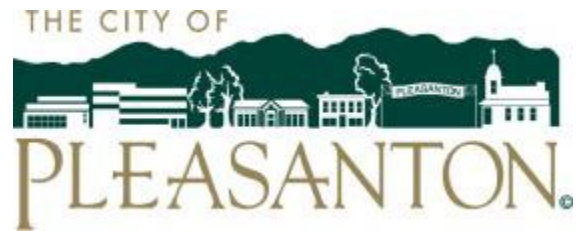


**Addendum to the City of Pleasanton Housing Element and
Climate Action Plan General Plan Amendment and
Rezoning Supplemental EIR
for the
Avalon Bay Pleasanton Project
City of Pleasanton, Alameda County, California**



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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACCMA	Alameda County Congestion Management Agency
ACCWP	Alameda Countywide Clean Water Program
ACTIA	Alameda County Transportation Improvement Authority
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
APA	Airport Protection Area
AQP	Air Quality Plan
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BGM	BAAQMD's Greenhouse Gas Model
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CWA	Clean Water Act
dB	decibels
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EFZ	Earthquake Fault Zone
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulation
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas

Acronyms and Abbreviations

GPCD	gallons per capita per day
HDR	High Density Residential
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
IAQ	Indoor Air Quality
LAVTA	Livermore Amador Valley Transit Authority
LAVTA Wheels	LAVTA Tri-Valley Wheels
lbs	pounds
L _{eq}	equivalent noise/sound level
LHMP	Local Hazard Mitigation Plan
L _{max}	maximum noise/sound level
LOS	Level of Service
LRA	Local Responsibility Area
MDR	Medium Density Residential
MERV	Minimum Efficiency Reporting Value
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MTC	Metropolitan Transportation Commission
MT CO _{2e}	metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO _x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
PM	particulate matter
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PRC	Public Resources Code
PUD	Planned Unit Development
PV	photovoltaics
RHNA	Regional Housing Needs Allocation
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
RWTF	Regional Wastewater Treatment Facility
SEIR	Supplemental Environmental Impact Report
SP	service population
SRA	State Responsibility Area
State Water Board	California State Water Resources Control Board

SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TCM	Transportation Control Measure
TCR	Tribal Cultural Resource
TIA	Traffic Impact Analysis
URBEMIS2002	Urban Emissions software
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WSA	Water Supply Assessment

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SECTION 1: INTRODUCTION

This Addendum and attached supporting documents have been prepared to determine whether and to what extent the City of Pleasanton 2015–2023 (5th Cycle) Housing Element Supplemental Environmental Impact Report (SEIR) (State Clearinghouse [SCH] No. 2011052002) addresses the potential impacts of the proposed modifications to the City of Pleasanton – Avalon Bay Project (proposed project) and if it would result in any new significant environmental effect not addressed in the SEIR or increase the severity of any previous identified environmental effect addressed in the SEIR as required under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC], § 21000, *et seq.*).

The proposed project consists of modifications to the approved, yet to be constructed podium building at 5601 Owens Drive (formerly 4452 Rosewood Drive) (project site). The modifications include the addition of a fifth floor to the podium building with an additional 31 residential units.

1.1 - CEQA Assessment

Pursuant to CEQA Guidelines, (PRC § 21000, *et seq.*), an SEIR and a Mitigation Monitoring and Reporting Program (MMRP) were prepared and certified by the City of Pleasanton (City) on January 4, 2012 pursuant to Resolution No. 12-493, for the 2015–2023 (5th Cycle) Housing Element (SCH No. 2011052002). This document will be referred to as the SEIR throughout this Addendum.

A previously prepared Addendum to the SEIR, dated March 4, 2012 (herein referred to as the 2012 Addendum), was prepared to analyze the site-specific project. The 2012 Addendum was certified, and the project was approved. The 2012 Addendum is incorporated into the SEIR and, as such, the documents are collectively referred to as the SEIR. Additional changes have now been proposed to the project, requiring discretionary approval.

CEQA Guidelines Section 15164, subd. (a) requires a lead agency or a responsible agency to prepare an Addendum to a previously certified Environmental Impact Report if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Sections 15162 or 15163 calling for preparation of a subsequent or supplemental document have occurred (CEQA Guidelines § 15164, subd. (a); 15163, subd. (a)). The CEQA Guidelines instruct agencies to use checklists or similar mechanisms to

conduct this analysis pursuant to Section 15162's guidance for determining the need for subsequent documents. Whether a later activity provides

changes to the approved project that are consistent with and within the scope of the conditions described in Section 15162 calling for preparation of the SEIR is a factual question that the City determines based on substantial evidence in the record. Factors that the City may consider in making this determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure as addressed in the SEIR.

1.2 - Summary of Results

As illustrated by the following Addendum, the proposed project is found to be in conformance with the analysis and conclusions of the Housing Element SEIR. This determination is based on the following criteria:

1. There are no substantial changes proposed by the proposed project or under the circumstances in which the proposed project would be undertaken that would require major revisions of the SEIR.
2. The proposed revisions do not require preparation of a new subsequent or Supplemental EIR due to either (1) the involvement of new significant environmental effects, (2) a substantial increase in the severity of previously identified significant effects, or (3) new information of substantial importance.
3. No mitigation measures or alternatives previously found not to be feasible would in fact be feasible nor has the proposed project proponent declined to adopt any additional mitigation measures or alternatives that would substantially reduce one or more significant effects on the environment.
4. Applicable mitigation measures from the previous SEIR are identified and discussed in this Addendum.

As illustrated herein, the proposed project is consistent with and within the scope of the previously Certified SEIR and would involve only minor changes; therefore, an Addendum is appropriate and is the legally required CEQA compliance for the proposed project.

The following Mitigation Measures (MMs) identified in the SEIR are applicable to the proposed project, as described in each environmental topic:

- MM 4.B-1a
- MM 4.C-1a
- MM 4.C-1b
- MM 4.D-4
- MM 4.D-3
- MM 4.G-5 (part c)
- MM 4.J-1
- MM 4.J-6c
- MM 4.N-1
- MM 4.L-2

The Housing Element Update SEIR is available at:

<https://www.cityofpleasantonca.gov/assets/our-government/community-development/final-supplemental-eir-he-cap-gpa010412%5B1%5D.pdf?t=1729096072>

The 2012 Addendum is available at:

City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566-0802

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SECTION 2: PROJECT DESCRIPTION

2.1 - Project Details

1. Project Title and Number

Avalon Bay Project Addendum (City Project No. PUD85-08-ID-6M)

2. Lead Agency Name and Address

City of Pleasanton
Community Development Department
Planning Division
200 Old Bernal Avenue
Pleasanton, California 94566-0802

3. Contact Person and Phone Number

Jenny Soo, Associate Planner
Phone: 925.931.5615

4. Project Location and Assessor's Parcel Number (APN)

5601 Owens Drive (APNs 941-2780-44 and 941-2780-45)

5. Project Sponsor's Name and Address

Avalon Bay Communities
455 Market Street, Suite 1650
San Francisco, CA 94105

6. General Plan Designation

Business Park/Mixed Use

7. Zoning and Density

Planned Unit Development (PUD) – High Density Residential (HDR)

8. Description of Project

This document is an Addendum to the SEIR as modified by the 2012 Addendum. For the purposes of this analysis the SEIR and the 2012 Addendum are collectively referred to as the SEIR.

The proposed project consists of modifications to the approved, yet to be constructed podium building at 5601 Owens Drive (formerly 4452

Rosewood Drive) (project site). The modifications include an addition of a fifth floor to the podium building with an additional 31 residential units.

9. Requested Permits/Approvals

- Planned Unit Development Modifications
- Building Permit

2.2 - Project Location and Setting

2.2.1 - Location

The project site consists of approximately 8.4 acres located on the north side of Owens Drive between Rosewood Drive and Tassajara Creek within the Hacienda Business Park in the City of Pleasanton (Exhibit 1). The project site is approximately 0.3 mile south of Interstate 580 (I-580) and approximately 0.7 mile southeast of the East Dublin/Pleasanton Bay Area Rapid Transit (BART) station.

2.2.2 - Existing Environmental Setting

Project Site

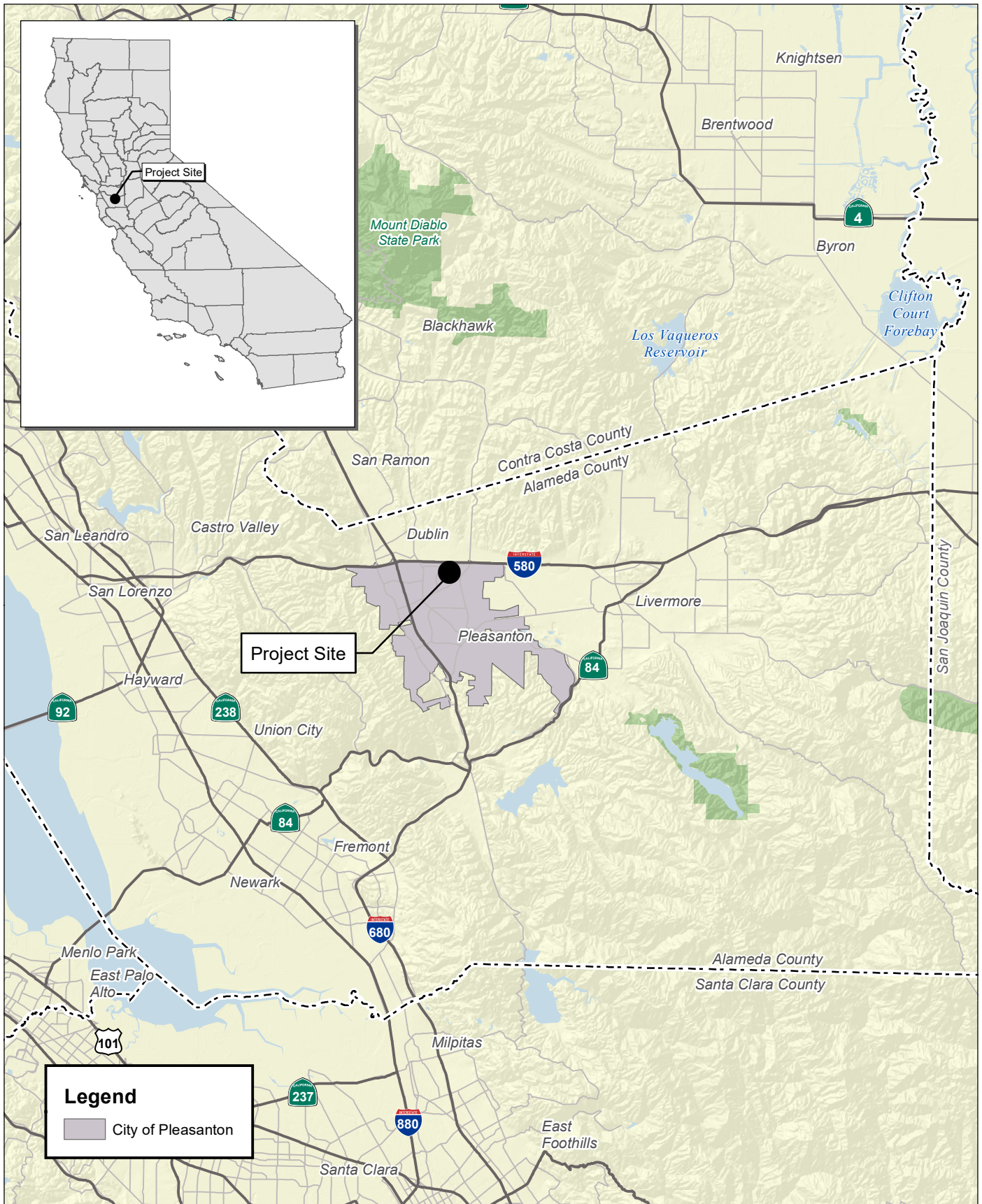
The 8.4-acre site is currently under construction in accordance with the project's 2013 approval with the exception of the podium building located in the southeastern portion of the project site. Prior to construction, the project site consisted of surface parking with associated landscaping areas (Exhibit 1).

Surrounding Land Uses

The project site is adjacent to a variety of land uses, including multi-family residential uses to the south and east, commercial retail uses to the northwest, and commercial office space to the north (Exhibit 2). Tassajara Creek abuts the project site on the east.

Land Use Designation and Zoning

The project site is zoned PUD –HDR and Planned Unit Development – Industrial/Commercial-Office (PUD-I/C-O) and has a General Plan land use designation of Business Park/Mixed Use (Exhibit 3 and Exhibit 4).



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Source: Bing Aerial Imagery. County of Alameda.

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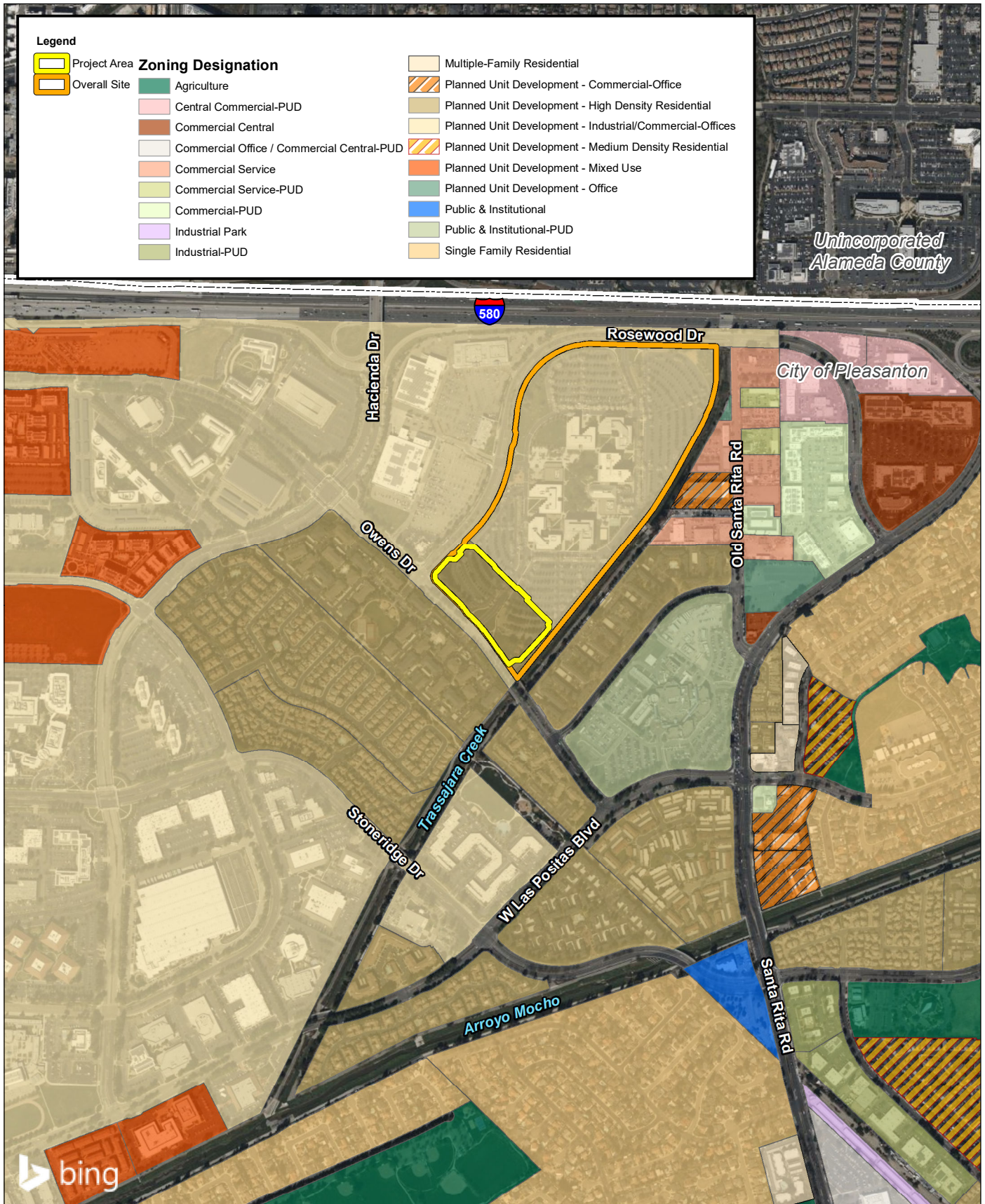
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Exhibit 2 Local Vicinity Map

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CITY OF PLEASANTON
ADDENDUM TO THE CITY OF PLEASANTON HOUSING ELEMENT AND CLIMATE ACTION PLAN GENERAL
PLAN AMENDMENT AND REZONING SUPPLEMENTAL EIR FOR THE AVALON BAY PLEASANTON PROJECT

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Source: Bing Aerial Imagery. City of Pleasanton.

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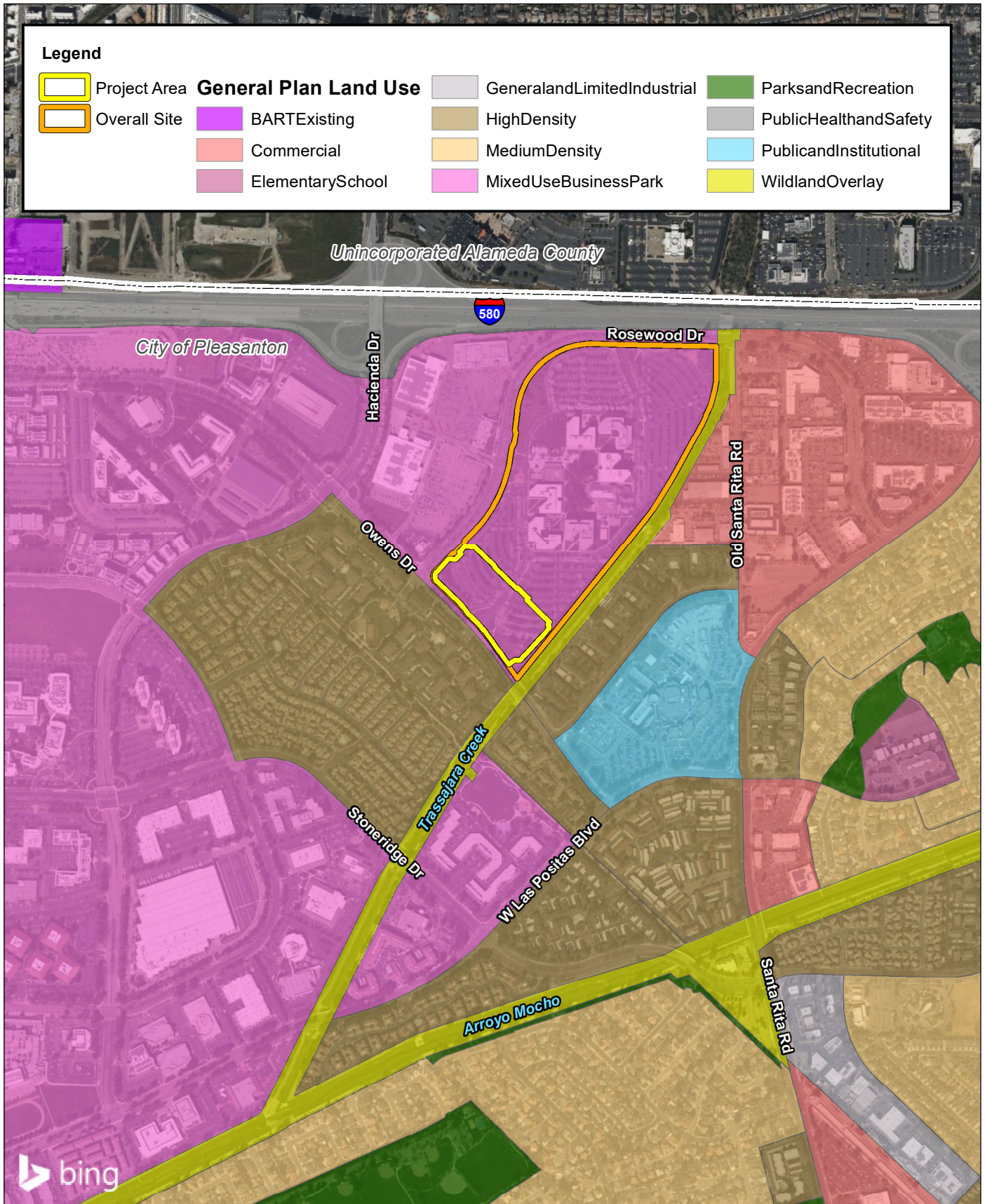
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Exhibit 3 Zoning Map

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CITY OF PLEASANTON
 ADDENDUM TO THE CITY OF PLEASANTON HOUSING ELEMENT AND CLIMATE ACTION PLAN GENERAL
 PLAN AMENDMENT AND REZONING SUPPLEMENTAL EIR FOR THE AVALON BAY PLEASANTON PROJECT

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Source: Bing Aerial Imagery. City of Pleasanton.



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2.3 - Project Background and Previous Environmental Review

2.3.1 - General Plan Housing Element

On July 21, 2009, the City of Pleasanton adopted the Pleasanton General Plan Update 2005–2025 subsequent to the certification of the Pleasanton General Plan Update 2005–2025 EIR (SCH No. 2005122139). However, as a result of two lawsuits (*Urban Habitat Program v. City of Pleasanton* and *State of California v. City of Pleasanton*) and a subsequent Settlement Agreement and Covenant Not to Sue, dated August 2010, the City was obligated to update its Housing Element to meet regional housing needs (including eliminating the housing cap) and adopt a Climate Action Plan, both of which are subject to the provisions of CEQA.

2.3.2 - 2012 Housing Element Update Supplemental Environmental Impact Report

On January 4, 2012, under Resolution No. 12-493, the City of Pleasanton certified the SEIR for the 5th Cycle City of Pleasanton Housing Element and Climate Action Plan General Plan Amendment and Rezoning (SCH No. 2011052002), hereinafter referred to as the SEIR. The document provided supplemental information for the City of Pleasanton General Plan Program EIR (SCH No. 2005122139) with regards to an updated Housing Element, the adoption of a Climate Action Plan, and related General Plan Amendments and Rezoning. The SEIR considered the potential impacts that were likely to result from implementation of the policies and programs contained within the updated Housing Element and Climate Action Plan and the changes in land use designations proposed in the General Plan Amendment and rezoning.

Within the SEIR, the City identified 21 potential sites for rezoning and the buildout potentials of those sites to provide an adequate inventory of housing to meet Pleasanton's share of regional housing needs through 2014 (City of Pleasanton 2011). Not all 21 sites were needed to meet Pleasanton's share of regional housing needs, and the City ultimately selected only nine of the 21 sites for rezoning. As such, the SEIR provides a conservative analysis regarding potential impacts resulting from the development of residential land uses on rezoned sites.

The subject property (project site) was included as a potential site for rezoning in the SEIR as site Number 10. Within the SEIR, 8.43 acres of the 60-acre parcel was considered for the development of 252 to 420 units and up to 10,000 square feet of retail space. Future development on the project site

would be required to abide by all applicable mitigation included in the SEIR. As a result of the SEIR, the 8.43-acre portion of the project site was rezoned from Planned Unit Development Industrial/ Commercial-Office (PUD-I/C-O) to Planned Unit Development High Density Residential (PUD-HDR). The PUD-HDR zoning for the project site requires a housing unit per acre ratio from 35:1 to no more than 40:1 and, as analyzed in the SEIR, allows for up to 10,000 square feet of retail space. The City approval includes a list of uses allowed and conditionally allowed. Child care facility is listed as a conditionally allowed use.

