FIRSTCARBONSOLUTIONS™

DRAFT
10x Genomics Project
Initial Study/Mitigated Negative Declaration
City of Pleasanton, Alameda County, California

Prepared for:
City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566
925.931.5600

Contact: Eric Luchini, Senior Planner

Prepared by:
FirstCarbon Solutions
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
925.357.2562

Contact: Mary Bean, Project Director
Cecilia So, Project Manager

Report Date: April 5, 2021

THIS PAGE INTENTIONALLY LEFT BLANK

Table of Contents

Acronyms and Abbreviations vii

Section 1: Introduction 1
1.1 - Purpose 1
1.2 - Project Location 1
1.3 - Environmental Setting 1
1.3.1 - Surrounding Land Uses 2
1.3.2 - General Plan and Zoning 2
1.4 - Project Description 3
1.4.1 - Project Phasing 3
1.4.2 - Construction 4
1.4.3 - Operations 4
1.4.4 - Site Access and Circulation 4
1.4.5 - Utilities 5
1.5 - Required Discretionary Approvals 6
1.6 - Intended Uses of this Document 6

Section 2: Environmental Checklist and Environmental Evaluation 19
2.1 Aesthetics 20
2.2 Agriculture and Forestry Resources 24
2.3 Air Quality 26
2.4 Biological Resources 49
2.5 Cultural Resources and Tribal Cultural Resources 57
2.6 Energy 63
2.7 Geology and Soils 68
2.8 Greenhouse Gas Emissions 75
2.9 Hazards and Hazardous Materials 87
2.10 Hydrology and Water Quality 93
2.11 Land Use and Planning 99
2.12 Mineral Resources 101
2.13 Noise 103
2.14 Population and Housing 117
2.15 Public Services 119
2.16 Recreation 123
2.17 Transportation 125
2.18 Utilities and Service Systems 132
2.19 Wildfire 137
2.20 Mandatory Findings of Significance 140

Section 3: List of Preparers 145

Appendix A: Air Quality and Greenhouse Gas Supporting Information

Appendix B: Biological Resources Supporting Information
B.1 - CNDDB Database Search Results
B.2 - CNPS Inventory Results
B.3 - Special-status Species Table
B.4 - Arborist Report

Appendix C: Cultural Resources Supporting Information
C.1 - Northwest Information Center Records Search
C.2 - Pedestrian Survey Photographs
C.3 - Native American Heritage Commission and Tribal Correspondence

Appendix D: Energy Supporting Information

Appendix E: Geotechnical Investigation
E.1 - Geotechnical Feasibility Study
E.2 - Geotechnical Investigation

Appendix F: Phase I Environmental Site Assessment

Appendix G: Hydrology Supporting Information

Appendix H: Combined Noise Data

Appendix I: Public Service Letters

Appendix J: Traffic Studies

Appendix K: Shade and Shadow Study

List of Tables

Table 1: BAAQMD Thresholds of Significance 27
Table 2: Project Consistency with Applicable Clean Air Plan Control Measures 29
Table 3: Project Construction Schedule 33
Table 4: Unmitigated Construction Emissions (Average Daily Rate) 34
Table 5: Maximum Daily Unmitigated Operational Emissions 36
Table 6: Annual Unmitigated Operational Emissions 37
Table 7: Exposure Assumptions for Cancer Risk 41
Table 8: Estimated Health Risks and Hazards—Unmitigated Construction 42
Table 9: Estimated Health Risks and Hazards—Mitigated Construction 43
Table 10: Summary of the Cumulative Health Impacts at the MIR during Construction 44
Table 11: Odor Screening Distances 46
Table 12: Estimated Annual Project Energy Consumption 65
Table 13: Construction Greenhouse Gas Emissions 77
Table 14: Operational Land Use-Related Greenhouse Gas Emissions 78
Table 15: Consistency with Pleasanton General Plan GHG Reduction Measures 80
Table 16: Project Consistency with Applicable GHG Reduction Goals and Supporting Actions from the City of Pleasanton CAP 81
Table 17: Consistency with SB 32 2017 Scoping Plan Update 84
Table 18: Noise and Land Use Compatibility Guidelines 105
Table 19: Stationary Operational Noise Impact Summary 111

Table 20: Existing Traffic Noise Model Results Summary 112
Table 21: Near-term Traffic Noise Model Results Summary..... 112
Table 22: Far-term Traffic Noise Model Results Summary..... 113

List of Exhibits

Exhibit 1: Regional Location Map 7
Exhibit 2: Local Vicinity Map..... 9
Exhibit 3: General Plan Land Use Map 11
Exhibit 4: Zoning Map..... 13
Exhibit 5: Site Plan–Full Buildout..... 15
Exhibit 6: Site Plan–Phase I..... 17

THIS PAGE INTENTIONALLY LEFT BLANK

ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
°F	degrees Fahrenheit
°C	degrees Celsius (Centigrade)
ABAG	Association of Bay Area Governments
ADT	Average Daily Traffic
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
APN	Assessor's Parcel Number
ARB	California Air Resources Board
BART	Bay Area Rapid Transit
BERD	California Built Environment Resource Directory
BGS	below ground surface
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
C-R (p)	Regional Commercial–Peripheral Area
CRHR	California Register of Historical Resources
CTC	County Transportation Commission
dB	decibel
dBA	A-weighted decibel
DSRSD	Dublin San Ramon Services District
EACCS	East Alameda Conservation Strategy
EBCE	East Bay Community Energy
EMP	Emergency Management Plan
EPA	United States Environmental Protection Agency

ESA	Environmental Site Assessment
EV	Electric Vehicle
FAR	floor area ratio
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
I-580	Interstate 580
I-680	Interstate 680
IAFF	International Association of Fire Fighters
in/sec	inch per second
IS/MND	Initial Study/Mitigated Negative Declaration
kBTU	kilo-British Thermal Unit
kWh	kilowatt-hour
LAVWMA	Livermore-Amador Valley Water Management Agency
L_{dn}	day/night sound level
L_{eq}	equivalent continuous sound level
L_{max}	maximum sound level
LEED™	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOS	Level of Service
LPFD	Livermore Pleasanton Fire Department
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MIR	Maximum Impacted Sensitive Receptor
MM	Mitigation Measure
mph	miles per hour
MRP	Municipal Regional Permit
MUTCD	Manual on Uniform Traffic Control Devices
NAHC	California Native American Heritage Commission
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration

Pb	lead
PG&E	Pacific Gas and Electric Company
PGS	Pleasanton Garbage Service, Inc.
PM_{10}	particulate matter, including dust, 10 micrometers or less in diameter
$PM_{2.5}$	particulate matter, including dust, 2.5 micrometers or less in diameter
PPV	peak particle velocity
PUD	Planned Unit Development
PUD-C-O	Planned Unit Development Commercial-Office
PUSD	Pleasanton Unified School District
R&D	Research and Development
REC	Recognized Environmental Condition
rms	root mean square
RWQCB	Regional Water Quality Control Board
SCP	Stormwater Control Plan
SO_2	sulfur dioxide
SR-84	State Route 84
State Water Board	California State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
TAZ	Traffic Analysis Zone
TCR	Tribal Cultural Resources
TIA	Transportation Impact Analysis
UWMP	Urban Water Management Plan
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts that would result from implementation of the 10x Genomics Project (proposed project) in the City of Pleasanton, California. The proposed project would result in the redevelopment of the site for commercial and office uses, Research and Development (R&D), and light laboratory manufacturing for 10x Genomics (Applicant), a biotechnology company headquartered in Pleasanton, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Pleasanton has discretionary authority over the proposed project and is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the proposed project. The intended use of this document is to determine the level of environmental analysis required to adequately analyze the proposed project pursuant to the requirements of CEQA and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the primary project characteristics. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation, elaborates on the information contained in the environmental checklist, and provides justification for each checklist response. The List of Preparers is included in Section 3.

1.2 - Project Location

The project site is located in the northwestern portion of the City of Pleasanton, in Alameda County, California (Exhibit 1). The 14.75-acre project site corresponds to Assessor's Parcel Number (APN) 941-1201-026, located at 1701 Springdale Avenue. The project site is surrounded by Stoneridge Mall Road to the north and east, Stoneridge Drive to the south, and Springdale Avenue to the west. Regional access to the site is provided by Interstate 580 (I-580), and Interstate 680 (I-680) (Exhibit 2). The West Dublin/Pleasanton Bay Area Rapid Transit (BART) station is located approximately 0.5 mile north of the side, adjacent to I-580.

1.3 - Environmental Setting

The project site is currently developed with a surface-paved parking lot and Pleasanton Plaza, which is a 163,500-square-foot single-story, multi-tenant retail/commercial shopping center. At the time that this Draft IS/MND was prepared, the City had issued a demolition permit for the existing buildings. Demolition of the buildings was completed in Spring 2021.

The project site is in an urbanized commercial area characterized by a variety of uses including Stoneridge Shopping Center; retail plazas; office and commercial centers; Kaiser Permanente Medical Center offices; hotels; and multi-family residential housing.

The elevation of the project site ranges from 340 to 350 feet above mean sea level, with a gentle slope from west to east. The project site is located on the United States Geological Survey (USGS) *Dublin* 7.5-minute Topographic Quadrangle map.

1.3.1 - Surrounding Land Uses

The project site is bound on the north by Stoneridge Mall Road, parking lots, office buildings, and the Stoneridge Shopping Center. Beyond the Stoneridge Shopping Center to the north is the West Dublin/Pleasanton BART station. To the south, the project site is bound by Stoneridge Drive and multi-family residential communities. To the east, the project site is bound by Stoneridge Mall Road, the Livermore Pleasanton Fire Department (LPFD) Fire Station No. 2, multi-family residential housing, the Pleasanton Commons Business Center, and beyond this area to the east is I-680. To the west, the project site is bound by Springdale Avenue, parking lots, and a Kaiser Permanente Medical Center.

1.3.2 - General Plan and Zoning

The General Plan Land Use Map designates the site "Commercial and Offices (retail, highway, and service; commercial business and professional offices)" within the Industrial, Commercial, and Office designation (Exhibit 3). Lands with this designation are intended to have a floor area ratio (FAR) not to exceed 60 percent (with certain exceptions). Certain uses such as warehouses, where employee density and traffic generation are minimal, may be allowed with higher FARs provided that they meet the requirements of the Zoning Ordinance as well as all other City requirements. General Plan Land Use Program 15.5 further stipulates that industrial, retail and office projects should generally conform to the average densities assumed in General Plan Table 2-3 (in this case 35 percent). However, projects proposing intensities greater than this average may be allowed up to the maximum indicated, provided that sufficient amenities and mitigations are incorporated into the proposed project to justify the increased density.[1]

According to the Pleasanton General Plan, the project site is also within the Stoneridge Mall Road Periphery sub-area.[2] The intended land uses of the Stoneridge Mall Road Periphery sub-area include office, retail, hotel, and medical uses.

The City's Zoning Ordinance further defines land-use types and densities, building height, parking, and other requirements of development. Zoning designations are consistent with the General Plan and the General Plan Map. Zoning designations include a specific list of uses allowed within a particular zone. As shown in Exhibit 4, the project site is zoned C-R (p) (Regional Commercial – Peripheral Area). Uses that are permitted within the C-R (p) zone include retail and office uses.[3] The zoning designation does not include R&D, or light laboratory manufacturing uses. Therefore, the implementation of the proposed project would rezone to the site to Planned Unit Development (PUD) Commercial-Office (PUD-C-O).

---

1 City of Pleasanton. 2005. Pleasanton General Plan 2005-2025, Chapter 2 – Land Use Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23896. Accessed December 17, 2020.

2 Ibid.

3 City of Pleasanton. 2020. Pleasanton Municipal Code 18.44.080 Permitted and Conditional Uses. Website: http://qcode.us/codes/pleasanton/view.php?topic=18-18_44-18_44_080&frames=on. Accessed December 17, 2020.

