activity shall commence within the buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.*

***Mitigation Measure 3.4-8:*** *Prior to any ground disturbance related to construction activities, a biologist shall conduct a preconstruction survey in areas which may support suitable breeding or denning habitat for San Joaquin kit fox. The survey shall establish the presence or absence of San Joaquin kit fox and/or suitable dens and evaluate use by kit foxes in accordance with USFWS survey guidelines (USFWS, 1999). Preconstruction surveys shall be conducted not earlier than 30 days from commencing ground*

*disturbance. On the parcel where activity is proposed, the biologist shall survey the proposed disturbance footprint and a 250-foot radius from the perimeter of the proposed footprint to identify San Joaquin kit fox and/or suitable dens. Adjacent parcels under different land ownership need not be surveyed. The status of all dens shall be determined and mapped. Written result of preconstruction surveys shall be submitted to the USFWS within 5 working days after survey completion and before start of ground disturbance. Concurrence by the USFWS is not required prior to initiation of construction activities. If San Joaquin kit fox and/or suitable dens are not discovered, then further mitigation is not necessary. If San Joaquin kit fox and/or suitable dens are identified in the survey area, Mitigation Measure 3.4-9 shall be implemented.*

***Mitigation Measure 3.4-9:*** *If a San Joaquin kit fox den is discovered in the proposed development footprint, the den shall be monitored for 3 days by a CDFW/USFWS-approved biologist using a tracking medium or an infrared beam camera to determine if the den is currently being used. Unoccupied dens shall be destroyed immediately to prevent subsequent use. If a natal or pupping den is found, the USFWS and CDFW shall be notified immediately. The den shall not be destroyed until the pups and adults have vacated and then only after further consultation with USFWS and CDFW. If kit fox activity is observed at the den during the initial monitoring period, the den shall be monitored for an additional 5 consecutive days from the time of the first observation to allow any resident animals to move to another den while den use is actively discouraged. For dens other than natal or pupping dens, use of the den can be discouraged by partially plugging the entrance with soil such that any resident animal can easily escape. Once the den is determined to be unoccupied, it may be excavated under the direction of the biologist. Alternatively, if the animal is still present after 5 or more consecutive days of plugging and monitoring, the den may have to be excavated when, in the judgement of a biologist, it is temporarily vacant (i.e., during the animal's normal foraging activities).*

***Mitigation Measure 3.4-10:*** *Future project proponent(s) of development projects within the Specific Plan Area shall implement the following measures to avoid or minimize impacts on bats:*

- *If removal of suitable roosting areas (i.e. buildings, trees, shrubs, bridges, etc.) must occur during the bat pupping season (April 1 through July 31), surveys for active maternity roosts shall be conducted by a qualified biologist. The surveys shall be conducted from dusk until dark.*

- *If a special-status bat maternity roost is located, appropriate buffers around the roost sites shall be determined by a qualified biologist and implemented to avoid destruction or abandonment of the roost resulting from habitat removal or other project activities. The size of the buffer shall depend on the species, roost location, and specific construction activities to be performed in the vicinity. No project activity shall commence within the buffer areas until the end of the pupping season (August 1) or until a qualified biologist conforms the maternity roost is no longer active.*

The Project will be required to comply with the City's General Plan and adopted Federal, State, and local regulations for the protection of special-status plants and animals, including habitat. The City of Brentwood General Plan includes numerous policies and actions intended to protect special-status plants and animals, including habitat, from adverse effects associated with future development and improvement projects. Additionally, future development projects within the Specific Plan Area would be subject to the mitigation requirements included within the PA-1 Specific Plan EIR (listed above) and

those set forth by the East Contra Costa County HCP/NCCP. While future development of the Specific Plan Area has the potential to result in significant impacts to protected special-status plants and animals, including habitat (as identified in the PA-1 Specific Plan EIR), the implementation of the policies and actions listed below, as well as Federal and State regulations, and those included in the PA-1 Specific Plan EIR, would ensure impacts to these resources are reduced to less than significant levels.

As such, the proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, General Plan, and zoning code, and would not result in any new or increased impacts associated with biological resources, beyond those that were already addressed in the PA-1 Specific Plan EIR.

*Project Requirement(s)*

***Requirement BIO-1:*** *Compliance with the East Contra Costa County HCP/NCCP and preconstruction survey requirements.*

***Requirement BIO-2:*** *Compliance with the following PA-1 Specific Plan Mitigation Measures:*

- Mitigation Measure 3.4-1
- Mitigation Measure 3.4-2
- Mitigation Measure 3.4-3
- Mitigation Measure 3.4-4
- Mitigation Measure 3.4-5
- Mitigation Measure 3.4-6
- Mitigation Measure 3.4-7
- Mitigation Measure 3.4-8
- Mitigation Measure 3.4-9
- Mitigation Measure 3.4-10

The PA-1 Specific Plan EIR (EIR) determined that this impact was potentially significant, but would be reduced to a less than significant level following implementation of EIR mitigation measures 3.4-1 thru 3.4-10. As noted above, the project is required to implement mitigation measures 3.4-1 thru 3.4-10 from the EIR. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** Riparian natural communities support woody vegetation found along rivers, creeks and streams. Riparian habitat can range from a dense thicket of shrubs to a closed canopy of large mature trees covered by vines. Riparian systems are considered one of the most important natural resources. While small in total area when compared to the state's size, they provide a special value for wildlife habitat.

Over 135 California bird species either completely depend upon riparian habitats or use them preferentially at some stage of their life history. Riparian habitat provides food, nesting habitat, cover, and migration corridors. Another 90 species of mammals, reptiles, invertebrates and amphibians depend on riparian habitat. Riparian habitat also provides riverbank protection, erosion control and improved water quality, as well as numerous recreational and aesthetic values.

As described in the PA-1 Specific Plan EIR, the CNDDB record search did not reveal any documented occurrences of sensitive habitat within the Specific Plan Area. Delineated aquatic habitat or riparian habitat is not located on the site. A small drainage feature is present on the eastern portion of the project site area, however this is a concrete structure and does not provide aquatic habitat.

The proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, General Plan, and zoning code, and would not result in any new or increased impacts associated with riparian resources.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response c): Adequately addressed in Specific Plan EIR.** A wetland is an area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Wetlands are defined by regulatory agencies as having special vegetation, soil, and hydrology characteristics. Hydrology, or water inundation, is a catalyst for the formation of wetlands. Frequent inundation and low oxygen causes chemical changes to the soil properties resulting in what is known as hydric soils. The prevalent vegetation in wetland communities consists of hydrophytic plants, which are adapted to areas that are frequently inundated with water. Hydrophytic plant species have the ability to grow, effectively compete, reproduce, and persist in low oxygen soil conditions. Vernal pools are seasonal depressional wetlands that are covered by shallow water for variable periods from winter to spring, but may be completely dry for most of the summer and fall. Vernal pools range in size from small puddles to shallow lakes and are usually found in a gently sloping plain of grassland.

Aquatic habitat and wetlands are not located on the site. The project site does not contain and would not affect a protected wetland. A developed drainage ditch is located within the project site, however this is a concrete structure and does not provide aquatic habitat. There are no wetlands located on the project site.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response d): Adequately addressed in Specific Plan EIR.** The CNDDB record search did not reveal any documented wildlife corridors or wildlife nursery sites on or adjacent to the Specific Plan Area. According to the California Department of Fish and Wildlife BIOS Viewer, no wildlife corridors or wildlife nursery sites exist on or adjacent to the project site. The nearest wildlife corridor is located approximately 3.0 miles southeast of the project site.

The proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts associated with biological resources, beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response e): Adequately addressed in Specific Plan EIR.** The site is within the boundaries of the ECCC HCP/NCCP. In July 2007 the ECCC HCP/NCCP was adopted by Contra Costa County, the City of Brentwood, other member cities, the USFWS and the CDFW. The ECCC HCP/NCCP provides guidance for the mitigation of impacts to covered species. Mitigation of impacts is accomplished through the payment of a Development Fee. The Development Fee requires payment based on a cost per acre for all acres converted to non-habitat with the cost per acre based on the quality of the habitat converted. The fees are used to acquire higher value habitats in preserved areas and to fund their restoration and management. Because the City of Brentwood is a signatory to the ECCC HCP/NCCP, the proposed project would comply with the ECCC HCP/NCCP requirements regarding special-status species, land conversion, development fees as applicable, per *Requirement Bio-1.* Therefore, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response f): Adequately addressed in Specific Plan EIR.** As described in Response a, e, above the Project will be required to comply with the City's General Plan and adopted Federal, State, and local regulations for the protection of special-status plants and animals, including habitat. Additionally, future development projects within the Specific Plan Area would be subject to the mitigation requirements included within the PA-1 Specific Plan EIR, and those set forth by the East Contra Costa County HCP/NCCP.

As such, the proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan and General Plan, would be required to be in compliance with the East Contra Costa County HCP/NCCP, and would not result in any new or increased impacts beyond impacts identified in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *V. CULTURAL RESOURCES -- WOULD THE PROJECT:*

| | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5? | | | X | |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5? | | | X | |
| c) Disturb any human remains, including those interred outside of formal cemeteries? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), b), c): Adequately addressed in Specific Plan EIR.**

As described in the PA-1 Specific Plan EIR, the Specific Plan Area is located in an area known to have historical and tribal cultural resources. However, the detailed field surveys completed within the Plan area did not reveal any significant historical resources, historical sites, or tribal cultural resources within the Plan area. Additionally, records of previously recorded cultural resources and cultural resource investigations were examined by the Northwest Information Center (NWIC) of the California Historical Resources Information System on November 8, 2016 for the Specific Plan Area (NWIC File # 16-0575), and surrounding 500-foot radius. Their report indicates that several portions of the Specific Plan Area have been subject to a number of small surveys related to development projects and larger scale linear cultural resource surveys, as well as several cultural resource overviews.

Despite the number of surveys in the Plan area, no prehistoric sites, historic sites, or historic buildings have been recorded. The only resource reported in the Plan area is a culvert under Sand Creek Road that appears to have been covered by the construction of SR 4.

As with most projects in the region that involve ground-disturbing activities, there is the potential for discovery of a previously unknown historical and/or tribal cultural resource. Additionally, there always exists the potential for buried prehistoric archaeological sites. As such, there remains a possibility that unrecorded cultural resources are present beneath the ground surface and that such resources could be exposed during project construction. Both CEQA and Section 106 of the National Historic Preservation Act of 1966 (NHPA) require the Lead Agency to address any unanticipated cultural resource discoveries during project construction.

The Brentwood General Plan includes policies and actions that would reduce impacts to cultural, historic, and archaeological resources, as well as policies and actions for the conservation of cultural, historic, and archaeological resources. General Plan Policies COS 6-7 and COS 6-9

encourage the protection and preservation of cultural and historic resources and consultation with Native American tribal representatives to identify and appropriately address cultural resources and sacred sites during the development review process. Actions COS 6d and COS 6e address the discovery of significant archaeological and historic resources during construction and grading activities, requiring that development work be stopped in the event of a discovery and that appropriate measures be implemented to protect the resource. The proposed project would be subject to all relevant General Plan policies and actions that provide protections for cultural, historical, and tribal resources.

The General Plan policies and actions provide a robust framework for ensuring that effects on significant unknown historic, archaeological and tribal cultural resources are reduced to the extent feasible. Additionally, Mitigation Measures, included in the PA-1 Specific Plan EIR, requires additional site-specific measures and sensitivity training for future projects within the Specific Plan Area. These included the following measure as identified in the PA-1 Specific Plan EIR:

> ***Mitigation Measure 3.5-1****: All construction workers shall receive a sensitivity training session before they begin site work within the Plan Area. The sensitivity training shall inform the workers of their responsibility to identify and protect any cultural resources, including prehistoric or historic artifacts, or other indications of archaeological resources, within the project site. The sensitivity training shall cover laws pertaining to cultural resources, examples of cultural resources that may be discovered in the project site, and what to do if a cultural resource, or anything that may be a cultural resource, is discovered.*
>
> *If any subsurface historic remains, prehistoric or historic artifacts, paleontological resources, other indications of archaeological resources, or cultural and/or tribal resources are found during grading and construction activities, all work within 100 feet of the find shall cease, the City of Brentwood shall be notified, and the applicant shall retain an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, to evaluate the find(s). If tribal resources are found during grading and construction activities, the applicant shall notify the Native American Heritage Commission. If paleontological resources are found during grading and construction activities, a qualified paleontologist shall be retained to determine the significance of the discovery.*
>
> *The archaeologist and/or paleontologist shall define the physical extent and the nature of any built features or artifact-bearing deposits. The investigation shall proceed immediately into a formal evaluation to determine the eligibility of the feature(s) for inclusion in the California Register of Historical Resources. The formal evaluation shall include, at a minimum, additional exposure of the feature(s), photo-documentation and recordation, and analysis of the artifact assemblage(s). If the evaluation determines that the feature(s) and artifact(s) do not have sufficient data potential to be eligible for the California Register, additional work shall not be required. However, if data potential exists (e.g., an intact feature is identified with a large and varied artifact assemblage), further mitigation would be necessary, which might include avoidance of further disturbance to the resource(s) through project redesign. If avoidance is determined to be infeasible, additional data recovery*

*excavations shall be conducted for the resource(s), to collect enough information to exhaust the data potential of those resources.*

*Pursuant to CEQA Guidelines Section 15126.4(b)(3)(C), a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Data recovery efforts can range from rapid photographic documentation to extensive excavation depending upon the physical nature of the resource. The degree of effort shall be determined at the discretion of a qualified archaeologist and should be sufficient to recover data considered important to the area's history and/or prehistory. Significance determinations for tribal cultural resources shall be measured in terms of criteria for inclusion on the California Register of Historical Resources (Title 14 CCR, §4852[a]), and the definition of tribal cultural resources set forth in Public Resources Code Section 21074 and 5020.1 (k). The evaluation of the tribal cultural resource(s) shall include culturally appropriate temporary and permanent treatment, which may include avoidance of tribal cultural resources, in-place preservation, and/or re-burial on project property so the resource(s) are not subject to further disturbance in perpetuity. Any re-burial shall occur at a location predetermined between the landowner and the Native American Heritage Commission. The landowner shall relinquish ownership of all sacred items, burial goods, and all archaeological artifacts that are found on the project area to the Native American Heritage Commission for proper treatment and disposition. If an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation.*

*The language of this mitigation measure shall be included on any future grading plans, utility plans, and subdivision improvement drawings approved by the City for the future development of the Plan Area.*

***Mitigation Measure 3.5-3:** Pursuant to CEQA Guidelines Section 15.64.5(e) if human remains are discovered during the course of construction, work shall be halted at the site and any nearby area reasonably suspected to overlie adjacent human remains until the Contra Costa County Coroner has been informed and has determined that no investigation of the cause of death is required.*

*If the Contra Costa County Coroner determines that the remains are of Native American origin, either of the following steps shall be taken:*

- *The Coroner shall contact the Native American Heritage Commission within 24 hours in order to identify the person or persons the Commission believes to be the most likely descended from the decreased individual. The most likely descendent shall make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, which may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.*

- *The landowner shall retain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance when any of the following conditions occurs:*

- *The Native American Heritage Commission is unable to identify a most likely descendent;*
- *The descendant identified fails to make a recommendation within 24 hours after being notified by the Commission; or*
- *The City of Brentwood or its authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.*

The project would be required to implement all policies and actions included in the General Plan and all recommendations and mitigation strategies included within the PA-1 Specific Plan EIR. The implementation of these project requirements would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains, and paleontological resources, and would be consistent with CEQA Guidelines Section 15064.5. The project would be subject to mitigation strategies included in the PA-1 Specific Plan EIR.