The SEIR concluded that all potential impacts resulting from the implementation of the Housing Element and Climate Action Plan were either less than significant or could be reduced to less than significant after mitigation with the exception of two significant unavoidable impacts. The first significant unavoidable impact involves the demolition of a potentially significant historic resource on Site 6. The project site evaluated in this Addendum is not located on Site 6 and, therefore, would not contribute to this significant unavoidable impact. The second significant unavoidable impact determined by the SEIR consists of the addition of traffic to Sunol Boulevard (First Street) and Hopyard Road to the point at which roadway segments would operate unacceptably under Cumulative Plus Project Conditions. However, the minor modifications to the previously approved project as analyzed herein would result in a reduced contribution to this impact as it proposes fewer residential units and less retail space than that analyzed in the SEIR.

2.3.3 - 2012 Addendum

In 2012, the City considered an Addendum to the SEIR (2012 Addendum) that analyzed an approximately 8.4-acre southern portion of the 60.9-acre California Center property and zoned it for PUD-HDR with a density of at least 35 dwelling units per acre (294 units) with no more than 40 dwelling units per acre (336 units), consistent with the SEIR.

The 2012 Addendum included analysis of this 8.4-acre area for the demolition of the existing parking lot, associated landscaping, the construction of 305 residences in eight buildings, and construction of 7,520 square feet of retail space in two buildings. The City unanimously approved the 2012 Addendum and the project on March 27, 2013.

2.3.4 - Approved 2022 Minor Modifications

In 2022, AvalonBay Communities acquired the 8.4-acre site that is zoned PUD-HDR. The same year, the City approved minor modifications (Case No. PUD-85-08-1D-5M) to the PUD analyzed in the approved 2012 Addendum, as follow: (1) modifying site layout, including on-site circulation, parking, and open spaces areas; (2) updating exterior elevations of all buildings; (3) changing the retail use of the corner building to a daycare center (subject to a conditional use permit approval),¹ and (4) modifying related on- and off-site improvements (APNs 941-2780-44 and 941-2780-45) (Exhibit 5).

2.4 - Project Characteristics

2.4.1 - Approved Development Summary

The approved 305-unit residential complex includes four garden buildings, two townhouse buildings, one podium building, and on-site amenity buildings. Residential amenities include a resident community center, pool and spa, and fitness building.

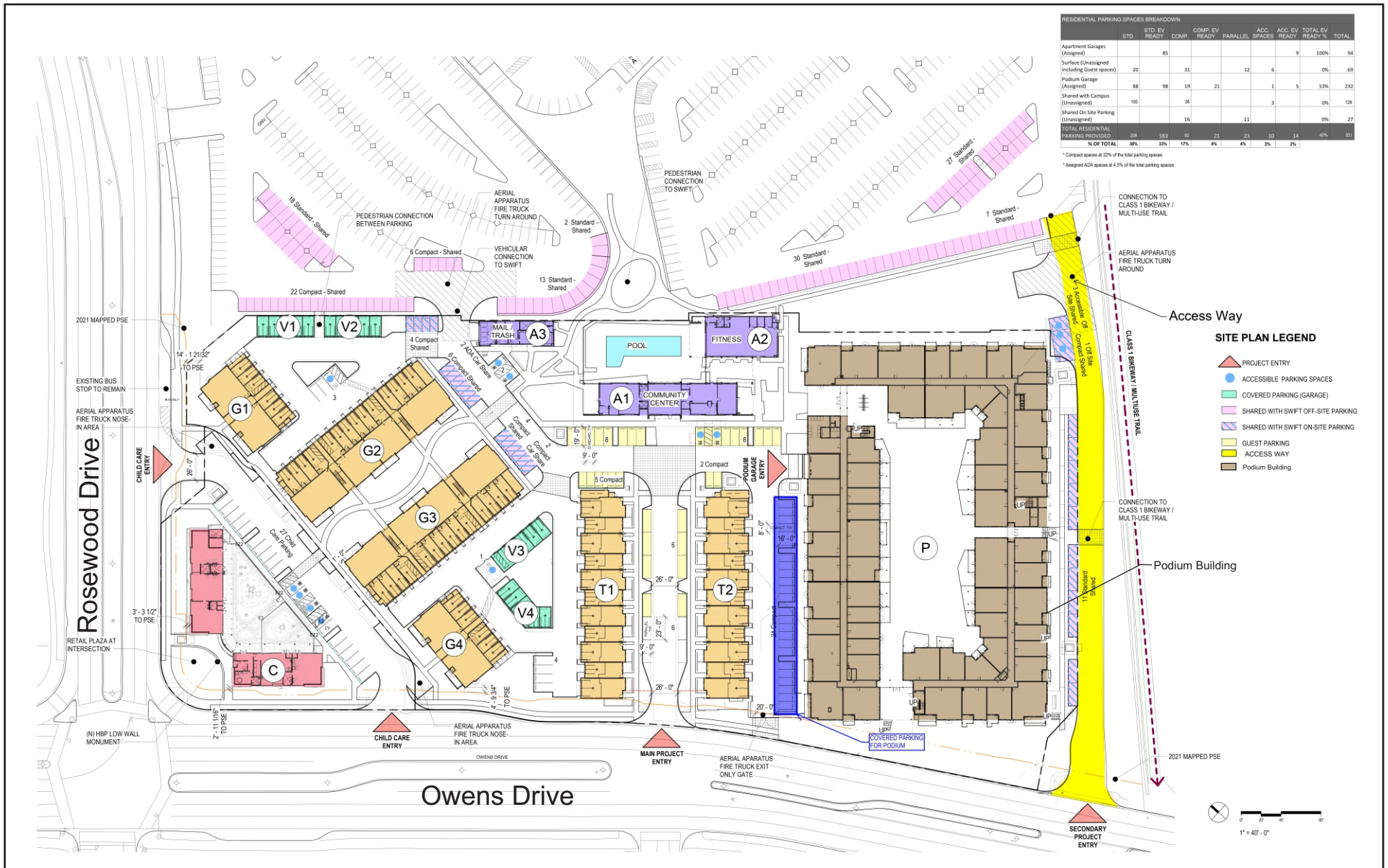
With the Planning Commission's approval of the Conditional Use Permit in 2024, a child care facility of approximately 6,600 square feet would be located at the corner of Rosewood Drive and Owens Drive, replacing the previously approved retail building. The child care facility would have a maximum of 110 children and 18 staff members on-site at one time.

In June 2024, building permits for the residential portion of the project were issued, with the exception of the podium building.

Table 1 provides a summary of the residential component changes between 2012 approval and 2022 modifications with the total residential units remain unchanged.

¹ The Planning Commission approved the child care facility (Case No. P24-0110) in April 2024.

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Table 1: Project Summary–Residential Component Comparison

2012 Approved Project		2022 Modifications	
Building	Units	Building	Units
Garden Walkup G1	37	Garden Walkup G1 and G4	20
Garden Walkup G2	31	Garden Walkup G2 and G3	40
Garden Walkup G3/G4	40	Townhouses T1 and T2	22
Podium P1, P2, P3	254	Podium	223
Total	305	Total	305

Table 2 shows the 2012-approved retail buildings replaced by the 2022-approved child care facility.

Table 2: Project Summary–Retail v. Daycare

Use	2012 Approved Project	2024 Modifications
Retail	7,520 square feet	—
Daycare	—	6,600 square feet

2.4.2 - Proposed Development Modification

The applicant now proposes to modify the approved four-story podium building. Specifically, the proposal would add a fifth floor with an additional 31 residential units, with the overall residential units consistent with the 2012 Housing Element update

Table 3 compares the currently proposed improvements with what was previously approved as part of the 2012 Addendum. As shown, the changes include an additional 31 units, which would be located in a new fifth floor to the podium building.

Table 3: Project Summary Compared to Approved Project in 2012 Addendum

Use	2012 Addendum	Approved Development Modifications (2022 and 2024)	Currently Proposed Development Modifications	Overall Change
Residential	305 units (4 stories)	305 units (4 stories)	336 units (5 stories)	31 units
Retail	7,520 square feet	0	—	-7,520 square feet

Use	2012 Addendum	Approved Development Modifications (2022 and 2024)	Currently Proposed Development Modifications	Overall Change
Child care Facility	0	6,600 square feet	—	+6,600 square feet

2.4.3 - Design and Appearance

The design of the proposed fifth floor of the podium building would match the approved podium building. It is designed on sustainable design principles, and the residential buildings will achieve a “Green Home” rating on Alameda County Waste Management Authority's Multi-family Green Building Rating System.

Exhibit 6, Building Elevations and Perspectives, depicts the podium building's proposed elevations from various angles.

2.4.4 - Landscaping

Addition of the fifth floor would not result in any changes to landscaping as approved and previously considered in the 2012 Addendum.

2.4.5 - Access and Circulation

Vehicular Circulation

There would not be any changes to vehicular access for the proposed project. Vehicular access would be provided from Owens Drive via an 80-foot-wide main project entry. Internal circulation would be provided as shown in Exhibit 5, Site Plan.

Alternative Transit

Livermore Amador Valley Transit Authority (LAVTA) Tri-Valley Wheels (Wheels) LAVTA Route 54 provides stops along Rosewood Drive and within California Center that would offer easy access for residents.

LAVTA Wheels Route 10R provides access along Owens Drive, which would also supply transit access for future residents.

Pedestrian Access

Rosewood Drive and Owens Drive include sidewalks for pedestrians. In addition, the Tassajara Creek Trail is located along the project's eastern boundary, located approximately 0.7 mile to the north.



1: S-E ELEVATION FACING SWIFT



2: S-W ELEVATION FACING OWENS DRIVE



3: VIEW FROM OWENS DRIVE



Source: Pyatok, AvalonBay Communities, 07/25/2024.

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2.4.6 - Parking

With the proposed 31 additional residential units, the applicant proposes an additional 60 parking spaces. The parking would be located on the adjoining property to the north via a recorded shared parking agreement.

2.4.7 - Off-site Improvements

No changes or additions to off-site improvements would be required or are proposed in association with the proposed additional fifth floor.

2.4.8 - Utilities

The proposed additional 31 residential units would be subject to requirements and fees per the City master fee schedule at the time of permit issuance.

Utility infrastructure, including stormwater, would not require any significant changes as a result of the proposed additional fifth floor and 31 units.

2.4.9 - Construction Schedule and Phasing

Construction of the residential complex is underway with the exception of the podium building. It is estimated that construction of the podium building may begin in January 2025, with podium building occupancy in late 2026. The project plans and specifications incorporate construction minimization plans designed to reduce construction equipment exhaust emissions and minimize emissions of toxic air contaminants. The architectural coatings phase of construction is estimated to take approximately 6 months to complete. Low VOC paint (250 grams volatile organic compounds [VOC] per liter or less) will be used. Off-road construction equipment with diesel-powered engines over 50 horsepower will be powered by Tier 4 certified engines; engines over 150 horsepower will have Level 3 diesel particulate filters with a minimum efficiency of 85 percent.

2.5 - Discretionary Approvals

The City of Pleasanton has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Addendum. In order to implement the proposed project, the following permits and/or approval would need to be granted:

- Planned Unit Development Modifications
- Building Permit

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SECTION 3: CEQA GUIDELINES SECTION 15164: ADDENDUM TO A CERTIFIED EIR

Section 15164 of the State CEQA Guidelines states that an Addendum to an EIR shall be prepared “if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Thus, if none of the conditions described below are met, the City may not require preparation of a subsequent or Supplemental EIR. Rather, the City can decide that no further environmental documentation is necessary or can require that an Addendum be prepared.

CEQA Guidelines Section 15164, subd. (a) provides that the lead agency or a responsible agency shall prepare an Addendum to a previously certified Environmental Impact Report or Negative Declaration (ND) if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR or ND have occurred (CEQA Guidelines § 15164, subd. (a)).

An Addendum need not be circulated for public review but can be included in or attached to the Final EIR or ND (CEQA Guidelines § 15164, subd. (c)). The decision-making body shall consider the Addendum to the Final EIR prior to making a decision on the proposed project (CEQA Guidelines § 15164, subd. (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent EIR or ND pursuant to Section 15162 (CEQA Guidelines § 15164, subd. (e)).

Consequently, once an EIR or ND has been certified for a project, no subsequent EIR or ND is required under CEQA unless, based on substantial evidence:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous Certified EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous Certified EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous Certified EIR was certified as complete or the ND was adopted. . . shows any of the following:
- A. The project will have one or more significant effects not discussed in the previous Certified EIR or ND;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous Certified EIR or ND;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Certified EIR or ND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines § 15162, subd. (a); see also PRC § 21166).

Thus, if none of the above conditions are met, the City may not require preparation of a subsequent or Supplemental EIR. Rather, the City can decide that no further environmental documentation is necessary or can require that an Addendum be prepared.

This Addendum reviews changes to the approved project and to existing conditions that have occurred since the SEIR and 2012 Addendum were certified and compares environmental effects of the proposed project with those analyzed and previously disclosed under the approved project. This Addendum also considers new information of substantial importance that was not known and could not have been known with exercise of reasonable diligence at the time the SEIR was certified and evaluates whether there are new or more severe significant environmental effects associated with changes in circumstances under which project development is being undertaken. It further examines whether, as a result of any changes or any new information, a subsequent or Supplemental EIR may be required. This examination includes an analysis of provisions of Public Resources Code Section 21166 and Section 15162 of the State CEQA Guidelines and their applicability to the proposed project.

This Addendum, checklist, and attached documents constitute substantial evidence supporting the conclusion that preparation of a supplemental or subsequent EIR or ND is not required.

This Addendum addresses the conclusions of the SEIR, as supplemented by the 2012 Addendum, in light of the proposed project.

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SECTION 4: ADDENDUM CHECKLIST

The purpose of the checklist is to evaluate the proposed project in terms of any changed condition (e.g., project changes, changed circumstances, or new information of substantial importance) that may result in a changed environmental result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect) (CEQA Guidelines § 15162).

Consistent with the thresholds used by the Lead Agency in the previous SEIR, the attached Addendum uses the standard environmental checklist categories provided in Appendix G of the CEQA Guidelines but provides summary columns for evaluation consistent with the provisions an addendum (CEQA Guidelines Sections 15162 through 15164).

A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the previously SEIR. These environmental categories might be answered with a “no” in the checklist where the proposed project does not introduce changes compared to the approved project that would result in a modification to the findings of the previously Certified SEIR.

Addendum Checklist

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
I. Aesthetics <i>Except as provided in Public Resources Code Section 21099, would the project:</i>					
a) Have a substantial adverse effect on a scenic vista?	Less than significant impact	No	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	Less than significant impact	No	No	No	None
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 applicable zoning and other regulations governing scenic quality?	Less than significant impact	No	No	No	None
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact	No	No	No	None

Discussion

a) Scenic Vistas

Would the project: *Have a substantial adverse effect on a scenic vista?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that, by following goals, policies, and programs included as part of the 2012 Housing Element, General Plan, applicable zoning requirements, design guidelines, and specific plans, Pleasanton's visual resources, including hillsides and ridgelines, would largely be protected from impacts resulting from development facilitated by the 2012 Housing Element including that proposed for the project site. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded that views of surrounding scenic resources are primarily obstructed by mature trees and residential and commercial buildings and the project would not create any obstructions or conflicts with scenic resources. Furthermore, the project would conform to all applicable City guidelines and policies regarding mixed use and residential development. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

Views of surrounding scenic vistas, including Mt. Diablo to the north, the Pleasanton Ridgelines to the west, and the Pleasanton, Southeast, and Main Hills (to the west, southeast, and east of Pleasanton) are obstructed by mature trees and residential and commercial buildings. The proposed project is consistent with surrounding land uses. Therefore, the proposed project's additional fifth floor would not create any additional obstructions or conflicts with scenic vistas. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Scenic Highways

Would the project: *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that, although multiple sites zoned for residential development or identified as potential sites for rezoning under the 2012 Housing Element are visible along the I-580 and I-680 corridors, development

of these sites would not result in substantial damage to scenic resources, which consist primarily of the hillsides and ridgelines that surround the City, and therefore, impacts would be less than significant.

The 2012 Addendum indicated that views of the project site from I-580 are blocked by developed commercial land uses. Because the project site is not visible from I-580 and I-580 is not a designated State Scenic Highway, the project would not introduce any new impacts to views from State Scenic Highways not previously disclosed. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project is adjacent to I-580, which is designated as an Eligible State Scenic Highway but is not officially designated as a State Scenic Highway. The proposed project consist of infill development and there are no scenic resources on the project site. Furthermore, views of the project site from I-580 are blocked by commercial land uses. As such, the proposed project would not damage scenic resources within a State Scenic Highway. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) Consistency with Scenic Quality Regulations and Visual Character

Would the project: *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 applicable zoning and other regulations governing scenic quality?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that potential adverse effects of new development on the visual character of the site and surrounding area would be reduced through the Design Review process required by Chapter 18.20 of the Pleasanton Municipal Code. As such, infill development, such as that of the proposed project, would be consistent with the character of its surrounding area and, overall, would retain the existing visual character of Pleasanton. As such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum determined that the project would be consistent with the mixed-use zoning considered for the project site by the SEIR. Furthermore, the project would undergo the Design Review process via the PUD process as

required by Chapter 18.68 of the Pleasanton Municipal Code and be subject to the City-approved Housing Site Development Standards and Design Guidelines. While the project would increase the development intensity and density, it would comply with the policies of the General Plan and zoning ordinance to ensure compatibility with the context of the site and the City in general. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would be consistent with development as considered by the SEIR and consistent with the mixed use zoning considered for the project site in the SEIR. The Design Review process via the PUD process as required by Chapter 18.68 of the Pleasanton Municipal Code, which would ensure that the proposed project would be consistent with the architectural style of the surrounding area and that the heights and massing of the buildings would respect the overall context. Furthermore, the City-approved Housing Site Development Standards and Design Guidelines also include guidelines to ensure compatibility with surrounding buildings. The proposed project would further increase the development intensity and density in the area; however, it would comply with the policies of the General Plan and zoning ordinance to ensure compatibility with the context of the site and the City in general. As such, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Light and Glare

Would the project: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that new residential and associated retail development would introduce artificial light from residences and outdoor parking area as well as glare. However, compliance with the State's Nighttime Sky-Title 24 Outdoor Lighting Standards and the City's General Plan policies and Municipal Code regulations regarding lighting and glare would reduce potential light and glare. As such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum indicated that the project has been designed in accordance with the City of Pleasanton's General Plan policies regarding

lighting and glare as well as the Pleasanton Municipal Code regulations, including Sections 18.48.100, 18.88.040, and 18.96.020, and the site lighting guidelines of the Housing Site Development Standards and Design Guidelines. In addition, the proposed project would be consistent with Title 24 Outdoor Lighting Standards. As such, the proposed project's lighting would be appropriately designed to limit glare and spillover light as well as to limit interior and exterior illumination, and impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would increase the podium building height and therefore would result in additional residential lighting, increasing the height of such lighting and the potential for glare from the building's increased surface area. However, consistent with the approved project, the proposed project has been designed in accordance with the City of Pleasanton's General Plan policies regarding lighting and glare as well as the Pleasanton Municipal Code regulations, including Sections 18.48.100, 18.88.040, and 18.96.020, and the site lighting guidelines of the Housing Site Development Standards and Design Guidelines. As such, the proposed project's lighting would be appropriately designed to limit glare and spillover light as well as limit interior and exterior illumination. In addition, the proposed project would be consistent with Title 24 Outdoor Lighting Standards. As such, the proposed project would not introduce any new lighting or glare impacts not previously disclosed. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Aesthetics, the Addendum demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.

4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in the Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
II. Agricultural and Forest Resources					
Would the project:					
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 nonagricultural use?	Less than significant impact	No	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	Less than significant impact	No	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact	No	No	No	None

Environmental Issue Area	Conclusions in the Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No impact	No	No	No	None
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	Less than significant impact	No	No	No	None

Discussion

a) Conversion of Important Farmland to Nonagricultural Use

Would the project: *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 nonagricultural use?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project would not result in the conversion of farmland to nonagricultural use.

The 2012 Addendum to the SEIR concluded that no changes had occurred to the status of the project site's non-farmland designation, as indicated by the Farmland Mapping and Monitoring Program of the California Department of Agriculture. As such, the project would continue to result in no impacts in this regard.

Proposed Project Analysis and Conclusion

No changes have occurred to the status of the project site's non-farmland designation as indicated by the Farmland Mapping and Monitoring Program of the California Department of Agriculture. There is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance on the project site or in its vicinity. The project site is currently mapped as Urban Built-up land.² Thus, the proposed project would not convert any farmland to nonagricultural use. As such, no impacts would occur and the proposed project would not result in a new or more severe adverse impact to agricultural land conversion not previously identified in the SEIR.

b) Conflict with Existing Zoning for Agricultural Use or Williamson Act Contracts

Would the project: *Conflict with existing zoning for agricultural use, or a Williamson Act Contract?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project would not result in any impacts to lands zoned for agriculture or existing Williamson Act contracts.

The 2012 Addendum to the SEIR concluded that no changes have occurred to the status of the project site's zoning and the project site continues to be unencumbered by a Williamson Act Contract. As such, the project would continue to result in no impacts in this regard.

Proposed Project Analysis and Conclusion

No changes have occurred to the status of the project site's zoning and the project site continues to be unencumbered by a Williamson Act Contract.³ As previously discussed, the project site is currently zoned as PUD-HDR and PUD-I/C-O and has a General Plan land use designation of Business Park/Mixed Use. As such, no impacts would occur and the proposed project would not result in any new or more severe adverse impacts related to agricultural zoning or Williamson Act impacts not previously identified in the SEIR.

c) Conflict with Existing Forest Land Zoning

Would the project: *Conflict with existing zoning for forest land or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

² California Department of Conservation. 2022. California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed August 1, 2024.

³ California Department of Conservation. 2022. California Williamson Act Enrollment Finder. Website: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html>. Accessed August 1, 2024.

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project would not result in any impacts to forest land or timberland.

The 2012 Addendum to the SEIR concluded that the project site is not zoned for forest or timberland uses and does not contain any forest or timberland. As such, the project would continue to result in no impacts in this regard.

Proposed Project Analysis and Conclusion

The City of Pleasanton does not contain any land that is zoned for forest land or timberland. The project site is currently within the PUD-HDR and PUD-I/C-O zones and is currently occupied by construction activities, surface parking, and associated landscaping. As such, the proposed project would not introduce any new forest land or timberland zoning impacts not previously disclosed. Therefore, no impacts would occur and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Conversion of Forest Land to Non-Forest Use

Would the project: *Result in the loss of forest land or conversion of forest land to non-forest use?*

Summary of Housing Element Update SEIR

The SEIR concluded that the project would not result in any impacts related to the conversion or loss of agricultural land.

The 2012 Addendum to the SEIR concluded that no changes have occurred to the project or project site that would alter this conclusion. The project site does not contain any forest or timberland and there no forest or timberlands in the surrounding area. As such, the project would continue to result in no impacts in this regard.

Proposed Project Analysis and Conclusion

As discussed above, the project site does not contain forest land, timberland, or timberland zoned for production. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, no impacts would occur and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

e) Other Changes to Convert Farmland to Nonagricultural Use or Forest Land to Non-Forest Use

Would the project: *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project would not result in any impacts related to the conversion or loss of agricultural land.