1.4 - Project Description

The proposed project would result in the redevelopment of the site for commercial and office uses, R&D, and light laboratory manufacturing for the Applicant. As shown in Exhibit 5, the proposed project would consist of the following structures:

- **Building 1:** a 2- and 3-story, 150,000-square-foot operations facility building located on the northern portion of the project site;
- **Building 2:** up to a 4-story, 115,000-square-foot R&D facility located on the eastern portion of the project site; and
- **Building 3**: up to a 4-story, 116,062-square-foot R&D facility located on the southeastern portion of the project site.

Although Buildings 2 and 3 are listed separately, the proposed Planned Unit Development would allow for the square footage of these buildings to be combined into a single structure.

Parking structure: a maximum 6-story parking structure would be located on the western portion of the project site, providing 1,168 parking stalls. A surface parking lot south of the parking structure would provide an additional 90 parking stalls at full project buildout.

Open space improvements, including landscaping and pedestrian walkways, would be provided throughout the site and along the setback of Stoneridge Drive, Springdale Avenue, and Stoneridge Mall Road. At full buildout, the open space improvements would be designed to foster a campus-style character for an estimated 1,280 employees. Phase 1 would employ an estimated 180 employees, and Phase 2 and 3 would employ an estimated 550 employees during each phase.

1.4.1 - Project Phasing

The proposed project would be constructed over the course of three phases, as described below.

Phase 1

Phase 1 would include construction of an operations facility on the northern portion of the project site (Building 1). The operations facility would have 80,000 square feet of general administrative and office space; 20,000 square feet of packing, distribution, and warehouse space; and 50,000 square feet for production laboratories, for a total of 150,000 square feet in a 2- and 3-story building with a maximum height of 68 feet. Phase 1 would also include the resurfacing and minor expansion of the existing paved parking lot and construction of additional paved parking if needed, for a total of up to 600 surface parking stalls. Upon completion of Phase 1, the project site would have an operations facility on the northern portion of the project site and surface parking lot on the southern portion of the project site, with the balance of the site remaining vacant (Exhibit 6). Construction of Phase 1 would also install landscaping such as trees and groundcover, walkways, and other improvements around edges of the site and throughout the surface parking area, as well as a 32-foot setback line and possible solar canopies.

Phase 2

Phase 2 would include construction of an R&D facility on the eastern portion of the project site (Building 2), removal of up to 600 existing surface parking stalls, and construction of a maximum 6-story parking structure. Building 2 would have up to 63,250 square feet of general administrative and office uses, and 51,750 square feet for production laboratories, for a total of up to 115,000 square feet in an up to 4-story building with a maximum height of 82 feet. The parking structure would provide 354,000 square feet for parking on a 59,000-square-foot building footprint supplying 1,168 parking stalls.

Phase 3

Phase 3 would include the construction of an R&D facility on the southeastern portion of the project site (Building 3). Building 3 would have 63,834 square feet for general administrative and office uses and 52,228 square feet for production laboratories, for a total of 116,062 square feet in an up to 4-story building with a maximum height of 82 feet. A 36,000 square foot surface parking lot would be constructed south of the parking structure, providing 90 surface parking stalls. The construction of Phase 3 may occur in conjunction with the construction of Phase 2.

1.4.2 - Construction

Phase 1 construction is expected to begin in Fall 2021 and would last for approximately 9.5 months. Phase 2 construction is estimated to be completed by 2025. Phase 3 is estimated to be completed by 2029.

1.4.3 - Operations

The proposed project would be used for commercial, and office uses, R&D, and light laboratory manufacturing. The specific nature of the proposed uses may include highly specialized, technical activities such as R&D, small-scale assembly of instruments, consumables, and software for analyzing biological systems. Per the Applicant, these activities would occur in clean-room environments that would not involve large- or heavy industrial-scale processes or machinery. At Phase I, the proposed project would include the following uses and square footages:

- 20,000 square feet would be used for packaging, warehousing, and distribution uses.
- 80,000 square feet would be for general administrative and office uses.
- 50,000 square feet would be used for production laboratories.

At full buildout, the proposed project would include the following uses and square footages:

- 20,000 square feet would be used for packaging, warehousing, and distribution uses.
- 206,834 square feet would be for general administrative and office uses.
- 153,978 square feet would be used for production laboratories.

1.4.4 - Site Access and Circulation

Primary access to the project site would be provided from a driveway off Springdale Avenue, located along the western project boundary. A second driveway along Stoneridge Mall Road would provide

site access from the northern side of the project site. These two driveways would be constructed during Phase I. At full buildout, a third driveway along Stoneridge Mall Road would provide site access from the eastern side of the project site (Exhibit 5).

At full buildout, the project site would include automobile access to two drop-off areas. The northern and western driveways would provide primary vehicular access to the internal roadways, parking structure, surface parking, loading/service areas, and a drop-off area on the northern side of the project site. The eastern driveway along Stoneridge Mall Road would provide vehicular access to the drop-off area along the eastern side of the project site at full buildout. Two loading/service areas would be provided adjacent to the buildings.

1.4.5 - Utilities

Existing public utility systems would continue to serve the site. The proposed project would be served by the following utility services:

Potable Water

As a water retailer, the City of Pleasanton provides potable water service to businesses and homes within the City.

Wastewater

The City of Pleasanton provides its own sewage collection facilities within the City limits. The Dublin San Ramon Services District (DSRSD) provides wastewater treatment services under contract with the City. The Livermore-Amador Valley Water Management Agency (LAVWMA)—a joint powers agency between the City of Pleasanton, City of Livermore, and DSRSD—provides export/treated wastewater disposal services for treated sewage effluent.[4]

Solid Waste

Pleasanton Garbage Service, Inc. (PGS) provides solid waste collection services under an agreement with the City of Pleasanton until 2028. These services include solid waste collection from commercial, industrial, and residential customers within the City. Solid waste is sorted at the Pleasanton Transfer Station and Recycling Center, which is operated by PGS.

Electricity

Pacific Gas and Electric Company (PG&E) provides electricity service to the project site.

Natural Gas

PG&E provides natural gas service to the project site.

[4] City of Pleasanton. 2015. Pleasanton General Plan 2005–2025. January 6.

1.5 - Required Discretionary Approvals

As mentioned previously, the City of Pleasanton has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Draft IS/MND. In order to implement the project, the City would need to secure the following permits/approvals:

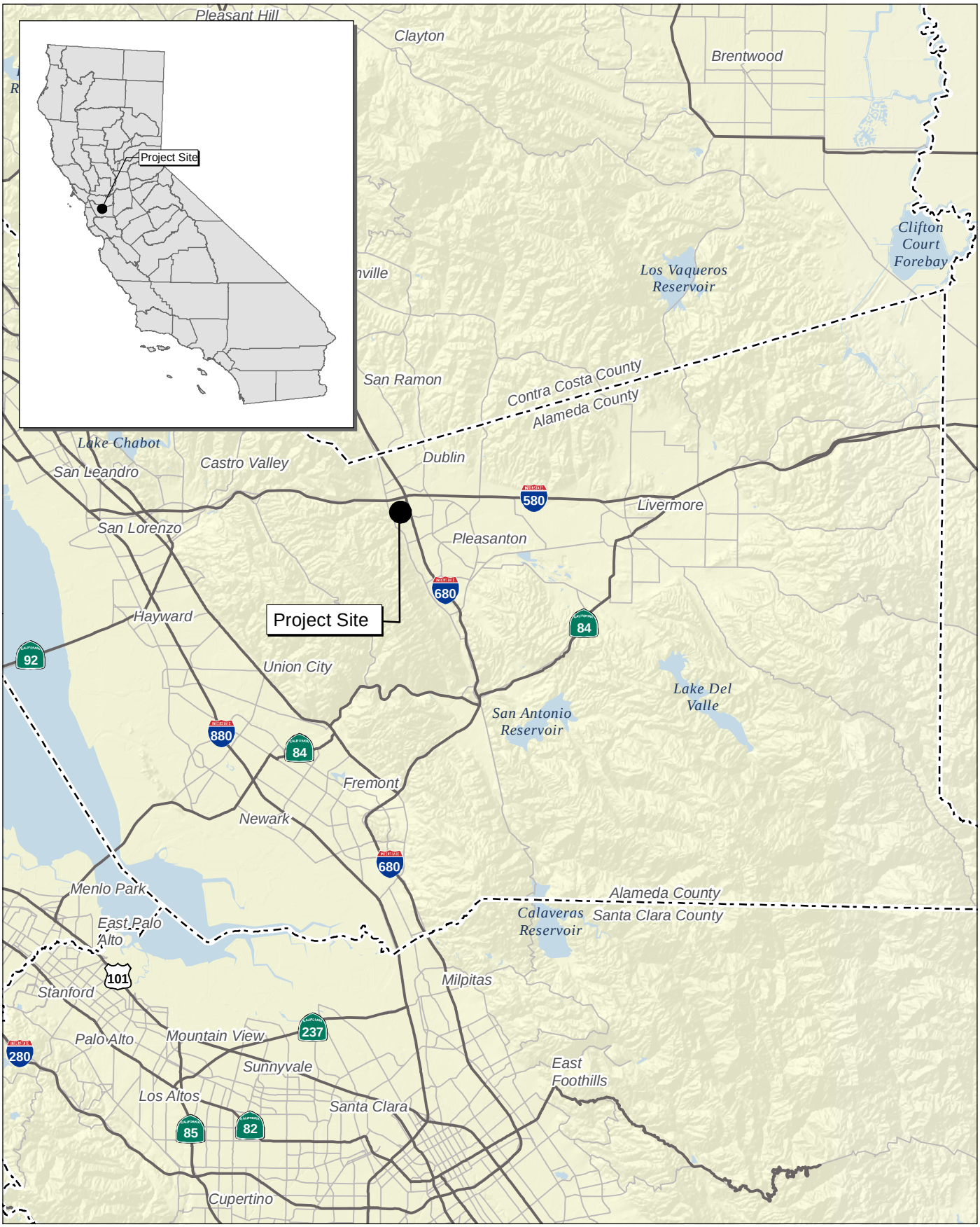
- Approval of the Draft IS/MND
- Approval of a Site Development Permit and Building Permits
- Approval of the Development Plan and Zone Change from C-R (p) (Regional Commercial–Peripheral Area) to PUD-C-O (Planned Unit Development Commercial-Office)
- Subsequent Design Review for Phase 2 and Phase 3 of the proposed project
- Approval of a vesting tentative map

1.6 - Intended Uses of this Document

This Draft IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project.