*Project Requirement(s)*

***Requirement CUL-1:*** *Implement PA-1 Specific Plan MM 3.5-1 and 3.5-3*

The PA-1 Specific Plan EIR (EIR) determined that this impact was potentially significant, but would be reduced to a less than significant level following implementation of EIR mitigation measures 3.5-1 and 3.5-3. As noted above, the project is required to implement mitigation measures 3.5-1 and 3.5-3 from the EIR. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *VI. ENERGY*

| ***Would the project:*** | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | | X |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | | X |

*Responses to Checklist Questions*

**Responses a), b): Impact not Previously Addressed in EIR.**

Appendix F of the State CEQA Guidelines requires consideration of the potentially significant energy implications of a project. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usage (Public Resources Code Section 21100, subdivision [b][3]). According to Appendix F of the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed project would be considered "wasteful, inefficient, and unnecessary" if it were to violate state and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

As most recently amended by SB 100 (2018), California's Renewables Portfolio Standard requires retail sellers of electric services and local publicly-owned electric utilities to increase procurement from eligible renewable energy resources to 50 percent of total retail sales by 2026, and 60 percent of total retail sales by 2030. SB 100 also established a State policy goal to achieve 100 percent renewables by 2045.

In March 2021, CEC, the California Public Utilities Commission (CPUC) and CARB released a joint-agency report evaluating the current feasibility of achieving the energy resource and GHG reductions goals of SB 100. The report finds that SB 100 is technically feasible when analyzed under scenarios of varying timelines, advancements in energy generation technology, and energy source portfolios. Under the SB 100 Core Scenario, it is anticipated that California will need to triple its current electricity power capacity.

Title 24, Part 6 of the California Code of Regulations regulates the design of building shells and building components. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

The CEC's 2019 Building Energy Efficiency Standards (2019 Building Standards), which became effective January 1, 2020, are the currently applicable version of these standards. In general, single-family homes built to the 2019 standards are anticipated to use about 7% less energy due to energy efficiency measures than those built to the 2016 standards, and nonresidential buildings built to the 2019 standards will use an estimated 30% less energy than those built to the 2016 standards.

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), commonly referred to as CalGreen Building Standard (CalGreen), establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. Like Part 6 of Title 24, the CalGreen standards are periodically updated, with increasing energy savings and efficiencies associated with each code update.

As of January 1, 2023, the CEC adopted the 2022 Energy Code, which improves upon the 2019 standards for construction of residential and non-residential buildings. The CEC periodically amends and enforces Appliance Efficiency Regulations contained in Title 20 of the California Code of Regulations. The regulations establish water and energy efficiency standards for both federally-regulated appliances and non-federally regulated appliances. The regulations cover numerous categories of appliances (e.g., refrigerators; plumbing fixtures; dishwashers; clothes washer and dryers; televisions) and apply to appliances offered for sale in California.

**Conclusion**

The proposed project includes the construction of a commercial warehouse, fuel facility and associated infrastructure improvements to serve the project. Other sources of proposed project energy consumption during construction include fuel used by vehicle trips generated during project construction, and fuel used by off-road construction vehicles during construction activities.

The proposed project would use energy resources for the operation of project buildings (electricity and natural gas), for on-road vehicle trips (e.g. gasoline and diesel fuel) generated by the proposed project, and from off-road construction activities associated with the proposed project (e.g. diesel fuel). Each of these activities would require the use of energy resources. The proposed project would be responsible for conserving energy, to the extent feasible, and relies heavily on reducing per capita energy consumption to achieve this goal, including through Statewide and local measures.

The proposed project would be in compliance with all applicable Federal, State, and local regulations regulating energy usage. Project-related electricity use results in indirect emissions, due to electricity generation activities occurring at off-site power plant locations. For the Project, electrical power will be supplied by PG&E. PG&E is in the process of implementing the Statewide Renewable Portfolio Standard (RPS) to increase the proportion of renewable energy (e.g. solar and wind) within its energy portfolio. PG&E achieved at least a 33% mix of renewable energy resources by 2020, and is expected to achieve 50% by 2030. Additionally, energy-saving regulations, including the latest State Title 24 building energy efficiency standards ("part 6"), would be applicable to the proposed project. Other Statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g. the Pavley Bill and the Low Carbon Fuel Standard), would improve vehicle fuel economies, thereby conserving gasoline and diesel fuel. These energy savings would continue to accrue over time. Furthermore, as described in greater detail in the transportation section of this report the project would result in a reduction in VMT further reducing energy requirements.

As a result, the proposed project would not result in any significant adverse impacts related to project energy requirements, energy use inefficiencies, and/or the energy intensiveness of materials by amount and fuel type for each stage of the project including construction, operations, maintenance, and/or removal. PG&E, the electricity and natural gas provider to the site, maintains sufficient capacity to serve the proposed project. The proposed project would comply with all existing energy standards, including those established by the City of Brentwood, and would not result in significant adverse impacts on energy resources. For these reasons, the proposed project would not be expected cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the threshold as described by Appendix F of the CEQA Guidelines.

The PA-1 Specific Plan EIR did not include an energy impact analysis, as this was not a required topic under CEQA at the time the Specific Plan EIR was prepared. However, as demonstrated in the analysis above, the proposed project would result in a less than significant impact related to this environmental topic.

## *VII. GEOLOGY AND SOILS - WOULD THE PROJECT:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | | | X | |
| ii) Strong seismic ground shaking? | | | X | |
| iii) Seismic-related ground failure, including liquefaction? | | | X | |
| iv) Landslides? | | | X | |
| b) Result in substantial soil erosion or the loss of topsoil? | | | X | |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | | | X | |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | | | X | |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | | | X | |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | | X | |

### *BACKGROUND*

Information included in the section is further detailed in Attachment B. Geotechnical Study Prepared by: Kleinfelder.

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a.i), a.ii), a.iii: Adequately addressed in Specific Plan EIR.**

As described in the PA-1 Specific Plan EIR there are no known active or potentially active faults, or Alquist-Priolo Earthquake Fault Zones, located within the Specific Plan Area. However, there are numerous faults located in the region. These include the Antioch Fault, Calaveras Fault, Coast Range-Sierran Block Boundary Zone, Concord-Green Valley Fault, Greenville-Marsh Creek Fault, Hayward Fault, Mount Diablo Thrust Fault, Pittsburg-Kirby Hills Fault, Rodgers Creek Fault, and the San Andreas Fault. Rupture of any of these faults, or of an unknown fault in the region, could cause seismic ground shaking. As a result, future development in the Specific Plan Area may expose people or structures to potential adverse effects associated with a seismic event, including strong ground shaking and seismic-related ground failure.

There are no seismic hazard zones currently mapped in the Specific Plan Area; however, the California Geological Survey estimates a 10 percent probability of exceeding 30-50 percent of gravity at peak ground acceleration over the next 50 years in the Brentwood Planning Area, as well as other communities within eastern Contra Costa County. Moving west toward the Hayward fault, the estimates increase up to 70 percent or more of gravity at peak ground acceleration.

While there are no known active faults located within Brentwood, the area could experience considerable ground shaking generated by faults outside the city. For example, Brentwood could experience intensities of MM VII to VIII generated by seismic events occurring along the Greenville-Marsh Creek Fault or Mount Diablo Thrust Fault (ABAG, 2013). The effect of this intensity level includes: VII) Difficulty standing; Vehicle shaking felt by drivers; some furniture breaks; and VIII) Difficulty steering vehicles; Houses may shift on foundations.

The proposed project would be required to comply with the provisions of the California Building Standards Code (CBSC), which requires development projects to: perform geotechnical investigations in accordance with State law, engineer improvements to address potential seismic and ground failure issues, and use earthquake-resistant construction techniques to address potential earthquake loads when constructing buildings and improvements.

The Project will be consistent with and in conformance with the CBSC, General Plan, Zoning Ordinance, and other regulations. In addition to the requirements associated with the CBSC and the Municipal Code, the General Plan includes policies and actions to address potential impacts associated with seismic activity.

All development and construction proposals must be reviewed by the City to ensure conformance with applicable building standards. Development on soils sensitive to seismic activity is only allowed after adequate site analysis, including appropriate siting, design of structure, and foundation integrity.

As required by the General Plan, a Geotechnical Study for the Proposed Project was completed by Kleinfelder (Project No. 20220773.001A) and in included as Attachment B of this report. The purpose of this geotechnical study was to evaluate soil and groundwater conditions at the site and provide geotechnical recommendations for project design and construction.

Based on the results of field exploration, Kleinfelder found the proposed project is geotechnically feasible, and provided the following observations and recommendations in the geotechnical report, which are to be incorporated into the project design and construction.

- The potential for liquefaction was evaluated at the site. Based on the CPT and boring data and engineering analyses, it is our opinion that isolated, thin layers of saturated sands from approximately 30 to 40 feet bgs may be subject to liquefaction in the event of a major earthquake occurring on a nearby fault. Based on our analyses, we estimate that seismically-induced settlement of saturated sandy soils due to strong ground shaking during a design-level seismic event to be up to about 1 inch based on a design groundwater depth of 20 feet bgs. Differential settlement at this site is anticipated to be less than 1 inch over a horizontal distance 50 feet.
- The proposed Costco warehouse building and fuel facility may be supported on a conventional shallow foundation system. Overexcavation and recompaction of the on-site soils is recommended to mitigate loose shallow soils and provide relatively uniform support for the proposed warehouse and other improvements.
- Organic matter in the topsoil varied across the site based on laboratory testing. It was found that organic content samples taken west of the diagonal concrete channel had organic contents between approximately 1 to 2. percent while the samples taken east of the channel were higher 3 to 4. percent to the depths explored (6-12 inches). It was noted during our field exploration that the land east of the concrete channel was more overgrown with smaller shrubs and trees. It is recommended that at least the upper 12 inches of topsoil be stripped in the area east of the channel. It may be possible to blend the topsoil in deeper fills outside of the warehouse building pad. Stripping is not required in the area west of the channel. Any roots and vegetative matter in excess of one inch should be removed by screening or raking prior to reuse as structural fill. After screening, raking, and required stripping is completed the surface soils can be moisture conditioned and used as structural fill.
- Soils within 10 feet of the warehouse pad (including the entrance canopy, building aprons, utility pads, stairs, ramps, stoops, and the loading dock) should be overexcavated to a depth of at least 5 feet below existing grade or 3 feet below the bottom of the footings and floor slabs, whichever is deeper, and replaced as structural fill. If fill soils are encountered at the base of the overexcavation within the warehouse pad, the overexcavation should continue until the fill is removed. Prior to placing fill, the base of the overexcavation should be scarified a depth of 6 to 8 inches below grade, moisture conditioned, and recompacted. The on-site soils can be moisture conditioned and reused as structural fill.

- Following overexcavation and prior to replacing soils, the exposed subgrade should be compacted with at least a 10-ton roller, fully-loaded tandem-axle dump truck or water truck. Areas identified as being soft or yielding may require additional compaction or overexcavation, as determined by Kleinfelder.
- Soils in pavement, sidewalk, and other flatwork areas should be overexcavated to a depth of at least 12 inches below existing grade or 12 inches below the finished subgrade elevation, whichever is deeper. The overexcavated soils can be moisture conditioned and recompacted as structural fill. The overexcavation should extend beyond the proposed improvements a horizontal distance of at least 2 feet.
- As an alternative to overexcavating below pavements, sidewalks and other flatwork areas, the upper 12 inches of the subgrade may be stabilized with lime. The treatment area should extend beyond the proposed improvements a horizontal distance of at least 2 feet. Lime percentages should be determined construction in consultation with Kleinfelder. Lime treatment should be performed by a specialty contractor experienced in this work and should be performed in accordance with Caltrans Standard Specifications. Lime treated areas will have a high pH level (pH over 10) that will need to be removed from landscape areas.
- The site soils are fine-grained, moisture sensitive, and susceptible to disturbance, rutting, and pumping during construction. The contractor should plan to repair subgrade conditions that become unstable/disturbed and should develop a plan to manage subgrade trafficability across the site throughout the construction period. Features of this plan may include temporary surface haul roads, limited traffic routes, etc.
- The on-site clays should not be used as retaining wall backfill. The granular backfill, which should meet the requirements for imported fill as defined in Section 5.2.4, should extend behind walls a horizontal distance of at least one-half the height of the wall.
- Due to compaction difficulties, we do not recommend compacting the onsite clayey soils to 95 percent of the maximum dry unit weight (ASTM D1557), as required in the CWDRs. Onsite clayey soils should be compacted between 92 percent of the soil's maximum dry unit weight (ASTM D1557) at moisture contents between 0 and 3 percent above optimum moisture content. Compacting the onsite soils between 92 percent relative compaction will achieve the necessary strength assumed in our design recommendations.
- Due to poor draining subgrade, we recommend installation of radial finger drains below new pavement sections. Additionally, planters should be detailed such that water exiting from them will not seep into the foundation areas or beneath slabs and pavement. If landscaping is proposed to be placed adjacent to the proposed warehouse buildings, we recommend that perimeter foundation drains be implemented in these areas.
- The minimum resistivity values found for the samples tested indicate that the soil may be extremely corrosive to ferrous metals. The concentrations of soluble sulfates indicate that the subsurface soils represent a Class S0 exposure to sulfate attack on concrete in contact with the soil based on ACI 318-14 Table 19.3.1.1 (ACI, 2014). Therefore, in accordance with ACI Building Code 318-14, no special provisions for selection of cement type are required.

- Based on the results of the infiltration testing and laboratory testing, the project site is not considered suitable for infiltration Best Management Practices (BMPs). Given the low infiltration capacity of the site soils, alternative infiltration BMPs, such as bio-filtration/bioretention systems (bio-swales and planter boxes) may be considered at the project site.

The Brentwood General Plan policies and project review requirements require geotechnical investigations to be completed prior to approval of any buildings as a means to ensure that these facilities are constructed in a way that mitigates site-specific seismic and/or geological hazards. As described previously, a geotechnical study has been prepared to explore, assess, and recommend site planning requirements to address seismic safety issues and provide adequate recommendations for potential hazards identified. With the implementation of the recommendations required by the geotechnical study, as well as applicable State and City codes, potential impacts associated with a seismic event, including rupture of an earthquake fault, seismic ground shaking, and liquefaction would be less than significant.

*Project Requirement(s)*

> ***Requirement GEO-1:*** *Implement recommendations presented in the Geotechnical Study Prepared by Kleinfelder during the project design and construction.*

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Responses c), d): Adequately addressed in Specific Plan EIR.**

The geologic conditions conducive to lateral spreading include gentle surface slope (0.3-5% slope), and liquefiable soils. As identified under Response a), portions of the site are at risk for liquefaction, however the site is essentially flat and the geotechnical report notes that lateral spreading was not anticipated on the site.

Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may result in unacceptable settlement or heave of structures or concrete slabs supported on grade. The surficial soils are generally lean clays with low to medium plasticity which are known to exhibit low to moderate expansion characteristics.