The 2012 Addendum to the SEIR concluded that no changes have occurred to the project or project site that would alter this conclusion. The project site does not contain any farmland or forest land. As such, the project would continue to result in no impacts in this regard.

Proposed Project Analysis and Conclusion

No changes have occurred to the project or project site that would alter this conclusion. The project site and surrounding area do not contain farmland or forest land. Therefore, no impacts would occur and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Agricultural Resources, the Addendum demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
III. Air Quality <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant impact	No	No	No	None
b) Violate air quality standard or contribute substantially to an existing or projected air quality violation?	Less than significant impact with mitigation incorporated	No	No	No	MM4.B-1a
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.B-1a
d) Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.B-1a
e) Create objectionable odors affecting a substantial number of people?	Less than significant impact with mitigation incorporated	No	No	No	None

Discussion

a) Consistency with Air Quality Management Plan

Would the project: *Conflict with or obstruct implementation of the applicable air quality plan?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project would not conflict with the implementation Bay Area 2010 Clean Air Plan (2010 Clean Air Plan) because the projected rate of Vehicle Miles Traveled (VMT) associated with the Housing Element and associated rezonings would not be greater than the projected rate of increase in population, and the Housing Element and associated rezonings demonstrate reasonable efforts to implement control measures contained in the 2010 Clean Air Plan. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded that implementation of following Circulation Element policies of the Pleasanton General Plan 2005-2025 would include Transportation Control Measures (TCMs) from the 2010 Clean Air Plan:

- | | |
|-----------|--|
| Policy 3 | Facilitate the free flow of vehicular traffic on major arterials. |
| Policy 4 | In the Downtown, facilitate the flow of traffic and access to Downtown businesses and activities consistent with maintaining a pedestrian-friendly environment. |
| Policy 5 | At gateway intersections, facilitate the flow of traffic and access into and out of the City, consistent with maintaining visual character, landscaping, and pedestrian convenience. |
| Policy 8 | Maximize traffic safety for automobiles, transit, bicycle users, and pedestrians. |
| Policy 9 | Work with other local jurisdictions and regional agencies such as the Metropolitan Transportation Commission (MTC), Alameda County Congestion Management Agency (ACCMA), Alameda County Transportation Improvement Authority (ACTIA), and Tri-Valley Transportation Council to plan and coordinate regional transportation improvements. |
| Policy 13 | Phase transit improvements to meet the demand for existing and future development. |

- Policy 14 Encourage coordination and integration of Tri-Valley transit to create a seamless transportation system.
- Policy 15 Reduce the total number of average daily traffic trips throughout the City.
- Policy 16 Reduce the percentage of average daily traffic trips taken during peak hours.
- Policy 17 Support the continued and expanded operation of the Livermore Amador Valley Transit Authority (LAVTA)

As stated in the 2012 Addendum to the SEIR, a project would be judged to conflict with or obstruct implementation of the 2010 Clean Air Plan if it would result in substantial new regional emissions not foreseen in the air quality planning process. The 2012 Addendum to the SEIR found that the project would not result in a substantial unplanned increase in population, employment or regional growth in VMT, or emissions, so it would not conflict with or obstruct implementation of the air quality plan. Furthermore, the analysis noted that the reduced number of dwelling units evaluated in the 2012 Addendum as compared to the SEIR would result in reduced effects to what was previously concluded and would not introduce any new impacts not previously disclosed. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The Bay Area Air Quality Management District (BAAQMD) has adopted several air quality policies and plans to address regional air quality standards, the most recent of which is the 2017 Clean Air Plan. The 2017 Clean Air Plan was adopted in April of 2017 and serves as the regional Air Quality Plan (AQP) for the Air Basin for attaining NAAQS. The primary goals of the 2017 Clean Air Plan are to protect public health and protect the climate. The 2017 Clean Air Plan acknowledges that the BAAQMD's two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants⁴ and greenhouse gas (GHG) emissions.⁵ The 2017 Clean Air Plan also accounts for projections of population growth provided by the

⁴ The EPA has established National Ambient Air Quality Standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as "criteria" air pollutants (or simply "criteria pollutants").

⁵ A greenhouse gas (GHG) is any gaseous compound in the atmosphere that is capable of absorbing infrared radiation, thereby trapping and holding heat in the atmosphere. By increasing the heat in the atmosphere, greenhouse gases are responsible for the greenhouse effect, which ultimately leads to global warming.

Association of Bay Area Governments (ABAG) and VMT projections provided by the MTC and identifies strategies to bring regional emissions into compliance with federal and State air quality standards. A project would be judged to conflict with or obstruct implementation of the 2017 Clean Air Plan if it would result in substantial new regional emissions not foreseen in the air quality planning process.

The BAAQMD does not provide a numerical threshold of significance for project-level consistency analysis with AQPs. Therefore, the following criteria will be used for determining a project's consistency with the AQP.

- **Criterion 1:** Does the project support the primary goals of the AQP?
- **Criterion 2:** Does the project include applicable control measures from the AQP?
- **Criterion 3:** Does the project disrupt or hinder the implementation of any AQP control measures?

Criterion 1

The primary goals of the 2017 Clean Air Plan, the current AQP to date, are to:

- Attain air quality standards;
- Reduce population exposure to unhealthy air and protect public health in the Bay Area; and
- Reduce GHG emissions and protect the climate.

A measure for determining whether the proposed project supports the primary goals of the AQP is if the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the air quality plans. This measure is determined by comparing project emissions to the significance thresholds identified by the BAAQMD for construction- and operation-related regional pollutants. These significance thresholds are applied in the evaluation of environmental issue area (b), below. As discussed therein, the proposed project would not exceed the applicable regional thresholds for either construction or operations. Therefore, the proposed project would be consistent with Criterion 1.

Criterion 2

Another measure for determining whether a proposed project is consistent with the AQP is to determine whether the project is inconsistent with the growth assumptions incorporated into the AQP and, thus, whether it would interfere with the region's ability to comply with federal and California air quality standards. The development of the AQP is based in part on the land use general plan determinations of the various cities and counties that constitute the Air Basin.

While the proposed project would increase the development intensity and density, it would comply with the policies of the General Plan and zoning ordinance to ensure compatibility with the context of the site and the City in general. As such, the proposed project falls within the land uses contemplated for development by the City. As noted in Section XIV, Population and Housing, with the additional 31 residences, the proposed project would result in a total of 938 residents in a total of 336 residential units. The 336 total residential units would fall within the SEIR's assumption of the 420 residential units. Considering this information, the proposed project would not directly or indirectly result in substantial unplanned population growth. Therefore, the overall development of the project site would generally be consistent with the growth assumptions incorporated into the Clean Air Plan.

The AQPs also assume adherence to all mandatory regulations to reduce air pollution. Therefore, to conform to the assumptions in the AQP, a project must be consistent with all applicable measures contained in the applicable AQP. The Clean Air Plan contains 85 control measures to reduce air pollutants and GHGs at the local, regional, and global levels. Along with the traditional stationary, area, mobile source, and TCMs, the Clean Air Plan contains several control measures designed to protect the climate, promote mixed-use, and compact development to reduce vehicle emissions and exposure to pollutants from stationary and mobile sources. The Clean Air Plan also includes an account of the implementation status of control measures identified in the 2010 Clean Air Plan. The proposed project would not conflict with any applicable measures under the 2017 Clean Air Plan. Considering the information provided above, the proposed project would be consistent with Criterion 2.

Criterion 3

The proposed project would not preclude extension of a transit line or bike path, propose excessive parking beyond parking requirements, or otherwise

create an impediment or disruption to implementation of any AQP control measures. The proposed project would incorporate several AQP control measures as project design features, such as utilizing asphalt which would be compliant with BAAQMD regulations, complying with energy efficiency standards contained in the 2022 California Building Standards Code (CBC), and installing landscaping across the project site. Considering this information, the proposed project would not disrupt or hinder the implementation of any AQP control measures. The proposed project is therefore consistent with Criterion 3.

Conclusion

As discussed above, the proposed project would be consistent with all three criteria. Thus, the proposed project would not conflict with the 2017 Clean Air Plan (the applicable AQP). Therefore, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Air Quality Standards or Violations

Would the project: *Violate air quality standard or contribute substantially to an existing or projected air quality violation?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the General Plan Amendment and rezonings would result in increased long-term emissions of criteria pollutants associated with construction activities that could contribute substantially to an air quality violation. Specifically, development anticipated by the SEIR would require demolition and removal of existing structures where applicable, grading, and site preparation and construction of new structures. Emissions generated during construction activities would include exhaust emissions from heavy-duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, as well as fugitive dust emissions associated with earth-disturbing activities. However, as indicated in the SEIR, implementation of mitigation would reduce this impact to less than significant. Compliance with MM 4.B-1a would ensure that impacts from fugitive dust would be less than significant as well as ensure the other construction emissions would adhere to the BAAQMD's requirements.

The 2012 Addendum to the SEIR concluded that with the implementation of MM 4.B-1a, impacts related to fugitive dust would continue to be less than significant.

Proposed Project Analysis and Conclusion

Construction of the fifth floor of the podium building and the associated 31 residences would generate construction emissions similar to those contemplated in the SEIR. As such, the implementation of MM 4.B-1a would be required to reduce impacts to less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) Cumulative Criteria Pollutant Emissions Impacts

Would the project: *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project would have less than significant impacts related to cumulatively considerable net increases of criteria pollutants for which the project region is nonattainment after implementation of MM 4.B-1a, which requires the application of Best Management Practices (BMPs) to limit emissions of fugitive dust.

The 2012 Addendum concluded that the proposed project would reduce the number of dwelling units from a maximum of 420 dwelling units anticipated in the SEIR to 305 dwelling units and would reduce the retail square footage from 10,000 to 7,520 square feet. Construction activities would include demolition, site excavation and grading as well as general construction. Heavy-duty construction equipment, construction-related on-road trucks, and worker vehicles would also result in exhaust emissions of reactive organic gas (ROG), nitrogen oxide (NO_x), particulate matter less than 10 microns in diameter (PM₁₀), and particulate matter less than 2.5 microns in diameter (PM_{2.5}) during construction of the proposed project. Exhaust emissions would vary depending on the number and type of construction equipment used, number of truck trips to the site, and number of workers present.

The 2012 Addendum used the California Emissions Estimator Model (CalEEMod) to quantify construction emissions. CalEEMod modeling was based on the known land uses and project information, as well as reasonable assumptions included for the purposes of modeling. On-site demolition would consist of approximately 6.7 acres of pavement removal. With an assumed depth of 3 inches of pavement removed, and a weight of 145 pounds per cubic foot of pavement, 5,305 tons of debris would be removed. Project

construction was assumed to begin in 2013. Default CalEEMod construction phase lengths, equipment, and equipment hours of operation were used for all phases except architectural coatings, which was estimated to take approximately 6 months. The construction emissions were found to be below the BAAQMD thresholds of significance. As such, the project was found not to introduce any new impacts not previously disclosed in the SEIR. Impacts were found to continue to be less than significant and no mitigation was deemed necessary to reduce exhaust emissions.

The 2010 Air Quality Guidelines provide screening criteria developed for criteria pollutants and precursors. According to the 2010 Air Quality Guidelines, and as discussed in the 2012 Addendum, if the project meets the screening criteria then its air quality impacts relative to criteria pollutants may be considered less than significant. In developing the 2010 Air Quality Guidelines, BAAQMD also considered the emission levels for which a project's individual emissions would be cumulatively considerable. As shown in Table 4 of the 2012 Addendum to the SEIR, the project's land uses were found to be individually and cumulatively less than the BAAQMD's screening size for criteria air pollutants and precursors. Therefore, the project was found to have less than significant impacts individually and cumulatively. Thus, the project was found not introduce any new impacts related to cumulatively considerable net increases of nonattainment pollutants not previously disclosed. As such, impacts from operations would continue to be less than significant.

Proposed Project Analysis and Conclusion

This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. The thresholds of significance represent the allowable amount of emissions each project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

Construction

Construction Fugitive Dust

Fugitive dust (PM₁₀ and PM_{2.5}) would be generated during earthmoving activities but would largely remain localized near the project site. The BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, the BAAQMD bases the determination of significance for fugitive dust on considering the control measures to be implemented. If all appropriate emissions control measures are implemented for a project as recommended by the BAAQMD, then fugitive dust emissions during construction are not considered significant. Although the proposed additional fifth floor and additional 31 units would not involve earthmoving activities, construction activities would still have the potential to generate fugitive dust. As such, MM 4.B-1a would remain applicable throughout the duration of construction of the proposed project including the fifth floor of the podium building. With incorporation of MM 4.B-1a, impacts related to fugitive dust would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

To determine significance related to construction, estimated construction emissions can be compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5} construction emissions to determine significance. The applicable thresholds of significance are shown below in Table 4.

Table 4: BAAQMD Construction Thresholds

Parameter	Air Pollutants			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Significance Threshold (pounds/day)	54	54	82	54
Notes: NO _x = oxides of nitrogen PM ₁₀ = particulate matter less than 10 microns in diameter PM _{2.5} = particulate matter less than 2.5 microns in diameter ROG = reactive organic gases Source: BAAQMD 2022 CEQA Guidelines				

As indicated in the 2012 Addendum, the construction emissions from all construction activities associated with the project assessed at that time (demolition, site preparation, grading, building construction, and

architectural coatings) were found to be below the recommended thresholds of significance. The additional fifth floor to the podium building and associated 31 units would only result in a slightly longer construction duration compared to what was previously analyzed but would not result in any more intense daily construction emissions. In addition, daily emissions for the same activity would be lower than those estimated in the 2012 Addendum using the most recent emission factors and most recent construction emissions minimization plan, due to improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment over time. Considering this information, the proposed project's daily construction emissions would continue to fall below the applicable thresholds shown in Table 4. Construction of the proposed project would result in less than significant impacts related to emissions of ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. As previously discussed, the proposed project would be required to implement MM 4.B-1a for dust control BMPs recommended by the BAAQMD to reduce potential impacts related to fugitive dust emissions during project construction. With implementation of MM 4.B-1a, construction of the proposed project would have a less than significant impact.

Operation

The analysis contained in the 2012 Addendum compared the project to the BAAQMD's criteria air pollutant and precursors size screening for operational emissions. Table 5 shows the screening analysis from the 2012 Addendum, as well as a screening analysis updated for the proposed modified project.

Table 5: Criteria Air Pollutant and Precursors Screening for Operational Emissions

Land Use	Screening Size	Project Size	Percent of Screening size
Project Analyzed in the 2012 Addendum¹			
Apartment Low-Rise	451 DU	305 DU	68%
Strip Mall	142,000 sf	7,520 sf	5%
Total Project Size Relative to the Screening Size (2011 BAAMD Sizes)			73 %
Proposed Project with Fifth Floor of the Podium Building and Associated 31 Dwelling Units²			
Apartment Low-Rise	638 DU	336 DU	53%
Daycare Center	232,000	6,600	3%
Total Project Size Relative to the Screening Size (2022 BAAMD Sizes)			56%

Land Use	Screening Size	Project Size	Percent of Screening size
<p>Notes: DU = dwelling units; sf = square feet ¹ 2012 Addendum, using the BAAQMD's 2011 Size Screening Thresholds ² Screening Sizes updated using the Size Screening Thresholds from the BAAQMD's 2022 CEQA Guidelines</p>			

As shown in Table 5, the project's land uses are individually and cumulatively less than the BAAQMD's screening size for criteria air pollutants and precursors. Since emissions from operation decrease with time, BAAQMD has updated its Screening Levels since 2012. Although the BAAQMD screening thresholds from the 2022 CEQA Guidance are only designed to be used for individual land uses, the proposed project is so far below the criteria expected to result in a potentially significant impact, operational emissions are expected to fall well below the BAAQMD's regional thresholds for criteria air pollutants and precursor emissions if modeled in detail. Therefore, the project would have a less than significant impact with respect to criteria pollutants and ozone precursors, individually and cumulatively.

In summary, the proposed project would not introduce any new impacts related to cumulatively considerable net increases of nonattainment pollutants not previously disclosed. Impacts would continue to be less than significant.

Conclusion

Project construction would have less than significant impact related to emissions of ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. The proposed project would be required to implement MM 4.B-1a for dust control BMPs recommended by the BAAQMD to reduce potential impacts related to fugitive dust emissions during project construction. As such, project construction would not result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant.

Similarly, project operations resulting from the modified proposed project would not result in a significant impact in regard to resulting in a cumulatively considerable net increase of any criteria pollutant.

In summary, approval of the modified proposed project would not result in any significant effects resulting in a cumulatively considerable net increase of any criteria pollutant. Impacts would be less than significant and the

proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Sensitive Receptors Exposure to Toxic Air Contaminant Concentrations

Would the project: *Expose sensitive receptors to substantial pollutant concentrations?*

Summary of Housing Element Update SEIR

The SEIR concluded that the proposed project would not subject residents, neighbors or customers and employees of nearby businesses to substantial concentrations of air pollutants after incorporation of mitigation. The SEIR included MM 4.B-4, which requires project-specific health risk assessments and project design features designed to reduce air pollution exposure for project sites where screening thresholds are exceeded. As such, the SEIR concluded impacts would be less than significant after incorporation of mitigation.

The 2012 Addendum to the SEIR concluded that the project analyzed would not introduce any new substantial impacts not previously disclosed. The analysis in the 2012 Addendum noted that activities associated with site preparation and construction would generate short-term emissions of fugitive dust. The effects of construction activities would increase dustfall and locally elevated levels of PM₁₀ and PM_{2.5} downwind of construction activity. Construction dust has the potential for creating a nuisance at nearby properties. Consistent with BAAQMD's 2010 Air Quality Guidelines, the SEIR included MM 4.B-1a to ensure that the current BMPs would be implemented to reduce fugitive dust emissions from construction activities to less than significant. The 2012 Addendum to the SEIR concluded that implementation of MM 4.B-1a by the proposed project would ensure impacts would remain less than significant.

The analysis in the 2012 Addendum concluded that incorporation of these emission-reducing measures included as part of the project plans as well as implementation of MM 4.B-1a would ensure that construction emissions would remain less than significant.

The analysis in the 2012 Addendum found that the project would expose future residents to mobile and stationary sources of toxic air contaminants (TACs). To assess community risks and hazards, BAAQMD's 2010 Air Quality Guidelines recommend that any proposed project involving sensitive receptors should assess associated impacts within 1,000 feet, taking into account both individual and nearby cumulative sources. Cumulative sources

represent the combined total risk values of each individual source within the 1,000-foot evaluation zone.

The 2010 Air Quality Guidelines methodology for mobile source risks considers highways and heavily traveled surface streets (carrying 10,000 or more daily vehicle trips) within 1,000 feet of the project site. Two roadways with daily traffic greater than 10,000 vehicles were identified within 1,000 feet of the project boundary: Owens Drive to the southwest and Hacienda Drive to the west. The BAAQMD's Highway Screening Analysis Tool was used to conservatively estimate risks associated with proximity to these roadways. Table 7 of the 2012 Addendum shows the cancer risk, chronic and acute hazard index, and annual PM_{2.5} concentration from these two roadways at the closest receptor along the property boundary, which are below BAAQMD individual source significance thresholds. Therefore, the 2012 Addendum found that the project would not expose on-site residents to a significant health risk from adjacent roadways.

The 2012 Addendum included a Screening Level Cumulative Risk Analysis prepared by Environ (Environ, October 1, 2012) for the analyzed project. This Screening Level Cumulative Risk Analysis contained a detailed analysis of the BAAQMD Risk Analysis Tool and potential impacts to the project site. The neighborhood of the proposed project was found to include several existing stationary sources of air pollutants. The BAAQMD database of permitted stationary sources indicated that there were six permitted sources of air pollutants within the 1,000-foot zone of influence of the project with non-trivial TAC emissions. Risk information for permitted sources was provided by the BAAQMD. All risks for permitted stationary sources were found to be below the BAAQMD single source thresholds of significance. Additionally, the combined estimated PM_{2.5} concentration, lifetime cancer risk and chronic non-cancer health risk from mobile and permitted sources were found to be below the BAAQMD cumulative Community Risks and Hazards thresholds. Cumulative risks were, therefore, found to be less than significant and no mitigation was determined to be required.

In summary, the 2012 Addendum concluded that the project would not subject residents, neighbors, or customers and employees of nearby businesses to substantial concentrations of air pollutants after incorporation of MM 4.B-1a. As such, impacts would continue to be less than significant with mitigation.

Proposed Project Analysis and Conclusion

SEIR MM 4.B-4 requires project-specific health risk assessments and project design features designed to reduce air pollution exposure for project sites where screening thresholds are exceeded. As discussed below, the modified proposed project would not introduce any new substantial impacts not previously disclosed and, therefore, remains consistent with MM 4.B-4.

Construction Localized Fugitive Dust

Activities associated with site preparation and earthmoving activities would generate short-term emissions of fugitive dust. The SEIR included MM 4.B-1a to ensure that the current BMPs would be implemented to reduce fugitive dust emissions from construction activities to less than significant. Although the proposed additional fifth floor and associated 31 units would not involve earthmoving activities, construction activities would still have the potential to generate fugitive dust. MM 4.B-1a would remain applicable throughout the duration of construction of the project. With incorporation of MM 4.B-1a, impacts related to fugitive dust would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Construction Toxic Air Contaminants Generation

The proposed additional fifth floor and associated 31 units would not result in any new demolition, site preparation, or grading. The additional fifth floor and units would require building construction and architectural coating activities, which are less intense construction activities compared to ground-disturbing activities such as grading. The air quality impact analysis performed for the 2012 Addendum assessed impacts for the reasonably worst-case construction air impacts related to the demolition, site preparation and grading phases of construction. The addition of a fifth floor to the podium building would not alter these phases of construction in any way and therefore would not result in any new or more severe construction impact than was previously identified and analyzed in the SEIR and the 2012 Addendum. As stated in the 2012 Addendum, the project plans and specifications incorporate a construction emissions minimization plan designed to reduce the creation of construction-period TACs. Specifically, equipment over 50 horsepower will be a minimum of Tier 4, and equipment over 150 horsepower will have Level 3 diesel particulate filters. These conditions would continue to apply to the proposed project, including during construction of the additional fifth floor and additional 31 units. Incorporation of these emission-reducing measures, as well as implementation of MM 4.B-

1a, would ensure that construction emissions would not result in significant impacts relating to the exposure of sensitive receptors to substantial pollutant concentrations. The impact would continue to be less than significant impact after incorporation of MM 4.B-1a.

Operational Toxic Air Contaminants Exposure

The air quality impact analysis performed for the 2012 Addendum included an analysis of the project's potential to expose future residents at the project site to existing sources of TACs, following the BAAQ's 2010 guidance related to TACs. The addition of a fifth floor to the podium building would not locate new sensitive receptors any closer to sources of TACs compared to what was previously analyzed. Furthermore, construction of the additional fifth floor and 31 units would be subject to the latest building code standards, which require indoor air filtration systems with a Minimum Efficiency Reporting Value (MERV) of 13 or better for new residents. According to the EPA, MERV 13 filters have a greater than or equal to 50 percent efficiency rate at removing particulate matters 0.3–1.0 microns in size and greater than or equal to 85 percent efficiency rate at removing particulate matters 1.0–3.0 microns in size.⁶ As such, with installation of MERV-13 filters as required by the 2022 California Building Code, the level of PM_{2.5} concentration would be reduced even more. Similarly, because the MERV-13 filter would also remove diesel particulate matter (DPM), cancer risk and chronic hazard would be further reduced as well. As such, cumulative health risks would remain less than significant.

e) Objectionable Odors Exposure

Would the project: *Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the proposed project would not subject residents to objectionable odors after incorporation of mitigation. Specifically, MM 4.B-5 was included to ensure that odors from a new transfer station to be constructed as part of the SEIR project would be minimized at the potential odor source appropriately.