The Draft IS/MND will be circulated for public review for a minimum of 30 days, during which comments concerning the environmental analysis contained in the Draft IS/MND should be sent to:

Eric Luchini, Senior Planner
City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566
Phone: 925.931.5612
Email: eluchini@cityofpleasantonca.gov



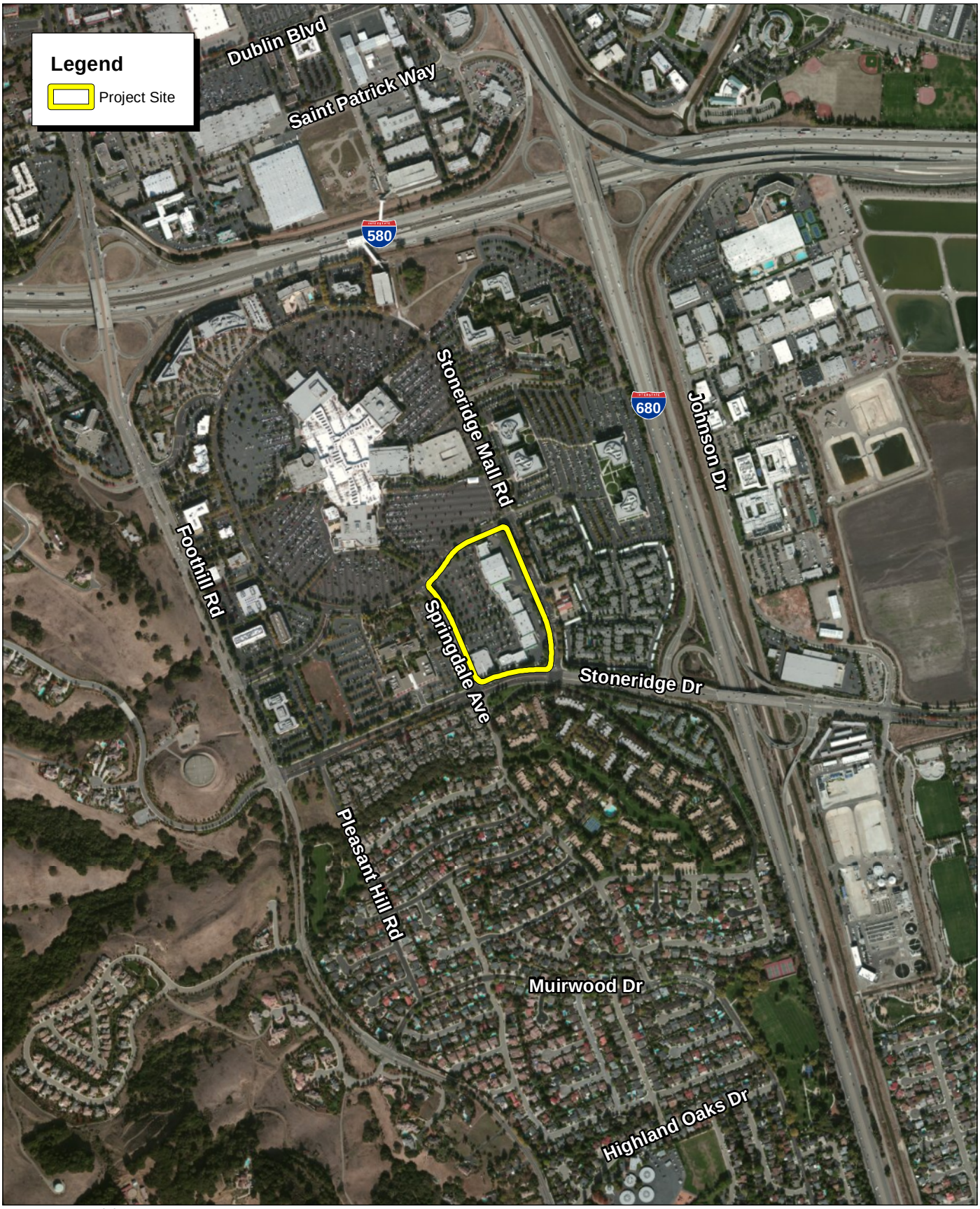
Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

FIRSTCARBON SOLUTIONS™

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

THIS PAGE INTENTIONALLY LEFT BLANK



Source: ESRI Aerial Imagery.

FIRSTCARBON SOLUTIONS™

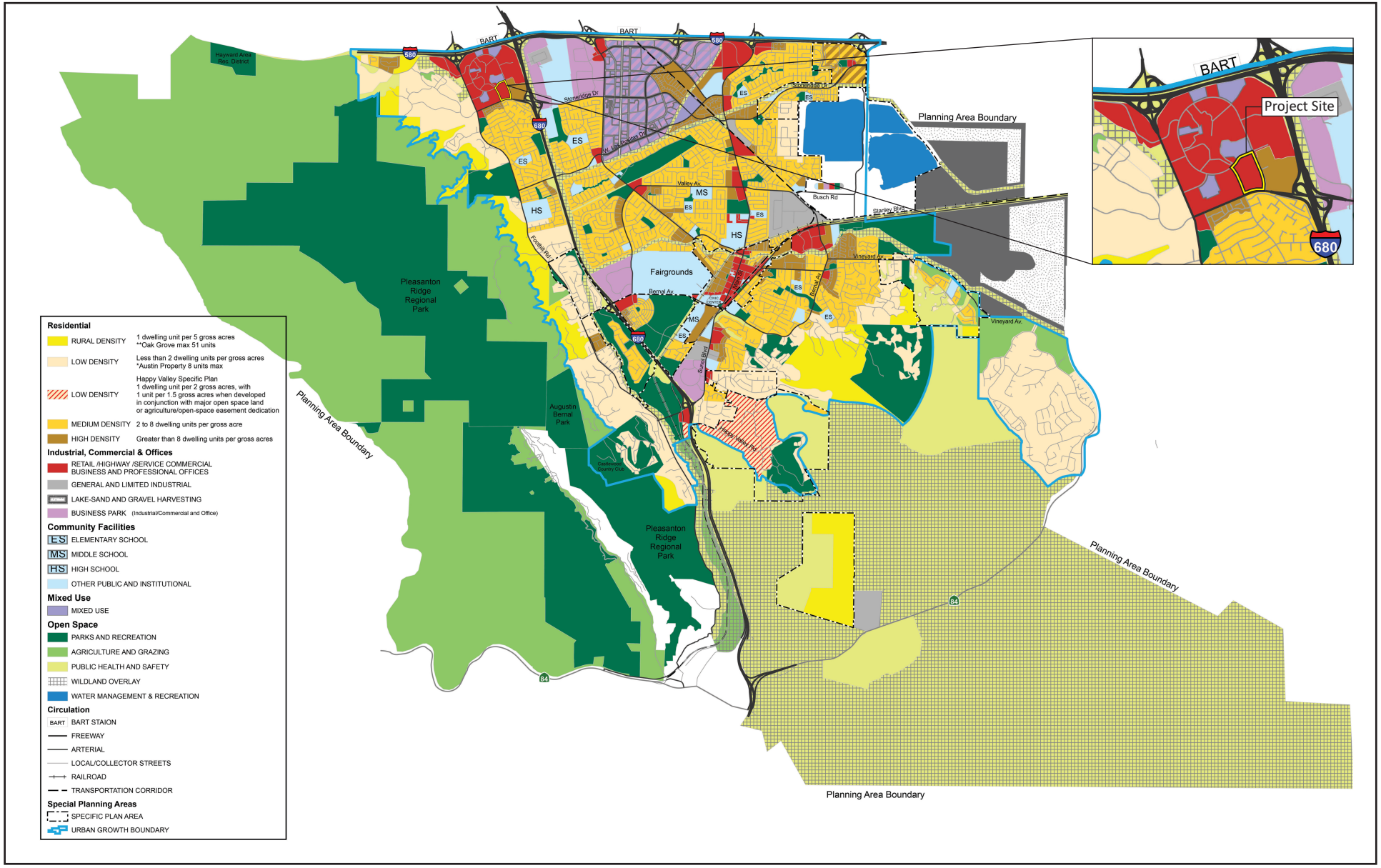
1,000 500 0 1,000
Feet

Exhibit 2
Local Vicinity Map

21480024 • 12/2020 | 2_local_vicinity.mxd

CITY OF PLEASANTON
10X GENOMICS PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

THIS PAGE INTENTIONALLY LEFT BLANK

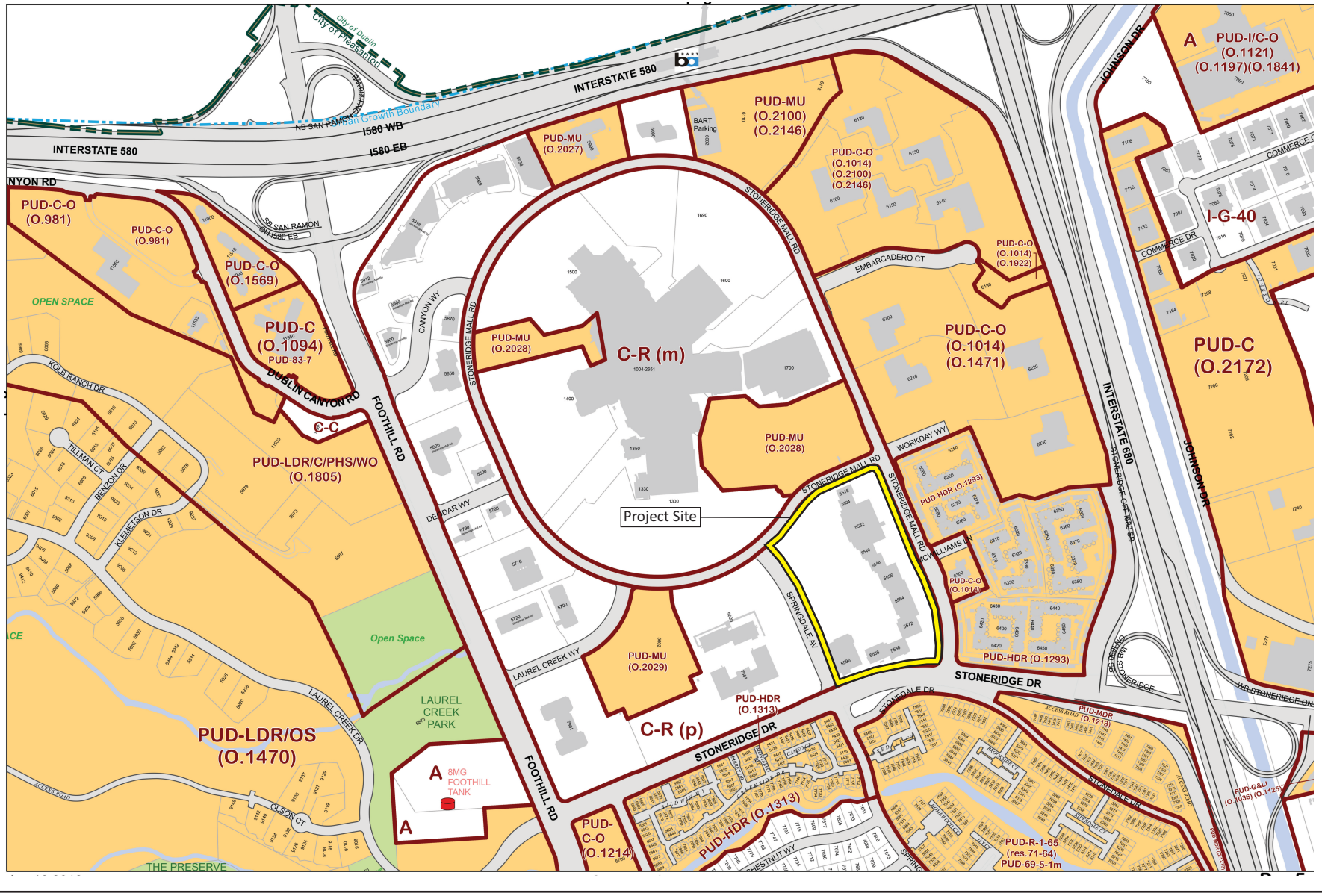


Source: City of Pleasanton General Plan, 2012.

FIRSTCARBON SOLUTIONS™

Exhibit 3
General Plan Land Use Map

THIS PAGE INTENTIONALLY LEFT BLANK



Source: City of Pleasanton Zoning Plan, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 4
Zoning Map

THIS PAGE INTENTIONALLY LEFT BLANK



Source: Hellmuth, Obata & Kassabaum, Inc., December 18, 2020.

FIRSTCARBON SOLUTIONS™

Exhibit 5
Site Plan - Full Buildout

THIS PAGE INTENTIONALLY LEFT BLANK



Source: Hellmuth, Obata & Kassabaum, Inc., December 16, 2020.

FIRSTCARBON SOLUTIONS™

Exhibit 6
Site Plan - Phase 1

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology/Soils	☒	Greenhouse Gas Emissions	☒	Hazards/Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☒	Noise	☐	Population/Housing	☒	Public Services
☐	Recreation	☒	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Services Systems	☐	Wildfire	☒	Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 03/31/21 Signed: 

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.1 Aesthetics *Except as provided in Public Resources Code Section 21099, would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Evaluation

Setting

The General Plan contains goals and policies related to aesthetics in the Conservation and Open Space Element and the Community Character Element. The Community Character Element of the General Plan, Goal 6 Policy 15, expresses the City's desire to preserve and enhance the City's commercial areas and residential neighborhoods through incorporating attractive architectural and site-design features in new commercial area development and redevelopment projects.[5] The City of Pleasanton General Plan Conservation and Open Space Element also seeks to retain the scenic attributes and views of woodlands, hills and ridges, valleys, and grazing lands.[6]

Several roadways that run through the City of Pleasanton are either designated by the California Department of Transportation (Caltrans) as State Scenic Highways or Eligible State Scenic Highways. I-680, which traverses the western side of the City in a north-south direction, is designated as a State Scenic Highway. Additionally, I-580 and State Route 84 (SR-84) are Eligible State Scenic Highways.