The geotechnical report identifies a low to medium risk for expansive soils on the site. Recommendations for mitigating expansive soils are provided in the geotechnical report, and include measures such as the use of lime-stabilized soil treatments. Lime treatment is commonly used to stabilize near surface expansive soils under concrete building slabs and pavements for

many of the large commercial developments in the project area. Requirement GEO-1 requires the recommendations presented in the geotechnical report to be incorporated into the project design and construction. Final lime percentage and stabilization techniques would be determined during construction in consultation with Kleinfelder. Additionally, the California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2 requires specific geotechnical evaluation when a preliminary geotechnical evaluation determines that expansive or other special soil conditions are present, which, if not corrected, would lead to structural defects. As noted above, a geotechnical report has been prepared for the project site, and the project is required to adhere to the engineering requirements contained in the geotechnical report.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response a.iv): Adequately addressed in Specific Plan EIR.** The project site is essentially flat and there are no major slopes in the vicinity of the project site. As such, the project site is exposed to little or no risk associated with landslides.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** Construction and site preparation activities associated with development of the project site include grading for the construction of the proposed project. During the construction preparation process, existing vegetation would be removed to grade and compact the project site, as necessary. As construction occurs, these exposed surfaces could be susceptible to erosion from wind and water. Effects from erosion include impacts on water quality and air quality. Exposed soils that are not properly contained or capped increase the potential for increased airborne dust and increased discharge of sediment and other pollutants into nearby stormwater drainage facilities. Risks associated with erosive surface soils can be reduced by using appropriate controls during construction and properly revegetating exposed areas. Project Requirement HYDRO 1 would require the implementation of a storm water pollution prevention plan (SWPPP) which includes various best management practices (BMPs) that would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction activities.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response e): Adequately addressed in Specific Plan EIR.** The project site would be served by public wastewater facilities and does not require an alternative wastewater system such as septic tanks.

The PA-1 Specific Plan EIR (EIR) determined that there was no impact related to this environmental topic. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response f): Adequately addressed in Specific Plan EIR.** Known paleontological resources or sites have not been identified on the project site. Additionally, unique geologic features are not located on the site. The site is currently undeveloped and surrounded by existing or future urban development. Should paleontological resources artifacts, such as fossils, or unusual amounts of bones or shells be uncovered during construction activities, a paleontologist should be consulted for an evaluation.

Additionally, Mitigation Measures, included in the PA-1 Specific Plan EIR, requires additional site-specific measures and sensitivity training for future projects within the Specific Plan Area. These included the following measure as identified in the PA-1 Specific Plan EIR.

> ***Mitigation Measure 3.5-2:*** *If paleontological resources are discovered during the course of construction, work shall be halted immediately within 50 meters (165 feet) of the discovery, the City of Brentwood shall be notified, and a qualified paleontologist shall be retained to determine the significance of the discovery. If the paleontological resource is considered significant, it should be excavated by a qualified paleontologist and given to a local agency, State University, or other applicable institution, where they could be curated and displayed for public education purposes.*

The project would be required to implement all policies and actions included in the General Plan and all recommendations and mitigation strategies included within the PA-1 Specific Plan EIR. The implementation of these project requirements would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including paleontological resources. The project would be subject to mitigation strategies included in the PA-1 Specific Plan EIR.

*Project Requirement(s)*

> ***Requirement GEO-2:*** *Implement PA-1 Specific Plan MM 3.5-2*

The PA-1 Specific Plan EIR (EIR) determined that this impact was potentially significant, but would be reduced to a less than significant level following implementation of EIR mitigation measure 3.5-2. As noted above, the project is required to implement mitigation measures 3.5-2 from the EIR. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *VIII. GREENHOUSE GAS EMISSIONS – WOULD THE PROJECT:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses? | | | X | |

### *BACKGROUND DISCUSSION*

Information and analysis in this section is bases on the Greenhouse Gas Emissions Technical Report prepared by: Ramboll US Consulting, Inc. January 2023. This report and associated GHG data is included as Attachment C.

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space, and a portion of the radiation is absorbed by the Earth's surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring greenhouse gases include water vapor ($H_2O$), carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and ozone ($O_3$). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also greenhouse gases, but they are, for the most part, solely a product of industrial activities. Although the direct greenhouse gases $CO_2$, $CH_4$, and $N_2O$ occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2011, concentrations of these three greenhouse gases have increased globally by 40, 150, and 20 percent, respectively (IPCC 2013)[1].

Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon

[1] Intergovernmental Panel on Climate Change. 2013. "Climate Change 2013: The Physical Science Basis, Summary for Policymakers." Available: <http://www.climatechange2013.org/images/report/WG1AR5_SPM_FINAL.pdf>.

dioxide ($CO_2$), methane ($CH_4$), ozone ($O_3$), water vapor, nitrous oxide ($N_2O$), and chlorofluorocarbons (CFCs).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors (California Energy Commission 2014) [2]. In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (California Energy Commission 2014).

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only $CO_2$ were being emitted.

Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2017, accounting for 41% of total GHG emissions in the state. This category was followed by the industrial sector (24%), the electricity generation sector (including both in-state and out of-state sources) (15%), the agriculture sector (8%), the residential energy consumption sector (7%), and the commercial energy consumption sector (5%) (California Energy Commission, 2019).

### *EFFECTS OF GLOBAL CLIMATE CHANGE*

The effects of increasing global temperature are far-reaching and extremely difficult to quantify. The scientific community continues to study the effects of global climate change. In general, increases in the ambient global temperature as a result of increased GHGs are anticipated to result in rising sea levels, which could threaten coastal areas through accelerated coastal erosion, threats to levees and inland water systems and disruption to coastal wetlands and habitat.

If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. The snowpack portion of the supply could potentially decline by 70% to 90% by the end of the 21st century (Cal EPA 2006)[3]. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature

[2] California Energy Commission. 2014. California Greenhouse Gas Emission Inventory. Available: <http://www.arb.ca.gov/cc/inventory/inventory_current.htm>.

[3] California Environmental Protection Agency, Climate Action Team. 2006. Climate Action Team Report to Governor Schwarzenegger and the Legislature. Available: <http://www.climatechange.ca.gov/climate_action_team/reports/>.

could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system.

Sea level has risen approximately seven inches during the last century and it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels (Cal EPA 2006). If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands (Cal EPA 2006). As the existing climate throughout California changes over time, mass migration of species, or failure of species to migrate in time to adapt to the perturbations in climate, could also result. Under the emissions scenarios of the Climate Scenarios report (California Environmental Protection Agency, 2010), the impacts of global warming in California are anticipated to include, but are not limited to, the following.

### Public Health

Higher temperatures are expected to increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation are projected to increase from 25% to 35% under the lower warming range and to 75% to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures will increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

### Water Resources

A vast network of man-made reservoirs and aqueducts capture and transport water throughout the state from Northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snow pack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snow pack, increasing the risk of summer water shortages.

The state's water supplies are also at risk from rising sea levels. An influx of saltwater would degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern

edge of the Sacramento/San Joaquin River Delta, a major state fresh water supply. Global warming is also projected to seriously affect agricultural areas, with California farmers projected to lose as much as 25% of the water supply they need; decrease the potential for hydropower production within the state (although the effects on hydropower are uncertain); and seriously harm winter tourism. Under the lower warming range, the snow dependent winter recreational season at lower elevations could be reduced by as much as one month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing, snowboarding, and other snow dependent recreational activities.

If GHG emissions continue unabated, more precipitation will fall as rain instead of snow, and the snow that does fall will melt earlier, reducing the Sierra Nevada spring snow pack by as much as 70% to 90%. Under the lower warming scenario, snow pack losses are expected to be only half as large as those expected if temperatures were to rise to the higher warming range. How much snow pack will be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snow pack would pose challenges to water managers, hamper hydropower generation, and nearly eliminate all skiing and other snow-related recreational activities.

## Agriculture

Increased GHG emissions are expected to cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. Although higher carbon dioxide levels can stimulate plant production and increase plant water-use efficiency, California's farmers will face greater water demand for crops and a less reliable water supply as temperatures rise.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures are likely to worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits and nuts, and milk.

Crop growth and development will be affected, as will the intensity and frequency of pest and disease outbreaks. Rising temperatures will likely aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

In addition, continued global warming will likely shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion is expected in many species while range contractions are less likely in rapidly evolving species with significant populations already established. Should range contractions occur, it is likely that new or different weed species will fill the emerging gaps. Continued global warming is also likely to alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

### Forests and Landscapes

Global warming is expected to alter the distribution and character of natural vegetation thereby resulting in a possible increased risk of large wildfires. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state. For example, if precipitation increases as temperatures rise, wildfires in southern California are expected to increase by approximately 30% toward the end of the century. In contrast, precipitation decreases could increase wildfires in northern California by up to 90%.

Moreover, continued global warming will alter natural ecosystems and biological diversity within the state. For example, alpine and sub-alpine ecosystems are expected to decline by as much as 60% to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests is also expected to decrease as a result of global warming.

### Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures will increasingly threaten the state's coastal regions. Under the higher warming scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats.

### *Responses to Checklist Questions*

**Response a): Adequately addressed in Specific Plan EIR.** The proposed wholesale retail facility would be approximately 152,000 square feet (sq. ft.), of which approximately 5,125 sq. ft. would be reserved for storage and receiving at the northwest corner of the warehouse. The Costco members-only gas station on the northwestern portion of the project site adjacent to Lone Tree Plaza Drive would include an approximately 11,500 square-foot canopy and a 125 square-foot controller enclosure. There would be four covered fueling islands, each with four two-sided fuel dispensers to provide for the fueling of eight cars at each island, for a total of 32 fueling positions. The project would have its main access points along Lone Tree Plaza Drive and include approximately 850 parking stalls.

Ramboll Consulting, Inc. prepared a Greenhouse Gas (GHG) Emissions Technical Report for the proposed Costco warehouse and gasoline dispensing facility. This report (included as Attachment C of this Report) analyzes the project's impacts related to GHGs from construction and operations.

As described in the GHG report, development of the site for urban uses and the corresponding generation of GHG emissions associated with buildout of the PA-1 Specific Plan area, including the project site, was taken into consideration in the PA-1 Specific Plan EIR. The project's GHG

emissions were calculated using CalEEMod® and compared to the GHG emissions inventory of the PA-1 Specific Plan. As shown in Table 9, the Project's GHG emissions are below those presented in the PA-1 Specific Plan EIR.

***Table 9: Summary of GHG Emissions Comparison to PA-1 Specific Plan***

| Emissions Category | Specific Plan - Overall Operational (MT $CO_2e$/year) | Project (MT $CO_2e$/year) |
|---|---|---|
| Area Sources | 162 | 2 |
| Energy Usage | 24,557 | 224 |
| Mobile | 39,146 | -20 |
| Water | 2,786 | 24 |
| Waste Disposed | 3,316 | 221 |
| **Operational Sub-Total** | ***69,967*** | ***451*** |
| Construction Amortized[4] | 162 | 14 |
| **Total** | **70,129** | **465** |

*SOURCE: GREENHOUSE GAS EMISSIONS TECHNICAL REPORT. PREPARED BY: RAMBOLL US CONSULTING, INC. JANUARY 2023.*

The total project GHG emissions for Project construction and operation were calculated to be 465 MT CO2e/year. The Brentwood PA-1 Specific Plan EIR provides an emissions inventory for the buildout of the entire PA-1 Specific Plan consisting of 70,129 MT CO2e/year.

The land uses assumed for development of the proposed Project are similar in nature to those assumed in the PA-1 Specific Plan EIR in terms of potential mobile source emissions that may be generated by these land uses. Additionally, construction footprints would be substantially similar to like uses allowed under commercial land use designations. The mobile emissions are the dominant source of emissions. The square footage of the proposed Project would be less than the corresponding square footage for retail development for this portion of the PA-1 Specific Plan assumed in the PA-1 Specific Plan EIR, and thus, it is expected that the proposed Project would have similar if not lower emissions for this portion of the PA-1 Specific Plan. The construction activities for the proposed Project is also expected to be similar for the land uses as assumed in the PA-1 Specific Plan given that similar site preparation and building construction is expected to occur.

As shown in Table 9, the GHG emissions for the Project are less than the GHG emissions outlined in the PA- 1 Specific Plan EIR. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.**

This section evaluates the project potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Statewide Emissions Reduction Targets

The Project will be consistent with the state's GHG reduction goals as discussed in the 2022 CARB Scoping Plan. As demonstrated in the Consistency Analysis with 2022 Scoping Plan Technical Memorandum (Ramboll, June 2023- Attachment 24 to the Staff Report). the Project would be consistent with applicable California Scoping Plan strategies for the reduction of GHG emissions.

Metropolitan Transportation Commission/Association of Bay Area

The Project will be consistent with the state's GHG reduction goals and strategies as discussed in the MTC/ABAG's Plan Bay Area 2050 (the current RTP/SCS for the region).

The RTP is based on an analysis that considers the entire San Francisco Bay Area and includes all projects involving changes in regional growth and land use in Contra Costa County, as well as the countywide vehicle traffic projections. Cumulative GHG emissions analyzed in the RTP were compared to regional GHG thresholds and analyzed under statewide plans and regulations. This analysis concluded that the projected increase in GHG emissions as a result of the Project would primarily be due to changes in regional growth/land use; however, the RTP achieves GHG emissions reduction targets from mobile sources from 2005 levels by implementing a mix of land use strategies, transportation management, economic factors, and road projects. Furthermore, the Brentwood Costco Transportation Analysis prepared by Kittelson shows that the overall change in total regional daily vehicle miles traveled (VMT) is net negative. As shown in the Greenhouse Gas Emissions Technical Report (Attachment C of this report) Table C-2, the Project would be consistent with applicable MTC/ABAG strategies for the reduction of GHG emissions.

California CEQA Guidelines Section 15183.5

The City of Brentwood does not have a Climate Action Plan or similar GHG reduction plan. However, Section 15183.5 of the State's CEQA Guidelines allows project-specific environmental documents to tier from and incorporate by reference an existing programmatic review for certain planning documents, such as Specific Plans. Therefore, this project's environmental document tiers from the existing PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR states that development within the specific plan area, which includes the proposed Project, would follow BAAQMD guidance for construction activities. The BAAQMD recommends Basic Construction Mitigation Measures for all projects, whether or not construction-related emissions exceed the thresholds of significance. The BAAQMD also encourages lead agencies to incorporate best management practices to reduce GHG emissions

during construction, as applicable. Best management practices may include, but are not limited to: using alternative fuels (e.g. biodiesel, electric) construction vehicles/equipment of at least 15 percent of the fleet; using local building materials of at least 10 percent; and recycling or reusing at least 50 percent of construction waste or demolition materials. Compliance with the BAAQMD construction-related mitigation requirements are considered to reduce GHG impacts at both the local and basin-wide levels. The PA-1 Specific Plan was determined to be consistent with and reliant upon these goals and policies.

As described above under Response a), the Project's GHG emissions are below those presented in the PA-1 Specific Plan EIR. The Project would not conflict with the Metropolitan Transportation Commission or the 2022 Scoping Plan. Additionally, the Project's less than significant VMT impact, as concluded in Kittelson's Brentwood Costco Transportation Impact Analysis supports the City of Brentwood's General Plan and PA-1 Specific Plan goals to reduce GHG emissions.

Because the Project emissions from construction and operation of the proposed project are less than those evaluated in the PA-1 Specific Plan EIR and the Project is consistent with the 2022 Scoping plan, MTC/ABAG's Plan Bay Area 2050, and the PA-1 Specific Plan EIR, the project would result in a less than significant impact relative to this topic.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *IX. HAZARDS AND HAZARDOUS MATERIALS -- WOULD THE PROJECT:*

| | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | X | |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | | | X | |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | X | |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | | | X | |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | | | X | |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | X | |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), b): Adequately addressed in Specific Plan EIR.** The proposed project would place a new commercial warehouse and fueling station in an area of the City that contains residential and commercial uses. The proposed project would include underground fuel tanks (USTs), which would dispense fuels as described in the Project Description. The underground storage of hazardous materials is subject to the provisions of the California Health and Safety Code Chapter 6.95 and Title 23 of the California Code of Regulations.