The 2012 Addendum to the SEIR concluded that the proposed project would not include uses that have been identified by BAAQMD as potential sources

⁶ United States Environmental Protection Agency (EPA). 2024. Indoor Air Quality (IAQ) What is a MERV Rating? March. Website: <https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating>. Accessed September 20, 2024.

of objectionable odors including the new transfer station. Sources of odors include manufacturing plants, agricultural operations, and industrial operations such as wastewater treatment plants and solid waste transfer stations or landfills.

As a new sensitive receptor for odors, the project is distant from the types of land uses that identified by the BAAQMD as having potential to create objectionable odors. As shown in the SEIR, the project site is beyond the 2-mile screening distance for odor sources. Therefore, the project would have a less than significant odor impact because it would not frequently create substantial objectionable odors affecting a substantial number of people. As such, impacts would continue to be less than significant and no mitigation was deemed necessary.

Proposed Project Analysis and Conclusion

As stated in the BAAQMD Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard. The ability to detect odors varies considerably among the population and is subjective. The BAAQMD does not have a recommended odor threshold for construction activities. However, the BAAQMD recommends operational screening criteria based on the distance between receptors and types of sources known to generate odors.

Construction

During construction activities, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. It is anticipated that by the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality or odor concern. These conclusions would not change as a result of the proposed additional fifth floor and 31 units.

Operation

Land uses typically associated with odors include wastewater treatment facilities, waste disposal facilities, agricultural operations, among others as shown in Table 3, Odor Screening Distances, of the BAAQMD Air Quality Guidelines. The proposed project would not be considered a known odor generator, as defined by the BAAQMD. Specifically, the proposed additional

fifth floor and 31 units would not include a known odor generator. Operations of the proposed project could lead to odors from associated vehicle exhaust, laundry cleaning, indoor or outdoor cooking, and waste disposal. However, such odors generated by project operation would be small in quantity and duration and would not pose an objectionable odor impact to nearby receptors.

Conclusion

The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people from construction or operations. MM 4.B-5 from the SEIR is applicable only to transfer stations as new potential odor generators, none of which are included as part of the proposed project. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Air Quality, the Addendum demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. MM 4.B-1a from the SEIR would be required and would reduce potential impacts to below a level of significance, consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

MM 4.B-1a Prior to the issuance of a grading or building permit, whichever is sooner, the project applicant shall submit an air quality construction plan detailing the proposed air quality construction measures related to the project such as construction phasing, construction equipment, and dust control measures, and such

plan shall be approved by the Director of Community Development. Air quality construction measures shall include Basic Construction Mitigation Measures (BAAQMD, May 2012) and, where construction-related emissions would exceed the applicable thresholds, Additional Construction Mitigation Measures (BAAQMD, May 2012) shall be instituted. The air quality construction plan shall be included on all grading, utility, building, landscaping, and improvement plans during all phases of construction.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
IV. Biological Resources Would the project:					
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 Wildlife or United States Fish and Wildlife Service?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.C-1a and MM 4.C-1b
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.C-1a and MM 4.C-1b
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct	Less than significant with mitigation incorporated	No	No	No	None

Addendum Checklist

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
removal, filling, hydrological interruption, or other means?					
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 wildlife nursery sites?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.C-1a and MM 4.C-1b
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant impact	No	No	No	None
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?	No impact	No	No	No	None

Discussion

a) Special-status Species

Would the project: *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 Wildlife or United States Fish and Wildlife Service?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project site is entirely within an existing urban/developed area and the removal of trees or other vegetation associated with the project could result in direct losses of nesting habitat, nests, eggs, nestlings, or roosting special-status bats; such impacts would be considered significant. As indicated in the SEIR, these impacts would require mitigation to ensure that any impacts to special-status bird and bat species are avoided or minimized. As such, the SEIR included MM 4.C-1a and 4.C-1b which would require pre-construction breeding bird and bat surveys. As such, the SEIR concluded that impacts would be less than significant with mitigation.

The 2012 Addendum to the SEIR concluded that with the implementation of MM 4.C-1a and 4.C-1b from the SEIR, the project's impacts would continue to be less than significant as concluded in the SEIR. As such, impacts would continue to be less than significant with mitigation.

Proposed Project Analysis and Conclusion

The proposed project is entirely within an urban/developed area and the removal of trees or other vegetation associated with the project could result in direct losses of nesting habitat, nests, eggs, nestlings, or roosting special-status bats. As indicated in the SEIR and 2012 Addendum, the project would implement MM 4.C-1a and 4.C-1b which would ensure that impacts to special-status bird and bat species are less than significant. No changes have occurred that would alter this conclusion. The addition of the 31 residential units would not result in an increase in the development footprint as the proposed project footprint would be the same as previously analyzed. As such, impacts would be less than significant with mitigation and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Sensitive Natural Communities and Riparian Habitat

Would the project: *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that construction of the project may result in degradation of water quality and aquatic habitat; degradation of wetland habitat; and accidental discharge of sediment or toxic materials into wetlands. The project would be required to comply with the City's General Plan Policies. Adherence to these policies would provide protection for identified riparian habitat along Tassajara Creek. The proposed project contains mature trees that are part of the riparian corridor that could serve as habitat for special-status species or other species of concern. As indicated in the SEIR, the proposed project would require the implementation of MM 4.C-2 which would require riparian and wetland setbacks 20 feet from the edge of riparian vegetation on top of bank. As such, the SEIR concluded that impacts would be less than significant with mitigation.

The 2012 Addendum to the SEIR concluded that MM 4.C-2 adequately ensures that any impacts to special-status species within the Tassajara Creek riparian corridor are avoided or minimized. As such, impacts would continue to be less than significant with mitigation.

Proposed Project Analysis and Conclusion

The addition of the 31 residential units would not prohibit implementation of General Plan policies related to riparian and wetland setbacks or SEIR MM 4.C-2. No changes have occurred that would alter the conclusion made in the SEIR. Implementation of the proposed project would not change the removal of vegetation nor does it change proposed project setbacks. As such, MM 4.C-2 has already been implemented as part of the 2012 Addendum and is not required for this modification. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) State or Federally Protected Waters and Wetlands

Would the project: *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?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that construction of the project may result in degradation of water quality and aquatic habitat, degradation of wetland habitat, and accidental discharge of sediment or toxic materials into wetlands. The project would be required to comply with the City's General Plan Policies. Adherence to these policies would provide adequate protection for wetland habitats. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded that adherence to the City's General Plan Policies would provide adequate protection for wetland habitats. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project site does not contain any State or federal protected waters or wetlands. Additionally, as previously discussed, the proposed project would be required to comply with the City's General Plan Policies which would provide protection for wetland habitats. No changes have occurred that would alter the conclusion in the SEIR. The addition of the 31 residential units would not prohibit General Plan compliance. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Fish and Wildlife Movement Corridors

Would the project: *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 wildlife nursery sites?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that that while the project site is developed and lacks habitat value, Tassajara Creek and landscaped areas within the vicinity provide wildlife corridors for fish, waterfowl, other birds, bats, and mammals. As indicated in the SEIR, this impact would require implementation of MM

4.C-1a, 4.C-1b, and 4.C-2. As such, the SEIR concluded impacts would be less than significant with mitigation.

The 2012 Addendum to the SEIR concluded that implementation of MM 4.C-1a, 4.C-1b, and 4.C-2 would ensure that any impacts to special-status species within the Tassajara Creek riparian corridor are avoided or minimized. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The project site has been previously developed, is currently under redevelopment, and is generally devoid of habitat value. Tassajara Creek within the vicinity provide wildlife corridors for fish, waterfowl, other local species. The SEIR indicated that the proposed project would require the implementation of MM 4.C-1a, 4.C-1b, and 4.C-2. No changes have occurred that would alter this conclusion and implementation of these mitigation measures would ensure that any impacts to special-status species within the Tassajara Creek riparian corridor are avoided or minimized. Note that MM 4.C-2, requiring riparian set back has already been implemented. Addition of the 31 residential units would not increase identified impacts nor prohibit implementation of identified mitigation measures. As such, impacts would be less than significant with mitigation and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

e) Local Biological Resources Policies/Ordinances Consistency

Would the project: *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the project could occur in locations where heritage trees would be adversely affected, through damage to root zones, tree canopy, or outright removal. According to the Arborist Report prepared by Hort Science (Appendix C) for the 2012 Addendum, the project site contains 457 trees, of which 97 are considered heritage trees under Chapter 17.16 of the Pleasanton Municipal Code.⁷ Implementation of the project includes removal of 305 trees, 47 of which are heritage trees. The trees to be removed are ornamental species that were planted in 1987-1988 with the development of the existing California Center office complex. The General Plan Open Space and Conservation Element's Program 2.1 strongly

⁷ HortScience, Inc. 2012. Arborist Report California Center Pleasanton, CA. October.

encourages preservation of heritage trees. Where preservation is not feasible, the City requires tree replacement or a contribution to the Urban Forestry Fund. Program 2.1 also indicates that no net loss of trees should be allowed. Chapter 17.16 of the Municipal Code provides adequate protection for heritage trees in the City of Pleasanton and required compliance would enable the project to avoid significant impacts to trees. As such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum concluded that with adherence to the City's tree ordinance, impacts would be less than significant. As such, the impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

Addition of the 31 residential units in the podium building would not result in any additional removal of trees nor would it prohibit the implementation of applicable regulations related to tree protection. As such, Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

f) Habitat Conservation Plan/Natural Community Conservation Plan Consistency

Would the project: *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the proposed project would not conflict with a Habitat Conservation Plan or Natural Community Conservation Plan because the City is not located within such a designated area. As such, the SEIR concluded that no impact would occur.

The 2012 Addendum to the SEIR concluded that no changes have occurred that would alter the conclusion of the SEIR. As such, the project would continue to have no impact.

Proposed Project Analysis and Conclusion

Consistent with the discussion and analysis in the SEIR, the proposed project site is not located within a Habitat Conservation Plan or Natural Community Conservation Plan. No changes have occurred that would alter the conclusion of the SEIR and the 2012 Addendum. As such, no impact would occur and the proposed project would not result in a new or more severe adverse impact that would not previously identified in the SEIR.

Conclusion

With regards to Biological Resources, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. MM 4.C-1a and 4.C-1b from the SEIR would be required and would reduce potential impacts to below a level of significance, consistent with the analysis in the Housing Element Update SEIR.

Applicable SEIR Mitigation Measures

MM 4.C-1a Pre-construction Breeding Bird Surveys

The City shall ensure that prior to development of all potential sites for rezoning (Sites 1-4, 6-11, 13, 14, and 16-21) and each phase of project activities that have the potential to result in impacts on breeding birds, the project applicant shall take the following steps to avoid direct losses of nests, eggs, and nestlings and indirect impacts to avian breeding success:

- If grading or construction activities occur only during the nonbreeding season, between August 31 and February 1, no surveys will be required.
- Pruning and removal of trees and other vegetation, including grading of grasslands, should occur whenever feasible, outside the breeding season (February 1 through August 31). During the breeding bird season (February 1 through August 31), a qualified biologist will survey activity sites for nesting raptors and passerine birds not more than 14 days prior to any ground-disturbing activity or vegetation removal. Surveys will include all line-of-sight trees within 500 feet (for raptors) and all

vegetation (including bare ground) within 250 feet for all other species.

- Based on the results of the surveys, avoidance procedures will be adopted, if necessary, on a case-by-case basis. These may include construction buffer areas (up to several hundred feet in the case of raptors) or seasonal avoidance.
- Bird nests initiated during construction are presumed to be unaffected, and no buffer would be necessary, except to avoid direct destruction of a nest or mortality of nestlings.
- If pre-construction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required. Trees and shrubs that have been determined to be unoccupied by nesting or other special-status birds may be pruned or removed.

MM 4.C-1b Pre-construction Bat Surveys

Conditions of approval for building and grading permits issued for demolition and construction [of the project] shall include a requirement for pre-construction special-status bat surveys when large trees are to be removed or underutilized or vacant buildings are to be demolished. If active day or night roosts are found, the bat biologist shall take actions to make such roosts unsuitable habitat prior to tree removal or building demolition. A no-disturbance buffer of 100 feet shall be created around active bat roosts being used for maternity or hibernation purposes. Bat roosts initiated during construction are presumed to be unaffected, and no buffer would [be] necessary.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
V. Cultural and Tribal Cultural Resources <i>Would the project:</i>					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Less than significant impact	No	No	No	None
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant impact	No	No	No	None
c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant impact	No	No	No	MM 4.D-4
<i>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:</i>					
d) 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), or	No conclusion was made in the SEIR or the Addendum regarding the significance. As such, no significant impact was identified.	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
e) 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.	No conclusion was made in the SEIR or the Addendum regarding the significance. As such, no significant impact was identified.	No	No	No	None

Discussion

Note: For the purposes of this Addendum, and consistent with current accepted practices, the discussion and analysis regarding potential impacts to paleontological resources is included in Section VII, Geology, Seismicity, and Soils.

a) Historical Resources

Would the project: *Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that there is no information indicating the presence of historic structures in the vicinity of the project site. Examination of historic aerial photography of the project site dating back to 1939 shows the area in agricultural use until the early 1980s. The current California Center development and associated parking lots were constructed in the mid-1980s and thus does not meet the threshold of being a historic resource. The SEIR also concluded that the site is located in a “Low Sensitivity” zone for cultural resources, which include historical resources, because the site is not located within the Downtown Historic Neighborhoods and Structure Area (refer to Figure 4.D-1 of the SEIR) and no other historic structures were identified in the

vicinity of the proposed project. While other sites considered in the SEIR were identified as having potentially significant impacts requiring mitigation, the project site was not identified as such. Therefore, for the purposes of this analysis, and because there are no historical resources on the project site, the SEIR is considered to have concluded that impacts would be less than significant at this project site in regard to historical resources.

The 2012 Addendum to the SEIR concluded that no changes have occurred that would alter the conclusion of the SEIR. As such, the project would continue to have less than significant impacts and mitigation from the SEIR would not be applicable.

Proposed Project Analysis and Conclusion

The proposed project is consistent with the findings of the previous Certified SEIR and 2012 Addendum. The records search results conducted at the Northwest Information Center (NWIC) on September 6, 2024, indicated that two historic resources have been recorded within the 0.5-mile search radius, none of which are located within the proposed project site. Additionally, the desktop survey confirmed that no cultural resources would be impacted due to the nature of the proposed project. The analysis did not reveal any significant changes from what was evaluated and disclosed in the previous SEIR and 2012 Addendum. As such, no new impacts would occur, and the proposed project would not result in a new or more severe adverse impact that were not previously identified in the previously Certified SEIR.

b) Archaeological Resources

Would the project: *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that project-related construction activities involving ground disturbance during construction could result in significant impacts if any unknown culturally significant sites are discovered. The project site clearly lies within the flat valley section of the City, in an area that has been extensively disturbed by agricultural activities for at least 40 years and subsequent development in the 1980s. Therefore, the potential for archaeological resources to remain at the site is low. While other sites considered in the SEIR were identified as having potentially significant impacts in this regard, the project site was not identified as such. Therefore, for the purposes of this analysis, and because of historical on-site disturbance on the project site, the SEIR is considered to have concluded that impacts

would be less than significant at this project site in regard to archaeological resources.

The 2012 Addendum to the SEIR concluded that the City requires a standard condition of approval for projects requiring Planning Department approval that would require that all construction stop in the event that cultural resources were uncovered during excavation. With implementation of this standard condition, the project would be expected to have a less than significant effect on unknown cultural resources. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project is consistent with the findings of the previously Certified SEIR and 2012 Addendum. The records search results conducted at the NWIC on September 6, 2024, indicated that four cultural resources (two pre-contact and two historic) were identified within the 0.5-mile search radius, none of which are located within the proposed project site. Further, the Sacred Land Files search conducted by the Native American Heritage Commission (NAHC) on September 9, 2024, failed to locate any Tribal Cultural Resources (TCRs). Additionally, the desktop survey confirmed that no known cultural resources would be impacted due to the nature of the proposed project.

Therefore, the analysis did not reveal any new significant changes and remains consistent with the findings of the previously Certified SEIR and 2012 Addendum. As such, no new impacts would occur, and the proposed project would not result in a new or more severe adverse impact that were not previously identified in the previously Certified SEIR.

c) Burial Sites

Would the project: *Disturb any human remains, including those interred outside of formal cemeteries?*

Summary of Housing Element Update SEIR

The SEIR concluded that there is no indication in the archaeological record that the project site has been used for human burial purposes in the recent or distant past. However, in the unlikely event that human remains are discovered during project construction, including those interred outside of formal cemeteries, human remains could be inadvertently disturbed, which would be a significant impact. The City requires a standard condition of approval for projects requiring Planning Department approval that would

require that all construction stop in the event that cultural resources were inadvertently uncovered during excavation. In addition, the SEIR included MM 4.D-4, which states requirements in the event human remains are discovered during grading and construction. With implementation of the City's standard conditions of approval and MM 4.D-4, the SEIR concluded that impacts would be less than significant with mitigation.

The 2012 Addendum to the SEIR concluded that no changes have occurred that would alter the conclusion of the SEIR. As such, impacts would continue to be less than significant with the implementation of mitigation.

Proposed Project Analysis and Conclusion

The NWIC records search results did not identify any burial sites, human remains, or formal cemeteries within the proposed project site or the 0.5-mile search radius. Subsurface Archaeological Sensitivity Assessment looks at four variables in determining the probability of encountering a prehistoric burial site, those being: (1) age of the underlying soil contemporaneous with period of human occupation of the area; (2) proximity to permanent or semi-permanent water sources capable of supporting long-term or seasonal occupation of the area; and (3) flat or gently sloped topography conducive to human habitation. Geologic mapping indicated that the proposed project site is underlain by Holocene deposits, which is contemporaneous with human occupation of California. Furthermore, the site is generally flat and therefore conducive to human habitation. Therefore, the possibility of inadvertent discovery remains. While the project site has already been graded, construction activities related to the construction of the podium building still have the potential to disturb soils and therefore, MM 4.D-4 would still apply and would reduce impacts to a less than significant level. As such, no new impacts would occur, and the proposed project would not result in a new or more severe adverse impact that were not previously identified in the previously Certified SEIR.

d) Listed or Eligible Tribal Cultural Resources

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 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)?*

Summary of Housing Element Update SEIR and Addendum

This checklist question was not included as a separate threshold in the SEIR and the 2012 Addendum because this checklist question did not exist at the time the SEIR and Addendum were prepared. No conclusion was made in the SEIR or the 2012 Addendum regarding the significance level of impacts related causing an adverse change in the significance of a TCR, defined in Public Resources Code Section 21074 as either a site, feature, place, or 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 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).

Proposed Project Analysis and Conclusion

No impacts related to TCRs were discussed or analyzed in the previously certified SEIR and 2012 Addendum. NWIC records search results did not identify any TCRs within the project site. Additionally, the NACH SLF search came back negative. As such no new impacts would occur, and the proposed project would not result in new or more severe adverse impacts.

e) Lead Agency Determined Tribal Cultural Resources

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 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?*

Summary of Housing Element Update SEIR and Addendum

This checklist question was not included in the SEIR and the 2012 Addendum because this checklist question did not exist at the time the SEIR and Addendum were prepared. No conclusion was made in the SEIR or the 2012 Addendum regarding the significance level of impacts related causing an adverse change in the significance of a TCR, defined in Public Resources Code Section 21074 as either a site, feature, place, or 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 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.

Proposed Project Analysis and Conclusion

Assembly Bill (AB) 52 and Senate Bill (SB) 18 consultation was not conducted by the Lead Agency in the previously Certified SEIR and 2012 Addendum. The recent records search conducted at the NAHC for TCRs on September 9, 2024, and at the NWIC on September 6, 2024, came back negative for previously unidentified TCRs. Thus, no new impacts would occur, and the proposed project would not result in new or more severe adverse impacts.

Conclusion

With regards to Cultural and Tribal Cultural Resources, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. MM 4.D-4 from the SEIR would be required and would reduce potential impacts to below a level of significance consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

MM 4.D-4 In the event that human remains are discovered during grading and construction of development facilities by the Housing Element, work shall stop immediately. There shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Section 5097.98. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify the persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
VI. Energy Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No conclusion was made in the SEIR or the Addendum regarding the significance. As such, no significant impact was identified.	No	No	No	None
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	No conclusion was made in the SEIR or the Addendum regarding the significance. As such, no significant impact was identified.	No	No	No	None

Discussion

a) Energy Use

Would the project: *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Summary of Housing Element Update SEIR and Addendum

This checklist question was not included in the SEIR or the 2012 Addendum as a separate threshold because this checklist question was not included as part of Appendix G at the time the SEIR and Addendum were prepared. No conclusion was made in the SEIR or the Addendum regarding the

significance level of the project's impacts related to wasteful, inefficient, or unnecessary consumption of energy resources.

Proposed Project Analysis and Conclusion

Energy use consumed by typical mixed-use development projects includes natural gas, electricity, and fuel consumption from construction and operations of the project.

Construction

Construction of the proposed project would result in energy consumption through the transportation of building materials and through the use of heavy-duty construction equipment. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks. For instance, the on-site equipment used during the construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, front-end loaders, forklifts, and cranes.

The overall construction schedule and process are designed to be efficient to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense of renting, maintaining, and fueling the equipment.

In addition, the proposed project only involves the addition of the fifth floor of the podium building and additional 31 units, which would not introduce any new construction energy consumption sources and would only extend the vertical building construction phase by a minimal amount. Therefore, the proposed project would not introduce any new or more severe energy consumption component than what was previously identified for the approved project.

Operation

The proposed project would consume energy as part of building operations and transportation activities. The proposed project, including the fifth floor of the podium building and additional 31 units, would be designed following Title 24 and California's Energy Efficiency Standards, as applicable. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), and indoor and outdoor lighting. Incorporating the Title 24 standards into the proposed project's design would ensure that the proposed project would not result in the use of

energy in a wasteful manner. In addition, the project is located in an urbanized portion of the City of Pleasanton and would not result in unusually long trip lengths for future employees, guests, or visitors. Considering the proposed project's location in a built-up environment and the project design features incorporated to reduce energy consumption, project operations would not be wasteful, inefficient, or unnecessary.

Conclusion

As discussed above, approval of the proposed project would not result in any significant effects relating to the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Energy Efficiency and Renewable Energy Standards Consistency

Would the project: *Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?*

Summary of Housing Element Update SEIR and Addendum

This checklist question was not included in the SEIR or the 2012 Addendum as a separate threshold because this checklist question was not included as part of Appendix G at the time the SEIR and Addendum were prepared. However, the SEIR discussed both energy efficiency and renewable energy throughout the SEIR. For example, in the discussion of Aesthetics the SEIR states that all new developments in Pleasanton would be subject to Title 24 requirements, which requires new development to adopt energy efficiency standards for outdoor lighting for the public and private sector, among other things. No conflicts with or obstruction of a State or local plan for renewable energy or energy efficiency were identified.