Would the project:

[5] City of Pleasanton. 2005. Pleasanton General Plan 2005–2025 Community Character Element. Website: https://www.cityofpleasantonca.gov/gov/depts/cd/planning/general.asp. Accessed January 15, 2021.

a) Have a substantial adverse effect on a scenic vista?

Less than significant impact. The project site is located a substantial distance away from any areas defined as a scenic resource in the Conservation and Open Space Element of the General Plan. The project is located in an urbanized landscaped area comprised of a mixture of developed commercial and other uses, including roadways and parking lots, buildings, landscaping, shrubs, and trees. The project site does not contain any woodlands, hills, ridges, valleys, or grazing lands, or views of such resources; therefore, redevelopment would not result in any impact to these resources. The proposed project would be consistent with General Plan goals and policies related to aesthetics, including Goal 6 Policy 15 of the Community Character Element, which encourages new commercial area development and redevelopment to incorporate attractive architectural and site design features, such as landscaping. The proposed project would reflect a redevelopment of a site that has contained a retail/commercial center and associated parking since the late 1970s, and would add attractive architectural and site-design features to the project site by redeveloping an underutilized parcel and creating a campus-style character on the project site with landscaping, pedestrian walkways, and outdoor patios and seating. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?

No impact. The nearest designated State Scenic Highway is I-680, located 0.24 mile to the east. Additionally, I-580, located 0.43 mile north of the project site, is an Eligible State Scenic Highway.[7] Neither I-680 or I-580 are visible from the project site because of obstruction by intervening urban development. Therefore, the proposed project would not result in any damage to any scenic resources located within this State Scenic Highway. Additionally, there are no trees, rock outcroppings, or historic buildings on the project site. There would be no impacts.

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. The project site has been developed for many years as a retail/commercial shopping center, and is surrounded by urban uses. The General Plan Land Use Map designates the site "Commercial and Offices (retail, highway, and service; commercial business and professional offices)" within the Industrial, Commercial and Offices designation, and the project site is also within the Stoneridge Mall Road Periphery sub-area. The proposed project would be consistent with the site's General Plan land use designation.

[7] California Department of Transportation (Caltrans). 2019. List of eligible and officially designated State Scenic Highways. Website: https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx. Accessed January 15, 2021.

The project site is currently zoned C-R (p), and the Applicant is requesting approval to rezone the site to PUD-C-O, which would allow R&D and light laboratory manufacturing uses on the project site.[8] When a project includes an amendment to the zoning, inconsistency with the existing designation or zoning is an element of the project itself, which then necessitates a legislative policy decision by the agency and does not signify a potential environmental effect. As such, the proposed project would be consistent with the permitted land uses of the PUD-C-O zone upon approval of the requested zone change, and the rezoning would not result in an environmental impact. Upon approval of the rezoning, the proposed project would be consistent with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

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. A shade and shadow study was completed for the proposed project that analyzed the shade and shadow impacts of the proposed project during winter, summer, spring, and fall in the morning and evening (Appendix K). The proposed buildings would cast shadows to the northwest during winter mornings and to the northeast during winter evenings. In the spring and fall the proposed buildings would cast shadows to the northwest during the mornings and west during the evenings. During the summer, the proposed buildings would cast shadows to the west during the morning and to the east in the evenings. Most of the shadows cast by the proposed buildings would occur within the project site. The adjacent properties most impacted would be the surface parking lot to the northwest and the residential uses to the west. However, the shadows cast by the proposed building would move away from these areas in less than an hour and would not significantly impact these land uses.

The existing development on the project site generates light and glare from parking lots, driveways, buildings, and vehicles. Pursuant to the City's Zoning Ordinance Chapter 18.68, Planned Unit Development District, the City would ensure that the proposed redevelopment would be in the best interest of the health, safety, and general welfare of the public and that it would be consistent with City of Pleasanton's General Plan policies regarding lighting and glare prior to project approval.[9] Additionally, the proposed project would comply with Part 6 of the California Energy Code requirements related to outdoor lighting, which requires exterior light fixtures to be directed downward to prevent light trespass.[10] The proposed buildings to be constructed during Phase 1 of the proposed project would be 68 feet in height and the buildings in Phase 2 and 3 would be up to 82 feet in height. The existing trees along Stoneridge Mall Road and Stoneridge Drive would shield existing uses from any light and glare produced by the proposed project. Additionally, the proposed project is anticipated to operate during typical business hours. Therefore, the proposed redevelopment would not substantially alter the existing light and glare on the project site such that the proposed project would adversely affect day or nighttime views in the area. Although Phase 1 may include expansion of existing surface parking areas, any new lighting required for these areas

[8] City of Pleasanton. 2021. Pleasanton Municipal Code, Chapter 18.68 PUD Planned Unit Development District. Website: http://qcode.us/codes/pleasanton/?view=desktop&topic=18-18_84-18_84_270. Accessed January 15, 2021.

[9] Ibid.

[10] California Building Standards Commission. 2019. California Energy Code, Title 24, Part 6. July. Website: codes.iccsafe.org/content/CAEC2019/subchapter-6-nonresidential-high-rise-residential-and-hotel-motel-occupancies-additions-alterations-and-repairs. Accessed February 9, 2021.

will be required to be shielded and down-directed so as to not cause any off-site light and glare. Additionally, at full buildout, the proposed project would substantially reduce the surface parking area on the project site and would increase the landscaping area to 234,380 square feet, thus reducing nighttime light sources from vehicle headlights and lighted parking areas on the project site. Impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.2 Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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 non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Evaluation

Setting

The project site has been previously developed and is in an urbanized area. The project site is not used for agricultural or forest purposes, nor are there any agricultural or forest uses in the surrounding area. There are no Williamson Act lands within or near the project site.

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 non-agricultural use?

No impact. The proposed project would not result in the conversion of any designated Farmlands to non-agricultural uses. According to the California Department of Conservation Farmland Mapping and Monitoring Program, the project site is designated Urban and Built-Up Land.[11] The nearest land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is an area of Unique Farmland located along Vineyard Avenue in the eastern portion of the City of Pleasanton, 5.29 miles southeast of the project site. Therefore, no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No impact. The project site is not zoned or used for agriculture and is not subject to a Williamson Act contract. Current zoning on the project site is C-R (p), which permits retail and office uses. Therefore, the proposed project would not conflict with existing zoning for agricultural uses or a Williamson Act contract. No impact would occur.

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. The project site does not contain any lands designated as forest land, timberland, or timberland zoned Timberland Production, and is not zoned for forest or timberland uses. The nearest forested area is located more than 0.5 mile west of the project site, in the area of the Pleasanton Ridge Regional Park.[12] Therefore, the proposed project would not conflict with existing zoning for forest land, nor would it cause the rezoning of forestland, timberland, or Timberland Production lands. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No impact. The project site does not contain any forest lands, nor would it result in the conversion of forest land to non-forest uses. Trees on the project site consist of ornamental landscaped trees and shrubs. Therefore, No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No impact. As discussed previously, the project site does not contain any Farmland, and there are no Farmlands located adjacent to or near the project site. Furthermore, there are no forestlands on or adjacent to the project site. This condition precludes the possibility of converting Farmland to non-agricultural uses or forestland to non-forest uses. No impact would occur.

Mitigation Measures

None required.

[11] California Department of Conservation. 2016. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed January 15, 2021.

[12] East Bay Regional Park District. 2018. Pleasanton Ridge Regional Park. Website: https://www.ebparks.org/parks/pleasanton/. Accessed January 15, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.3 Air Quality *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:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

Setting

The proposed project is located in the City of Pleasanton and is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which regulates air quality in the San Francisco Bay Area Air Basin (Air Basin). Within the Air Basin, ambient air quality standards for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter of 2.5 microns and smaller ($PM_{2.5}$) and 10 microns and smaller (PM_{10}), and lead (Pb) have been established by both the State of California and the United States Environmental Protection Agency (EPA). The State has also set standards for sulfate concentrations and atmospheric visibility. The BAAQMD is classified as non-attainment for the State ozone and particulate matter standards and as non-attainment for federal ozone 8-hour and $PM_{2.5}$ 24-hour standards, indicating that the BAAQMD has not achieved compliance with these State and federal standards in the Air Basin.

Thresholds of Significance

For purposes of this proposed project, the City determined that the significance criteria established or recommended by the BAAQMD would be used to make CEQA significance determinations related to the proposed project's impacts on air quality. The BAAQMD has adopted standards of significance for construction and operation. The thresholds of significance are shown in Table 1**.** In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Table 1: BAAQMD Thresholds of Significance

Pollutant	Construction Thresholds Average Daily Emissions (pounds/day)	Operational Thresholds	
		Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance, other Best Management Practices (BAAQMD Basic Construction Mitigation Measures)	Not Applicable	
Health Risks and Hazards for New Sources			
Excess Cancer Risk	10 per one million	10 per one million	
Chronic or 1-hour Acute Hazard Index	1.0	1.0	
Incremental annual average $PM_{2.5}$	0.3 µg/m^3	0.3 µg/m^3	
Health Risks and Hazards for Sensitive Receptors (Cumulative from All Sources within 1,000-Foot Zone of Influence) and Cumulative Thresholds for New Sources			
Excess Cancer Risk	100 per 1 million		
Chronic Hazard Index	10.0		
Annual Average $PM_{2.5}$	0.8 µg/m^3		

Notes:
ROG = reactive organic gases, NO_X = nitrogen oxides, CO= carbon monoxide
PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 µm or less
$PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5 µm or less
µg/m3 = micrograms per cubic meter
Source: Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Air Quality Guidelines. May. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed June 25, 2020.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than significant impact with mitigation incorporated. To address regional air quality standards, the BAAQMD has adopted several air quality policies and plans, the most recent 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 federal ambient air quality standards. 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 air pollutants[13] and greenhouse gases (GHG).[14] The 2017 Clean Air Plan also accounts for projections of population growth provided by the Association of Bay Area Governments and Vehicle Miles Traveled (VMT) provided by the Metropolitan Transportation Commission 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 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 protecting public health in the Bay Area; and
- Reduce GHG emissions and protect the climate.

A measure for determining if the proposed project supports the primary goals of the AQP is if the proposed project would 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 AQPs. 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. The City of Pleasanton General Plan Land Use Element designates the project site as Retail/Highway Service/Commercial/Business and Professional Offices, which is generally intended to accommodate retail, commercial, and professional office uses, and may accommodate warehouse under certain circumstances.[15] Therefore, the proposed project is considered consistent with the General Plan land use designation. Because the proposed project would not increase the VMT generated during project operation compared to the assumptions used in the AQP, it is reasonable to conclude that the proposed project would not adversely affect implementation of the AQP.

[13] 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").

[14] A greenhouse gas 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.

[15] City of Pleasanton. 2009. 2005 Pleasanton Plan 2025, 2. Land Use Element. Adopted July 21. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23896. Accessed January 6, 2021.

Moreover, as further discussed under Impact 3(b), Impact 3(c), and Impact 3(d), the proposed project would not create a localized violation of State or federal air quality standards, or significantly contribute to cumulative non-attainment pollutant violations. Nonetheless, the proposed project may expose sensitive receptors to substantial pollutant concentrations, as will be discussed under Impact c. However, implementation of the mitigation measures identified under Impact 3(b) and Impact 3(c), the proposed project would be consistent with Criterion 1.

Criterion 2

The 2017 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 transportation control measures, the 2017 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 2017 Clean Air Plan also includes an account of the implementation status of control measures identified in the 2010 Clean Air Plan.