The proposed fueling station would require the routine transport and use of hazardous materials as part of the operation. The transport of fuels to the project site would be required to adhere to the Hazardous Materials Regulations stipulated in the Code of Federal Regulation, Title 49, Parts 100-185, which regulates the transportation of hazardous material and hazardous waste. Therefore, the operational phase of the proposed project does not pose a significant hazard to the public or the environment.

Construction equipment and materials would likely require the use of petroleum-based products (oil, gasoline, diesel fuel), and a variety of common chemicals including paints, cleaners, and solvents. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials. In addition, Project Requirements included in the Hydrology Section of this Report (Hydrology and Water Quality) requires the project applicant to implement a stormwater pollution prevention plan (SWPPP) during construction activities, which would prevent contaminated runoff from leaving the project site during construction.

In addition to the requirements associated with Federal and State regulations and the Municipal Code, the City's General Plan includes policies and actions to address potential impacts associated with hazardous materials among other issues. Policy SA 4-2 requires hazardous waste generated within the city limits to be disposed of in a safe manner, consistent with all applicable local, State, and Federal laws. Policy SA 4-3 requires materials be stored in a safe manner, consistent with all applicable local, State, and Federal laws, and Policy SA 4-4 requires coordination with the East Contra Costa Fire Protection District (which has since become part of the Contra Costa County Fire Protection District) to ensure that businesses in Brentwood which handle hazardous materials prepare and file a Hazardous Materials Business Plan (HMBP).

A Phase I and Limited Phase II Environmental Site Assessment were prepared to for the proposed site. These are included as Attachments D and E of this report.

Kleinfelder's Phase I ESA of the Site revealed the following potential recognized environmental conditions RECs:

- A potential presence of residual pesticides (specifically OCPs, as well as arsenic and lead based on the possibility that lead arsenate pesticides were used) due to the Site's historical use for agriculture.
- A potential presence of ADL from the use of historic leaded gasoline in vehicles travelling on the highway adjoining to the east of the Site.
- The presence of two observed small soil and debris piles of unidentified origin on the Site.
- A potential for methane and associated oilfield gases to be present in the subsurface due to the Site's location within the Brentwood Oil and Gas Field.

Given the above findings, Kleinfelder recommended the performance of the Limited Phase II ESA at the Site. In summary, Kleinfelder performed the field activities of the Limited Phase II ESA between August 26 and September 3, 2021. A summary of the results of the laboratory analyses of the soil samples collected by Kleinfelder and its field measurements collected at the Site follows:

- Residual organochlorine pesticide concentrations in the Site's surface soil due to the Site's historical use for agriculture do not appear to warrant concern.
- Arsenic and lead concentrations in sampled Site soil suggest that potential historical lead arsenate pesticide use on the Site is similarly not a concern.
- Aerially-deposited lead (ADL) associated with use of historic leaded gasoline in vehicles travelling on the highway adjoining to the east of the Site does not appear to represent a concern for the Site.
- The analytical results of sampled Site soil and results of the sampled material in the two stockpiles that Kleinfelder observed on the Site appear to be representative of non-hazardous waste.
- The methane concentration results obtained during Kleinfelder's monitoring of soil vapor beneath the Site suggest there is a low potential for methane to be present despite the Site's location within the Brentwood Oil and Gas Field.

Given the laboratory results and field measurements, Kleinfelder no longer considers the initial RECs discussed in its June 22, 2021 draft Phase I ESA report concerning the Site to represent environmental hazards or conditions requiring further analysis or remediation. No further Site assessment is recommended. Overall, compliance with applicable federal, state, local statutes and regulations and preparation of the SWPPP provided in Project Requirement Hydro-1, would result in the project having a less-than-significant impact relative to this issue.

*Project Requirement(s)*

***Requirement HAZ-1:*** *Prepare and file a Hazardous Materials Business Plan (HMBP).*

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response c): Adequately addressed in Specific Plan EIR.** The proposed project has limited potential for the routine transport, use, or disposal of hazardous materials as discussed above. The project does include a fuel dispensing facility that would require the transport and storage of gasoline for fuel dispensing activities. One school, Heritage Baptist Academy is located within one-quarter mile of the project site. The proposed commercial site uses do not propose business activities that will result in hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste. Potential impacts from fuel dispensing emissions and

TACs are discussed in detail in the Air Quality portion of this report and were found to be less than significant.

All hazardous materials would be handled in accordance with Federal, State, local, and County requirements, which would limit the potential for a project to expose nearby uses, including schools, to hazardous emissions or an accidental release. Hazardous emissions are monitored by the Bay Area Air Quality Management District, Regional Water Quality Control Board, and Department of Toxic Substances Control, and the local CUPA. In the event of a hazardous materials spill or release, notification and cleanup operations would be performed in compliance with applicable Federal, State, and local regulations and policies, including hazard mitigation plans. Additionally, as described previously, General Plan Policy SA 4-4 ensures that businesses in Brentwood which handle hazardous materials prepare and file a Hazardous Materials Business Plan (HMBP).

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response d): Adequately addressed in Specific Plan EIR.** According the California Department of Toxic Substances Control (DTSC) there are no Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites on, or adjacent to the project site. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Responses e): Adequately addressed in Specific Plan EIR.** As discussed in the PA-1 Specific Plan EIR, the Plan Area is not located within two miles of a public airport or private airstrip. The nearest airport, Byron Airport, is located approximately 9.7 miles southeast of the Plan Area. This airport is a County-owned facility that occupies approximately 1,307 acres. Brentwood does not lie within the Runway Protection Zone, Inner/Outer Safety Zones, Inner Turning Zone, Sideline Safety Zone, or Traffic Pattern Zone for this airport. According to the City's General Plan EIR, none of the Planning Area (which includes the Specific Plan Area) lies within the land use compatibility zones for the Byron Airport.

The PA-1 Specific Plan EIR (EIR) determined that there was no impact related to this topic. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response f): Adequately addressed in Specific Plan EIR.** The proposed project does not include actions that would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project involves the development of commercial land uses within an urbanized environment, and would not interfere with any emergency response or evacuation plans.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response g): Adequately addressed in Specific Plan EIR.** The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

The state has charged CalFire with the identification of Fire Hazard Severity Zones (FHSZ) within State Responsibility Areas. In addition, CalFire must recommend Very High Fire Hazard Severity Zones (VHFHSZ) identified within any Local Responsibility Areas. The FHSZ maps are used by the State Fire Marshall as a basis for the adoption of applicable building code standards.

Brentwood is a Local Responsibility Area (LRA) that is served by the Contra Costa County Fire Protection District (CON Fire). Con Fire provides fire, rescue and emergency medical services to Brentwood, and some 750,000 residents in 11 cities and 10 unincorporated areas across their 553 square-mile jurisdiction. The City of Brentwood is not categorized as a "Very High" FHSZ by CalFire.

Development allowed under the proposed project would not place people and/or structures in areas at significant risk of wildland fires. Additionally, the proposed project will be evaluated for consistency with all applicable building and fire safety code sections that reduce fire risks.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *X. HYDROLOGY AND WATER QUALITY -- WOULD THE PROJECT:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | | | X | |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | | | X | |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | X | |
| i) result in substantial erosion or siltation on- or off-site; | | | X | |
| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | | | X | |
| iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to provide substantial additional sources of polluted runoff; or | | | X | |
| iv) impede or redirect flood flows? | | | X | |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | X | |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a): Adequately addressed in Specific Plan EIR.** Grading, excavation, removal of vegetation cover, and loading activities associated with construction activities could temporarily increase runoff, erosion, and sedimentation. Construction activities also could result in soil compaction and wind erosion impacts that could adversely affect soils and reduce the revegetation potential at construction sites and staging areas.

The State Water Resources Control Board (SWRCB) regulates stormwater discharges associated with construction activities where clearing, grading, or excavation results in a land disturbance of one or more acres. Performance Standard NDCC-13 of the City's National Pollutant Discharge Elimination System (NPDES) permit requires applicants to show proof of coverage under the State's General Construction Permit prior to receipt of any construction permits. The State's General Construction Permit requires a Storm Water Pollution Prevention Plan (SWPPP) to be prepared for the site. A SWPPP describes Best Management Practices (BMPs) to control or minimize pollutants from entering stormwater and must address both grading/erosion impacts and non-point source pollution impacts of the development project, including post-construction impacts. The City of Brentwood requires all development projects to use BMPs to treat runoff.

The City owns and operates the Brentwood Wastewater Treatment Plant (WWTP) located at 2251 Elkins Way in Contra Costa County. The WWTP is regulated under Waste Discharge Requirements Order R5-2013-0106-01 (NPDES Permit No. CA0082660) for the discharge of disinfected tertiary treated wastewater. The WWTP receives wastewater from approximately 19,612 residential connections and 504 commercial business connections. The City's sewer system consists of approximately 243 miles of main line, ranging from 8 inches to 42 inches in diameter, and two lift stations. Section 120 of the City's Standard Specifications addresses Sanitary Sewer Installation. This section includes specifications on pipe, manhole, cleanout, and sewer lateral materials and construction methods, as well as sewer line pressure testing, acceptance, and final inspection. These requirements provide reasonable assurance sewers constructed to these specifications will perform adequately with minimal infiltration or maintenance problems and will maintain their structural integrity for the duration of their intended useful lives. The City's Standard Specifications are updated periodically to help prevent future problems in the City's sewer system.

Additionally, in accordance with thresholds and effective dates in the city's NPDES permit, every application for a development project, including, but not limited to, a rezoning, tentative map, parcel map, conditional use permit, variance, site development permit, design review, or building permit that is subject to the development runoff requirements in the city's NPDES permit shall be accompanied by a stormwater control plan that meets the criteria in the most recent version of the Contra Costa Clean Water Program Stormwater C.3. Guidebook.

The collection of fees and determined fair share fee amounts are adopted by the City for all new development projects. The payment of applicable development impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards future system expansions. Additionally, through compliance with the NPDES permit requirements, and compliance with the SWPPP, and stormwater control plan C.3 stormwater requirements the proposed project would not result in a violation of any water quality standards or waste discharge requirements.

*Project Requirement(s)*

> ***Project Requirement Hydro-1****: The project applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that includes specific types and sources of stormwater pollutants, determine the location and nature of potential impacts, and specify appropriate control measures to eliminate impacts on receiving water quality from stormwater runoff. The SWPPP shall require treatment BMPs that incorporate, at a minimum, the required hydraulic sizing design criteria for volume and flow to treat projected stormwater runoff. The SWPPP shall comply with the most current standards established by the RWQCB, and the Contra Costa Clean Water program. Best Management Practices shall be subject to approval by the City Engineer and RWQCB.*
>
> ***Project Requirement Hydro 2:*** *Prior to approval of the building permit, the project applicant shall submit a detailed Stormwater Control Plan that meets the criteria in the most recent version of the Contra Costa Clean Water Program Stormwater C.3. Guidebook. The project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the project site within the on-site retention facility to the City's existing stormwater conveyance system and demonstrate that the project would not result in on- or off-site drainage impacts.*

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** The proposed project would not result in the construction of new groundwater wells, nor would it increase the levels of groundwater pumping.

The City's water supply consists of both surface water from the Delta and groundwater from existing wells located in the East Contra Costa Subbasin within the larger San Joaquin Valley Groundwater Basin. The City pumps groundwater from an alluvial basin underlying the City. The City has nine permitted groundwater wells within its service area, five of which are active wells. Historical conditions as reflected in the hydrographs and contour maps for the East Contra Costa Subbasin indicate that the groundwater system has no apparent overdraft, suggesting that historical extraction patterns have not exceeded the safe yield of the basin.

Development proposed by the project would result in new impervious surfaces and could reduce stormwater infiltration and groundwater recharge. Groundwater recharge occurs primarily through percolation of surface waters through the soil and into the groundwater basin. The addition of significant areas of impervious surfaces (such as roads, parking lots, buildings, etc.) can interfere with this natural groundwater recharge process. Upon project buildout, portions of the project site would be covered in impervious surfaces, which would limit the potential for

groundwater percolation to occur on the project site. However, given the relatively large size of the groundwater basin, the areas of impervious surfaces added as a result of project implementation will not adversely affect the recharge capabilities of the local groundwater basin.

Additionally, the project would maintain pervious surfaces within the on-site landscaping and drainage features. These pervious areas could maintain opportunities for groundwater recharge.

Because the City has adequate existing water service capacity to serve the project, and the limited scope of impervious surface coverage (when compared to the larger groundwater basin), the proposed project would result in less-than-significant impacts related to depletion of groundwater supplies and interference with groundwater recharge.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Responses c), e): Adequately addressed in Specific Plan EIR.** When land is in a natural or undeveloped condition, precipitation will infiltrate/percolate the soils and mulch. Much of the rainwater that falls on natural or undeveloped land slowly infiltrates the soil and is stored either temporarily or permanently in underground layers of soil. When the soil becomes completely soaked or saturated with water or the rate of rainfall exceeds the infiltration capacity of the soil, the rainwater begins to flow on the surface of land to low lying areas, ditches, channels, streams, and rivers. Rainwater that flows off of a site is defined as storm water runoff. When a site is in a natural condition or is undeveloped, a larger percentage of rainwater infiltrates into the soil and a smaller percentage flows off the site as storm water runoff.

The infiltration and runoff process is altered when a site is developed with urban uses. Buildings, roads, and parking lots introduce asphalt, concrete, and roofing materials to the landscape. These materials are relatively impervious, which means that they absorb less rainwater. As impervious surfaces are added to the ground conditions, the natural infiltration process is reduced. As a result, the volume and rate of storm water runoff increases. The increased volumes and rates of storm water runoff can result in flooding in some areas if adequate storm drainage facilities are not provided.

There are no rivers, streams, or water courses located on or immediately adjacent to the project site. As such, there is no potential for the project to alter a water course, which could lead to on or offsite flooding. Drainage improvements associated with the project site would be located on the project site, and the project would not alter or impact offsite drainage facilities.

Development of the project site would potentially increase local runoff production, and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons.

BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels.

The project would be subject to all relevant General Plan policies and actions that aim to reduce water pollution from construction and new development, and protect and enhance natural storm drainage and water quality features. The policies include numerous requirements that would reduce the potential for implementation of the proposed project to result in increased water quality impacts. In addition, compliance with the Clean Water Act and regulations enforced by the RWQCB would ensure that construction-related impacts to water quality are minimized and projects comply with all applicable laws and regulations.

Additionally, all municipalities within Contra Costa County (and the County itself) are required to develop more restrictive surface water control standards for new development projects as part of the renewal of the Countywide NPDES permit. Known as the "C.3 Standards," new development and redevelopment projects that create or replace an acre or more of impervious surface area must contain and treat stormwater runoff from the site. The proposed project is a C.3 regulated project and is required to include appropriate site design measures, source controls, features and facilities for hydromodification management (HM) and hydraulically-sized stormwater treatment measures. These measures would include underground storage facilities for HM and biorention areas to treat stormwater runoff before allowing it to proceed into the public storm drain system.

In order to ensure that stormwater runoff from the project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, Project Requirement Hydro 1 requires the preparation of a SWPPP. As described previously, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site during both the construction and operational phases of the project.

Additionally, the project is subject to the project Requirement Hydro 2 that requires the project applicant to prepare and submit a Stormwater Control Plan that meets the criteria in the most recent version of the Contra Costa Clean Water Program Stormwater C.3. Guidebook.