Proposed Project Analysis and Conclusion

As noted previously, incorporating the Title 24 standards into the proposed project's design would ensure that the proposed project would not result in the use of energy in a wasteful manner. The proposed project's electricity provider would also be required to meet the State's future objective of 60 percent of in-State electricity sales being generated from renewable energy sources by 2030. The proposed project would comply with existing State and local energy standards and with energy conservation policies contained in the General Plan and related GHG reduction measures listed in the GHG discussion below (see Section VIII. Greenhouse Gas Emissions). As such, the

proposed project would not conflict with State or local renewable or energy efficiency objectives. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Energy, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts:	New Information Requiring New Analysis or Verification>	
VII. Geology, Seismicity, and Soils					
Would the project:					
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.	Less than significant impact	No	No	No	None
ii) Strong seismic ground shaking?	Less than significant impact	No	No	No	None
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact	No	No	No	None
iv) Landslides?	Less than significant impact	No	No	No	None
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant impact	No	No	No	None

Addendum Checklist

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts:	New Information Requiring New Analysis or Verification>	
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?	Less than significant impact	No	No	No	None
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?	Less than significant impact	No	No	No	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than significant impact	No	No	No	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.D-3

Discussion

a) Earthquakes

Would the project: *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; (ii) Strong Seismic Ground Shaking; (iii) Seismic-related ground failure, including liquefaction; or (iv) Landslides.*

i) Surface Fault Rupture

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the development facilitated by the proposed Housing Element would result in a less than significant impact related to surface fault rupture. The SEIR identified the Calaveras fault zone (an established Earthquake Fault Zone [EFZ]) as being within the City but not within the project site. As such, the SEIR concluded that the impact would be less than significant.

The 2012 Addendum to the SEIR concluded that no changes had occurred to the project site and the project would not result in an impact related to surface fault rupture. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

The project site is not within an established EFZ. The nearest EFZ is the Pleasanton fault zone (approximately 0.67-mile northwest of the project site) and the Calaveras fault zone (approximately 2.6 mile west of the project site). As the project site is not within an established EFZ, the impact would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

ii) Strong Seismic Ground Shaking

Summary of Housing Element Update SEIR

The SEIR concluded that ground shaking in the City could occur and could cause significant damage to structures. However, the SEIR indicates that the project would be subject to the goals and policies of the City General Plan, which would minimize the risk from ground shaking by requiring a site-specific soil and geotechnical study with recommendations to minimize seismic hazards. The SEIR further concluded that compliance with the CBC is State

law and required as a condition of building permits. Compliance with CBC (as adopted by the City) would mitigate structural failure resulting from strong seismic ground shaking. As such, the SEIR concluded that the impact would be less than significant.

The 2012 Addendum to the SEIR concluded that no changes had occurred to the project site and the project would not introduce any new impacts related to strong seismic ground shaking. The project would be subject to the CBC as adopted by the City. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

As discussed above, the project site is in proximity to the Pleasanton and Calaveras fault zones, which are established EFZs. Other nearby faults that could generate strong seismic ground shaking at the project site include the Verona fault (3.8 miles south of the project site) and the Las Positas fault (approximately 7.2 miles southeast of the project site). Consistent with the SEIR and the 2012 Addendum, construction of the podium building including the fifth floor and additional 31 units would be required to comply with the current version of the CBC (2022) and the City General Plan, which would ensure that structures associated with the proposed project would be designed to withstand strong seismic ground shaking. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

iii) Seismic-related Ground Failure, Including Liquefaction

Summary of Housing Element Update SEIR

The SEIR concluded that seismic-related ground failure, including liquefaction, is a risk that exists throughout much of the City. The SEIR identified the project site as being within an established liquefaction hazard zone. The SEIR concluded that compliance with the CBC would ensure that buildings constructed as part of the project would be designed to withstand the potential effects of liquefaction and other seismic-related ground failures. As such, the impact would be less than significant.

The 2012 Addendum concluded that no changes had occurred to the project site and the project would not introduce any new impacts related to seismic-related ground failure, including liquefaction with the incorporation of CBC compliance. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the SEIR and the 2012 Addendum, the project site is within an established liquefaction hazard zone. Construction of the podium building, including the fifth floor and additional 31 units would be required to comply with the current version of the CBC (2022) and the City General Plan, which would ensure that structures associated with the proposed project would be designed to withstand the potential effects of liquefaction. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

iv) Seismic-related Ground Failure, Including Landslides

Summary of Housing Element Update SEIR

The SEIR concluded that, due to the flat topography and existing development at the project site, the development facilitated by the proposed General Plan would not expose people or structures to landslides. The SEIR concluded that the impact would be less than significant.

The 2012 Addendum concluded that no changes had occurred at the project site that would alter the conclusions made in the SEIR and the impact would remain less than significant.

Proposed Project Analysis and Conclusion

Consistent with the SEIR and the 2012 Addendum, the project site is in a developed area with flat topography. The project as approved was required to undergo geotechnical evaluation (consistent with the 2022 CBC) to ensure that the any potential risks associated with landslides would be addressed. Construction of the fifth floor and additional 31 units would not change this requirement or conclusion. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Soil Erosion or Topsoil Loss

Would the project: *Result in substantial soil erosion or the loss of topsoil?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the potential impacts related to erosion as the result of site grading would be less than significant. Additionally, the SEIR indicated that the project site would be required to adhere to the National Pollutant Discharge Elimination System (NPDES) General Construction Permit, which contains requirements for erosion control of exposed soils including

implementation of a Stormwater Prevention Plan's Best Management Practices. In addition, policies in the Public Safety Element of the General Plan minimize the risk of soil erosion and mitigate its effects further (Goal 1, Policy 2; Goal 2, Policy 5). As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded no changes to the project site or regulatory conditions have occurred that would alter the conclusion of the SEIR. As such, the impact would continue be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the SEIR and the 2012 Addendum, the proposed project would be required to be permitted under the NPDES General Permit. Compliance with the NPDES General Permit would reduce the amount of soil erosion that could occur during construction of the project site. Construction of the fifth floor and additional 31 units would not change this requirement or conclusion. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) Unstable Geologic Location

Would the project: *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 landsliding, lateral spreading, subsidence, liquefaction, or collapse?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that residential development would be required to implement geotechnical tests and reports specific to the development site to identify the suitability of soils and measures to minimize unsuitable soil conditions must be applied. The SEIR also indicated that the design of foundation support must conform to the analysis and implementation criteria described in the CBC, Chapters 16 and 18. Adherence to the City's codes and policies would ensure maximum practicable protection from unstable soils. As such, the SEIR concluded less than significant impacts would occur.

The 2012 Addendum concluded that, in accordance with Goal 2, Policy 5, a Geotechnical Feasibility Investigation has been prepared for the proposed project. The Geotechnical Feasibility Investigation recommended the completion of a design-level geotechnical investigation, which would develop detailed recommendations for design and construction. Programs 5.1, 5.2, and 5.3 of Goal 2, Policy 5 of the Public Safety Element of the

General Plan require a site-specific geotechnical engineering study and mitigation measures to mitigate potential geologic safety hazards for a project site. Mitigation measures identified by the site engineering studies must be incorporated into the project design. Consistent with these policies, a design-level geotechnical investigation was required as well as the implementation of recommended design features to ensure geologic stability. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

As discussed above, the project site is within an established liquefaction hazard zone. Addition of a fifth story and 31 additional units to the podium building would, like the approved project, require implementation of applicable General Plan goals, policies, and programs as well as a design-level geotechnical investigation. As such, the proposed project would be designed consistent with a site-specific geotechnical report to ensure that the potential impacts of developing on unstable soil would be reduced. Therefore, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Expansive Soils

Would the project: *Be located on expansive soil, creating substantial direct or indirect risks to life or property?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that expansive soils are typically found within the upper 5 feet of ground surface and are often found in low-lying alluvial valleys such as the valley in which the City of Pleasanton is located. The SEIR indicated that adherence to the City's codes and policies, and the CBC, Chapter 16 and 18, would ensure maximum practicable protection from expansive soils would be implemented, thereby reducing impacts to a less than significant level. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum concluded that, in accordance with Goal 2, Policy 5, a Geotechnical Feasibility Investigation had been prepared for the project. The Geotechnical Feasibility Investigation indicated that the project site is underlain by areas of moderately expansive silty clay. It was recommended that conventionally reinforced slabs-on-grade constructed at grade should have sufficient reinforcement and be supported on a layer of non-expansive fill and footings should extend below the zone of seasonal moisture fluctuation. Programs 5.1, 5.2, and 5.3 of Goal 2, Policy 5, of the Public Safety

Element of the General Plan requires a site-specific geotechnical engineering study and mitigation measures to mitigate potential geologic safety hazards for a project site. Mitigation measures identified by the site engineering studies must be incorporated into the project design. Consistent with these policies, the project was required to implement a design-level geotechnical investigation and implement recommended mitigation measures. The project would not introduce any new impacts related to expansive soils not previously disclosed. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the SEIR and the 2012 Addendum, expansive soil has been identified at the project site. Addition of a fifth story and 31 additional units to the podium building would, like the approved project, require implementation of applicable General Plan goals, policies, and programs as well as a design-level geotechnical investigation. As such, the proposed project would be designed consistent with a site-specific geotechnical report to ensure that the potential impacts expansive soils would be reduced. Therefore, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

e) Wastewater Disposal Systems

Would the project: *Have soils incapable of supporting the use of septic tanks or other alternative wastewater disposal systems where sewers are not available?*

Summary of Housing Element Update SEIR and Addendum

The SEIR did not analyze the use of septic tanks. However, the 2012 Addendum concluded the project would be required to connect to the City sewer system and would not utilize a septic tank or alternative wastewater disposal system. As such, no impact would occur with regards to the use of a septic system or alternative wastewater disposal system.

Proposed Project Analysis and Conclusion

The proposed project would connect to the City sewer system and would not utilize a septic tank or alternative wastewater disposal system. Addition of the fifth floor or 31 units to the podium building would not change this design. As such, no impact would occur and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

f) Destruction of Paleontological Resource or Unique Geologic Feature

Would the project: *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded (see Section 4-D, Cultural Resources) that Pleasanton is directly underlain by Quaternary Alluvium, which is unlikely to contain vertebrate fossils. However, it is possible that the City is also underlain by older Quaternary deposits that are known to contain vertebrate fossils. Fossils have been found within 5 miles of areas in similar deposits. Therefore, the City has moderate paleontological sensitivity. While shallow excavation or grading is unlikely to uncover paleontological resources, deeper excavation into older sediments may uncover significant fossils.

If a paleontological resource is uncovered and inadvertently damaged, the impact to the resource could be substantial. As previously indicated, the City has moderate paleontological sensitivity, and it is possible that paleontological resources could be disturbed during deeper construction activities such as the excavation of the underground garage. Therefore, implementation of the proposed project could result in significant impacts to paleontological resources. The City requires a standard condition of approval for projects requiring Planning Department approval that would require that all construction stop in the event that paleontological resources were uncovered during excavation. With implementation of this standard condition, future projects in the Planning Area would be expected to have a less than significant effect on unknown paleontological resources. In addition, the SEIR included MM 4.D-3, which requires construction activity to cease in the event that paleontological resources are encountered during the course of development. As such, the SEIR concluded impacts would be less than significant with mitigation.

The 2012 Addendum to the SEIR concluded no changes have occurred that would change the conclusion of the SEIR. As such, impacts would continue to be less than significant with mitigation.

Proposed Project Analysis and Conclusion

The proposed project would not require any new ground disturbance that was not analyzed in the SEIR and the 2012 Addendum. The City standard conditions of approval and mitigation measure that were identified in the SEIR and identified as applicable in the 2012 Addendum would still be applicable to the project, which would reduce the potential impact to

paleontological resources. Implementation of the additional fifth story and associated residences would not change the need for or prohibit the implementation of MM 4.D-3.

The impact would be less than significant with the implementation of mitigation and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Geology, Seismicity, and Soils, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. MM 4.D-3 from the SEIR would be required and would reduce potential impacts to below a level of significance consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

MM 4.D-3 In the event that paleontological resources are encountered during the course of development, all construction activity must temporarily cease in the affected area(s) until the uncovered fossils are properly assessed by a qualified paleontologist and subsequent recommendations for appropriate documentation and conservation are evaluated by the Lead Agency. Excavation or disturbance may continue in other areas of the site that are not reasonably suspected to overlie adjacent or additional paleontological resources.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
VIII. Greenhouse Gas Emissions <i>Would the project:</i>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant impact	No	No	No	None
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant impact	No	No	No	None

Discussion

a, b) Greenhouse Gas Emissions Generation and Greenhouse Gases Emissions Reduction Plan Conflict

Would the project: a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

b) *Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that, because the quantifiable thresholds established in the BAAQMD 2011 Air Quality Guidelines were based on AB 32 reduction strategies, a project cannot exceed the numeric thresholds without also conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The SEIR utilized the

BAAQMD's 2011 plan-level threshold of 6.6 metric tons of carbon dioxide equivalent (MT CO₂e) per service population (SP) per year to determine significance.

The SEIR quantified emissions from the development of the project site as a component of the development facilitated by the Housing Element and associated rezonings. URBEMIS2002 and the BAAQMD's Greenhouse Gas Model (BGM) were used to quantify emissions in the SEIR. For the analysis included in the 2012 Addendum, the CalEEMod program was used to estimate construction and operational emission of greenhouse gases for the proposed project.

Project construction emissions were calculated in the 2012 Addendum as 2,471 MT CO₂e, to be emitted over the construction period. Construction emissions are generally considered separately from operational emissions because construction emissions are a one-time event, while operational emissions would be continuous over the life of the project. The 2010 Air Quality Guidelines do not contain a threshold for construction generated greenhouse gases but recommend quantification and disclosure of these emissions.

Total operational emissions were estimated at 2,883 MT CO₂e in the 2012 Addendum. The SEIR indicates an average of 2.79 persons per household. Therefore, the project is assumed to accommodate 851 residents. The number of employees is unknown. At an SP of 851, the project would generate approximately 3.4 MT CO₂e per service person at year 2020. The addition of project employees would further reduce the MT CO₂e per service person. Therefore, the project would not exceed the BAAQMD's 2011 thresholds and would not have a significant generation of greenhouse gases.

The City adopted a Climate Action Plan as part of the adoption of the SEIR. As described in the SEIR, the Climate Action Plan includes the project site in its community-wide analysis of VMT and associated greenhouse gas emissions. The SEIR analysis of the Climate Action Plan shows that the City of Pleasanton can meet a community-wide 2020 emissions reduction target that is consistent with the provisions of AB 32, as interpreted by BAAQMD. The SEIR further found that the Housing Element, associated rezonings, and Climate Action Plan would improve the local jobs-housing balance and provide for additional greenhouse gas emissions mitigation and would not conflict with AB 32 or any plan, policy, or regulation regarding greenhouse gases. The project assessed in the 2012 Addendum would construct 305

dwelling units and 7,520 square feet of retail space on a mixed-use site, consistent with the parameters analyzed within the SEIR. Therefore, the project would not conflict with City's Climate Action Plan or any other applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded that applying the City's General Plan Policies and Climate Action Plan, the project would not result in the City exceeding the levels set forth above. As such, impacts were found to continue to be less than significant.

Proposed Project Analysis and Conclusion

GHG emissions associated with development of the proposed project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal.

The City of Pleasanton's Council adopted an updated Climate Action Plan (CAP 2.0) in February 2022, with minor revisions in February 2023. CAP 2.0 updates the City's original CAP, which was adopted in 2012. CAP 2.0 outlines local actions to reduce GHG emissions, enhance environmental sustainability, and prepare for climate change.⁸

To assess the modified proposed project's generation of GHG emissions and their potential to cause a significant impact, the proposed project is analyzed for its consistency with the City's CAP 2.0. In regard to demonstrating project consistency with applicable GHG plans, the proposed project must be consistent with a local GHG reduction strategy (BAAQMD Threshold B) or meet the minimum project design elements recommended by BAAQMD (BAAQMD Threshold A). Threshold B is being applied to the analysis of this project as the City has adopted a qualified CAP that includes a CAP Consistency Checklist.

Construction GHG Emissions

GHG emissions associated with development of the proposed project would occur short-term from construction activities, consisting primarily of emissions

⁸ City of Pleasanton. 2024. Key Initiatives, Climate Action Plan. Website: <https://www.cityofpleasantonca.gov/our-government/key-initiatives/climate-action-plan/>. Accessed September 20, 2024.

from equipment exhaust and worker and vendor trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions. BAAQMD encourages the incorporation of BMPs during construction. As noted in the project description, the project plans and specifications incorporate a construction emissions minimization plan designed to reduce the creation of construction-period TACs. The construction emissions minimization plan may also reduce GHG emissions during construction where feasible and applicable. Therefore, the construction GHG emissions would have less than significant impact and would not conflict with any GHG plans or policies.

Operational GHG Emissions

To assess operational-related GHG emissions and their potential to cause a significant impact, the proposed project is analyzed for its consistency with the City's CAP 2.0. In regard to demonstrating project consistency with applicable GHG plans, the proposed project will similarly demonstrate consistency with City and State GHG reduction strategies and goals and result in less than significant CEQA impacts through compliance with the CAP 2.0 GHG Emission Compliance Checklist.

The CAP 2.0 Checklist sets forth several strategies for GHG reductions across areas including energy, waste, and water. The proposed project (including the additional fifth floor and associated 31 dwelling units) will be subject to and comply with the requirements generally applicable to new construction and covered projects (which includes new residential construction), accounting for economic and technological feasibility considerations as allowed by CAP 2.0. As noted in the CAP 2.0 Checklist, a completed copy of the Checklist is required to accompany discretionary applications submittals. Some examples of GHG reduction measures consistent with CAP 2.0 are presented below:

Green Building Standards

- The proposed project will comply with the latest version of mandatory measures in the California Green Building Standards Code (CALGreen).

Energy

- The proposed project will include installation of solar photovoltaics (PV) systems at time of new construction that meet the power needs of the additional 31 dwelling units.

- The proposed project will install electric vehicle charging infrastructure as required by code standards.

Waste

- The proposed project will comply with Municipal Code requirements for cement and asphalt recycling and reuse.

Water

- The proposed project will comply with Municipal Code requirements and the City's Water Efficient Landscape Ordinance.

As noted above, the proposed project is consistent with the CAP 2.0. The proposed project (the additional fifth floor and associated 31 dwelling units) would also be constructed in conformance with the 2022 CALGreen and the Title 24 Building Codes, which requires high-efficiency water fixtures, water efficient irrigation systems, and compliance with current energy efficiency standards. Compliance with these standards ensures compliance with State and federal plans, policies, and regulations applicable to GHG emissions. Thus, the proposed project would result in a less than significant impact.

Therefore, the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Greenhouse Gas Emissions, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
IX. Hazards and Hazardous Materials <i>Would the project:</i>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant impact	No	No	No	None
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?	Less than significant impact with mitigation incorporated	No	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant impact	No	No	No	None
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section	Less than significant impact with mitigation incorporated	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
65962.5 and, as a result, would it create a significant hazard to the public or the environment?					
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?	Less than significant impact with mitigation	No	No	No	MM 4.G-5 (part c.)
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	No impact	No	No	No	None
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
h) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	Less than significant impact	No	No	No	None

Discussion

a) Routine Transport, Use, or Disposal of Hazardous Materials

Would the project: *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that residential and retail development consistent with the proposed Housing Element would involve demolition activities and use of construction equipment that would require the use of hazardous materials such as fuel or solvents. These materials could accidentally spill and may cause a potentially significant impact to the public and/or environment. However, the SEIR indicated development such as the proposed project would be required to comply with all applicable regulations for management of hazardous materials during construction and demolition. These policies include Title 22 and 26 of the California Code of Regulations governing hazardous material transport, Title 8 Standards for handling asbestos and lead during demolition/construction, and Title 19 of the California Code of Regulations and Chapter 6.95 of the Health and Safety Code for site remediation. In addition, the Pleasanton General Plan's Public Safety Element's Goal 5 and Policies 16 through 19 include regulations regarding the use and transport of hazardous materials and waste. Compliance with these regulations would ensure potential hazards resulting from the use of hazardous materials during construction activities would be less than significant. Furthermore, because the project site does not contain

any buildings or structures, it is unlikely that demolition activities would encounter lead or asbestos.

The SEIR also concluded that new residential development, such as the proposed project, may routinely use commonly available hazardous substances such as fuels, lubricants, and household cleaners. The project would also consist of retail operators that would be likely to use similar substances. However, such use typically consists of limited quantities and would not be expected to present a significant risk to the environment. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded no changes have occurred to the project site or to the proposed development that would alter the conclusion of the SEIR. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

Construction of the fifth floor and 31 residential units within the podium building would not change the transport, use, or disposal of hazardous materials at the project site. Consistent with the SEIR and the 2012 Addendum to the SEIR, the proposed project would comply with all applicable regulations for management of hazardous materials during construction, as well as the Pleasanton General Plan's Public Safety Element's goals and policies. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Hazardous Materials Risk of Upset

Would the project: *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?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that construction of residences and retail uses on sites for rezoning would disturb soils that could be contaminated from past releases of hazardous substances into the soil or groundwater. The project site was not identified in the SEIR as potentially containing contaminated soil or groundwater. Nonetheless, implementation of MM 4.G-2 as required by the SEIR required both the preparation of a Phase I Environmental Site Assessment (ESA) to determine the potential presence of on-site contamination and the provision of documentation indicating that any on-

site contamination has been appropriately remediated. As such, with the implementation of MM 4.G-2 and adherence to General Plan Policy 17, the SEIR concluded that impacts would be less than significant with mitigation.

As a part of the 2012 Addendum a Phase I ESA was prepared for the project site, which indicated no evidence of recognized environmental constraints such as contaminated soil or groundwater are present at the project site. As such, with the implementation of MM 4.G-2, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

On-site conditions have not changed such that contaminated soil or groundwater have been identified on-site. Construction of the proposed project would not change this condition nor would it introduce any new impacts related to hazardous material upset or accident that was not analyzed in the SEIR and the 2012 Addendum. MM 4.G-2 has already been implemented and is satisfied; no further mitigation is necessary. Impacts would be less than significant, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) Hazardous Emissions Proximate to a School

Would the project: *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the that development facilitated by the Housing Element would not result in the handling of significant quantities of hazardous materials, substances, or wastes; therefore, risk of hazardous material releases within the vicinity of schools would be less than significant.

The 2012 Addendum to the SEIR concluded the project site is not located within 0.25 mile of a school and, therefore, would not introduce any new impacts related to hazardous materials in proximity to schools not previously disclosed. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

The Cozy Nest Daycare is approximately 200 feet northeast of the project site and the Kidsplanet Daycare is approximately 0.25 mile west of the project site. Furthermore, a daycare center is now planned for the northwestern corner of the project site. However, as stated above, the proposed project

would not require the handling of significant quantities of hazardous materials, substances, or wastes and addition of the fifth floor and 31 residences to the podium building would not change this conclusion. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Hazardous Materials Sites, Government Code Section 65962.5 Sites

Would the project: *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?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that development of sites known to be contaminated by hazardous materials or wastes could occur on potential sites for rezoning. However, the project site was not identified by the SEIR as containing hazardous materials. Nonetheless, the SEIR indicated that with implementation of MM 4.G-2 and adherence to General Plan Policy 17 would ensure impacts related to hazardous material sites are addressed. As such, the SEIR concluded that impacts would be less than significant with mitigation.