Table 2 lists Clean Air Plan control measures that are relevant to the proposed project, and evaluates the proposed project's consistency with those measures. As discussed below, the proposed project would be consistent with all applicable control measures.

Table 2: Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Buildings Control Measures	
BL1: Green Buildings	**Consistent.** The proposed project would not conflict with implementation of this measure. The proposed project will comply with the latest energy efficiency standards and incorporate applicable energy efficiency features designed to reduce project energy consumption; as well as green building requirements of Pleasanton Municipal Code Chapter 17.50. Additionally, the proposed project would be committed to advanced energy efficiency and would seek United States Green Building Council Leadership in Energy and Environmental Design (LEED™) Gold Certification
BL4: Urban Heat Island Mitigation	**Consistent.** The proposed project would incorporate landscaping (including trees) throughout the site. The proposed project would provide landscaping in accordance with City standards that would serve to reduce the urban heat island effect and would include the planting of shade trees.
Energy Control Measures	
EN1: Decarbonize Electricity Generation	**Consistent.** The proposed project would not conflict with implementation of this measure. The proposed project would comply with the latest energy efficiency standards and incorporate applicable energy efficiency features designed to reduce project energy consumption.

Control Measure	Project Consistency
EN2: Decrease Electricity Demand	**Consistent.** The project Applicant would be required to conform to the California Building Standards Code's (California Code of Regulations [CCR], Title 24) energy efficiency requirements, which was adopted to meet an Executive Order[16] in the Green Building Initiative to improve the energy efficiency of buildings through aggressive standards.
Natural and Working Lands Control Measures	
NW2: Urban Tree Planting	**Consistent.** The proposed project would incorporate landscaping (including trees) throughout the site. The proposed project would provide landscaping according to City standards that would reduce the urban heat island effect.
WA3: Green Waste Diversion	**Consistent.** The proposed project's waste service provider will be required to meet the Assembly Bill (AB) 341 and Senate Bills (SB) 939 and SB 1374 requirements that require waste service providers to divert green waste. All plant refuse generated during operations of the proposed project would be recycled off-site.
WA4: Recycling and Waste Reduction	**Consistent.** The proposed project's waste service provider will be required to meet the AB 341 and SB 939 and SB 1374 requirements that require waste to be recycled.
Stationary Control Measures	
SS36: Particulate Matter from Trackout	**Consistent with Mitigation.** Mud and dirt that may be tracked out onto the nearby public roads during construction activities shall be removed promptly by the contractor based on the BAAQMD's requirements. Mitigation Measure (MM) AIR-1, identified under Impact 3(b), would require the implementation of best management practices (BMPs) recommended by BAAQMD for fugitive dust emissions during construction.
SS37: Particulate Matter from Asphalt Operations	**Consistent.** Asphalt used during project construction would be subject to BAAQMD Regulation 8, Rule 15-Emulsified and Liquid Asphalts. Although this rule does not directly apply to the proposed project, it does limit the reactive organic gas (ROG) content of asphalt available for use during construction through regulating the sale and use of asphalt. By using asphalt from facilities that meet BAAQMD regulations, the proposed project would be consistent with this Clean Air Plan measure.
Transportation Control Measures	
TR9: Bicycle and Pedestrian Access and Facilities.	**Consistent.** Existing Class 2 bicycle facilities are on Foothill Road. Additionally, the Bicycle and Pedestrian Master Plan proposes changes to bicycle facilities on Stoneridge Drive and Stoneridge Mall Road. The proposed project will not alter or conflict with these facilities. While the proposed project does not dedicate space specifically for bicycle facilities, it does include sidewalks along the perimeter of the project site for any pedestrian passersby. Additionally, the proposed project would be required to install and/or upgrade certain bicycle facilities adjacent to the project site, in accordance with the City's Complete Streets Policy (2012) and plans. The proposed project would not limit or obstruct pedestrian or bicycle access adjacent to the project site; therefore, the proposed project would not conflict with and would be consistent with the BAAQMD's effort to encourage planning for bicycle and pedestrian facilities.

[16] California Executive Order S-20-04.

Control Measure	Project Consistency
Notes: Source: Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. April 19. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed December 3, 2020.	

In summary, the proposed project would not conflict with any applicable measures under the 2017 Clean Air Plan after implementing Mitigation Measure (MM) AIR-1; therefore, the proposed project would be consistent with Criterion 2 after incorporation of mitigation.

Criterion 3

The proposed project would not preclude extension of a transit line or bike path, nor would it propose excessive parking beyond parking requirements, or otherwise create an impediment or disruption to implementing any AQP control measures. Table 2 illustrates that the proposed project would incorporate several AQP control measures as project design features. Considering this information, the proposed project would not disrupt or hinder the implementation of any AQP control measures. Therefore, the proposed project would be consistent with Criterion 3.

Summary

As addressed above, the proposed project would be consistent with all three criteria after incorporating MM AIR-1. Thus, the proposed project would not conflict with the 2017 Clean Air Plan. Therefore, impacts associated with conflicting with or obstructing the 2017 Clean Air Plan's implementation would be less than significant with incorporation of MM AIR-1.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

Less than significant impact with mitigation incorporated. 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 non-attainment status of regional pollutants is a result of past and present development within the Air Basin, and this regional impact is a cumulative impact. Therefore, new development projects within the Air Basin would contribute to this impact only on a cumulative basis. And in the present case, the proposed project is the redevelopment of an existing developed site, therefore its contribution is only an incremental increase from the prior use. No single project would be sufficient in size, by itself, to result in non-attainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when evaluated in combination with past, present, and future development projects.

Potential localized and regional impacts could result in exceedances of State or federal standards for nitrogen oxides (NO_X), particulate matter (PM_{10} and $PM_{2.5}$), or CO. NO_X emissions are of concern because of potential health impacts from exposure to NO_X emissions during both construction and operation and as a precursor in the formation of ground-level ozone. PM_{10} and $PM_{2.5}$ are of concern during construction because the operation of off-road construction equipment generates emissions

of particulate matter consisting of uncombusted fuel and fugitive dust. Particulate matter is also of concern during both construction and operation due to the operation of motor vehicles generating aerated brake particulates and aerated tire particulates from vehicle wear and tear. CO emissions are of concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion and their consequential health impacts.

Reactive organic gas (ROG) emissions are also important because of their participation in the formation of ground-level ozone. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections, and that can cause substantial damage to vegetation and other materials. Excessive ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, elderly, and young children.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether that project would result in regional emissions that exceed the BAAQMD thresholds of significance for construction and operations on a project level. The thresholds of significance represent the allowable volume 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 a 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 Emissions

During construction, fugitive dust would be generated from site preparation, grading, and other earth-moving activities. The majority of this fugitive dust would remain localized and deposited near the project site; however, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce this source's emissions. Exhaust emissions would also be generated from the operation of the off-road construction equipment.

Construction Fugitive Dust

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 a consideration of the control measures to be implemented, referred to as Best Management Practices (BMPs). 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. During construction activities, air pollution control measures should be implemented as outlined in MM AIR-1. With the incorporation of this measure, short-term construction impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation would be less than significant for fugitive dust.

Construction Air Pollutant Emissions: ROG, NO_X, PM_{10}, and $PM_{2.5}$

California Emissions Estimator Model (CalEEMod), Version 2016.3.2, was used to estimate the proposed project's construction emissions. CalEEMod provides a consistent platform for estimating construction and operational emissions from various land-use projects and is the model recommended by the BAAQMD for estimating project emissions. Estimated construction emissions are compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$ construction emissions to determine significance for this impact.

As presented in Table 3, construction of the proposed project is tentatively expected to start in September 2021 and conclude in March 2023. The construction schedule displayed in Table 3 represents a construction schedule that was updated on March 15, 2021, and differs from that utilized in the emissions modeling in Appendix A. The emissions modeling contained in Appendix A reflects a construction schedule from January 2021 through July 2022, as provided by the project Applicant. [17] While the construction schedule provided in Table 3 represents a later schedule than that utilized in the emissions modeling supporting this analysis, the earlier schedule utilized in the emissions modeling represents a conservative assessment of emissions from project construction. By assuming an earlier operational year, the construction emission estimates contained herein present a conservative assessment as fuel efficiency with construction fleets generally improves over time as new equipment gradually replaces older equipment. As shown in Table 3, in each project phase, architectural coating and paving activities would start concurrently, and architectural coating activities were anticipated to conclude concurrently with building construction activities.

Table 3: Project Construction Schedule

Phase	Phase Start Date	Phase End Date	Working Days per Week[1]	Total Number of Working Days
Site Preparation	9/16/2021	12/01/2021	5	54
Grading	02/01/2022	04/01/2022	5	44
Building Construction	04/01/2022	03/01/2023	5	239
Paving	06/01/2022	09/14/2023	5	76
Architectural Coating	06/01/2022	03/01/2023	5	195

Notes:
[1] Working days per week is assumed to be 5 in the model. The construction schedule displayed above reflects later dates than those provided in the emissions modeling (Appendix A); however, the total number of working days for each construction activity and the occurrence of overlapping activities match those provided by the Project Applicant. The construction schedule presented here represents the anticipated construction schedule for the proposed project as updated by City staff on March 15, 2021.
Source: Terrasset. 2020, 2021. 10x Genomics, 1701 Springdale Avenue Redevelopment – Request for Information. Dated October 22, 2020. Revised January 6, 2021.

[17] Terrasset. 2020, 2021. 10x Genomics, 1701 Springdale Avenue Redevelopment – Request for Information. Dated October 22, 2020. Revised January 6, 2021.

According to Applicant-provided information, dated October 22, 2020, and revised January 6, 2021, the proposed project would involve the removal of an estimated 240,000 square feet of pavement during Phase 2. As calculated in the Hauling Calculations sheet contained in Appendix A, the pavement removal would generate an estimated 9,000 tons of debris. The proposed project would also involve the removal of approximately 200 cubic yards of vegetation during site preparation activities and the exportation of approximately 1,500 cubic yards of cut soil during grading activities. For a more detailed description of the construction parameters and debris calculations used in estimating air pollutant emissions, please refer to Appendix A.

Average daily construction emissions are compared with the significance thresholds in Table 4.

Table 4: Unmitigated Construction Emissions (Average Daily Rate)

Construction Activity	ROG	NO_X	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
	Tons per Year			
Construction Phase 1				
Site Preparation	0.04	0.34	0.02	0.02
Grading	0.06	0.78	0.03	0.03
Building Construction	0.11	0.90	0.02	0.02
Paving	0.02	0.08	0.00	0.00
Architectural Coating	0.86	0.22	0.01	0.01
Construction Phase 2				
Pavement Removal	0.08	0.85	0.03	0.03
Building Construction	0.02	0.15	0.00	0.00
Year 2021 Total	*1.19*	*3.32*	*0.12*	*0.11*
Building Construction	0.11	0.87	0.02	0.02
Paving	0.01	0.08	0.00	0.00
Architectural Coating	0.70	0.23	0.01	0.01
Construction Phase 3				
Building Construction	0.03	0.23	0.01	0.01
Paving	0.00	0.03	0.00	0.00
Architectural Coating	0.62	0.07	0.00	0.00
Year 2022 Total	*1.47*	*1.51*	*0.05*	*0.05*
Emission Summary and Analysis				
Total Emissions (Tons)[1]	2.66	4.83	0.17	0.16
Total Emissions (Pounds)[1]	5,320	9,665	343	321
Average Daily Emissions (lbs/day)[2]	**13.96**	**25.37**	**0.90**	**0.84**

Construction Activity	ROG	NO_X	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
	Tons per Year			
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
lbs = pounds
ROG = reactive organic gases
NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
[1] Totals may not add up due to rounding. Calculations use unrounded totals.
[2] Calculated by dividing the total lbs. of emissions by the total number of working days of construction (381).
Source: CalEEMod Output (see Appendix A).