New development projects in the City of Brentwood are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach presented in Contra Costa County Flood Control District Drainage Area maps. The project applicant is required to submit a detailed storm drainage infrastructure plan to the City for review and approval. The project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the project site within the on-site retention and detention facility to the City's existing stormwater conveyance system and demonstrate that the project would not result in on- or off-site flooding impacts.

The development of an onsite storm drainage system, the payment of all applicable development fees, and the implementation of Requirements Hydro 1 and Hydro 2 would ensure that this impact is less than significant.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response d): Adequately addressed in Specific Plan EIR.** Floodplain zones are determined by the Federal Emergency Management Agency (FEMA) and used to create Flood Insurance Rate Maps (FIRMs). These tools assist cities in mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction, whether residential, commercial, or industrial within 100-year floodplains.

Tsunamis are defined as sea waves created by undersea fault displacement. A tsunami poses little danger away from shorelines. As Brentwood is several miles inland from the Carquinez Strait, the project site is not exposed to flooding risks from tsunamis and adverse impacts would not result.

A seiche is a long-wavelength, large-scale wave action set up in a closed body of water such as a lake or reservoir. The project is not located near a closed body of water.

The project site is not located within the FEMA designated 100-year floodplain, or within inundation areas from tsunami or seiche events.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XI. LAND USE AND PLANNING - Would the project:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Physically divide an established community? | | | X | |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Response a): Adequately addressed in Specific Plan EIR.** The project site is part of a master planned area within the PA-1 Specific Plan Area. General Plan Policy LU 1-2 provides specific guidance regarding the planning and development goals for PA-1. In order to ensure that the General Plan guidance with respect to PA-1 is implemented and carried out, the City elected to prepare a specific plan to establish a detailed land use, infrastructure, and development plan for PA-1.

The land uses allowed under the adopted PA-1 Specific Plan provide opportunities for cohesive new growth within existing urbanized areas of the city, as well as new growth adjacent to existing urbanized areas, but would not create physical division within the community.

Surrounding existing uses include vacant lands to the south and developed commercial uses to the north, and SR-4 to the east. Residential uses are located to the west of the site, west of Heidorn Ranch Road in the City of Antioch. The project would be consistent and compatible with the surrounding land uses, and would not divide an established community.

As such, the proposed project is consistent with the adopted vision, allowed uses, and standards identified within the PA-1 Specific Plan, and would not result in any new or increased impacts, beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** The PA-1 Specific Plan was prepared in conformance with State laws and regulations associated with the preparation of specific plans. Discussion of the proposed PA-1 Specific Plan's consistency with State regulations, plans, and policies associated with specific environmental issues (e.g., air quality, traffic, water quality, etc.) is provided in the relevant chapters of the PA-1 Specific Plan EIR.

The key planning documents that are directly related to, or that establish a framework within which the proposed project must be consistent, include:

- City of Brentwood PA-1 Specific Plan;
- City of Brentwood General Plan; and
- City of Brentwood Zoning Ordinance.

CITY PLANS

In July 2014, the City of Brentwood completed and adopted a comprehensive update to the General Plan. The 2014 Brentwood General Plan is the overarching policy document that guides land use, housing, transportation, infrastructure, community services, and other policy decisions throughout Brentwood. The Land Use Element of the 2014 General Plan establishes one Priority Area within the city, PA-1. A Priority Area is an overlay designation that identifies an area of the city that warrants particular attention with respect to the land use mix, jobs/housing balance, and overall design and integration of future development projects.

The PA-1 Specific Plan contains detailed development standards, distribution of land uses, infrastructure requirements, and implementation measures for the development of a specific geographic area. The Land Use Plan of the PA-1 Specific Plan defines various land use designations by their allowable uses, minimum parcel sizes, and maximum development densities. These designations implement both the PA-1 Specific Plan and the City's General Plan vision, policies, and land use classifications for the project area.

As demonstrated throughout this analysis, the proposed project is consistent with uses identified by the PA-1 Specific Plan.

CONCLUSION

The proposed project is required to be consistent with all applicable policies, standards, and regulations, including those land use plans, policies, and regulations adopted to mitigate environmental effects by the City as well as those adopted by agencies with jurisdiction over components of development projects. The proposed project is consistent with the adopted vision and uses identified within the PA-1 Specific Plan, and would not result in any new or increased impacts, beyond those that were already addressed in the PA-1 Specific Plan EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XII. MINERAL RESOURCES -- Would the project:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | | | X | |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), b): Adequately addressed in Specific Plan EIR.**

According to the Brentwood General Plan EIR, the most important mineral resources in the region are sand, gravel, coal, oil, and gas. There are no known mineral resources located in the Specific Plan Area or in the immediate vicinity. As shown in Figure 3.6-6 of the City's General Plan EIR, there are no active dry gas wells located in the Specific Plan Area. Additionally, there is no land designated or zoned for mineral resources within the City limits or in the Specific Plan Area. Given that no known mineral resources are located in the vicinity of the Specific Plan Area, implementation of the proposed project would not result in the loss of availability of a known mineral resource or of a locally-important mineral resource recovery site.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XIII. NOISE -- WOULD THE PROJECT RESULT IN:*

| | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | | X | |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | | | X | |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | | | X | |

### *BACKGROUND*

An Acoustical Assessment for the Project was prepared by Kimley-Horn and Associates, Inc. in January 2023.

This report documents the results of an Acoustical Assessment completed for the proposed Project. The purpose of this Acoustical Assessment is to evaluate the Project's potential construction and operational noise and vibration levels associated with the Project and determine the level of impact the Project would have on the environment. To determine the level of impact, the Acoustical Assessment compares the impacts associated with the Project to the impacts analyzed in the City of Brentwood's Priority Area 1 Specific Plan Environmental Impact Report.

Results from the Acoustical Assessment are described below. The full acoustical assessment and noise data is attached to this document as Attachment F of this Report.

### *RESPONSES TO CHECKLIST QUESTIONS*

**Response a): Adequately addressed in Specific Plan EIR.**

**Construction**

As identified in the PA-1 Specific Plan EIR, construction noise would be generated through the use of construction equipment and construction-related traffic on nearby roads. Construction activities would be temporary and would primarily occur during daytime hours. Based on the

analysis from the Specific Plan, construction equipment would produce noise levels ranging from 76 to 90 dBA at a distance of 50 feet. The City's General Plan includes policies and actions that address construction noise. Policy N-1.15 and Action N-1e provide guidance on construction activities to reduce its impact on the surrounding area. Therefore, the PA-1 Specific Plan EIR concluded that construction noise would produce a less than significant impact with the implementation of the suggested best practices listed in Action N-1e.

The proposed Project construction would result in approximately five months of substantial noise generating activities, including phases such as demolition, grading and building framing. According to the applicant, no pile-driving would be required during construction.

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the residential neighborhoods surrounding the construction site. Project construction would occur approximately 80 feet from the nearest sensitive receptor to the north. However, construction activities would occur throughout the Project site and would not be concentrated at a single point near sensitive receptors. Noise levels typically attenuate (or drop off) at a rate of 6 dB per doubling of distance from point sources, such as industrial machinery.

Construction activities associated with development of the Project would include site preparation, grading, paving, building construction, and architectural coating. Such activities could require concrete/industrial saws, excavators, and dozers during demolition; dozers and tractors/loaders/ backhoes during site preparation; graders, dozers, and tractors during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, mixers, tractors, and paving equipment during paving; and air compressors during architectural coating. Grading and excavation phases of Project construction tend to be the shortest in duration and create the highest construction noise levels due to the operation of heavy equipment required to complete these activities. It should be noted that only a limited amount of equipment can operate near a given location at a particular time. Equipment typically used during this stage includes heavy-duty trucks, backhoes, bulldozers, excavators, front-end loaders, and scrapers. Operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three to four minutes at lower power settings. Other primary sources of noise would be shorter-duration incidents, such as dropping large pieces of equipment or the hydraulic movement of machinery lifts, which would last less than one minute.

Typical noise levels associated with individual construction equipment are listed in Table 10: Typical Construction Noise Levels from Construction Equipment.

***Table 10: Typical Noise Levels from Construction Equipment***

| Equipment | Typical Noise Level (dBA)from Source |
|---|---|
| | 50 feet |
| Air Compressor | 80 |
| Backhoe | 80 |
| Compactor | 82 |
| Concrete Mixer | 85 |
| Concrete Pump | 82 |
| Concrete Vibrator | 76 |
| Crane, Derrick | 88 |
| Crane, Mobile | 83 |
| Dozer | 85 |
| Generator | 82 |
| Grader | 85 |
| Impact Wrench | 85 |
| Jack Hammer | 88 |
| Loader | 80 |
| Paver | 85 |
| Pump | 77 |
| Roller | 85 |
| Saw | 76 |
| Scraper | 85 |
| Shovel | 82 |
| Truck | 84 |
| Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018. | |

Construction activities are conditionally exempt from the Noise provisions of the General Plan during certain hours. Construction activities are exempt from the noise standard from 7 AM to 6 PM Monday through Friday, and from 8 AM to 5 PM on Saturdays with written approval of the City Engineer or designee. Further, Project construction would not result in substantial noise-generating activities for more than 12 months. The proposed Project construction would result in approximately five months of substantial noise generating activities, including phases such as grading and building framing as well as the less noise intensive construction phases such as site preparation, building construction, paving, and architectural coating. Additionally, the project would not include pile-driving.

Based on the short-lived nature of the noise levels associated with construction and consistency with General Plan Policy N-1.15 and Action N- 1e (which provide guidance and standards to reduce construction noise impacts), construction noise would result in a less-than-significant impact, which is consistent with the findings in the PA-1 Specific Plan EIR. There are no new or changed circumstances relevant to the Project as compared to the PA-1 Specific Plan EIR that

could result in a new significant impact or a significant impact that is substantially more severe than significant impacts previously disclosed.

Construction Traffic Noise

Construction is estimated to be approximately five months. Construction noise may be generated by large trucks moving materials to and from the Project site. Large trucks would be necessary to deliver building materials as well as remove dump materials. Excavation, cut and fill would be required. Based on the California Emissions Estimator Model (CalEEMod) default assumptions for this Project, the Project would generate the highest number of daily trips during the building construction phases. The model estimates that the Project would generate up to 106 worker trips and 56 daily vendor trips for a total of approximately 162 daily vehicle trips during building construction. Because of the logarithmic nature of noise levels, a doubling of the traffic volume (assuming that the speed and vehicle mix do not also change) would result in a noise level increase of 3 dBA. Lone Tree Plaza Drive between Heidorn Ranch Road to Project Driveway A has an average daily trip volume of 1,660 vehicles. Therefore, a maximum of 162 daily Project construction trips would not double the existing traffic volume per day. Construction related traffic noise would not be noticeable and would not create a significant noise impact.

This noise increase would be of short duration, and would likely occur primarily during daytime hours. Construction would be temporary in nature and the Project would implement standard best practice controls listed under General Plan Policy N-1.15 and Action N-1e to limit construction noise and impacts.

**Operations**

Implementation of the Project would create new sources of noise in the Project vicinity. The major noise sources associated with the Project that would potentially impact existing nearby sensitive receptors include the following:

- Off-site traffic noise;
- Mechanical equipment (i.e., trash compactors, air conditioners, tire center/vehicle maintenance equipment, etc.);
- Activities at the loading areas (i.e., maneuvering and idling trucks, loading/unloading, and equipment noise);
- Parking and fueling station areas (i.e., car door slamming, car radios, engine start-up, and car pass-by);
- Landscape maintenance activities; and
- Trash/Recycling pickups.

As shown in Table 11, receptors near the Project site would either remain below the allowable noise threshold of 55 dBA for residential uses and 72 dBA for commercial uses and would not increase ambient noise levels by more than 3 dBA when the existing ambient noise levels are

already in exceedance of the City's noise standards. Therefore, the Project's operational noise levels would not result in a significant increase over existing ambient noise levels at the nearest noise-sensitive uses in the City of Brentwood. Impacts would be less than significant in this regard. Furthermore, the Project would comply with the relevant General Plan goals and policies listed in the above. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

***Table 11: Composite Project Operational Noise for Brentwood Receptors***

| Receptor No. | Land Use | Daytime | | | | | Nighttime | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Ambient Noise Level (dBA $L_{eq}$) [1] | Composite Project Operations | Ambient + Project (dBA $L_{eq}$) | Increase Over Ambient (dBA $L_{eq}$) | Significant?[2] | Ambient Noise Level (dBA $L_{eq}$) [1] | Composite Project Operations | Ambient + Project (dBA $L_{eq}$) | Increase Over Ambient (dBA $L_{eq}$) | Significant?[2] |
| 1[3] | Residential | 63.6 | 53.6 | 64.0 | 0.4 | No | 61.8 | 40.7 | 61.9 | 0.0 | No |
| 2[3] | Residential | 58.0 | 53.5 | 59.3 | 1.3 | No | 56.2 | 41.3 | 56.3 | 0.1 | No |
| 3[3] | Residential | 55.0 | 52.3 | 56.8 | 1.9 | No | 53.2 | 41.8 | 53.5 | 0.3 | No |
| 4[3] | Residential | 51.3 | 51.1 | 54.2 | 2.9 | No | 49.5 | 41.6 | 50.1 | 0.7 | No |
| 5[3] | Residential | 47.8 | 49.2 | 51.6 | 3.8 | No | 46.0 | 41.2 | 47.3 | 1.2 | No |
| 6[3] | Residential | 47.8 | 46.9 | 50.4 | 2.6 | No | 46.0 | 40.7 | 47.2 | 1.1 | No |
| 7[3] | Residential | 54.6 | 45.5 | 55.1 | 0.5 | No | 52.8 | 40.2 | 53.0 | 0.2 | No |
| 8[3] | Residential | 60.7 | 44.6 | 60.8 | 0.1 | No | 58.9 | 39.6 | 58.9 | 0.1 | No |
| 9 | Residential | 67.2 | 43.9 | 67.2 | 0.0 | No | 65.4 | 39.1 | 65.4 | 0.0 | No |
| 10[3] | Residential | 55.6 | 50.7 | 56.8 | 1.2 | No | 53.8 | 41.4 | 54.0 | 0.2 | No |
| 11[3] | Residential | 62.6 | 46.1 | 62.7 | 0.1 | No | 60.8 | 38.8 | 60.8 | 0.0 | No |
| 12[3] | Residential | 62.1 | 44.6 | 62.2 | 0.1 | No | 60.3 | 36.9 | 60.3 | 0.0 | No |
| 13[3] | Residential | 63.3 | 45.3 | 63.4 | 0.1 | No | 61.5 | 39.7 | 61.6 | 0.0 | No |
| 37 | Government | 67.2 | 45.0 | 67.2 | 0.0 | No | 65.4 | 40.0 | 65.4 | 0.0 | No |
| 38[3] | Commercial | 55.8 | 46.8 | 56.3 | 0.5 | No | 54.0 | 41.5 | 54.2 | 0.2 | No |
| 39 | Commercial | 56.9 | 49.8 | 57.7 | 0.8 | No | 55.1 | 43.9 | 55.4 | 0.3 | No |
| 40 | Commercial | 56.9 | 52.5 | 58.2 | 1.3 | No | 55.1 | 46.5 | 55.7 | 0.6 | No |
| 41 | Commercial | 56.9 | 52.3 | 58.2 | 1.3 | No | 55.1 | 46.6 | 55.7 | 0.6 | No |
| 42 | Commercial | 56.9 | 53.2 | 58.4 | 1.5 | No | 55.1 | 47.7 | 55.8 | 0.7 | No |
| 43 | Commercial | 56.9 | 54.6 | 58.9 | 2.0 | No | 55.1 | 49.0 | 56.1 | 1.0 | No |
| 44 | Commercial | 56.9 | 55.9 | 59.4 | 2.5 | No | 55.1 | 50.4 | 56.4 | 1.3 | No |
| 45 | Commercial | 56.9 | 57.9 | 60.4 | 3.5 | No | 55.1 | 52.3 | 56.9 | 1.8 | No |
| 46 | Commercial | 56.9 | 59.6 | 61.5 | 4.6 | No | 55.1 | 53.9 | 57.6 | 2.5 | No |
| 47 | Commercial | 56.9 | 59.5 | 61.4 | 4.5 | No | 55.1 | 52.9 | 57.1 | 2.0 | No |
| 48 | Commercial | 56.9 | 62.0 | 63.2 | 6.3 | No | 55.1 | 53.5 | 57.4 | 2.3 | No |
| 49 | Commercial | 56.9 | 59.3 | 61.3 | 4.4 | No | 55.1 | 50.9 | 56.5 | 1.4 | No |
| 50 | Commercial | 56.9 | 52.6 | 58.3 | 1.4 | No | 55.1 | 46.3 | 55.6 | 0.5 | No |
| 51 | Vacant | 56.9 | 53.3 | 58.5 | 1.6 | No | 55.1 | 47.4 | 55.8 | 0.7 | No |
| 52 | Vacant | 56.9 | 53.8 | 58.6 | 1.7 | No | 55.1 | 47.4 | 55.8 | 0.7 | No |
| 53 | Vacant | 56.9 | 53.0 | 58.4 | 1.5 | No | 55.1 | 45.5 | 55.6 | 0.5 | No |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 54 | Vacant | 56.9 | 52.9 | 58.4 | 1.5 | No | 55.1 | 43.5 | 55.4 | 0.3 | No |
| 55[3] | Vacant | 55.8 | 50.6 | 56.9 | 1.1 | No | 54.0 | 44.9 | 54.5 | 0.5 | No |
| 56[3] | Vacant | 55.8 | 49.3 | 56.7 | 0.9 | No | 54.0 | 42.7 | 54.3 | 0.3 | No |
| 57[3] | Vacant | 55.8 | 49.2 | 56.7 | 0.9 | No | 54.0 | 42.4 | 54.3 | 0.3 | No |
| 58[3] | Vacant | 55.8 | 49.4 | 56.7 | 0.9 | No | 54.0 | 42.0 | 54.3 | 0.3 | No |