As a part of the 2012 Addendum a Phase I ESA was prepared for the project site in accordance with MM 4.G-2 confirming the site is not included on a list of hazardous materials sites. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

According to the California State Water Resources Control Board (State Water Board) GeoTracker database and the California Department of Toxic Substances Control (DTSC) EnviroStor database, the project site is not on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List). As indicated, MM 4.G-2, requiring a Phase I ESA, has been satisfied for the project site and no on-site contamination or site listing has been identified. No further mitigation is applicable or necessary. Construction of the fifth floor and 31 residences would not change this conclusion. The impacts would be less than significant, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

e) and f) Public and Private Airport Safety

Would the project: *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?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that a conflict between the Livermore Municipal Airport Land Use Compatibility Plan (ALUCP) and potential rezoning sites for housing development was not anticipated. However, at the time the SEIR was written, the ALUCP was being revised; therefore, the SEIR indicated that, without specific project site details and a newly adopted ALUCP, additional analysis regarding residential development consistency with the Livermore Municipal Airport would be speculative. As such, the SEIR included MM 4.G-5 requiring compliance with the ALUCP and verification of compliance with the Federal Aviation Administration (FAA) Part 77 air space. As such, the SEIR concluded impacts would be less than significant with mitigation.

The SEIR concluded that no private airstrips exist in the vicinity of the City and therefore no related impacts would occur.

The 2012 Addendum concluded that the project site is located approximately 3 miles west of the Livermore Municipal Airport and is not within Airport Protection Area (APA), Airport Influence Area (AIA), or Federal Aviation Regulation (FAR) Part 77 height restriction space as indicated in the ALUCP. Furthermore, none of the proposed on-site buildings would exceed 200 feet in height.

The 2012 Addendum indicated that MM 4.G-5 (part a) does not apply and the project site is not regulated by the newly adopted ALUCP. Furthermore, MM 4.G-5 (part b) does not apply to the project. However, as required MM 4.G-5 (part c), prior to the issuance of a grading or building permit for the proposed project, verification of compliance with the FAA Part 77 would be required. With the implementation of this mitigation the project would not introduce any new impacts related to air safety not previously disclosed. As such, impacts would continue to be less than significant with mitigation.

The SEIR concluded that no private airstrips exist in the vicinity of the City and therefore no related impacts would occur. Similarly, the 2012 Addendum indicated that no changes have occurred that would result in potential impacts related to private airstrips and, as such, no impact would continue to occur.

Proposed Project Analysis and Conclusion

The addition of the fifth floor and 31 residential units to the podium building would modify the total height of the podium building to 68 feet and 11 inches from the existing grade to the podium building roof.

As discussed above, the project site is not within the APA, AIA, or FAR Part 77 height restriction space as indicated in the ALUCP.

Consistent with the SEIR, the podium building would not exceed 200 feet in height. Consistent with the 2012 Addendum to the SEIR, MMs 4-G (parts a and b) would not apply to the proposed project. However, MM 4.G-5 (part c) would apply and would require verification of compliance with the FAA Part 77 prior to the issuance of a grading or building permit. As such, impacts would be less than significant with the implementation of mitigation, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

g) Emergency Response and Evacuation

Would the project: *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that the buildout of the proposed Housing Element would not interfere with current guidelines set forth in the Pleasanton Comprehensive Emergency Management Plan. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum concluded no changes have occurred that would alter the conclusion of the SEIR. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

No changes have occurred that would alter the conclusions made in the SEIR and the 2012 Addendum. The proposed project would not interfere with current guidelines for emergency response and evacuation. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

h) Wildland Fires

Would the project: *Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that all the sites considered for rezoning, including the project site, are located outside of the designated wildland-urban interface threat areas within Pleasanton. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum concluded the project would be required to comply with policies of the Public Safety Element of the City of Pleasanton General Plan and the Pleasanton Building Code that set standards for building sprinklers, fire response systems, and built-in fire protection systems. No changes have occurred to the status of the project site's location outside of the wildland-urban interface area. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

No changes have occurred to the status of the project site's location outside of the wildland-urban interface area. Consistent with the SEIR and the 2012 Addendum, the project would be required to comply with policies of the Public Safety Element of the City of Pleasanton General Plan and the Pleasanton Building Code that set standards for building sprinklers, fire response systems, and built-in fire protection systems. As such, the impact would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Hazards and Hazardous Materials, the consistency checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the Housing Element Update FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the Housing Element Update FEIR.

4. MM 4.G-5 (part c.) from the SEIR would be required and would reduce potential impacts to below a level of significance consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

MM 4.G-5c The following condition shall be included in any PUD development approval : Prior to the issuance of a grading permit or building permit, whichever is sooner, the project applicant shall submit verification from the FAA, or other verification to the satisfaction of the City Engineer or Chief Building Official, of compliance with the FAA Part 77 (Form 7460 review) review for construction on the project site.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification	
X. Hydrology and Water Quality <i>Would the project:</i>					
a) Violate any water quality standards or waste discharge requirements?	Less than significant impact	No	No	No	None
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?	Less than significant impact	No	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion	Less than significant impact	No	No	No	None

Addendum Checklist

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification	
or siltation on-site or off-site?					
(d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site?	Less than significant impact				
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than significant impact	No	No	No	None
f) Otherwise substantially degrade water quality?	Less than significant impact	No	No	No	None
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification	
Rate Map or other flood hazard delineation map?					
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows;	Less than significant impact	No	No	No	None
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less than significant impact	No	No	No	None
j) Result in inundation by seiche, tsunami or mudflow?	Less than significant impact	No	No	No	None

Discussion

a) , d), e), f) Water Quality, Flooding or Polluted Runoff

Would the project: *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? Or*

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site? Or

Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? Or

Otherwise substantially degrade water quality?

Summary of Housing Element Update SEIR and Addendum

The SEIR stated that development projects facilitated by the Housing Element, specifically those on the potential sites for rezoning, could affect drainage patterns and create new impervious surfaces that cause changes to stormwater flows and water quality. However, compliance with the Alameda Countywide Clean Water Program (ACCWP) NPDES Permit and implementation of the related Construction Storm Water Pollution Prevention Program (SWPPP) would require future development at potential sites for rezoning to incorporate BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Further, the C.3 provision of the ACCWP NPDES Permit requires that there be no net increase in stormwater rates and runoff at a potential site for rezoning after project construction through preparation of a hydromodification and stormwater management plan. Development proposals, including grading and drainage plans will be reviewed by the City's Engineering Division of the Community Development Department for compliance with City ordinance codes regarding flooding and drainage (including properly sized storm sewers and building within FEMA flood hazard zones). For these reasons, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum to the SEIR concluded the proposed project would not introduce any new water quality, flooding, or polluted runoff related impacts not previously disclosed in the SEIR. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would include the addition of a fifth floor (and 31 additional residential units) to the podium building. The addition of the fifth floor would not require more ground disturbance than what was already analyzed in the SEIR and the 2012 Addendum. Consistent with the SEIR and the 2012 Addendum, the proposed project would be required to comply with the NPDES General Permit and would be required to prepare and implement a SWPPP and its associated BMPs. As such, impacts would be less than significant, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Groundwater

Would the project: *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Summary of Housing Element Update SEIR

The SEIR concluded that development of impervious surfaces on rezoning sites could potentially reduce groundwater infiltration and that the addition of new housing and retail space would result in an increase in consumption of municipal water supply, which could potentially increase demand on groundwater supplies. However, the SEIR concluded impacts would be less than significant because the City has already planned for the residential growth and because the Housing Element includes policies to protect water supplies. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum concluded because the development of the project site was considered in the SEIR and is now included in the City of Pleasanton's General Plan, the project site's growth has been included in future water supply planning and would not deplete groundwater supplies. Furthermore, the project site currently contains mostly impervious surfaces in the form of parking lots and does not provide substantial groundwater recharge. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would include the addition of a fifth floor (and 31 additional residential units) to the podium building. The construction of the proposed project would not introduce any new impacts related to the use of groundwater or groundwater recharge. Impervious surface amounts would not be altered. The addition of a fifth floor to the podium building and related 31 residential units may result in additional demand for groundwater supplies. However, the number of residential units on-site would still be below the 420 units analyzed in the SEIR and planned for by the City. As such, impacts would be less than significant, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) Drainage Resulting in Erosion or Flooding

Would the project: *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on-site or off-site?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that through the compulsory implementation of NPDES Construction General Permit requirements, including preparation of a SWPPP, compliance with Goal 6 of the Public Facilities and Community Programs Element of the General Plan, and, once constructed, implementation of C.3 requirements, development of housing sites would have less than significant impacts with respect to on-site and off-site erosion or flooding.

The 2012 Addendum indicated that the project would be required to demonstrate compliance with these regulations as part of issuance of building and/or grading permits. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

Construction of the podium building would abide by the above-mentioned regulations. Addition of the fifth floor and 31 residential units to the podium building would not prohibit the compliance and implementation of applicable regulations related to erosion flooding. As such, the impact would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

g), h), i), j) Flood Hazard

Would the project: *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? Or*

Place within a 100-year flood hazard area structures that would impede or redirect flood flows? Or

Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? Or

Result in inundation by seiche, tsunami or mudflow?

Summary of Housing Element Update SEIR

The SEIR concluded that development proposals resulting from the Housing Element would be reviewed by the City's Engineering Division of the Community Development Department for compliance with City ordinance codes regarding flooding and drainage, including properly sized storm sewers and building within FEMA flood hazard zones. The SEIR concluded that no impacts would occur related to seiche, tsunami, or mudflow because the City is inland from the ocean and in a relatively flat area. Furthermore, the SEIR indicated that most of the City of Pleasanton is within the 5- to 40-minute inundation area in the event of the failure of Del Valle Dam. However, catastrophic dam failure is considered highly unlikely. The SEIR indicated that compliance with applicable regulations would ensure that the impacts of development within flood hazard zones would be less than significant or, in the case of seiche, tsunami or mudflow, no impact would occur.

The 2012 Addendum concluded that the project is not located in significant flood hazard zone, a levee failure zone, or in a location susceptible to seiche, tsunami, or mudflow. As such, the impacts would continue to be less than significant or in the case of seiche, tsunami, or mudflow no impact would occur.

Proposed Project Analysis and Conclusion

The addition of the fifth floor and associated 31 residential units would not change the potential for inundation to occur on-site. Impacts would be less than significant, or in the case of seiche, tsunami, or mudflow no impact, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Hydrology and Water Quality, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously

Certified SEIR or an impact which is more severe than shown in the Certified SEIR.

4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification	
XI. Land Use and Planning Would the project:					
a) Physically divide an established community?	Less than significant impact	No	No	No	None
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?	Less than significant impact	No	No	No	None
c) Conflict with any Habitat Conservation Plan or Natural Communities Conservation Plan	Less than significant impact	No	No	No	None

Discussion

a) Division of an Established Community

Would the project: *Physically divide an established community?*

Summary of Housing Element Update SEIR and 2012 Addendum

The SEIR indicated that sites selected for rezoning met certain criteria established by the City as being suitable for multi-family housing development, including compatibility with surrounding residential development and location within existing neighborhoods. As such, the SEIR concluded construction of residential units and retail as allowed by the Housing Element would result in less than significant impacts related to the division of an established community.

The 2012 Addendum concluded that the project would be consistent with surrounding uses and therefore would not introduce any new impacts in this regard. Impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The addition of the fifth floor and 31 residences to the podium building would be consistent with surrounding existing uses and would not physically divide an established community. As such, the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Conflict with Applicable Land Use Plans, Policies, or Regulations

Would the project: *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?*

Summary of Housing Element Update SEIR and 2012 Addendum

The SEIR indicated that several of the potential sites for rezoning are located in areas that could result in conflicts with General Plan policies related to air quality and noise, due to their proximity to point sources of air pollution and to noise sources, if not properly addressed. However, the SEIR indicated that compliance with mitigation set forth in SEIR Section 4.B, Air Quality and 4.J, Noise, as well as consistency with applicable policies of the Housing Element would ensure that sites rezoned for residential and retail development would be consistent with the General Plan and as such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum indicated that the project is consistent with the vision of the Hacienda Business Park to move toward more mixed-use development. The project's residential and commercial use is also consistent with the General Plan designation of Business Park/Mixed Use. The 2012 Addendum also concluded that the project would be consistent with the PUD – HDR zoning designation as well as applicable zoning requirements, such as density and parking. In addition, the project was designed to be consistent with the Housing Site Development Standards and Design Guidelines including the provision of pedestrian and bicycle connections, group usable open space, landscaping, and lighting.

Furthermore, the project was required to go through the PUD process ensuring consistency with the Housing Site Development Standards and Design Guidelines and Hacienda Business Park Design Guidelines. As such,

the 2012 Addendum concluded that because the project was designed to be consistent with existing General Plan and Zoning Designations, as well as the Housing Site Development Standards and Design Guidelines, and because the project required additional PUD review, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would add a fifth floor and the associated 31 residential units to the podium building. The project site would continue to consist of mixed uses and would therefore continue to be consistent with General Plan land use designations. The proposed project would increase on-site residential density from the approved 36.3 housing units per acre to 40 housing units per acres. This is consistent with the allowable PUD-HDR zoning density of no more than 40 housing units per acre. The additional residential units would be constructed consistent with the design of the approved podium building and would continue to be consistent with Housing Site Development Standards and Design Guidelines. As such, the proposed project would not introduce any new impacts in this regard. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) Conflict with habitat or natural communities plan

Would the project: *Conflict with any applicable Habitat Conservation Plan or Natural Communities Conservation Plan?*

Summary of Housing Element Update SEIR and 2012 Addendum

The SEIR concluded that no impact would occur with respect to conflicts with a habitat or Natural Community Conservation Plan because the City is not located within such a designated area.

The 2012 Addendum indicated that no changes occurred that would alter this conclusion.

Proposed Project Analysis and Conclusion

No changes have occurred that would alter this conclusion. No impacts would occur and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Land Use and Planning, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XII. Mineral Resources <i>Would the project:</i>					
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?	No impact	No	No	No	None
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?	No impact	No	No	No	None

Discussion

a, b) Loss of Minerals Resources of Statewide or Local Importance

Would the project: 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?*

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?*

Summary of Housing Element Update SEIR and Addendum

The Housing Element Update FEIR indicated that most of the sites are urban infill sites and are developed or partially developed with existing uses and concluded that no activities related to mineral resources currently occur within the potential sites for housing and none of the sites are designated for this use. These conditions preclude the possibility of impacts on mineral resources; therefore, the SEIR concluded that there would be no impacts associated with mineral resources.

The 2012 Addendum to the SEIR concluded that no changes have occurred that would alter the conclusion of the SEIR in this respect. As such, the project would continue to have no impact.

Proposed Project Analysis and Conclusion

No changes have occurred that would alter the conclusion of the SEIR and the 2012 Addendum. As such, no impact would occur and the proposed project would not result in a new or more severe adverse impact that would not previously identified in the SEIR.

Conclusion

With regards to Mineral Resources, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			New Information, More Severe Adverse Impact?
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XIII. Noise <i>Would the project:</i>					
a) Expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.J-1 and MM 4.J-6c
b) Expose persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less than significant impact with mitigation incorporated	No	No	No	None
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than significant impact with mitigation incorporated	No	No	No	None
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.J-1 and MM 4.J-6c
e) For a project located within an	No impact	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			New Information, More Severe Adverse Impact?
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, would the project expose people residing or working in the project area to excessive noise levels?					

Discussion

a) Substantial Noise Increase in Excess of Standards or Existing Levels

- Would the project:
- a) *Expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*
 - c) *Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*
 - d) *Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Construction

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that construction activities on rezoning sites would involve the use of heavy equipment, in addition to small power tools, generators, and hand tools that would be sources of noise. Noise would vary based on construction location relative to receptors and type and quantity of construction equipment. The SEIR concluded that because the development projects would be required to comply with Municipal Code 9.04.100, individual project construction equipment would not produce a

noise in excess of 83 decibels (dB) equivalent noise level (L_{eq}) at a distance of 25 feet, nor would total construction noise exposure exceed 86 dB L_{eq} outside of project boundaries. In addition, to ensure construction noise resulting from project development resulted in less than significant impacts, the SEIR included MM 4.J-1, which requires the project to comply with applicable construction noise exposure criteria. As such, the SEIR concluded impacts would be less than significant with mitigation.

The 2012 Addendum concluded the nearest sensitive receptors to the project site consists of multi-family residences located approximately 160 feet to the southwest and approximately 180 feet to the southeast. As indicated in Table 4.J-5 of the SEIR, the use of pneumatic tools would be one of the loudest pieces of construction equipment with an 85 dB maximum noise level (L_{max}) at 50 feet. At a distance of 160 feet pneumatic tool noise would be at a level of approximately 75 dB L_{max} and would not exceed the acceptable maximum noise levels at the nearby receptors. However, MM 4.J-1 would still be required and with its implementation, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

Construction

No additional equipment or additional construction phases are necessary to implement the proposed project beyond what was previously evaluated in the SEIR and Addendum and approved by the City. As the 2012 Addendum requires and consistent with the SEIR, the project would abide by construction noise limits outlined by Municipal Code 9.04.100 and would be required to implement MM 4.J-1. As such, the project would not introduce any new impacts related to construction noise not previously identified in the SEIR and impacts would continue to be less than significant with the implementation of mitigation

Operation

Traffic Noise Impacts

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that traffic noise level increases from traffic pattern changes due to the land use changes on the rezoning sites would be expected in the range of 1 to 3 dB along some roadway segments. The SEIR concluded that project-related traffic noise level increases of 1 dB along two segments (Hopyard Road between West Las Positas Boulevard and Valley Avenue, and Stoneridge Drive between West Las Positas Boulevard and

Santa Rita Road) may increase traffic noise exposure to above 60 dB day/night average noise level (L_{dn}) within single-family residential back yards and therefore would be potentially significant.

The SEIR also considered roadway noise impacts in the cumulative (year 2035) noise scenario. Potentially significant, cumulatively considerable traffic noise increases were identified along two additional roadway segments: Stoneridge Drive between Johnson Drive and Hopyard Road, and Hopyard Road between Stoneridge Drive and West Las Positas Boulevard. At these locations, increased traffic noise exposure may exceed the City's 60 dB L_{dn} limit within neighboring single-family residential backyards and therefore, would also be potentially significant.

As a part of the 2012 Addendum, to determine the project's potential contribution to these traffic noise impacts, a Noise Assessment Study was prepared by Edward L. Pack Associates, Inc. dated December 17, 2012 (Appendix G of the 2012 Addendum).⁹ As indicated therein, project-generated traffic noise exposure would be below the 60 dB L_{dn} limit of the City of Pleasanton Noise Element standards at all receptor locations along roadways identified in the Traffic Impact Analysis prepared by Fehr & Peers in support of the 2012 Addendum (Appendix H of the 2012 Addendum).¹⁰

The roadway segments identified in the SEIR as having potentially significant impacts under the project and cumulative scenarios are not located in the project vicinity. The Noise Assessment Study focused on roadway segments in the project vicinity, which would experience the greatest increase in traffic noise. For the 2012 project, the segment of West Las Positas from Stoneridge Drive to Santa Rita Road (nearest to the impacted segment of Stoneridge Drive identified in the SEIR) would experience a traffic generated noise exposure of 42 to 51 dB L_{dn} , well below the acceptable 60 dB L_{dn} limit.

The 2012 Addendum concluded that because all impacted roadway segments identified in the SEIR are located farther away from the project site, the project's contribution would be even smaller and would not represent a considerable contribution to the existing plus project or cumulative impacts identified in the SEIR. As such, the 2012 project would not introduce any new project-related traffic noise impacts not previously disclosed. Impacts related

⁹ Edward L. Pack Associates, Inc. 2012. Noise Assessment Study. December 17.

¹⁰ Fehr & Peers. 2012. Traffic Assessment for Residences at California Center.

to the project as considered in 2012 would be less than significant and less than those concluded in the SEIR.

The SEIR also concluded that developments on rezoned sites may be exposed to exterior traffic noise in excess of 65 dB and interior traffic-related noise exposure in excess of the acceptable 45 dB L_{dn} threshold; therefore, impacts would be potentially significant. Residential development is required to comply with Title 24 of the California Code of Regulations, which requires an interior noise exposure of 45 dB L_{dn}/CNEL or less within any habitable room and requires an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard. To ensure compliance and reduce impacts to less than significant, the SEIR included MM 4.J-5b and 4.J-5c, which requires buildings to be built to California interior noise insulation standards and any locations of outdoor activity for sensitive uses associated with the project site be designed so that the noise exposure from traffic does not exceed 65 dB L_{dn} at these activity areas. As such, the SEIR concluded impacts would be less than significant with mitigation.

The 2012 Addendum to the SEIR concluded that exterior and interior noise exposures at the proposed project site would be within the limits of the City of Pleasanton and Title 24 standards under current and future conditions. Provision of the Noise Assessment Study to the City of Pleasanton fulfilled the requirements of both MM 4.J-5b and 4.J-5c. As such, impacts would continue to be less than significant.

Stationary Operational Noise Impacts-Mechanical Equipment Operations

The SEIR concluded that development on rezoned sites could be exposed to stationary noise sources (e.g., industrial/ commercial area loading noise and late or 24-hour operations noise) and impacts would be potentially significant. To ensure impacts would be reduced to a less than significant level, the SEIR included the following MM 4.J-6a and 4.J-6c, which require, as applicable to the project, site-specific acoustical assessments to determine noise exposure, impact, and mitigation regarding non-transportation sources and noise disclosures and noise complaint procedures for new residents at the project site. As such, the SEIR concluded impacts would be less than significant with mitigation.

The 2012 Addendum concluded that a Noise Assessment Study was prepared for the project and indicated that no additional measures were needed to ensure that interior or exterior noise levels remain below acceptable standards. While the project site is located adjacent to a

commercial area that includes a Walmart and Kohl's department store, loading areas for these establishments are located on the far side of the buildings, away from the project site, and the Noise Assessment Study indicated that traffic associated with the retail center does not significantly affect the noise environment. The Noise Assessment Study indicated that exterior and interior noise levels would be below acceptable levels at the project site and no additional measures would be needed to attenuate noise levels. As such, the Noise Assessment Study fulfills the requirements of MM 4.J-6a. With the implementation of MM 4.J-6c, requiring implementation of noise disclosures and noise complaint procedures, impacts would continue to be less than significant with mitigation.

Proposed Project Analysis and Conclusion

Stationary Noise

Addition of the podium building fifth floor and associated 31 residential units would not introduce any new stationary noise source exposure. As indicated in the Noise Assessment Study, exterior and interior noise levels would be below acceptable levels for the project site. The additionally proposed fifth floor would not change this conclusion nor would it prohibit or change the need for or implementation of MM 4.J-6c. As such, impacts would continue to be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Construction

The proposed project modifications would include an addition of a fifth floor to the podium building and an additional 31 residential units.

The construction noise impact analysis performed for the 2012 Addendum identified that the reasonable worst-case construction noise impacts were related to the demolition, site preparation, and grading phases of construction. The addition of a fifth floor to the podium building would not alter these loudest phases of construction in any way and would not introduce any new construction noise sources and therefore would not result in any new or more severe construction noise impact than was previously identified and analyzed in the SEIR and the 2012 Addendum.