As shown in Table 4, the average daily construction emissions from all construction activities are below the BAAQMD thresholds of significance; therefore, project construction would have a less than significant impact regarding emissions of ROG, NO_X, exhaust PM_{10}, and exhaust $PM_{2.5}$. As previously discussed, the proposed project must implement MM AIR-1 for BMPs recommended by the BAAQMD to reduce potential impacts related to fugitive dust emissions from construction equipment. Therefore, project construction would have a less than significant impact with incorporation of MM AIR-1.

Operational Emissions

Operational Air Pollutant Emissions: ROG, NO_X, PM_{10}, and $PM_{2.5}$

Operational emissions would include area, energy, and mobile sources. Area sources would include emissions from architectural coatings, consumer products, and landscape equipment. Energy sources include emissions from the combustion of natural gas for water heaters and other heat sources. Mobile sources include exhaust and road dust emissions from the automobiles that would travel to and from the project site. Stationary sources include emissions from stationary source equipment, such as back-up generators, that would require a permit issued by the BAAQMD. As the proposed project includes a back-up diesel generator, stationary source emissions are included in the annual emissions summary displayed in Table 7. Pollutants of concern include ROG, NO_X, PM_{10}, and $PM_{2.5}$.

Project operations were analyzed assuming operations would commence immediately following the completion of each project phase's construction. As previously stated, the anticipated construction schedule displayed in Table 3 represents a construction schedule updated from that utilized in the emissions modeling contained in Appendix A. While the construction schedule provided in Table 3 represents a later schedule than that utilized in the emissions modeling supporting this analysis, the earlier schedule utilized in the emissions modeling, which reflects the anticipated construction

schedule originally provided by the project Applicant,[18] represents a conservative assessment of emissions from vehicle traffic generated by project operation in its first year of operation. By assuming an earlier operational year, the mobile emission estimates contained herein present a conservative assessment as fuel efficiency with vehicle fleets generally improves over time as new vehicles gradually replace older vehicles. To provide a conservative estimate of emissions occurring from project operation in the earliest year of operation, the proposed project (all phases) is assumed to be fully operational in July 2022. While specific phases of the proposed project would be operational prior the full buildout date of July 2022, the transportation data which is used for this analysis is based on full buildout of the proposed project and cannot be used to determine vehicle trips generated during each project phase. Therefore, the proposed project's operational emissions are based on full buildout starting in July 2022 and are presented in Table 5 and Table 6.

According to the traffic volume data provided by the City of Pleasanton,[19] the proposed project is expected to generate approximately 4,520 average daily vehicle trips at buildout, principally from employee passenger vehicles traveling to and from the project site.[20] Under existing operations, the regional shopping center that occupies the project site generated approximately 840 average daily vehicle trips.[21] Therefore, the operational emissions from the existing regional shopping center and parking lot were included in the analysis baseline to estimate the net increase in emissions from the proposed project. For detailed assumptions used to estimate emissions, see Appendix A. The estimated net daily emissions are presented in Table 5, while net annual emissions from project operations are presented in Table 6.

Table 5: Maximum Daily Unmitigated Operational Emissions

Emissions Source	ROG	NO_X	PM_{10} Total	$PM_{2.5}$ Total
	Pounds per Day			
Existing Emissions[1]				
Area	4.13	0.00	0.00	0.00
Energy	0.01	0.10	0.01	0.01
Mobile	1.31	7.49	0.04	0.04
Stationary	0.00	0.00	0.00	0.00
Existing Total[2]	*5.46*	*7.59*	*0.05*	*0.04*
Proposed Project–Full Buildout Emissions[1]				
Area	9.44	0.00	0.00	0.00
Energy	0.03	0.24	0.02	0.02
Mobile	6.65	8.69	0.16	0.14
Stationary	0.00	0.00	0.00	0.00
Proposed Project Total[2]	*16.12*	*8.93*	*0.17*	*0.16*

[18] Terrasset. 2020, 2021. 10x Genomics, 1701 Springdale Avenue Redevelopment – Request for Information. Dated October 22, 2020. Revised January 6, 2021.
[19] Tassano, Mike. Deputy Director of Community Development, Transportation, City of Pleasanton. Personal communication: e-mail. January 4, 2021.
[20] Fehr and Peers. 2021. Draft Final Transportation Impact Analysis. March.
[21] Ibid.

Emissions Source	ROG	NO_X	PM_{10} Total	$PM_{2.5}$ Total
	Pounds per Day			
Emission Summary and Analysis				
Net Daily Emissions	**10.66**	**1.34**	**0.13**	**0.12**
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
lbs = pounds
ROG = reactive organic gases
NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
[1] Daily operational emission for ROGs are obtained from the CalEEMod summer run while all other pollutant emissions are taken from the CalEEMod winter run to account for maximum daily emissions for each respective pollutant; see Appendix A.
[2] Totals may not add up due to rounding. Calculations use unrounded results.
Source: CalEEMod Output (see Appendix A).

Table 6: Annual Unmitigated Operational Emissions

Emissions Source	ROG	NO_X	PM_{10} Total	$PM_{2.5}$ Total
	Tons per Year			
Area	1.72	0.00	0.00	0.00
Energy	0.00	0.04	0.00	0.00
Mobile	0.98	1.48	0.03	0.03
Stationary	1.72	0.00	0.00	0.00
Existing Emissions	*0.96*	*1.37*	*0.01*	*0.01*
Emission Summary & Analysis				
Net Daily Emissions	**1.75**	**0.17**	**0.02**	**0.02**
Significance Threshold (lbs/day)	**10**	**10**	**15**	**10**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
lbs = pounds
ROG = reactive organic gases
NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
[1] Totals may not add up due to rounding. Calculations use unrounded results.
Source: CalEEMod Output (see Appendix A).

As illustrated in Table 5 and Table 6, the proposed project would not result in any criteria air pollutant or ozone precursor generated during project operation that would exceed the BAAQMD's thresholds of significance. Long-term operational impacts associated with criteria pollutant and ozone precursor emissions would be less than significant.

Operational Carbon Monoxide Hotspot

The CO emissions from traffic generated by the proposed project are a concern at the local level. Congested intersections can result in high, localized concentrations of CO.

The BAAQMD recommends a screening analysis to determine if a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is necessary. The proposed project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; or
2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

As indicated by the traffic volume data provided by the City of Pleasanton,[22] the proposed project at full buildout would generate an estimated 548 net new AM peak-hour vehicle trips and 400 net new PM peak-hour vehicle trips. As indicated in the Traffic Impact Analysis (TIA) prepared for the proposed project,[23] the greatest AM peak-hour traffic volumes under existing plus project conditions would be experienced at the intersection of Hopyard Road and Stoneridge Drive and the greatest PM peak-hour traffic volumes under existing plus project conditions would be experienced at the intersection of the I-680 northbound offramp and Stoneridge Drive. As displayed therein, the AM peak-hour traffic volumes at the intersection of Hopyard Road and Stoneridge Drive would total an estimated 5,176 vehicles and PM peak-hour traffic volumes at the I-680 northbound offramp and Stoneridge Drive would total an estimated 6,585 vehicles. As illustrated in the TIA, the proposed project would not result in a nearby intersection exceeding 44,000 vehicles per hour.

Nonetheless, CO hotspots can occur when a transportation facility's design or orientation prevents the adequate dispersion of CO emissions from vehicles, resulting in the accumulation of local CO concentrations. The design or orientation of a transportation facility which may prevent the dispersion of CO emissions include tunnels, parking garages, bridge underpasses, natural or urban canyons, below-grade roadways, or other features where vertical or horizontal atmospheric mixing is substantially limited. Adjacent roadways that would receive new vehicle trips generated by the proposed project do not include roadway segments where vertical or horizontal atmospheric mixing is substantially limited. Therefore, based on the above criteria, the proposed project would not exceed the CO screening criteria and would have a less than significant impact related to CO.

[22] City of Pleasanton. 2009. 2005 Pleasanton Plan 2025, 2. Land Use Element. Adopted July 21. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23896. Accessed January 6, 2021.
[23] Fehr and Peers. 2021. Draft Final Transportation Impact Analysis. March.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. The BAAQMD defines sensitive receptors as the following: "Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas." The closest sensitive receptors would be multi-family residences approximately 130 feet east of the project site across from Stoneridge Mall Road, as well as multi-family residences approximately 200 feet south of the project site across from Stoneridge Drive, and multi-family residences 175 feet southwest of the project site across from Stoneridge Drive. (While these nearby land uses represent the closest sensitive receptors to the proposed project, they do not necessarily represent the location of the maximally impacted sensitive receptor during construction activities.)

The following four criteria were applied to determine the significance of the exposure of sensitive receptors to project emissions based on the health risk and hazard significance thresholds shown in Table 1.

- **Criterion 1:** Construction of the project would not exceed the health risk significance thresholds.
- **Criterion 2:** The cumulative health impact would not exceed the cumulative health risk significance thresholds.
- **Criterion 3:** The project's operation would not result in an exceedance of the health risk significance thresholds.
- **Criterion 4:** A CO hotspot assessment must demonstrate that the project would not result in a CO hotspot development that would cause an exceedance of the CO ambient air quality standards.

Criterion 1: Project Construction Toxic Air Pollutants

An assessment was made of the potential health impacts to surrounding sensitive receptors resulting from toxic air contaminants (TAC) emissions during construction. A summary of the assessment is provided below, while the detailed assessment is provided Appendix A.

Diesel particulate matter (DPM) has been identified by the California Air Resources Board (ARB) as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery truck and worker activities. For purposes of this analysis, DPM is represented as exhaust emissions of $PM_{2.5}$.

Estimation of Construction DPM Emissions

Construction DPM emissions were estimated using CalEEMod, Version 2016.3.2, as described under the discussion for Impact 3(b). As presented in Table 3, the proposed project's construction is anticipated to occur from September 2021 through March 2023. Construction emissions were assumed to be distributed over the project area.

Estimation of Cancer Risks

The BAAQMD has developed a set of guidelines for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young children to exposures to TACs.[24,25] These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The recommended method for the estimation of cancer risk is shown in the equations below with the cancer risk adjustment factors provided in Table 7 for several types of sensitive/residential receptors (infant, child, and adult).

$$\text{Cancer Risk} = \text{CPF} \times \text{DOSE}_{AIR} \times \text{ASP} \times \text{ED/AT} \times \text{FAH} \qquad \text{(EQ-1)}$$

Where:

Cancer Risk = Total individual excess cancer risk defined as the cancer risk a hypothetical individual faces if exposed to carcinogenic emissions from a particular source for specified exposure durations; this risk is defined as an excess risk because it is above and beyond the background cancer risk to the population; cancer risk is expressed in terms of risk per million exposed individuals.

CPF = Inhalation Cancer Potency Factor (1.1)
ASF = Age Sensitivity Factor (see Table 7)
ED = Exposure Duration (BAAQMD recommends 3 years for short-term projects less than 3 years in duration)
AT = Averaging Time for lifetime cancer risk (70 years)
FAH = Fraction of time At Home
$\text{DOSE}_{AIR} = C_{AIR} \times \text{DBR} \times \text{A} \times \text{EF}$ (EQ-2)

Where:

C_{AIR} = TAC concentration from air dispersion model ($\mu g/m^3$)
DBR = Daily Breathing Rate (BAAQMD recommends 95th percentile for residential receptors; liter of air per kilogram of body weight per day)
A = Inhalation Absorption factor (1)
EF = Exposure Frequency (workdays/365 days)

The California Office of Environmental Health Hazard Assessment (OEHHA) recommended values for the various cancer risk parameters, as described by equations 1 and 2 above (EQ-1 and EQ-2), are provided in Table 7.

[24] Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May. Website: https://www.baaqmd.gov/~/media/files/planning-and research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed June 8, 2020.

[25] Bay Area Air Quality Management District (BAAQMD). 2020. BAAQMD Health Risk Assessment Modeling Protocol. August. Website: https://www.baaqmd.gov/~/media/files/ab617-community-health/facility-risk-reduction/documents/baaqmd_hra_modeling_protocol_august_2020-pdf.pdf?la=en. Accessed January 6, 2020.