1. Ambient noise levels were derived from the short□ and/or long□term measurement data obtained by Kimley□Horn and Associates on September 28□ 29, 2022. The sound level data from the nearest noise measurement location was utilized at the closest modeled receptor.
2. The most stringent daytime and nighttime ambient noise standards are utilized in accordance with General Plan Policy N□1.7 and Brentwood Municipal Code Section 9.32.030(3).
3. The ambient noise levels were interpolated using the noise measurement data obtained by Kimley-Horn and Associates on September 28□29, 2022.

Source: Kimley-Horn and Associates on September 28-29, 2022.

City of Antioch Operational Noise Analysis

As indicated in Table 12: Composite Project Operational Noise for Antioch Receptors, the ambient plus Project's on-site operational noise levels would be at 65.9 dBA Ldn at Heritage Baptist Academy, and between 49.4 dBA Ldn and 54.2 dBA Ldn at the residential uses to the southwest of the Project site located within the City of Antioch. As such, noise levels from on-site operations at the Project site would not exceed the City of Antioch's noise standards of 60 dBA CNEL for residential uses. Noise levels at Heritage Baptist Academy are expected to be similar to existing ambient levels with implementation of the Project, and a noticeable change would not occur. A **less than significant** impact would occur in this regard.

***Table 12: Composite Project Operational Noise for Antioch Receptors***

| Receptor No. | Land Use | Ambient Noise Level (dBA $L_{dn}$) [1] | Composite Project Operations | Ambient + Project (dBA $L_{dn}$) | Increase Over Ambient (dBA $L_{dn}$) | Significant?[2] |
|---|---|---|---|---|---|---|
| 14 | Residential | 53.4 | 46.6 | 54.2 | 0.8 | No |
| 15 | Residential | 53.4 | 46.4 | 54.2 | 0.8 | No |
| 16 | Residential | 53.4 | 46.3 | 54.2 | 0.8 | No |
| 17 | Residential | 53.4 | 46.2 | 54.2 | 0.8 | No |
| 18 | Residential | 53.4 | 46.0 | 54.1 | 0.7 | No |
| 19 | Residential | 53.4 | 45.9 | 54.1 | 0.7 | No |
| 20 | Residential | 53.4 | 36.2 | 53.5 | 0.1 | No |
| 21 | Residential | 53.4 | 32.0 | 53.4 | 0.0 | No |
| 22 | Residential | 53.4 | 32.4 | 53.4 | 0.0 | No |
| 23 | Residential | 49.1 | 42.4 | 49.9 | 0.8 | No |
| 24 | Residential | 49.1 | 42.5 | 50.0 | 0.9 | No |
| 25 | Residential | 49.1 | 42.5 | 50.0 | 0.9 | No |
| 26 | Residential | 49.1 | 43.0 | 50.1 | 1.0 | No |
| 27[3] | School | 65.8 | 47.5 | 65.9 | 0.1 | No |
| 28 | Residential | 49.1 | 38.3 | 49.4 | 0.3 | No |
| 29 | Residential | 49.1 | 40.0 | 49.6 | 0.5 | No |
| 30 | Residential | 49.1 | 45.3 | 50.6 | 1.5 | No |
| 31 | Residential | 49.1 | 47.6 | 51.4 | 2.3 | No |
| 32 | Residential | 49.1 | 48.0 | 51.6 | 2.5 | No |
| 33 | Residential | 49.1 | 44.8 | 50.5 | 1.4 | No |
| 34 | Residential | 49.1 | 46.6 | 51.0 | 1.9 | No |
| 35 | Residential | 49.1 | 44.6 | 50.4 | 1.3 | No |
| 36 | Residential | 49.1 | 44.0 | 50.3 | 1.2 | No |

1. Ambient noise levels were derived from the short- and/or long-term measurement data obtained by Kimley-Horn and Associates on September 28-29, 2022. The sound level data from the nearest noise measurement location was utilized at the closest modeled receptor.
2. The City of Antioch utilizes stationary source noise standard of 60 dBA CNEL for residential uses per Antioch Municipal Code Section 9-5.1901.A.
3. The ambient noise levels were interpolated using the noise measurement data obtained by Kimley-Horn and Associates on September 28-29, 2022.

Source: Kimley-Horn and Associates

There are no aspects of the project as compared to the PA-1 Specific Plan EIR that would result in a new significant impact or an impact that is more severe than disclosed in the PA-1 Specific Plan EIR. For these reasons, impacts related to noise would be consistent with the PA-1 Specific Plan EIR.

**Cumulative Noise**

Noise by definition is a localized phenomenon, and drastically reduces as distance from the source increases. Cumulative noise impacts involve development of the Project in combination with ambient growth and other related development projects. As noise levels decrease as distance from the source increases, only projects in the nearby area could combine with the Project to potentially result in cumulative noise impacts.

Cumulative Construction Noise: The Project's construction activities, with standard best practices, would not result in a substantial temporary increase in ambient noise levels. The City permits construction hours within the hours of 7:00 a.m. to 6:00 p.m. on Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturdays, unless otherwise allowed in a Development Permit or other planning approval. The Project would contribute to other proximate construction noise impacts if construction activities were conducted concurrently. However, based on the noise analysis above, the Project's construction-related noise impacts would be less than significant following implementation of General Plan Action N-1e.

Construction activities at other planned and approved projects would be required to take place during daytime hours, and the City and Project applicants would be required to evaluate construction noise impacts and implement mitigation, if necessary, to minimize noise impacts. Each Project would be required to comply with the applicable City of Brentwood Municipal Code limitations on allowable hours of construction. Therefore, Project construction would not contribute to cumulative impacts and impacts in this regard are not cumulatively considerable.

Cumulative Operational Noise: Cumulative noise impacts describe how much noise levels are projected to increase over existing conditions with the development of the Project and other foreseeable projects. Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to buildout of the Project and other projects in the vicinity. However, noise from generators and other stationary sources could also generate cumulative noise levels.

Stationary Noise: As discussed above, impacts from the Project's operations would be less than significant. Due to site distance, intervening land uses, and the fact that noise dissipates as it travels away from its source, noise impacts from on-site activities and other stationary sources would be limited to the Project site and vicinity. No known past, present, or reasonably foreseeable projects would compound or increase the operational noise levels generated by the Project. Thus, cumulative operational noise impacts from related projects, in conjunction with Project-specific noise impacts, would not be cumulatively significant.

Traffic Noise: The PA-1 Specific Plan EIR assessed cumulative traffic noise on road segments surrounding the Project site. The PA-1 Specific Plan EIR concluded that multiple road segments surrounding the Project site would have significant increases in cumulative traffic noise, but would remain below the City's thresholds for sensitive receptors. One road segment, Heidorn Ranch Road between Lone Tree Plaza Drive to A Street, would have a cumulative traffic noise increase of 8 dBA Ldn with the implementation of future development and would exceed the City's thresholds. Therefore, the PA-1 Specific Plan EIR states that traffic noise would be cumulatively significant even with the implementation of mitigation measures. However, as discussed above, the proposed Project traffic scenario which includes existing traffic, Project traffic, and future projects (cumulative growth) would result in noise traffic impacts that would be consistent with the findings of the PA-1 Specific Plan EIR. Therefore, the Project would not result in any new significant effects or increase the severity of previously identified environmental effects related to noise as compared with the PA-1 Specific Plan EIR.

*Project Requirement(s)*

***Project Requirement N-1:*** *The following requirements shall be implemented during all construction phases of the project: In compliance with General Plan Action N-1e, the Project would be required to control construction noise with standard best practice controls. The General Plan's suggested best practices for control of construction noise include:*

1. *Construction period shall be less than 12 months;*
2. *Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, and between 8:00 a.m. and 5:00 p.m. on Saturdays. No construction shall occur on Sundays or City holidays;*
3. *All equipment drive by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment;*
4. *The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists;*
5. *At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences;*
6. *Unnecessary idling of internal combustion engines shall be prohibited;*
7. *Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction activities, to the extent feasible;*
8. *The required construction-related noise mitigation plan shall also specify that haul truck deliveries are subject to the same hours specified for construction equipment;*
9. *Neighbors adjacent to the construction site shall be notified of the construction schedule in writing;*

10. *The construction contractor shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall be responsible for determining the cause of the noise complaint (e.g., starting too early, poor muffler, etc.) and instituting reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.*

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** The FTA has published standard vibration velocities for construction equipment operations. In general, depending on the building category of the nearest buildings adjacent to the potential pile driving area, the potential construction vibration damage criteria vary. For example, for a building constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.50 inch per second (in/sec) peak particle velocity (PPV) is considered safe and would not result in any construction vibration damage. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on soil composition and underground geological layer between vibration source and receiver. PA-1 Specific Plan EIR utilized a 0.1 in/sec threshold for construction vibration noise.

<u>Construction:</u>

As shown in Table 13, the highest vibration levels are achieved with the large bulldozer operations. This construction activity is expected to take place during grading. Project construction would be approximately 100 feet from the closest sensitive receptor/structure. However, as indicated in Table 14, construction equipment vibration velocities would not exceed the City's 0.10 PPV threshold.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

***Table 13: Representative Vibration Source Levels for Construction Equipment***

| *Equipment* | *Peak Particle Velocity At 25 feet (in/sec)* | *Peak Particle Velocity At 50 feet (in/sec)* | *Peak Particle Velocity At 100 feet (in/sec)* |
|---|---|---|---|
| Large Bulldozers | 0.089 | 0.0239 | 0.0111 |
| Loaded Trucks | 0.076 | 0.0204 | 0.0095 |
| Rock Breaker | 0.059 | 0.0159 | 0.0074 |
| Jackhammer | 0.035 | 0.0094 | 0.0002 |
| Small Bulldozers | 0.003 | 0.0008 | 0.0004 |

*Source: Kimley-Horn and Associates; Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual,*

Operations

The Project would not generate groundborne vibration that could be felt at surrounding uses. Project operations would not involve railroads or substantial heavy truck operations, and therefore would not result in vibration impacts at surrounding uses. As a result, impacts from vibration associated with Project operation would be less than significant.

**Conclusion**

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response c): Adequately addressed in Specific Plan EIR.** The Project Area is not located within an airport land use plan, nor within two miles of a public airport or private airstrip. The nearest airport, Byron Airport, is located approximately 10 miles southeast of the Plan Area. According to the City's General Plan EIR, none of the Planning Area (which includes the Specific Plan Area) lies within the land use compatibility zones for the Byron Airport. Therefore, the proposed Project would not expose people in the Plan Area to excessive noise levels. As such, this topic does not require further analysis. The PA-1 Specific Plan EIR (EIR) determined that there was no impact related to this environmental topic. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XIV. POPULATION AND HOUSING -- WOULD THE PROJECT:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | | | X | |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Response a): Adequately addressed in Specific Plan EIR.** The proposed commercial development would not induce population growth, either directly or indirectly. The commercial store and fueling station would create local jobs, however, they would not generate significant employment and would not expand the job base such that notable population growth may occur.

The employment growth that would occur as a result of approval and development of the proposed project was considered in the PA-1 Specific Plan EIR. The proposed project is consistent with the land use designation that was addressed in the Specific Plan EIR, and the environmental effects of the employment growth generated by the project were considered in the analysis of buildout of the Specific Plan area. Additionally, as described in relevant sections of this document, employment growth attributable to the proposed project would not result in any significant site-specific environmental impacts related to other environmental topics. There are no aspects of the project as compared to the PA-1 Specific Plan EIR that would result in a new significant impact or an impact that is more severe than disclosed in the EIR.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b): Adequately addressed in Specific Plan EIR.** There are no existing homes or residences located on the project site. As such, no displacement would occur.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XV. PUBLIC SERVICES*

| | | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|---|
| Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | | |
| i) | Fire protection? | | | X | |
| ii) | Police protection? | | | X | |
| iii) | Schools? | | | X | |
| iv) | Parks? | | | X | |
| v) | Other public facilities? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Response a): i) Fire Protection, ii) Police Protection: Adequately addressed in Specific Plan EIR.** Development of the Specific Plan Area for urban uses (including residential, commercial, mixed use pedestrian transit, etc.) was analyzed in the City's General Plan EIR. The City's General Plan EIR analyzed impacts to public services which may occur as a result of buildout of the PA-1 Specific Plan. As described in the PA-1 Specific Plan EIR, implementation of the PA-1 Specific Plan would not create new impacts over and above those identified in the General Plan Final EIR, nor significantly change previously identified impacts.

The Brentwood General Plan includes a range of policies and actions to ensure that public services are provided in a timely fashion, are adequately funded, are coordinated between the City and appropriate service agency, and that new development funds its fair share of services. The Brentwood General Plan includes policies to ensure that fire protection and law enforcement services keep pace with new development. For example, Policy IF-7.1 requires coordination with the ECCFPD (now CON Fire) in planning for adequate fire and emergency services. Policy IF-7.2 requires new development to comply with the Brentwood Police Department and ECCFPD's (now CON Fire) regulations pertaining to site and building design.