Therefore, similar to the findings of the SEIR and the 2012 Addendum, with implementation of best management noise reduction practices, required compliance of the proposed project with the noise ordinance requirements of Section 9.04.100 of the Municipal Code, and implementation of identified

MM 4.J-1, construction noise impacts would be reduced to less than significant.

Operation

Traffic Noise Impacts

The proposed project modifications would include an addition of a fifth floor to the podium building and an additional 31 residential units.

As identified in the SEIR and the 2012 Addendum, the proposed project's contribution to traffic noise levels would not represent a considerable contribution to the existing plus project or cumulative impacts.

Based on the traffic study prepared for the approved project, the 305 apartment units for the approved project would generate 156 AM and 189 PM peak-hour trips. However, the 336 apartment units of the proposed project would generate 134 AM and 171 PM peak-hour trips. This anticipated trip reduction is due to a change between the ninth and eleventh editions of the Trip Generation Manual. Therefore, the proposed project would not result in any increase in traffic noise levels compared to what was already previously identified and analyzed for the approved project.

As a result, project-related traffic noise impacts would remain less than significant without mitigation. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR or the 2012 Addendum.

Stationary Operational Noise Impacts-Mechanical Equipment Operations

The proposed project modifications would include an addition of a fifth floor to the podium building and an additional 31 residential units.

These modifications would not introduce any new stationary noise sources to the project vicinity or alter proposed stationary noise sources that were previously identified and analyzed. Therefore, the proposed project would not result in a new or more severe adverse impact related to operational stationary noise sources that was not previously identified in the SEIR or the 2012 Addendum.

b) Groundborne Vibration/Noise Levels

Would the project: *Expose persons to or generation of excessive groundborne vibration or groundborne noise levels?*

Summary of Housing Element Update SEIR

The SEIR concluded that vibration exposure at neighboring sensitive uses, which are expected to be greater than 100 feet removed from the rezoned construction sites, would not be expected to exceed the applicable criteria outlined by the California Department of Transportation (Caltrans) Transportation and Construction-Induced Vibration Guidance Manual except in situations where pile driving occurs. Should pile driving occur, the SEIR concluded that implementation of MM 4.J-2 would reduce construction-related vibration to a less than significant level. As such, the SEIR concluded impacts would be less than significant with mitigation with the implementation of mitigation.

The 2012 Addendum to the SEIR concluded the project would not introduce any new construction-related vibration impacts not previously disclosed. The project site is more than 100 feet from nearby sensitive receptors; therefore, typical construction vibration levels would not exceed acceptable levels at nearby receptors. According to the Geotechnical Feasibility Investigation (Cornerstone Earth Group 2012), project site soils can accommodate conventional shallow footings or mat foundations; therefore, pile driving would not be required, and implementation of MM 4.J-2 would not be required. As such impacts would be less than significant and no mitigation is needed.

Proposed Project Analysis and Conclusion

Construction

The addition of a fifth floor to the podium building would not result in any changes to construction-related vibration from what was previously analyzed and would not introduce any new construction vibration sources. Therefore, the proposed project would not result in any new or more severe construction vibration impact that was not previously identified and analyzed in the SEIR and the 2012 Addendum and the impact would remain less than significant.

Operation

The addition of a fifth floor to the podium building would not result in any changes to what was previously analyzed and would not introduce any new operational vibration sources. Therefore, the proposed project would not result in any new or more severe operational vibration impact that was not previously identified and analyzed in the SEIR and the 2012 Addendum and the impact would remain less than significant.

c) Excessive Noise Levels from Airport Activity

Would the project: *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?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that maximum noise levels from aircraft departures to the west from Livermore Municipal Airport may exceed the applicable 50/55 dB L_{max} criteria within habitable rooms at sites near the left-hand pattern of Runway 25L, resulting in potentially significant impacts. To ensure impacts would be reduced to a less than significant level, the SEIR included MM 4.J-7 for sites located in affected areas. As such, the SEIR concluded impacts would be less than significant with the implementation of mitigation.

The 2012 Addendum to the SEIR concluded the approved project would not introduce any new aviation noise impacts not previously disclosed. The proposed project is not located near the left-hand pattern of Runway 25L and, therefore, would not be exposed to aircraft-related noise. As such, impacts would continue to be less than significant and no mitigation is needed.

Proposed Project Analysis and Conclusion

The proposed project modifications would include an addition of a fifth floor to the podium building and an additional 31 residential units. These modifications would not change the location of the project (i.e., locate it closer to an airport) nor result in any changes to potential airport noise impacts. Therefore, implementation of the project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur. Therefore, there are no environmental effects that are peculiar to the proposed project. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR or the 2012 Addendum and no mitigation is required.

Conclusion

With regards to Noise, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. MM 4.J-1 and 4.J-6c from the SEIR would be required and would reduce potential impacts to below a level of significance, consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

- MM 4.J-1** In addition to requiring that all project developers comply with the applicable construction noise exposure criteria established within the City's Municipal Code 9.04.100, the City shall require developers on the potential sites for rezoning to implement construction best management practices to reduce construction noise, including:
- a. Locate stationary construction equipment as far from adjacent occupied buildings as possible.
 - b. Select routes for movement of construction-related vehicles and equipment so that noise-sensitive areas, including residences, and outdoor recreation areas, are avoided as much as possible. Include these routes in materials submitted to the City of Pleasanton for approval prior to the issuance of building permits.
 - c. All site improvements and construction activities shall be limited to the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday. In addition, no construction shall be allowed on State and federal holidays. If complaints are received regarding the Saturday construction hours, the Community Development Director may modify or revoke the Saturday construction hours. The Community Development Director may allow earlier "starttimes" for specific construction activities (e.g., concrete foundation/floor pouring), if it can

be demonstrated to the satisfaction of the Community Development Director that the construction and construction traffic noise will not affect nearby residents.

- d. All construction equipment must meet DMV noise standards and shall be equipped with muffling devices.
- e. Designate a noise disturbance coordinator who will be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site and shall be provided to the City of Pleasanton. Copies of the construction schedule shall also be posted at nearby noise-sensitive areas.

MM 4.J-6c The City shall require noise disclosures and noise complaint procedures for new residents at the project site. The requirement shall include a) a disclosure of potential noise sources in the project vicinity; b) establish procedures and a contact phone number for a site manager the residents can call to address any noise complaints.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XIV. Population and Housing Would the project:					
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)?	Less than significant impact	No	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than significant impact	No	No	No	None

Discussion

a) Growth Inducement

Would the project: *Induce substantial 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)?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that development of all the sites considered for rezoning could result in substantial population growth, resulting in significant impacts. However, the SEIR indicated that not all of the sites considered for rezoning would actually be rezoned and, in fact, only nine of the 21 sites

contemplated for rezoning under the SEIR have been rezoned. The remaining sites considered for rezoning are not expected to be rezoned as they are not needed to meet the City of Pleasanton's Regional Housing Needs Allocation. Furthermore, the SEIR indicated that implementation of Housing Element policies would reduce any potential impacts related to future population and housing to less than significant while still meeting Regional Housing Needs Allocation (RHNA) need and without stressing the City's current infrastructure. As such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum to the SEIR concluded that the project site is one of the nine sites that have been rezoned by the City for the development of residential uses to ensure housing allocations of the RHNA are met. Under the SEIR, the project site was contemplated as containing up to 420 residences and up to 10,000 square feet of retail space. Under the 2012 Addendum the project site was assumed to develop 305 residences that, at a rate of 2.79 persons per household, would house approximately 851 people and therefore be within the SEIR assumptions. Furthermore, the proposed 7,520 square feet of retail space would be expected to provide additional jobs, resulting in indirect population growth; however, this nominal amount of retail space would not be expected to create enough jobs to create substantial population growth. The project, as considered in the 2012 Addendum, would not include the extension of road or infrastructure that could result in indirect population growth. The project would develop less than maximum number of residential units and retail space considered in the SEIR and would assist the City in meeting the housing allocation as determined by RHNA. Furthermore, it has been designed to be consistent with the policies included in the Housing Element. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The City has a current estimated average of 2.62 persons per household, a decrease since the 2012 Addendum in which persons per household was indicated as 2.79.¹¹ The proposed project's additional 31 residences would result in approximately 87 additional residents based on the 2.79 persons per household estimate. As such, the proposed project would result in a total of 938 residents in a total of 336 residences, well within the SEIR's assumption of the 420 residences. No other changes to the project would occur that would result in direct or indirect population growth. Impacts would be less than

¹¹ State of California, Department of Finance. 2024. E-5 Population Housing Estimates for Cities, Counties and the State, 2022-2024. Website: <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/> Accessed October 3, 2024.

significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Housing Displacement/Replacement Housing

Would the project: *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Summary of Housing Element Update FEIR

The SEIR concluded that that impacts related to the displacement of existing homes, necessitating the construction of replacement housing elsewhere would be less than significant. Additionally, the SEIR concluded that development of potential sites for rezoning, such as the proposed project, would not displace residents but would build on existing neighborhoods by utilizing infill development, would be compatible with surrounding residential development, and would be consistent with land use and housing policies in the General Plan. As such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum also indicated that the project site does not contain any housing. The 2012 Addendum concluded that the project would result in the addition of 305 residences that would assist the City in meeting RHNA needs. Thus, the approved project would not result in the displacement of people or housing. As such, impacts would continue to be less than significant in this regard.

Proposed Project Analysis and Conclusion

The project site is currently being developed with residential and commercial uses. No housing previously existed on-site. The proposed project would add an additional 31 units to the residences being constructed. Therefore, the proposed project plan would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Instead, it would provide additional housing. The intended use of the proposed project site is to provide necessary housing for the City and its residents. Therefore, no impacts related to population and housing would occur and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Population and Housing, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XV. Public Services <i>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>					
a) Fire protection?	Less than significant impact	No	No	No	None
b) Police protection?	Less than significant impact	No	No	No	None
c) Schools?	Less than significant impact	No	No	No	None
d) Other public facilities?	Less than significant impact	No	No	No	None

Discussion

a) Need for New or Altered Fire Protection Facilities

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 fire protection?*

Summary of Housing Element Update SEIR and Addendum

The SEIR indicated that all the proposed rezoning sites, including the project site, are located within a 5-minute response radius of a fire station; and, as required by the General Plan's Public Safety Element, Program 8.2, new development would be required to pay for related fire safety improvement needs it generated. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded the proposed project would result in an increase in demand for fire protection. However, the project is located approximately 0.4 mile from the nearest fire station, is within a 5-minute response radius, and is not located in an area designated as a Special Fire Protection Area. In accordance with General Plan's Public Safety Element, Program 8.2, the project developer is required to pay a Public Facilities Fee that provides for the fire safety improvement needs generated by the proposed project related to both the housing and retail components. Payment of this fee would effectively mitigate any increase in demand for services. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would result in a podium building fifth floor and associated 31 residential units. The SEIR considered the construction of up to 420 residential units and 10,000 square feet of retail space on the project site, which exceeds the demand for fire protection services that would be expected of the project's reduced residential and retail uses. The addition of the 31 residential units would not result in an increase in the demand for fire protection services that was previously analyzed. As such, impacts would continue to be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Need for New or Altered Police Protection Facilities

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 police protection?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that new development on sites proposed for rezoning would increase demand for police services. However, General Plan Public Safety Element's Program 26.2 requires that all new development pay for police safety improvements required of that development. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum to the SEIR concluded the proposed project would result in increased demands for police services that could result in increased response times. However, in accordance with Program 26.2, the project developer would be required to pay for police safety improvements required

of the proposed project, which would provide for capital facilities and equipment costs. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would result in a podium building fifth floor and associated 31 residential units. The SEIR considered the construction of up to 420 residential units and 10,000 square feet of retail space on the project site, which exceeds the demand for police protection services that would be expected of the project's reduced residential and retail uses. The addition of the 31 residential units would not result in an increase in the demand for fire protection services that was previously analyzed. As such, impacts would continue to be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR and the Addendum.

c) Need for New or Altered School Facilities

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 schools?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that new development on sites proposed for rezoning, such as the project site, would increase enrollment at schools, which could require additional facilities and staff. The SEIR concluded that with the payment of developer fees as collected by the Pleasanton Unified School District, impacts to schools would be less than significant.

The 2012 Addendum concluded that the project would result in increased enrollment at nearby schools. However, the project developer would be required to pay fees to the Pleasanton Unified School District that would cover facility costs created by the residential development. The 2012 Addendum concluded the project would not introduce any new impacts related to school services not previously disclosed. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would result in on-site residential units increasing to 336. Related increases in enrollment at nearby schools would occur. However, the SEIR considered the construction of up to 420 residential units and 10,000

square feet of retail space on the project site, which exceeds the demand for school facilities that would be expected of the proposed project's reduced residential and retail uses. No changes have occurred that would alter the conclusion of the SEIR and the proposed project would be required to pay fees to the Pleasanton Unified School District. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Other Public Facilities

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 other public facilities.*

Summary of Housing Element Update SEIR and Addendum

The SEIR did not specifically address public facility services other than fire, police, school, and recreation facilities. The Supplemental EIR indicated that additional population resulting from sites rezoned for residential development, including the project site, could result in impacts to park services. The SEIR concluded that because the City plans to build approximately 131 acres of new community parks in Pleasanton by 2025, impacts to park services would be less than significant.

The 2012 Addendum to the SEIR concluded that residential development of the project site has been planned for and it is located in an urbanized area currently served by a variety of public facilities; therefore, the proposed infill project would not be expected to significantly change or impact public services or require the construction of new or remodeled public service facilities. As previously noted, the project is required to pay applicable development fees related to incremental increases in demand on public services. As such, the 2012 Addendum concluded impacts would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would increase on-site residents and therefore could result in increased use of park, library, or other public facilities. However, consistent with the 2012 Addendum, the proposed project would result in less than the number of on-site residents considered in the SEIR. Accordingly, the proposed project would not result in the need for expanded or additional government facilities. Furthermore, the proposed project would be required

to pay applicable development fees related to incremental increases in demand on public services. As such, impacts would continue to be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Public Services, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XVI. Recreation <i>Would the project:</i>					
a) 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?	Less than significant impact	No	No	No	None
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	Less than significant impact	No	No	No	None

Discussion

a) Effects of Increased Use of Parks

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; or*

Summary of Housing Element Update SEIR and Addendum

The SEIR indicated that rezoned sites, such as the project site, would result in additional residents and a corresponding increased demand for park and recreational facilities. However, because the City plans to build approximately 131 acres of new community parks by 2025, the City would be able to offer 5.9 acres of parkland per capita and would exceed the goal of 5 acres per capita. As such, the SEIR concluded that impacts to recreational facilities would be less than significant.

The 2012 Addendum concluded that the project would not be expected to create a significant demand for park services. The proposed project would provide on-site recreation amenities to serve the existing residents that would decrease the project's overall demand for public recreational facilities. As noted in the SEIR, the City plans to build additional parks to serve the expected population growth of the City, including the population growth of the proposed project as considered in the Housing Element. Increased recreational facility use resulting from the project has been planned for in the General Plan. As such, impacts would continue to be less than significant impacts.

Proposed Project Analysis and Conclusion

As discussed in Section XIV, Population and Housing, the proposed project's additional 31 residences would result in approximately 87 additional residents based on the 2.79 persons per household estimate. As such, the proposed project would result in a total of 938 residents in a total of 336 residences, well within the SEIR's assumption of 420 residences. The additional residents would also be served by on-site recreation amenities that would decrease the project's overall demand for public recreational facilities. As such, significant increased use in existing parks would not be expected and the proposed project would continue to be within the assumed population growth accounted for in the SEIR. Therefore, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR

b) Effects from Provision of Parks or Recreational Facilities

Would the project: *include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

Summary of Housing Element Update SEIR and Addendum

The SEIR indicated that that future park development has been planned and accounted for in the General Plan and the impacts of this development have been analyzed in the General Plan EIR. Therefore, the SEIR concluded that adverse physical impacts associated with new parks and recreational facilities would be less than significant.

The 2012 Addendum to the SEIR concluded that the proposed project would include recreational amenities, including a pool and spa, a fitness building, a community building with community kitchen, an outdoor barbeque area, a children's playground, a play lawn, two bicycle/pedestrian connections to

the future Tassajara Canal Trail, pet zones, and garden areas. The environmental effects of constructing these components were considered in the 2012 Addendum, and the implementation of mitigation and compliance with applicable regulations, as discussed throughout the 2012 Addendum and herein, would ensure that any potential impacts are reduced to less than significant. Furthermore, increased off-site recreational facility use resulting from the proposed project has been planned for in the General Plan and analyzed by the General Plan EIR. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

Addition of the 31 additional residential units would not result in construction of parks or recreational facilities beyond what was considered in the 2012 Addendum. Furthermore, the additional residential population would be appropriately served by on-site and off-site existing recreational facilities. Therefore, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Recreation, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XVII. Transportation Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Less than significant impact	No	No	No	None
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Significant and unavoidable impact	No	No	No	MM 4.N-7

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Less than significant impact with mitigation	No	No	No	MM 4.G-5 (part c.)
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact	No	No	No	None
e) Result in inadequate emergency access?	Less than significant impact	No	No	No	None
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Less than significant impact	No	No	No	None

Discussion

a) Consistency with Applicable Transportation Plans and Policies

Would the project: *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that development facilitated by the rezoning of sites for residential development would be consistent with applicable transportation policies establishing effectiveness. The SEIR concluded that development facilitated by rezonings would result in less than significant impacts to levels of service at the local study intersections under existing plus project conditions because all of the study intersections would continue to operate at LOS D or better during both peak periods evaluated. Further, because the rezonings would be consistent with the Housing Element of the General Plan, it is also consistent with other applicable transportation related policies of the General Plan. As such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum noted that the SEIR assumed that the proposed project site would be built out to include up to 420 residences and up to 10,000 square feet of retail space. However, the project as considered in the 2012 Addendum includes only 305 residences and 7,520 square feet of retail space; therefore, the SEIR over estimated traffic increases. As indicated in the Transportation Assessment prepared for the 2012 Addendum, in the near-term and cumulative conditions, both without and with the project, the signalized intersections were expected to continue operating at overall acceptable service levels. Unacceptable service levels (LOS E and F) were identified at the project driveways; however, the City's LOS D or better standard, as established in the General Plan Circulation Element, applies only to major intersections. Therefore, the project driveways do not need to meet the LOS D or better standard per the General Plan. Therefore, impacts to LOS at the project's driveways would be considered less than significant. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

A Transportation Impact Analysis (Appendix C) was prepared for the proposed project, focusing on the changes proposed since the project was analyzed in the 2012 Addendum. As indicated therein, all study intersections would operate acceptably during existing with proposed project conditions. In addition, all study intersections would operate acceptably during the cumulative with proposed project conditions except for the intersection of the main project driveway and Owens Drive. The minor street movement at this intersection would function at an unacceptable level with either the approved or currently proposed project, consistent with the findings of the 2012 Addendum. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Consistency with Applicable Transportation Program

Would the project: *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Summary of Housing Element Update SEIR and Addendum

The SEIR indicated that development facilitated by the rezoning of sites for residential development would be consistent with applicable transportation policies establishing effectiveness. However, the SEIR concluded that development facilitated on the potential sites for rezoning, such as the proposed project, would result in significant unavoidable impacts to the regional roadway network, under both Year 2015 and Year 2025 scenarios, to the Sunol Boulevard (First Street) roadway segment between Vineyard Avenue and Stanley Boulevard and to the Hopyard Road roadway segment (Year 2025 only) between Owens Drive and Interstate 580 (I-580). Development would worsen pre-existing LOS F conditions and would increase the volume to capacity ratio by more than 0.03. As indicated in the SEIR, widening of these roadways is not feasible or desirable due to the surrounding built environment and improvements to nearby parallel corridors to create more attractive alternative routes and additional capacity is preferred. As such, the SEIR included MM 4.N-7 and concluded that impacts would be significant and unavoidable.

The 2012 Addendum indicated that the project would not cause any study intersections to operate below acceptable LOS standards. Further, it

concluded that because the project is consistent with the Housing Element of the General Plan, it is also consistent with other applicable transportation related policies of the General Plan. Finally, it concluded that the project would be required to pay any applicable fair-share fees as required by MM 4.N-7. Furthermore, the project would result in a reduced contribution to the significant and unavoidable impact because the project includes fewer residential units and retail space than analyzed in the SEIR. As such, impacts would continue to be significant and unavoidable but to a lesser degree.

Proposed Project Analysis and Conclusion

As indicated by the Traffic Impact Analysis (TIA) prepared for the proposed project (Appendix C), the project changes would not cause any study intersections to operate below applicable and acceptable LOS standards. MM 4.N-7 would continue to be applicable to compensate for the proposed project's contribution to regional roadway impacts. While the proposed project would increase the number of on-site residences, it would still be below the 420 residences contemplated for the project site by the SEIR. Further, the proposed project would continue to be consistent with the Housing Element of the General Plan and other applicable transportation related policies. Impacts would continue to be significant and unavoidable, but to a lesser degree, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

c) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that because development consistent with the Housing Element Update would be subject to all applicable State, regional, and City guidelines, standards, and specifications related to service standards, including, but not limited to, those provided in the Hacienda Design Guidelines, Vineyard Avenue Corridor Specific Plan, the City of Pleasanton Bicycle and Pedestrian Master Plan, and CAP 2.0, it would not conflict with adopted policies, plans, or programs.

The 2012 Addendum concluded that the project would be consistent with the Housing Element of the General Plan and therefore would also be consistent with other applicable transportation related policies. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

As indicated by the TIA prepared for the proposed project (Appendix C), a complete and comprehensive system of sidewalks exists on all roadways serving the project site. Crosswalks with pedestrian signal heads and actuation are present at all existing signalized intersections. The project includes a network of on-site sidewalks and pedestrian linkages. Crosswalks would be installed at the internal intersections wherein substantial numbers of pedestrians are expected to cross. Implementation of the additional podium building fifth floor and associated 31 residences would not change this or the project's consistency with the Housing Element of the General Plan. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Air Traffic Patterns

Would the project: *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

Summary of Housing Element Update SEIR

The SEIR concluded that a conflict between the Livermore Municipal ALUCP and potential rezoning sites for housing development was not anticipated. However, at the time the SEIR was written, the ALUCP was being revised; therefore, the SEIR indicated that, without specific project site details and a newly adopted ALUCP, additional analysis regarding residential development consistency with the Livermore Municipal Airport would be speculative. As such, the SEIR included MM 4.G-5 requiring compliance with the ALUCP and verification of compliance with the FAA Part 77 air space.

The 2012 Addendum indicated that a revised ALUCP has been completed. The project site is located approximately 3 miles west of the Livermore Municipal Airport and is not located within APA, AIA, or FAR Part 77 height restriction space as indicated by the ALUCP. Nonetheless, as required by part c. of the SEIR's MM HAZ-4.G-5, prior to the issuance of a grading or building permit for the proposed project, verification of compliance with FAR Part 77 would be required. With implementation of mitigation required in the SEIR, the 2012 Addendum concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The site is already graded and under construction with the exception of the podium building and therefore HAZ-4.G-5 part a and b have been satisfied. The 31 additional residential units and additional story on the podium building

would result in a building height increase. As such, prior to the issuance of the building permit for the podium building, implementation of HAZ 4.G-5 (part c.) would be required to confirm no conflict with aviation air space would occur. As such, impacts would be less than significant with the implementation of mitigation and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

e) Roadway Safety Hazards

Would the project: *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Summary of Housing Element Update SEIR and Addendum

The Supplemental EIR concluded that impacts related to roadway hazards and traffic safety would be less than significant because each individual residential development would be required to adhere to design standards and traffic safety protocols outlined in the City's General Plan, Caltrans's Highway Design Manual, the California Manual of Uniform Traffic Control Devices, and the City Standard Specifications and Details.