Table 7: Exposure Assumptions for Cancer Risk

Receptor Type	Exposure Frequency		Age Sensitivity Factors (ASF)	Fraction of time At Home (FAH)	Daily Breathing Rate (DBR) [1] (L/kg-day)
	Hours/day	Days/year			
Sensitive/Residential—Infant					
3rd Trimester	24	350	10	1.00	361
0 to 1 year	24	350	10	1.00	1,090
1 to 2 years	24	350	10	1.00	1,090
Sensitive/Residential—Child					
3 to 16 years	24	350	3	1.00	572
Sensitive/Residential—Adult					
> 16 years	24	350	1	0.73	261

Notes:
(L/kg-day) = liters per kilogram body weight per day
[1] The daily breathing rates recommended by the BAAQMD for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th percentile breathing rates for all older individuals.
Source: Bay Area Air Quality Management District (BAAQMD). 2016. Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines. Website: http://www.baaqmd.gov /~/media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en.

Estimation of Non-Cancer Chronic Hazards

An evaluation of the potential non-cancer effects of chronic chemical exposures was also conducted. Adverse health effects are evaluated by comparing the annual receptor concentration of each chemical compound with the appropriate reference exposure limit. Available reference exposure limits promulgated by the OEHHA were considered in the assessment.

Risk characterization for non-cancer health hazards from TACs is expressed as a hazard index. The Hazard Index is a ratio of the predicted concentration of the proposed project's emissions to a concentration considered acceptable to public health professionals, termed the reference exposure limit.

The hazard index assumes that chronic sub-threshold exposures adversely affect a specific organ or organ system (toxicological endpoint). For each discrete chemical exposure, target organs presented in regulatory guidance were used. To calculate the hazard index, each chemical concentration or dose is divided by the appropriate toxicity reference exposure level. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total equals or exceeds 1, a health hazard is presumed to exist. For purposes of this assessment, the TAC of concern is DPM for which the OEHHA has defined a reference exposure limit for DPM of 5 µg/m3. The principal toxicological endpoint assumed in this assessment was through inhalation.

Estimation of Health Risks and Hazards from Project Construction

To assess impacts to off-site sensitive receptors, receptor locations within the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) model were placed at locations of existing residences, schools, and daycares located within approximately 1,000

feet of the project boundary. As shown in Table 5, Phase 1 grading activities and Phase 2 pavement removal activities would generate the greatest volume of exhaust emissions during project construction. These activities would occur across the entire project site. The Maximum Impacted Sensitive Receptor (MIR) during construction would be at the multi-family residences approximately 130 feet east of the project site across from Stoneridge Mall Road.

Table 8 provides the estimated health and hazard impacts from construction emissions at the MIR for each sensitive receptor age group. The estimates shown in Table 10 include the application of BMPs recommended by the BAAQMD and required by MM AIR-1; however, it should be noted that implementation of MM AIR-1 would only reduce $PM_{2.5}$ fugitive dust emissions and not $PM_{2.5}$ exhaust.

Table 8: Estimated Health Risks and Hazards—Unmitigated Construction

Sensitive Receptor Age Group	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[1]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Infant	17.54	0.03	0.16
Child	3.37	0.03	0.16
Adult	0.52	0.03	0.16
Risks and Hazards	**21.43**	**0.03**	**0.16**
BAAQMD Thresholds of Significance	**10**	**1**	**0.3**
Exceeds Individual Source Threshold?	**Yes**	**No**	**No**

Notes:
[1] Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the reference exposure level of 5 $\mu g/m^3$.
Source: Appendix A.

As shown above in Table 8, the proposed project's construction DPM emissions would exceed the BAAQMD's cancer risk but would not exceed the BAAQMD's chronic non-cancer hazard index or annual $PM_{2.5}$ thresholds of significance at the maximum impacted receptor for any of the sensitive receptor age groups analyzed. Therefore, the proposed project would be required to implement MM AIR-2 to ensure that construction emissions would not result in significant health impacts to nearby sensitive receptors.

MM AIR-2 would require the use of Tier 4 Final engines for select construction equipment, including excavators, sweepers and scrubbers, trenchers, graders, scrapers, aerial lifts, cement and mortar mixers, cranes, forklifts, welders, pavers, rollers, and off-highway trucks. Equipment tiers refer to a generation of emission standards established by the EPA and ARB that apply to diesel engines in off-road equipment. The "tier" of an engine depends on the model year and horsepower rating; generally, the newer a piece of equipment is, the higher the tier number it is likely to have. Excluding engines greater than 750 horsepower, Tier 1 engines were manufactured generally between 1996 and 2003. Tier 2 engines were manufactured between 2001 and 2007. Tier 3 engines were

manufactured between 2006 and 2011. Tier 4 engines are the newest and some incorporate hybrid electric technology; Tier 4 engines are manufactured after 2007.

Table 8 provides the estimated health and hazard impacts from construction emissions at the MIR for each sensitive receptor age group. The estimates shown in Table 9 include the application of MMs AIR-1 and AIR-2.

Table 9: Estimated Health Risks and Hazards—Mitigated Construction

Sensitive Receptor Age Group	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[1]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Infant	1.22	<0.01	0.01
Child	0.23	<0.01	0.01
Adult	0.04	<0.01	0.01
Risks and Hazards	**1.49**	**<0.01**	**0.01**
BAAQMD Thresholds of Significance	**10**	**1**	**0.3**
Exceeds Individual Source Threshold?	**No**	**No**	**No**

Notes:
[1] Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the reference exposure level of 5 $\mu g/m^3$.
Source: Appendix A.

As shown above in Table 9, the proposed project's mitigated construction DPM emissions would not exceed the BAAQMD's cancer risk, chronic non-cancer hazard index, or annual $PM_{2.5}$ thresholds of significance at the maximum impacted receptor for any of the sensitive receptor age groups analyzed. Therefore, the proposed project would not result in significant health impacts to nearby sensitive receptors after mitigation.

Criterion 2: Cumulative Health Risk Assessment

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. For a project-level analysis, BAAQMD provides several tools for use in screening potential sources of TACs. The BAAQMD-provided tools used to assess the potential cumulative impacts from TACs are described below:

- **Health Risks for Local Roadways.** The BAAQMD pre-calculated concentrations and the associated potential cancer risks and $PM_{2.5}$ concentration increases for each county within their jurisdiction for roadways that carry at least 30,000 average daily trips. For certain areas, the BAAQMD also included local roadways that meet BAAQMD's "major roadway" criteria of 10,000 vehicles or 1,000 trucks per day. The latest available screening tool is in the form of a Geographic Information System (GIS) raster file.

- **Freeway Screening Analysis Tool**. The BAAQMD prepared a GIS tool that contains pre-estimated cancer risk and $PM_{2.5}$ concentration increases for highways within the Bay Area. Highway 680 is approximately 940 feet west and of the MIR, and Highway 580 is approximately 3,300 feet north of the MIR.
- **Stationary Source Risk and Hazard Screening Tools**. The BAAQMD prepared a GIS tool[26] with the location of permitted stationary sources. For each emissions source, the BAAQMD provides conservative estimates of cancer risk and $PM_{2.5}$ concentrations. Based on the GIS tool's information, no BAAQMD-permitted stationary source is within 1,000 feet of the MIR.
- **Rail Screening Tools.** The BAAQMD prepared GIS tools that contains estimated cancer risks and $PM_{2.5}$ concentrations from railroad operations at any point within the Air Basin. The closest rail line to the MIR is the BART line running along Highway 580, approximately 3,350 feet north of the MIR.

The cumulative health risk results, including health risks from the existing stationary source, are summarized during project construction in Table 10. Cumulative health risk results shown therein are representative of the health risks to the MIR, which would experience the highest concentration of pollutants.

Table 10: Summary of the Cumulative Health Impacts at the MIR during Construction

Source	Source Type	Distance from MIR(1) (feet)	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Project					
Mitigated Project Construction	Diesel Construction Equipment	130	1.49	<0.01	0.01
Roadways					
Existing Local Roadways		100	0.25	N/A	<0.01
Rail					
Existing Rail Lines		3,350	0.43	N/A	<0.01
Freeway					
Existing Freeways		3,300	19.16	N/A	0.32
Cumulative Health Risks					
Cumulative Total with Project Construction			**21.33**	**<0.01**	**0.42**
BAAQMD's Cumulative Thresholds of Significance			**100**	**10**	**0.8**
Threshold Exceedance?			**No**	**No**	**No**

[26] Bay Area Air Quality Management District (BAAQMD).2018. Permitted Stationary Sources Risk and Hazards. Permitted Stationary Sources Risk and Hazards. Website: https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=2387ae674013413f987b1071715daa65. Accessed December 18, 2020.

Source	Source Type	Distance from MIR(1) (feet)	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Notes: N/A = no data available (1) The maximum impacted sensitive receptor represents a multi-family residence approximately 130 feet east of the project site. (2) Assumes emissions remain constant with time. Source: Appendix A.					

As noted in Table 10, the cumulative impacts from project construction and existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance after implementation of MM AIR-2. Thus, the cumulative health risk impacts from project construction would be less than significant with mitigation.

Criterion 3: Project-Specific Toxic Air Contaminants During Operation

As previously described, the proposed project at full buildout is expected to generate approximately 4,520 estimated daily vehicle trips, or a net increase of 3,680 daily vehicle trips beyond existing conditions, principally from employee passenger vehicles traveling to and from the project site. Because nearly all passenger vehicles are gasoline-fueled, the proposed project would not generate significant amounts of DPM emissions during operation. Therefore, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation. In addition, as discussed under Impact 3(b), the operational CO hotspot impact as a result of project operations would be less than significant.

Criterion 4: CO Hotspot

As discussed under Impact 3(b), the operational CO hotspot impact as a result of project operations would be less than significant.

d) Result in other emission (such as those leading to odors) adversely affecting a substantial number of people?

Less than significant impact. As stated in the BAAQMD 2017 Air Quality Guidelines,[27] odors are generally regarded as an annoyance rather than a health hazard and the ability to detect odors varies considerably among the populations and overall 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. For projects within the screening distances, the BAAQMD has the following threshold for project operations:

[27] Bay Area Air Quality Management District (BAAQMD). 2017. Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines. May. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed January 6, 2021.

> An odor source with five or more confirmed complaints per year averaged over 3 years is considered to significantly impact receptors within the screening distance shown in Table 3-3 [of the BAAQMD's guidance].

Two circumstances have the potential to cause odor impacts:

1. A source of odors is proposed to be located near existing or planned sensitive receptors, or
2. A sensitive receptor land use is proposed near an existing or planned source of odor.

Projects that would introduce a new odor source or a receptor farther than the applicable screening distance, shown in Table 11 below, would not likely result in a significant odor impact.

Table 11: Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Notes: Source: Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. April 19. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed January 6, 2021.	

Project Construction

Diesel exhaust and ROGs would be emitted during construction of the proposed project, which may be objectionable to some; however, emissions would disperse rapidly from the project site and therefore would not create objectionable odors affecting a substantial number of people. As such, construction odor impacts would be less than significant.

Project Operation

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, agricultural operations, or other operations listed in Table 11. The proposed project would introduce a new research and development facility that is not expected to produce any offensive odors that would result in odor complaints. During operation of the proposed project, odors would primarily consist of exhaust from passenger vehicles traveling to and from the site. These occurrences would not produce objectionable odors affecting a substantial number of people. Furthermore, as a new research and development facility, the proposed project would not be placing sensitive receptors near existing odor sources. Therefore, operational impacts associated with the project's potential to create odors would be less than significant.