The proposed project is consistent with the PA-1 Specific Plan. Development of the project does not propose, and would not require the development of a new facility or modifications of an existing facility at this time. As such, there are no additional environmental impacts, beyond those disclosed in the relevant chapters of the PA-1 Specific Plan EIR that are anticipated to occur.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**iii) Schools: Adequately addressed in Specific Plan EIR.**

The Project is located within Brentwood Union and Liberty Union School Districts. Development of the Project is expected to employ up to 250 – 300 employees, and some portion of these employees would have school-aged children that could attend either School District depending on where employees choose to live. However, the Project itself would not require the construction of a new school facility and does not propose the construction of a new school facility which may cause substantial adverse physical environmental impacts.

School Districts collect impact fees from new developments under the provisions of SB 50. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from taxes, would fund capital and labor costs associated with school services. The adequacy of fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund improvements associated with school services and would ensure that project impacts to school services are less than significant.

The proposed project is consistent with the PA-1 Specific Plan. Development of the project does not propose, and would not require the development of a new school facility or modifications of an existing facility at this time. As such, there are no additional environmental impacts, beyond those disclosed in the relevant chapters of the PA-1 Specific Plan EIR that are anticipated to occur.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**iv) Parks: Adequately addressed in Specific Plan EIR.**

As described in the PA-1 Specific Plan EIR, growth accommodated under the Specific Plan would include a range of uses that would increase the population of the city and also attract additional workers and tourists to the city. This growth would result in increased demand for parks and recreation facilities. It is anticipated that over the life of the Specific Plan, use of regional parks, trails, and recreation facilities would increase, due to new residents, as well as tourists, visiting the city. Use of neighborhood parks would also increase, but the level of increase would be less pronounced since future residential projects within the Specific Plan Area would be required to provide adequate parks and open space and/or in-lieu fees to ensure that adequate parks and recreation facilities are provided to serve the development. The provision of new park and recreational facilities is required by Brentwood General Plan Policies CSF 2-4 and CSF 2-8. The

additional demand on existing parks and recreational facilities, particularly regional facilities, would increase the need for maintenance and improvements. These improvements could have environmental impacts, although the exact impacts cannot be determined since the potential improvements are unknown.

The project would result in the construction of a commercial warehouse buildings and fuel facility with no proposed recreational facilities. The project would not directly introduce new residents to the City as no housing is proposed as part of the project; as such, the project would not be anticipated to result in new residents which would utilize nearby neighborhood parks, regional parks, or other recreational facilities. Employees of the warehouse are generally not anticipated to utilize nearby park areas. The proposed project would not significantly increase the use of existing parks such that substantial physical deterioration of the facility would occur or be accelerated.

The proposed project is consistent with the PA-1 Specific Plan. Development of the project does not propose, and would not require the development of a park facility or modifications of an existing facility at this time. As such, there are no additional environmental impacts, beyond those disclosed in the relevant chapters of the PA-1 Specific Plan EIR that are anticipated to occur.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**v) Other Public Facilities: Adequately addressed in Specific Plan EIR.** Other public facilities in the City of Brentwood include facilities such as libraries, and community centers. The proposed project would generate employment and attract visitors to the area which may increase demand on these facilities in a limited capacity. The City of Brentwood requires new development to pay its fair share of the costs of public buildings by collecting the Community Facilities Impact Fee. The Community Facilities Impact fee is used by the City to expand public services and maintain public buildings in order to meet the increased demand generated by new development. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from taxes, would ensure that project impacts to libraries and public buildings are less than significant.

The proposed project is consistent with the PA-1 Specific Plan. Development of the project does not propose, and would not require the development of other public facilities or modifications of an existing facility at this time. As such, there are no additional environmental impacts, beyond those disclosed in the relevant chapters of the PA-1 Specific Plan EIR that are anticipated to occur.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XVI. RECREATION*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | | | X | |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), b): Adequately addressed in Specific Plan EIR.** The proposed project would not directly lead to population growth and does not propose any residential uses. Demand for parks and recreational facilities within the City would not increase and the use of the City's existing parks and recreation system would remain substantially the same compared to the existing conditions.

Development of the project does not propose, and would not require the development of other recreation facilities or modifications of an existing facility. As such, there are no additional environmental impacts, beyond those disclosed in the relevant chapters of the PA-1 Specific Plan EIR that are anticipated to occur.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XVII. TRANSPORTATION/TRAFFIC -- WOULD THE PROJECT:*

| | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | | | | X |
| b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | | | | X |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | X | |
| d) Result in inadequate emergency access? | | | X | |

Information included in the section is further detailed in Attachment G. Traffic Impact Analysis (TIA) Prepared by: Kittelson & Associates, Inc. Project Number 26600. March 21, 2023. The report includes the following elements:

**Local Traffic Analysis**

- Existing Transportation Conditions & Traffic Operations
- Background and Background Plus Project Conditions Traffic Operations
- Cumulative (2040) and Cumulative (2040) Plus Project Conditions Traffic Operations
- Site Access & Circulation

**CEQA Transportation Analysis**

- Consistency with Plans, Programs, and Policies
- VMT Analysis
- Potential Hazards
- Emergency Access

*RESPONSES TO CHECKLIST QUESTIONS*

**Responses a): b): Impact not Previously Addressed in EIR.**

Relevant plans, policies, and programs related to the transportation network

**STATE**

**Senate Bill 743** Adopted on September 27, 2013, SB 743 directs the California Office of Planning and Research (OPR) to administer new CEQA guidance for jurisdictions that removes automobile vehicle delay and LOS from CEQA analysis and replaces it with VMT analysis or other measures that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses," to be used as a basis for determining significant transportation impacts. The change from LOS to VMT is intended to balance the needs of congestion management with statewide goals related to infill development, the promotion of public health, and the reduction of greenhouse gas emissions. State of California General Plan Guidelines (Governor's Office of Planning and Research)

**The State of California General Plan Guidelines,** published in 2017, assists local governments in preparing general plans by providing detailed guidelines which streamline the process of updating general plans. The document provides free online tools and resources, promotes increased use of online data, and includes templates, sample policies and links to more information. The transportation section of this document notes objectives including designing with "Complete Streets", improving safety for all modes, and improving air quality and health.

**REGIONAL**

**Plan Bay Area 2050** (Metropolitan Transportation Commission – MTC) In 2021, the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments completed the Bay Area's update to its long-range Regional Transportation Plan and Sustainable Communities Strategy, which was adopted in 2013. The document describes growth and development in the region over a 20-year horizon and identifies transportation and land use strategies to enable a more sustainable, equitable, and economically vibrant future. Key transportation strategies include maintaining and optimizing the existing system, creating healthy and safe streets, and building a next-generation transit network. At the time the PA-1 Specific Plan EIR was prepared, Plan Bay Area 2050 had not yet been adopted. As such, the EIR analyzed the Specific Plan's consistency with Plan Bay Area 2040. However, the Specific Plan and the proposed project remain consistent with the updated Plan Bay Area 2050.

**Contra Costa Transportation Authority (CCTA)** CCTA acts as the countywide planning and programming agency for transportation-related issues in Contra Costa County. CCTA manages the county's transportation sales tax program, secures transportation funds, provides project oversight, and initiates long-term planning activities. CCTA serves as the Congestion

Management Agency (CMA) for the county and prepares a Congestion Management Program (CMP) update every two years. CCTA also maintains the regional transportation demand model, used to determine and assess the effectiveness of transportation network improvements.

**LOCAL**

**City of Brentwood General Plan – Circulation Element** The General Plan is a comprehensive planning document adopted by the City in 2014 to set policy and guide growth within Brentwood. The following goals related to the transportation network are applicable to the project.

- Goal Cir 1: Provide a transportation system that facilitates the efficient movement of people and goods within and through the city of Brentwood and promotes the use of alternatives to the single-occupant vehicle.
- Goal Cir 2: Proactively support and encourage travel by non-automobile modes by maintaining and expanding safe and efficient pedestrian, bike, equestrian, and transit networks.
- Goal Cir 3: Coordinate circulation facilities with land use and development patterns to create an environment that encourages walking, bicycling, and transit use.
- Goal Cir 4: Ensure that a combination of managed growth and adequate funding mechanisms are in place to complete future improvements on the local and regional circulation networks.

**City of Brentwood Priority Area One Specific Plan** The City of Brentwood completed a specific plan in 2018 for the development area known as Priority Area 1 (PA-1), located in the northwestern corner of the city limits, bounded by Heidorn Ranch Road, Shady Willow Lane, Sand Creek Road, and Lone Tree Way. This area is envisioned as one of the city's primary future employment centers, comprised of a vibrant, compact, mixed-use district. The PA-1 specific plan outlines an overall vision for the area, as well as land use and circulation plans, development standards and design guidelines, and implementation actions and strategies. The project falls within the PA-1 area and adheres with the specific plan's goals, outlined below:

- Goal 1: Prioritize the Specific Plan area's emergence as Brentwood's employment hub
- Goal 2: Support the construction of a transit station surrounded by transit-oriented development
- Goal 3: Encourage housing that supports the Specific Plan area's employment focus and proposed transit station
- Goal 4: Achieve a safe and efficient circulation system for all users and modes of transportation
- Goal 5: Encourage a network of public open spaces
- Goal 6: Encourage well-designed development that creates a sense of place

The proposed project would be consistent with the PA-1 Specific Plan Commercial designation for the site. The project would result in reduced VMT as described below, and as such would not hinder implementing regional or state plans and goals for trip and VMT reductions. Additionally, the project would not have any detrimental effects on the existing and planned bicycle and pedestrian network in Brentwood, nor would it conflict with any plans or planned improvements to these systems.

**CEQA Guidelines section 15064.3, subdivision (b)** In January 2016, the Office of Planning and Research published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, recommending that transportation impacts for projects be measured using a VMT metric. In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the section implementing SB 743 (section 15064.3). The Office of Planning and Research developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which contains OPR's technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. Since the City of Brentwood has not published guidelines associated with completing a CEQA transportation analysis or assigned VMT thresholds, the OPR CEQA Guidelines are followed in this analysis.

Significance criterion "b" is related to the implementation of vehicle-miles traveled (VMT) as the primary performance metric. OPR recommends using the project's total VMT (as opposed to the per-capita or per employee VMT) as the performance measure – a project is considered to have a significant impact if it results in a net increase in existing regional total VMT.

A Transportation Analysis was prepared by Kittelson & Associates, Inc., 2023 for the proposed project, which can be found in *Attachment G*. The Transportation Analysis analyzed the project VMT. The following components comprise the change in regional VMT attributed to the project:

- Existing VMT associated with existing members visiting two existing warehouses in the area
- Estimated VMT associated with existing members shifting from the existing warehouses to the new warehouse (i.e., change in travel distance for existing trips that would shift to the new warehouse)
- Estimated VMT associated with existing members visiting the existing warehouses more frequently due to latent demand that would occur after some members shift to the new warehouse and the existing warehouses become less busy
- Estimated VMT associated with new members visiting the new warehouse
- Estimated VMT associated with employees at the new warehouse

The project VMT analysis estimates the change in regional VMT associated with the project. Project VMT = changes in existing member VMT + new member VMT + employee VMT.

Table 14 presents the change in regional daily VMT associated with the opening of the new warehouse (project VMT). The change in total regional daily VMT is calculated by comparing the existing VMT by Costco members in the project area and VMT by members and employees after the new warehouse is open. As presented in the table, the change in total regional daily VMT with the new warehouse (project VMT) is estimated to be a net decrease of 14,729 miles.

***Table 14. Change in Regional Total VMT***

| | Existing VMT | VMT with New Warehouse | Change (Project VMT) |
|---|---|---|---|
| **Existing Member VMT** | **208,127** | **162,655** | **-45,472** |
| **Existing Trips** | **208,127** | **157,647** | **-50,481** |
| *Antioch* | 114,182 | 35,201 | -78,981 |
| *Tracy* | 93,945 | 75,361 | -18,584 |
| *New Warehouse* | 0 | 47,085 | 47,085 |
| **Latent Demand at Existing Warehouses** | **0** | **5,009** | **5,009** |
| *Antioch* | 0 | 1,595 | 1,595 |
| *Tracy* | 0 | 3,414 | 3,414 |
| **New Member VMT** | **0** | **27,893** | **27,893** |
| **Employee VMT** | **0** | **2,850** | **2,850** |
| **Total VMT** | **208,127** | **193,398** | **-14,729** |

*SOURCE: BRENTWOOD COSTCO TRANSPORTATION ANALYSIS KITTELSON & ASSOCIATES, INC., 2023*

As descried above the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bike, and pedestrian facilities. Additionally, as shown in Table 15, the project is expected to decrease total regional daily VMT by about 14,729 miles. Therefore, there would be no net increase in regional VMT (as recommended by OPR), the project is expected to result in a **less than significant impact**.

The PA-1 Specific Plan EIR did not include a VMT impact analysis, as this was not a required topic under CEQA at the time the Specific Plan EIR was prepared. However, as demonstrated in the analysis above, the proposed project would result in a less than significant impact related to this environmental topic.

**Responses c, d)**: **Adequately addressed in Specific Plan EIR.**

POTENTIAL HAZARDS

The design of the proposed internal drive aisles, access driveways, and other on-site circulation improvements would be required to adhere to the Contra Costa County Fire Protection District's standards, which are imposed on project developments during the building plan check and development review process. Compliance with established design standards and implementation would ensure hazards due to design features would not occur and that the placement of circulation improvements would not create conflicts for motorists, pedestrians, or bicyclists traveling within or around the project site.

The project does not recommend off-site improvements that alter the geometry of the roadway or transportation system. Since the project is compatible with surrounding land uses and all on-site and off-site improvements would be made adhering to the latest design standards and engineering procedures for the City of Brentwood preventing hazardous conditions, the project would result in a **less than significant** impact.

EMERGENCY ACCESS

Emergency vehicles access to the project site is accommodated at the access points on Lone Tree Way/Canada Valley Road and Heidorn Ranch Road/Lone Tree Plaza Drive. To address emergency and fire access needs, the site improvements would be required to be designed in accordance with all applicable Contra Costa County Fire Protection District design standards for emergency access. Adequate emergency access is required per the local fire code and site plans will be reviewed by local fire officials as part of the design review.

The project is not anticipated to result in inadequate emergency vehicle access. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XVIII. TRIBAL CULTURAL RESOURCES*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? | | | X | |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe. | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), b): Adequately addressed in Specific Plan EIR.** There is a potential for the discovery of prehistoric, ethnohistoric, or historic archaeological sites that may meet the definition of Tribal Cultural Resources (TCRs). Although no TCRs have been documented on the project site, the project is in a region where cultural resources have been recorded and there remains a potential that undocumented archaeological resources that may meet the TCR definition could be unearthed or otherwise discovered during ground-disturbing and construction activities. Due to the possible presence of undocumented TCRs within the project site, construction-related impacts on tribal cultural resources may occur.

The project would be required to implement all policies and actions included in the General Plan and all recommendations and mitigation strategies included within the PA-1 Specific Plan EIR including PA-1 Specific Plan MM 3.5-1, 3.5-2, and 3.5-3. The implementation of these project requirements would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains, and paleontological resources, and would be consistent with CEQA Guidelines Section 15064.5. The project would be subject to mitigation strategies included in the PA-1 Specific Plan EIR. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XIX. UTILITIES AND SERVICE SYSTEMS -- WOULD THE PROJECT:*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | | | X | |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | | | X | |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments? | | | X | |
| d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reductions goals? | | | X | |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Responses a), c): Adequately addressed in Specific Plan EIR.**

**Wastewater:** The Public Works Department's Wastewater Division operates and maintains the City's WWTP, a tertiary treatment plant that provides recycled water for a variety of landscape and industrial uses. The WWTP has an average dry weather flow capacity of 5 mgd and was designed to be expandable to an average dry weather flow capacity of 6.4 mgd.