The 2012 Addendum concluded that roadway hazards related to emergency access, sight distances, accidents rates, and delivery vehicle access would not result in any new impacts related to roadway hazards not previously disclosed and impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

Addition of the 31 residences to the podium building would not change the type of use or configuration of the project site. Therefore, it would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

f) Emergency Access

Would the project: *Result in inadequate emergency access?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that impacts related to emergency access would be less than significant because development facilitated by the proposed Housing Element, such as the project, would not significantly alter or modify the

circulation system in the Planning Area and therefore would not adversely affect travel times of emergency vehicles. Further, compliance with the City's Fire Code and Subdivision regulations would ensure adequate on-site emergency vehicle access. As such, the SEIR concluded that impacts would be less than significant.

The 2012 Addendum to the SEIR concluded that, based on the level of access to the site and the extent of the internal roadway system, the project is not expected to result in inadequate emergency access. The project's plans are subject to review by the City and the Fire Department as part of the standard building permit process to ensure consistency with the City's Fire Code to allow apparatus access and maneuverability. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

As indicated in the Transportation Impact Analysis prepared for the proposed project (Appendix C), adequate emergency vehicle access is provided to the project site. Addition of the 31 residential units would not alter site access and therefore would not alter this conclusion. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Transportation, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. MM 4.N-7 and MM 4.G-5 part c from the SEIR would be required and would reduce potential impacts to the fullest extent feasible, consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

MM 4.N-7 The City shall require developers on the potential sites for rezoning to contribute fair-share funds through the payment of the City of Pleasanton and Tri-Valley Regional traffic impact fees to help fund future improvements to local and regional roadways.

MM 4.G-5-c The following condition shall be included in any PUD development approval for all the potential sites for rezoning: Prior to the issuance of a grading permit or building permit, whichever is sooner, the project applicant shall submit verification from the FAA, or other verification to the satisfaction of the City Engineer or Chief Building Official, of compliance with the FAA Part 77 (Form 7460 review) review for construction on the project site.

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XVIII. Utilities and Service Systems <i>Would the project:</i>					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less than significant impact	No	No	No	None
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than significant impact	No	No	No	None
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than significant impact	No	No	No	None
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Less than significant impact with mitigation incorporated	No	No	No	MM 4.L-2
e) Result in a determination by the wastewater	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?					
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than significant impact	No	No	No	None
g) Comply with federal, State, and local statutes and regulations related to solid waste?	Less than significant impact	No	No	No	None

Discussion

a) Wastewater treatment requirements of the RWQCB

Would the project: *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

Summary of Housing Element Update SEIR and Addendum

The SEIR did not indicate that impacts would occur regarding the exceedance of wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB).

The 2012 Addendum indicated the project would be served by the City of Pleasanton's sewer collection services, which directs wastewater to the Dublin-San Ramon Services District's Regional Wastewater Treatment Facility. The treatment facility treats and disposes of wastewater in accordance with

applicable requirements of the RWQCB. As such, the impact would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed addition of the 31 residential units would not change the project's sewage collection services. The project would be served by the Dublin-San Ramon Services District's Regional Wastewater Treatment Facility which operates in compliance with the RWQCB. Impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Construction or Expansion of Water Treatment or Stormwater Drainage Facilities

Would the project: *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

and

c) Stormwater Drainage facilities

Would the project: *Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Summary of Housing Element Update SEIR and 2012 Addendum

The SEIR indicated that development on rezoned sites would increase demand for water. The Supplemental EIR concluded that because the City of Pleasanton has planned for such residential growth by supporting Zone 7's capital improvement projects impacts related to the construction or expansion of water treatment facilities would be less than significant. The Supplemental EIR also concluded that because sufficient wastewater treatment capacity is available now and in the future at the Dublin-San Ramon Services District Regional Wastewater Treatment Facility, impacts related to the construction or expansion of wastewater treatment facilities would be less than significant.

The SEIR also indicated that because housing sites would be required to abide by C.3 provisions of the ACCWP NPDES permit, requiring that there be no net increase in stormwater rates and runoff after project construction, and implementation of the permit would occur throughout review and approval of applicable permits and grading and drainage plans, impacts related to stormwater drainage facilities would be less than significant.

The 2012 Addendum indicated that the project's 305 residential units and 7,520 square feet of retail space would be expected to require only a small portion of the water and wastewater service increases contemplated in the Supplemental EIR, because it analyzed rezoning 21 sites for residential development where the City ultimately chose only nine sites to implement the rezoning. Therefore, the project would not require the unplanned construction or expansion of water or wastewater treatment facilities.

The 2012 Addendum also confirmed that if the project is required to abide by c.3 provisions ACCWP NPDES and that sufficient bioretention treatment areas would slow stormwater rates to ensure no net increase. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would increase the need for water and wastewater facilities compared to the approved project evaluated in the 2012 Addendum commensurate to the increase in 31 residential units. However, because the proposed project would still be within the maximum of 420 units planned for the site as well as the acceptable density, and because the SEIR analyzed significantly more sites for rezoning that has or will occur, such increase would not be significant. Furthermore, the addition of the 31 residential units would not increase impervious surfaces nor change planned bioretention or stormwater treatment areas beyond what was evaluated and approved in the SEIR. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

d) Water Supply

Would the project: *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that new development as facilitated on the potential sites for rezoning would increase demand for water and could require new water supply sources. However, because the City has already planned for this growth by supporting Zone 7's capital improvement projects to secure more water and the residential development contemplated in the SEIR would not exceed Zone 7's allocated of contractual water supply, sufficient water supply exists and impacts would be less than significant. To further ensure supply is adequate, the City's 2011 Water Supply Assessment (WSA)

includes a condition of approval for residential development on the potential sites for rezoning, including the project site. The WSA's condition of approval was included in the SEIR as MM 4.L-2, which requires the applicant to submit written verification from Zone 7 Water Agency or the City of Pleasanton's Utility Planning Division that water is available for the project. With the implementation of MM 4.L-2 and applicable water conserving programs included in the General Plan's Water Element, the SEIR concluded that impacts on water supply would be less than significant.

The 2012 Addendum to the SEIR concluded the project would require water service in excess of what is currently used at the project site. However, the project would include water saving features such as low-flow fixtures, high-efficiency irrigation systems, drought tolerate native landscaping, and minimized turf areas. The SEIR considered the construction of up to 420 residential units and 10,000 square feet of retail space on the project site, which exceeds the water usage that would be expected of the project's reduced residential and retail uses. Accordingly, the project's expected water uses were considered at a greater amount in the SEIR. As such, impacts would continue to be less than significant with the implementation of mitigation.

Proposed Project Analysis and Conclusion

The 2020 Urban Water Management Plan (UWMP) includes a supply and demand assessment for projected years between 2025 and 2045 for normal, single, and multiple dry years. For each scenario the UWMP indicates that the City would be able to meet the projected water demand based on the available supply. The demands are expected to be met with groundwater, imported water, and recycled water supplies.¹² The UWMP accounts for projected water demand based on water consumption by single- and multi-family residences, commercial, and institutional/government customers. The UWMP also accounts for projected land use, population, economic growth, and future conservation.¹³

The UWMP indicates that the City would have sufficient water supply for normal, single, and multiple dry years. Based on the City's 10-year base daily per capita water use of 246 gallons per capita per day (GPCD) for the 881 people generated under the proposed project, this would result in 216,726 gallons or 0.67 acre-feet of water. As noted in the UWMP, the projected

¹² City of Pleasanton. 2021. 2020 Urban Water Management Plan. Website: <https://www.cityofpleasantonca.gov/assets/our-government/public-works/water-conservation/2020-urban-water-management-plan.pdf>. Accessed August 8, 2024.

¹³ Ibid.

Citywide water use in 2025 is 18,240 acre-feet. Therefore, the small projected water use of the proposed project can be reasonably considered a part of the existing demand projections in the UWMP. Because the addition of the podium building fifth story and associated 31 residences would increase the need for water supply, MM 4.L-2 would apply to further ensure impacts are less than significant. Accordingly, the project's expected water uses were considered at a greater amount in the SEIR. As such, impacts would continue to be less than significant with the implementation of mitigation.

e) Wastewater Capacity

Would the project: *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that because sufficient wastewater treatment capacity is available now and in the future at the Dublin-San Ramon Services District Regional Wastewater Treatment Facility, impacts related to wastewater capacity would be less than significant.

The 2012 Addendum similarly concluded and sufficient capacity is available and impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would result in a podium building fifth floor and associated 31 residential units. The SEIR considered the construction of up to 420 residential units and 10,000 square feet of retail space on the project site. Therefore, while the proposed project would increase wastewater production and the need for wastewater treatment capacity, it would still be within the amount anticipated by the SEIR. Furthermore, the proposed project is consistent with planned development on which wastewater treatment capacity planning is based. As such, impacts would continue to be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

f, g) Solid Waste Capacity, Reduction Goals and Regulations Consistency

- Would the project:
- f) *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 reduction goals and*
 - g) *Comply with federal, State, and local management and reduction statutes and regulations related to solid waste.*

Summary of Housing Element Update SEIR and Addendum

The SEIR concluded that development on rezoned sites would contribute to an increase in solid waste generation within the City of Pleasanton. The Supplemental EIR concluded that because waste would be diverted from landfills pursuant to AB 939, sufficient space remains at the Vasco Landfill for waste that cannot be diverted, and residential projects are required to implement a Waste Diversion Plan consistent with General Plan Program 26.18. The SEIR also concluded that impacts related to solid waste regulations would be less than significant because of the City's compliance with AB 939 and General Plan Program 26.18 requiring Waste Diversion Plans to be implemented by residential development. As such, the SEIR concluded impacts would be less than significant.

The 2012 Addendum concluded that the would be expected to produce solid waste to be disposed of at the Vasco Road Landfill via the Pleasanton Garbage Service. The project would implement a Waste Diversion Plan consistent with General Plan Program 26.18, which would include on-site disposal, composting, and recycling facilities, as well as construction debris and disposal recycling. This plan was reviewed and approved by the City as part of the land entitlement process. As such, impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The proposed addition of 31 residential units would result in an increase in solid waste. However, the increased total of 336 residential units is still below the total of 420 residential units considered for the project site in the SEIR. Therefore, the overall project would produce less solid waste than previously considered and could be readily accommodated at the Vasco Landfill. According to the California Department of Resources Recycling and Recovery (CalRecycle) Solid Waste Information System (SWIS), the Vasco

Road Landfill has a maximum daily capacity of 2,518 tons per day and a remaining capacity of 11,560,000 Cubic Yards.¹⁴

CalRecycle provides a solid waste generation factor to estimate the amount of solid waste generated by residential projects. Using a generation rate of 12.23 pounds (lbs) per household per day for residential development, the proposed project would generate approximately 4,109.28 lbs per day of solid waste, or approximately 2.05 tons per day (based on 336 residential units)—which represent less than 1 percent of the maximum daily capacity of the landfill.¹⁵

Therefore, the Vasco Road Landfill would have sufficient capacity to serve the proposed project and solid waste generated during construction and operations would represent a negligible increase compared to the daily permitted tonnage. Impacts would continue to be less than significant in this regard.

Implementation of the additional fifth story and associated 31 residential units would not prohibit the implementation of a Waste Diversion Plan consistent with General Plan Program 26.18, which would include on-site disposal, composting, and recycling facilities, as well as construction debris and disposal recycling. As such, the proposed project would not introduce any new impacts related to landfill capacity not previously disclosed. Therefore, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Utilities and Service Systems, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.

¹⁴ California Department of Resources and Recycling and Recovery (CalRecycle). 2024. Website. <https://www2.calrecycle.ca.gov/SolidWaste/Site>. Accessed August 6, 2024.

¹⁵ California Department of Resources and Recycling and Recovery (CalRecycle). 2024. Website: <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed August 6, 2024.

3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.
5. MM 4.L-2 from the SEIR would be required and would reduce potential impacts to below a level of significance consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

MM 4.L-2 Prior to the recordation of a Final Map, the issuance of a grading permit, the issuance of a building permit, or utility extension approval to the site, whichever is sooner, the applicant shall submit written verification from Zone 7 Water Agency or the City of Pleasanton's Utility Planning Division that water is available for the project. To receive the verification, the applicant may need to offset the project's water demand. This approval does not guarantee the availability of sufficient water capacity to serve the project. Development consistent with the Housing Element Update would result in a significant unavoidable impact with respect to water supply and the Housing Element Update's incremental contribution to the cumulative impact is significant. Accordingly, in certifying the Housing Element Update FEIR, the City made findings that there is no available feasible mitigation and impacts would be significant and unavoidable. Accordingly, the City adopted a Statement of Overriding Considerations.

Addendum Checklist

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XIX. Wildfire <i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Not applicable	No	No	No	None
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?	Not applicable	No	No	No	None
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?	Not applicable	No	No	No	None
d) Expose people or structures to significant risks,	Not applicable	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts:	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?					

Discussion

a) Emergency Response/Evacuation Plan Consistency

Would the project: *If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan?*

Summary of Housing Element Update SEIR and Addendum

As discussed in the SEIR, according to the California Department of Forestry and Fire Protection, much of the outer areas of Pleasanton are located in wildland-urban interface threat areas. Risks associated with wildfires vary according to land use, environmental conditions, and availability of fire protection services. The central core of Pleasanton is not considered to be an area of high risk, which includes the potential sites for rezoning. Additionally, Section 8, Hazards and Hazardous Materials of the SEIR concluded that the buildout of the proposed Housing Element would not interfere with current guidelines set forth in the Pleasanton Comprehensive Emergency Management Plan.

Additionally, Section 8, Hazards and Hazardous Materials of the 2012 Addendum concluded no changes have occurred that would alter the conclusion made in the SEIR. As such, it can reasonably be concluded that the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and impacts would continue to be less than significant.

Proposed Project Analysis and Conclusion

The project site is not located in a Fire Hazard Severity Zone (FHSZ) and is designated as a Local Responsibility area (LRA).¹⁶ Addition of the podium building's fifth floor and associated 31 residential units would not change this. As such, impacts would be less than significant.

b) Expose Project Occupants to Pollutant Concentrations from Wildfire

Would the project: *If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, 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?*

Summary of Housing Element Update SEIR and Addendum

As indicated in the SEIR, the central core of Pleasanton is not considered to be an area of high wildfire risk, which includes the potential sites for rezoning. The SEIR and 2012 Addendum did not identify any impacts regarding the exposure of project occupants to pollutant concentrations from wildfire.

Proposed Project Analysis and Conclusion

The project site is not located in an FHSZ and is designated as an LRA.¹⁷ The project site is located 2.61 miles south of land identified as a moderate and high FHSZ within a State Responsibility Area (SRA). The nearest Very High FHSZ is located approximately 8.32 miles southeast of the project site. The project site is mostly surrounded by urbanized uses. The proposed project would not include new or more pronounced slopes and is not located in an area that would experience significantly different prevailing winds, nor is it located in a location where occasional wind events would pose a significant additional risk related to wildfire spread. Furthermore, as part of the proposed project, landscaping would be managed and vegetation would be managed as to not provide fuel for a wildfire. Addition of a fifth story and associated residential units to the podium building would not change these conclusions. As such, the proposed project would not result in significant impacts related to the exposure of project applicants to pollutant concentrations due to

¹⁶ California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zones in State Responsibility Area. Website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>. Accessed September 13, 2024.

¹⁷ California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zones in State Responsibility Area. Website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>. Accessed September 13, 2024.

slope, prevailing winds, and other factors that may exacerbate wildfire risks. Impacts would be less than significant.

c) Infrastructure that Exacerbates Fire Risk

Would the project: *If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, 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?*

Summary of Housing Element Update SEIR

According to the SEIR, the sites identified in the SEIR are not considered to be areas at high risk of wildfire. Neither the SEIR nor the 2012 Addendum identified any potentially significant impacts.

Proposed Project Analysis and Conclusion

The project site is not located in an FHSZ and is designated as an LRA.¹⁸ The project site is located in an urbanized area of the City and would connect to existing infrastructure that currently serves the site and the surrounding area. Construction activities may temporarily increase fire risk due to equipment use at the project site that could be sources of ignition. Standard construction BMPs would reduce risk of fire and ensure that construction workers respond appropriately should fire result during construction activities. The proposed project does not require the installation or maintenance of infrastructure specifically for the purposes of reducing wildfire risk. The proposed project would include typical on-site infrastructure including roads, fire hydrants, and underground utilities. Addition of a fifth story and associated residential units to the podium building would not change these conclusions. Therefore, the proposed project would not exacerbate fire risk. Impacts would be less than significant.

¹⁸ California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zones in State Responsibility Area. Website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>. Accessed September 13, 2024.

d) Flooding and Landslide Hazards Due To Post-fire Slope Instability/Drainage Changes

Would the project: *If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, 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?*

Summary of Housing Element Update SEIR and Addendum

The SEIR and 2012 Addendum did not identify any impacts regarding flooding and landslide hazards due to post-fire instability.

Proposed Project Analysis and Conclusion

The project site is not located in an FHSZ and is designated as an LRA.¹⁹ The project site is flat and is not located within an area identified as having a potential for landslides by the California Geological Survey.²⁰ The proposed project does not have other features with the potential to exacerbate wildfire, downstream flooding, or landslide risks. The project site is also not located in an area subject to flood hazards. Therefore, the proposed project would not be susceptible to slope disturbance such as runoff, instability, or drainage changes due to post-fire instability. As such, impacts would be less than significant.

Conclusion

With regards to Wildfire, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.
2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.

¹⁹ California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zones in State Responsibility Area. Website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>. Accessed September 13, 2024.

²⁰ California Department of Conservation. 2024. Landslide Inventory. Website: <https://maps.conservation.ca.gov/cgs/lsi/app/>. Accessed September 13, 2024.

4. No mitigation measures are necessary because the specific impacts related to the proposed project would be less than significant.

Applicable SEIR Mitigation Measures

None.

Addendum Checklist

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
XX. Mandatory Findings of Significance					
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?	Less than significant impact with mitigation incorporated	No	No	No	None
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the	Significant and unavoidable with mitigation	No	No	No	None

Environmental Issue Area	Conclusions in Previous Certified SEIR	Do the Proposed Changes Involve:			Applicable Mitigation Measures
		New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	
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)?					
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	Less than significant impact with mitigation incorporated	No	No	No	None

Discussion

a) Potential Degradation to Environment and Examples of California History or Prehistory

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?*

Summary of Housing Element Update SEIR

The SEIR concluded that the development of the potential sites considered for rezoning could result in significant impacts regarding the potential to degrade the quality of the environment, including effects on animals or plants. It also found that there would be a potentially significant impact to

prehistoric cultural resources and a significant impact to historic resources. However, the SEIR indicated that the implementation of mitigation measures would reduce these impacts to less than significant.

Similarly, the 2012 Addendum indicated that mitigation identified in the SEIR would be required to reduce the project's impacts to a less than significant level. As such, impacts would continue to be less than significant with the implementation of mitigation.

Proposed Project Analysis and Conclusion

As discussed herein, mitigation from the SEIR is required to reduce the proposed project's impacts to a less than significant level. With the implementation of mitigation measures as identified herein, the proposed project does not have the potential to significantly degrade the quality of the environment, including effects on animals or plants, or to eliminate historic or prehistoric resources. As such, impacts would be less than significant and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

b) Cumulatively Considerable Impacts

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)?*

Summary of Housing Element Update SEIR

The SEIR concluded that development of the potential sites considered for rezoning, in combination with potential development in the surrounding areas, would result in significant and unavoidable impacts under cumulative conditions related to transportation. As indicated in the SEIR, transportation impacts are considered significant and unavoidable on regional roadways under the buildout of the General Plan as the City would not be fully responsible for addressing feasible infrastructure improvements on regional roadways.

Similarly, the 2012 Addendum concluded that the project's contribution to traffic on regional roadways would contribute to this significant and unavoidable impact that is cumulatively considerable. As concluded in the SEIR, this impact would be significant and unavoidable. The 2012 Addendum determined that the project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Proposed Project Analysis and Conclusion

Addition of the podium building's fifth floor and associated 31 residential units would result in additional residences that would add to traffic trips generated by the project. However, as indicated herein, overall estimated trip generation would be reduced compared to the approved project evaluated in the 2012 Addendum. As such, the proposed project's contribution to traffic on regional roadways would be consistent with the development envisioned in the SEIR, remain consistent with the approved project evaluated in the 2012 Addendum, and would not have cumulatively considerable contribution to any impacts.

c) Adverse Effects on Human Beings?

Does the project: *Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?*

Summary of Housing Element Update SEIR

The SEIR concluded that implementation of rezoning for housing development would have less than significant impacts related to direct or indirect adverse effects on human beings after the implementation of mitigation.

Similarly, the 2012 Addendum concluded that the project would not cause substantial adverse impacts on human beings with the implementation of mitigation.

Proposed Project Analysis and Conclusion

Based on the responses provided herein, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly, because the project's potential impacts would be mitigated to a less than significant level, with the exception of regional traffic impacts (which would not have substantial adverse effects on human beings). Therefore, the proposed project would not result in a new or more severe adverse impact that was not previously identified in the SEIR.

Conclusion

With regards to Mandatory Findings, the consistency checklist demonstrates that:

1. No substantial changes are proposed in the project which will require major revisions of the previously Certified SEIR.

2. No substantial changes have occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previously Certified SEIR.
3. No new information of substantial importance has been identified which results in a significant effect not discussed in the previously Certified SEIR or an impact which is more severe than shown in the Certified SEIR.
4. MM 4.B-1a, 4.C-1a, 4.C-1b, 4.D-4, 4.D-3, 4.J-1 and 4.J-6c from the SEIR would be required and would reduce potential impacts to below a level of significance, consistent with the analysis in the SEIR.

Applicable SEIR Mitigation Measures

Implement to MM 4.B-1a, MM 4.C-1a, MM 4.C-1b, MM 4.D-4, MM 4.D-3, MM 4.J-1, and MM 4.J-6c.

SECTION 5: FINDINGS

As illustrated in the preceding checklist, the proposed project is found to be in conformance with the analysis and conclusions of the previously Certified SEIR and 2012 Addendum. The SEIR and 2012 Addendum adequately anticipated and described the impacts of the proposed project. Consistent with the mandate in the State CEQA Guidelines Section 15164, no further environmental review is required based on the following findings:

1. There are no substantial changes proposed by the proposed project or under the circumstances in which the proposed project would be undertaken that would require major revisions of the SEIR.
2. The proposed revisions do not require preparation of a new subsequent or Supplemental EIR due to either (1) the involvement of new significant environmental effects, (2) a substantial increase in the severity of previously identified significant effects, or (3) new information of substantial importance.
3. No mitigation measures or alternatives previously found not to be feasible would in fact be feasible nor has the proposed project proponent declined to adopt any additional mitigation measures or alternatives that would substantially reduce one or more significant effects on the environment.
4. Applicable mitigation measures from the previous SEIR are identified and discussed in this Addendum.

Conclusions

No further action is required, and a Notice of Determination (pursuant to CEQA Guidelines Section 15094) can be filed indicating that the proposed project is eligible for an exemption from additional environmental review under CEQA Guidelines Section 15164.

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