The Wastewater Treatment Plant Expansion project is currently underway and is expected to be complete by summer 2023. The plant will accommodate up to 6.4 million gallons a day — an amount expected to accommodate the city's buildout population of 92,336.

The expansion project is designed for 69 gallons per capita per day flow, and the new plant is rated as 6.4 MGD. The WWTP expansion project includes the addition of one diffused air oxidation basin, retrofit of existing oxidation ditches to diffused air, secondary clarifiers, converting chlorine contact facilities to ultra violet/free chlorine disinfection, bar screens, utility

pumps, sand filters, new solids mechanical dryer, dried bio-solids storage building, electrical distribution system upgrade, and all related appurtenances.

The Brentwood General Plan includes policies and actions that would reduce impacts related to wastewater treatment. These relevant policies and actions are summarized below.

General Plan Policy IF 1-2 requires development, infrastructure, and long-term planning projects to be consistent with all applicable City infrastructure plans, including the Water Master Plan, the Wastewater Master Plan, and the Capital Improvement Program. Policy IF 1-3 requires all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services, and that service levels for existing users will not be degraded or impaired.

Additionally, the PA-1 Specific Plan includes infrastructure and public services policies aimed to support the private development and public improvements which would result from implementation of the Specific Plan. For example, Policy IF-3.2 aims to ensure that wastewater system infrastructure is in place prior to occupancy of new development in the Specific Plan Area. Further, Policy IF-3.3 requires construction of needed wastewater system improvements in the City's Capital Improvement Program as timing or conditions warrant.

The General Plan and the PA-1 Specific Plan include provisions to ensure that new development cannot be approved until it can be demonstrated that adequate capacity is available to serve it. As described above, the City must also periodically review and update the Wastewater Master Plan, and as growth continues to occur.

As shown in the PA-1 Specific Plan EIR Table 2.0-4, the proposed PA-1 Specific Plan would result in up to 4,569 residents and 8,383 employees. The project as proposed would develop 17.71 acres for the Costco wholesale facility, and a 1.81-acre fuel facility, and would support 250 to 300 employees. As such, the project would be consistent with growth identified by the Specific Plan and would not result in impacts greater or more severe than those evaluated as part of the PA-1 Specific Plan EIR. The project would be required to connect to existing wastewater distribution infrastructure in the vicinity of the site, pay the applicable wastewater system connection fees, and pay the applicable wastewater generation rates. No new or expanded facilities are proposed or would be required. The infrastructure necessary to serve the project site would involve development of on-site, extension to the site or within rights-of-way.

The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Stormwater:** Development under the proposed project would result in increased areas of impervious surfaces throughout the Specific Plan Area, resulting in the need for additional or expanded stormwater drainage, conveyance, and retention infrastructure.

The stormwater infrastructure necessary to serve the proposed project would involve development of some facilities on-site, extension of infrastructure to connect to existing facilities and connections to facilities within roadway rights-of-way.

As part of the development review process the project will be evaluated for conformance with the PA-1 Specific Plan, General Plan, Municipal Code, and other applicable regulations.

The City's General Plan includes policies and actions designed to ensure adequate drainage infrastructure is available to serve development, to minimize the potential adverse effects of stormwater conveyance, and to ensure that development does not move forward until adequate drainage capacity exists. Policy IF 4-3 requires all development projects to demonstrate how stormwater runoff will be detained or retained on-site and/or conveyed to the nearest drainage facility as part of the development review process and as required by the City's NPDES Municipal Regional Permit. As noted above under Project Requirement Hydro-2, prior to approval of the building permit, the project applicant shall submit a detailed Stormwater Control Plan that meets the criteria in the most recent version of the Contra Costa Clean Water Program Stormwater C.3. Guidebook. The project's storm drainage infrastructure plans must demonstrate adequate infrastructure capacity to collect and direct all stormwater generated on the project site within the on-site retention facility to the City's existing stormwater conveyance system and demonstrate that the project would not result in on- or off-site drainage impacts.

The PA-1 Specific Plan includes infrastructure and public services policies aimed to support the private development and public improvements which would result from implementation of the Specific Plan. For example, Policy IF-6.5 requires construction of needed stormwater system improvements in the City's Capital Improvement Program as timing or conditions warrant.

Additionally, the Brentwood, Municipal Code Title 14 Chapter 14.20 (Stormwater Management and Discharge Control) requires every application for a development project, including, but not limited to, a rezoning, tentative map, parcel map, conditional use permit, variance, site development permit, design review, or building permit that is subject to the development runoff requirements in the city's NPDES permit shall be accompanied by a stormwater control plan that meets the criteria in the most recent version of the Contra Costa Clean Water Program Stormwater C.3. Guidebook. Implementation of an approved stormwater control plan and submittal of an approved stormwater control operation and maintenance plan by the applicant shall be a condition precedent to the issuance of a certificate of occupancy for a project.

The policies and actions described above along with adherence with the Brentwood, Municipal Code Title 14 Chapter 14.20 would ensure that there is adequate stormwater drainage and flood control infrastructure to serve the project. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

*Project Requirement(s)*

> ***Requirement UTIL-1:*** *Compliance with the Brentwood, Municipal Code Title 14 Chapter 14.20 (Stormwater Management and Discharge Control).*

**Response b): Adequately addressed in Specific Plan EIR.**

The City's water supply consists of surface water from the Sacramento-San Joaquin Delta (Delta), groundwater from the East Contra Costa Subbasin (ECC Subbasin), and recycled water. The reliability of the City's surface water supplies is relatively high since the permanent purchase entitlement from which the City's supplies stem are protected by pre-1914 water rights, which historically have not been subject to delivery reductions during water shortages, including regulatory restricted and drought years. The comparison of current and projected water supply and demand conducted as part of the water supply reliability assessment in the 2020 Urban Water Management Plan (UWMP) showed that the City water supply is adequate to meet the projected demand across all year types.

The City's General Plan includes a range of policies and actions designed to ensure an adequate water supply for development and to minimize the potential adverse effects of increased water use. Policy IF 1-3 requires all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services, and that service levels for existing users will not be degraded or impaired. Policy IF 2-1 requires the City to ensure that the water system and water supplies are adequate to meet the needs of existing and future development. Action IF 2a requires the City to routinely assess its ability to meet demand for potable water by periodically updating the Water Master Plan.

Additionally, the PA-1 Specific Plan includes infrastructure and public services policies aimed to support the private development and public improvements which would result from implementation of the Specific Plan. For example, Policy IF-2.1 encourages the use of recycled water for landscaping irrigation within roadways, parks, and facilities to the greatest extent feasible. Further, Policy IF-2.4 requires construction of needed water system improvements in the City's Capital Improvement Program as timing or conditions warrant. Subsequent development projects including the proposed project is within the Specific Plan Area would be subject to these policies.

The proposed project is consistent with long range planning documents including the General Plan and the PA-1 Specific Plan. Given that the General Plan includes a comprehensive set of goals, policies and actions to ensure an adequate and reliable source of clean potable water, and the comparison of current and projected water supply and demand conducted as part of the water supply reliability assessment in the 2020 Urban Water Management Plan (UWMP) showed that the City water supply is adequate to meet the projected demand across all year types, impacts associated with water supplies are less than significant. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in

the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Responses d), e): Adequately addressed in Specific Plan EIR.**

Development under the proposed project would result in an increase in solid waste generation. As described in the PA-1 Specific Plan EIR, the city's increase in solid waste generation is well within the permitted capacity of the Solid Waste Transfer Station and does not exceed the daily permitted capacity of the Keller Canyon landfill. The Solid Waste Transfer Station has a permitted daily capacity of 400 tons, and in 2012 averaged approximately 155 tons per day of materials received. The additional solid waste generated by the proposed project would not exceed the capacity of the Solid Waste Transfer Station. The Keller Canyon landfill currently handles 2,500 tons of waste per day, although the permit allows up to 3,500 tons of waste per day to be managed at the facility. According to the CalRecycle Solid Waste Facility Permit (07-AA-0032), as of September 2008, the remaining capacity of the landfill's disposal area is estimated at 60-64 million cubic yards, and the estimated closing date for the landfill is 2050.

While there is adequate permitted landfill capacity to accommodate future growth, the City's General Plan includes policies and actions to further reduce the project's impact on solid waste services. Additionally, the proposed PA-1 Specific Plan includes infrastructure and public services policies aimed to support the private development and public improvements which would result from implementation of the Specific Plan. For example, Policy IF-4.1 aims to expand recycling efforts in the Specific Plan area, and encourage recycling by all residents and employees. Policy IF-4.2 requires compliance with the City's construction and demolition debris ordinance (Brentwood Municipal Code Chapter 8.40). Further, Policy IF-4.3 encourages the use of recycled content building materials.

As described in the PA-1 Specific Plan EIR, implementation and buildout of the Specific Plan area would not exceed the permitted capacity of the landfill serving the city, and the Specific Plan complies with regulations related to solid waste.

As described above, there is adequate landfill capacity to serve the proposed project, and the project will comply with all applicable statutes and regulations related to solid waste. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

## *XX. WILDFIRE*

| | *Significant Impact Peculiar to the Project or the Project Site* | *Significant Impact due to New Information* | *Impact Adequately Addressed in the Specific Plan EIR* | *Impact not Previously Addressed in Specific Plan EIR* |
|---|---|---|---|---|
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | | | | X |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | | | | X |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | | | | X |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | | | | X |

*Existing Setting*

Brentwood is a Local Responsibility Area (LRA) that is served by the Contra Costa County Fire Protection District (CON Fire). The City of Brentwood is not categorized as a "Very High" FHSZ by CalFire.

The proposed project is not located within a State Responsibility Area (SRA), or area identified with wildland fire risks.

*Responses to Checklist Questions*

**Response a-d): Impact not Previously Addressed in EIR.** Development allowed under the proposed PA-1 Specific Plan would not place people and/or structures in areas at significant risk of wildland fires. The Project Site is not located in or near any State Responsibility Areas and there are no lands classified as very high fire hazard severity zones (VHFHSZ). Therefore, the Project would have **no impact** related to wildfire risks associated with lands in or near State Responsibility Areas or lands classified as very high fire hazard severity zones. The PA-1 Specific Plan EIR did not include a wildfire impact analysis, as this was not a required topic under CEQA at the time the Specific Plan EIR was prepared. However, as demonstrated in the analysis above, the proposed project would result in no impact related to this environmental topic.

## *XXI. MANDATORY FINDINGS OF SIGNIFICANCE --*

| | ***Significant Impact Peculiar to the Project or the Project Site*** | ***Significant Impact due to New Information*** | ***Impact Adequately Addressed in the Specific Plan EIR*** | ***Impact not Previously Addressed in Specific Plan EIR*** |
|---|---|---|---|---|
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | | | X | |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | | | X | |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | | | X | |

### *RESPONSES TO CHECKLIST QUESTIONS*

**Response a): Adequately addressed in Specific Plan EIR.** As described throughout the analysis above, the proposed project would not result in any significant impacts that would substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal to the environment. The project would not result in impacts to known cultural, historical, archaeological or tribal resources.

All potentially significant impacts related to plant and animal species would be reduced to a less-than-significant level through the application of uniformly applied development policies and/or standards. The proposed project is required to implement a range of standard and uniformly applied development policies and standards, most of which are identified in the Brentwood General Plan and PA-1 Specific Plan EIR, which would ensure impacts would be less-than-significant. The cumulative impacts associated with development of the project were considered, analyzed and disclosed in the PA-1 Specific Plan EIR. The project would not result in any cumulative impacts that were not contemplated in the PA-1 Specific Plan EIR. The project would not result in any peculiar site-specific impacts, impacts to biological resources or impacts to

cultural and/or historical resources. All potentially significant impacts to cultural and/or historical resources would be reduced to a less than significant level through the implementation of mitigation measures 3.5-1 thru 3.5-3, as described previously in this report.

The proposed project would implement requirements aimed at reducing stormwater pollutants and runoff, as well as through compliance of various state, regional and local standards. Specifically related to ensuring the continued sustainability of biological resources through adaptive management, Project Requirement Bio-1 ensures the project proponent seeks coverage under the East Contra Costa County Habitat Conservation Plan / Natural Community Conservation Plan (HCP/NCCP) to mitigate for habitat impacts to covered special status species. Through the application of uniformly applied development policies and/or standards, the project would not result in any cumulative impacts related to biological resources. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response b)**: **Adequately addressed in Specific Plan EIR.** The PA-1 Specific Plan's environmental review assumed full development and buildout of the project site, consistent with the uses and density proposed by the project. The cumulative impacts associated with buildout of the PA-1 Specific Plan Area, including the project site, were fully addressed in the PA-1 Specific Plan EIR, and the cumulative conditions in and around Brentwood have not changed such that the cumulative analysis and conclusions in the PA-1 Specific Plan EIR would be altered or invalidated. Additionally, as described throughout the analysis above, the proposed project would not result in any significant individual or cumulative impacts that would not be reduced to less-than-significant levels through the application of uniformly applied development policies and/or standards. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

**Response c): Adequately addressed in Specific Plan EIR.** As described throughout the analysis above, the proposed project would not result in any significant impacts that would have environmental effects which will cause substantial adverse effects on humans. The analysis in the relevant sections above provides the application of uniformly applied development policies and/or standards reduce any potentially significant impacts on humans to less-than-significant levels. Compliance with the Brentwood General Plan, Policies and mitigation requirements included within the PA-1 Specific Plan, and through the application of a variety of uniform standards and requirements including those related to air quality, biological resources, cultural resources, hazardous materials, geologic hazards, water pollution and water quality, and noise, ensure any adverse effects on humans are reduce to an acceptable standard. The PA-1 Specific Plan EIR (EIR) determined that this impact was less than significant. This impact was adequately

addressed in the EIR. The proposed project would not result in a new or more severe impact than what was previously analyzed.

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ATTACHMENT A. AIR QUALITY/HEALTH RISK TECHNICAL REPORT PREPARED BY: RAMBOLL US CONSULTING, INC. IRVINE, CALIFORNIA. PROJECT NUMBER 1690022489. JANUARY 2023.

ATTACHMENT B. GEOTECHNICAL STUDY PREPARED BY: KLEINFELDER PROJECT NO. 20220773.001A. FEBRUARY 22, 2022

ATTACHMENT C. GREENHOUSE GAS EMISSIONS TECHNICAL REPORT. PREPARED BY: RAMBOLL US CONSULTING, INC. PROJECT NUMBER 1690022489, JANUARY 2023.

ATTACHMENT D. PHASE I ENVIRONMENTAL SITE ASSESSMENT PREPARED BY: KLEINFELDER PROJECT NO. 20220783.001A. JUNE 22, 2021.

ATTACHMENT E. LIMITED PHASE II ENVIRONMENTAL SITE ASSESSMENT REPORT PREPARED BY: KLEINFELDER PROJECT NO. 20220783.001A. SEPTEMBER 28, 2021.

ATTACHMENT F. ACOUSTICAL ASSESSMENT PREPARED BY: KIMLEY-HORN AND ASSOCIATES, INC. MAY 2023

ATTACHMENT G. TRAFFIC IMPACT ANALYSIS (TIA) PREPARED BY: KITTELSON & ASSOCIATES, INC. PROJECT NUMBER 26600. MARCH 21, 2023