Mitigation Measures

MM AIR-1 Implement BAAQMD Best Management Practices During Construction

The following Best Management Practices (BMP), as recommended by the Bay Area Air Quality Management District (BAAQMD), shall be implemented during construction:

- All active construction areas should be watered at least two times per day.
- All exposed non-paved surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and access roads) shall be watered at least three times per day and/or non-toxic soil stabilizers should be applied to exposed non-paved surfaces.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered and/or should maintain at least 2 feet of freeboard.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage regarding idling restrictions shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- The prime construction contractor shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. The City of Pleasanton and the construction contractor shall take corrective action within 2 business days. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

MM AIR-2 Minimizing Impacts to Sensitive Receptors

During construction activities, select off-road equipment shall meet either United States Environmental Protection Agency (EPA) or California Air Resources Board (ARB) Tier 4 Final off-road emission standards. The construction equipment that shall meet this standard include excavators, sweepers and scrubbers, trenchers, graders, scrapers, aerial lifts, cement and mortar mixers, cranes, forklifts, welders, pavers, rollers, and off-highway trucks. The construction contractor shall maintain records concerning its efforts to comply with this requirement, including equipment lists. Off-road equipment descriptions and information may include but are not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, and engine serial number.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.4 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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Environmental Evaluation

Setting

The analysis in this section is based on database search results from the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Plants of California, a tree assessment plan completed by HortScience in May 2019, as well as a site visit performed by FirstCarbon Solutions (FCS) Biologist, Robert Carroll, on December 17, 2020. All supporting material is included as Appendix B.

The project site was previously developed with a retail shopping plaza. At the time that FCS performed a site visit, all buildings except for one, operating as a Cost-Plus World Market, appeared to be vacant. Numerous ornamental trees and shrubs are present throughout the site, which is in an urbanized commercial area surrounded by the Stoneridge Shopping Center; retail plazas; commercial office centers; Kaiser Permanente Medical Center offices; hotels; and multi-family residential housing. Subsequent to the site visit, the City issued a demolition permit for removal of the existing structures on-site. Demolition was completed in Spring 2021.

The habitat present within the project site can be classified as Urban/Developed, characterized as areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported and retains no soil substrate, or vegetation or soils are highly disturbed and/or managed. Developed land is characterized by permanent or semi-permanent structures, pavement, or hardscape, and landscaped areas that often require irrigation.

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 with mitigation incorporated.

Special-status Plant Species

A plant's potential to occur is based on presence of suitable habitats, soil types, and occurrences recorded by the CNPS Inventory of Rare and Endangered Plants of California and CNDDB within the Dublin, California USGS quadrangle.[28,29] According to the CNDDB and CNPS database searches, seven special-status plant species are known to occur in the greater vicinity of the project site. Because of previous development and current disturbances at the project site, and lack of specific suitable habitat types, all of these species were determined to have no potential to occur on the project site and were excluded from further analysis (see Table 1; Appendix B for a species-specific discussion of potential to occur for all seven special-status plant species).

Special-status Wildlife Species

The potential for wildlife to occur is based on the presence of suitable habitats and occurrences recorded by the CNDDB within the *Dublin*, California USGS quadrangle.[30] Based on the CNDDB database search, 15 special-status wildlife species are known to occur in the greater vicinity of the project site. The Special-status Wildlife Species Table (Appendix B) identifies three special-status wildlife species that have the potential to occur on-site: white-tailed kite *(Elanus leucurus*), pallid bat (*Antrozous pallidus*), and Yuma myotis bat (*Myotis yumanensis*). The table also includes the species'

[28] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed December 14, 2020.

[29] California Native Plant Society (CNPS). 2020. California Native Plant Society Rare and Endangered Plant Inventory. Website: http://www.rareplants.cnps.org/. Accessed December 14, 2020

[30] California Department of Fish and Wildlife (CDFW). 2020. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed December 14, 2020.

status and required habitat (Table 2; Appendix B). No special-status wildlife species were observed within the project site during the site visit. Wildlife observed included species commonly found in urban areas, such as American crow (*Corvus brachyrhynchos)*, house finch (*Haemorhous mexicanus)*, black phoebe (*Sayornis nigricans)*, and Allen's hummingbird (*Selasphorus sasin)*.

Nesting birds

The project site and adjacent developments contain numerous ornamental trees that may provide suitable nesting habitat for bird nests protected under the Migratory Bird Treaty Act (MBTA) and/or the Fish and Game Code. However, due to the lack of suitable foraging habitat, it is unlikely that the special-status species, white-tailed kite, would nest in the trees on-site, although it cannot be ruled out.

Potential direct and indirect impacts could occur to resident and migratory nesting bird species if project construction occurs during the nesting season (generally February 1 to August 31). Construction activities can result in noise, vibrations, and increased activity levels that could render the project site temporarily unsuitable for bird nesting, resulting in the abandonment of active bird nests, and/or subject birds to risk of death or injury; therefore, birds are likely to avoid the area until such construction activities have dissipated or ceased. Relocation, in turn, could cause hunger or stress among individual birds by displacing them into adjacent territories belonging to other individuals.

No action is necessary if no active nests are found or if construction occurs during the non-breeding season (generally September 1 through January 31). MM BIO-1 requires the project Applicant to conduct a pre-construction survey and, if active nests are identified, requires the Applicant to implement further avoidance and minimization measures. Implementation of MM BIO-1 would reduce potential impacts to nesting birds to a less than significant level.

Roosting bats

Vacant buildings can provide suitable roosting habitat for special-status bat species including pallid bat and Yuma myotis. As noted above, the City issued a demolition permit for the existing buildings, and demolition was completed in Spring 2021. Therefore, because there are no vacant buildings on the project site or other suitable roosting habitat, the proposed project would not result in any potential impacts to roosting bats.

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?

No Impact. The project site is entirely developed and does not contain any riparian habitat or sensitive plant communities. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur.

c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Prior to conducting the field survey of the project site, FCS reviewed existing topographic maps, aerial photography as well as the online resources including the United States Fish and Wildlife Service (USFWS), National Wetlands Inventory [31] to determine if any potentially jurisdictional water bodies or wetlands exist within the vicinity of the project site. The project site is entirely developed and does not contain any potential jurisdictional waters or wetlands. Therefore, the proposed project would not have a substantially adverse effect on State or federally protected wetlands. No impact would occur.

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?

No Impact. The project site is located within an urban and built-up area of Pleasanton. The project site contains impervious surfaces, lacks native vegetation, and is surrounded by urban development including commercial businesses and busy roadways in all directions. These structures serve as significant barriers to wildlife movement through the project site and vicinity. As such, the proposed project would not interfere substantially with the movement of wildlife. No impact would occur.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than significant with mitigation incorporated. Prior to conducting the field survey of the project site, FCS reviewed the Pleasanton General Plan for relevant local policies or ordinances related to the protection and preservation of biological resources. FCS also reviewed a Preliminary Arborist Report (Appendix B) prepared for the project site in 2021.[32] The plan identified 159 trees on-site, of which 70 are classified as Heritage Trees, based on their species and/or size as described below.

The Pleasanton General Plan was adopted in 2009 and includes policies on Heritage Tree preservation. Heritage trees are illegal to remove without the appropriate permit. Chapter 17.16 of the Municipal Code defines a Heritage Tree as:

3. Any single-trunked tree with a circumference of 55 inches or more measured four and one half feet above ground level;
4. Any multi-trunked tree of which the two largest trunks have a circumference of 55 inches or more measured four and one-half feet above ground level;
5. Any tree 35 feet or more in height;

[31] United States Fish and Wildlife Service (USFWS). 2020. https://www.fws.gov/wetlands/data/mapper.html Accessed December 14, 2020.
[32] Hort Science. 2021. Preliminary Arborist Report 1701 Springdale Avenue, Pleasanton, CA.

6. Any tree of particular historical significance specifically designated by official action;
7. A stand of trees, the nature of which makes each dependent upon the other for survival or the area's natural beauty.

The proposed project will require the removal of 61 trees, four of which qualify as Heritage Trees, . The City of Pleasanton requires the approval of a Heritage Tree Application to remove Heritage Trees, as cited in Chapter 17.16 of City's Municipal Code. Adherence to the City's tree removal ordinance would ensure compliance with any local policies or ordinances protecting biological resources. Additionally, 95 trees have been identified for preservation and three for possible preservation, 66 of which are qualified as Heritage Trees. Implementation of MM BIO-2 would require the Applicant to adhere to the Tree Preservation Guidelines as outlined in the Preliminary Arborist Report (Appendix B). As such, impacts would be less than significant with mitigation incorporated.

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. The project site is located within Conservation Zone (CZ)-2 of the East Alameda Conservation Strategy (EACCS),[33] which provides "context and guidance to project applicants, local jurisdictions with permit authority, and resource agencies in determining the potential impacts of a project and the level and type of mitigation necessary to offset those impacts." Conservation priorities for the CZ-2 zone include the following:

- Protection of burrowing owl nesting and foraging habitat.
- Protection of and restoration opportunities in mixed willow riparian scrub along Arroyo Valle and Arroyo Mocho.
- Protection of and restoration opportunities along Arroyo Seco and Arroyo Mocho to support California red-legged frog and future Central California coast steelhead habitat.
- Surveys for San Joaquin spearscale and protection of extant populations.
- Surveys for Congdon's tarplant and protection of extant populations.
- Protection of vernal pool habitat.

The project site does not contain any habitats (e.g., riparian, vernal pools) or species (burrowing owl, California red-legged frog) that are identified by the EACCS as conservation priorities. As such, the proposed project would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan. No impact would occur.

[33] ICF International. 2010. Final Draft: East Alameda County Conservation Strategy.

Mitigation Measures

MM BIO-1 Migratory Birds

- To prevent impacts to Migratory Bird Treaty Act (MBTA) and/or Fish and Game Code-protected birds, nesting raptors, and their nests, removal of trees shall be limited to only those necessary to construct the proposed project.
- If any tree removal is necessary, then it should occur outside the nesting season between September 1 through January 31. If trees cannot be removed outside the nesting season, preconstruction surveys shall be conducted no more than 7 days prior to tree removal to verify the absence of active nests.
- If an active nest is located during pre-construction surveys, construction activities shall be restricted as necessary to avoid disturbance of the nest until its young has fledged or the agencies deem disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 100 feet around an active nest depending on the species) or alteration of the construction schedule.
- A qualified Biologist shall delineate the buffer using Environmentally Sensitive Area fencing, pin flags, and or yellow caution tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.

MM BIO-2 Tree Preservation Guidelines

The following requirements would reduce impacts to trees from development and maintain and improve their health and vitality through the clearing, grading and construction phases.

1. All plans affecting trees shall be reviewed by the Consulting Arborist with regard to tree impacts. These include, but are not limited to, grading, drainage and utility plans, and landscape and irrigation plans.
2. A Tree Protection Zone shall be established around each tree to be preserved. Tree Protection Zones are described in the Tree Protection Plan (provided under separate cover). No grading, excavation, construction or storage of materials shall occur within that zone.
3. Underground services including utilities, sub-drains, water or sewer shall be routed around the Tree Protection Zone. Where encroachment cannot be avoided, special construction techniques such as hand digging or tunneling under roots shall be employed where necessary to minimize root injury.
4. Tree Preservation Notes, prepared by the Consulting Arborist, should be included on all relevant plans.
5. Any herbicides placed under paving materials must be safe for use around trees and labeled for that use.
6. Irrigation systems must be designed so that no trenching will occur within the Tree Protection Zones.

7. Maintain the existing irrigation system. If the existing irrigation system is not functional, have a temporary system installed (using soaker hoses or PVC pipe laid on the ground and covered with mulch) as soon as possible to supply the trees with water and help them recover and prepare them for impacts associated with the construction process.

Pre-construction Treatments

1. The contractor and construction superintendent shall meet with the Consulting Arborist before beginning work to discuss work procedures and tree protection.
2. Fence all trees to be retained to completely enclose the Tree Protection Zone prior to grubbing or grading. Fences shall be 6-foot chain link or equivalent as approved by Consulting Arborist. Fences are to remain until all grading, construction and landscaping is completed. Place weatherproof signs, 2 feet by 2 feet, on the fencing that read "Tree Protection Zone Keep Out" (e.g., one sign for each of the four compass points).
3. Where possible, cap and abandon all existing underground utilities within the Tree Protection Zone in place. Removal of utility boxes by hand is acceptable but no trenching should be performed within the Tree Protection Zone in an effort to remove utilities, irrigation lines, etc.
4. If structures and underground features have to be removed within the Tree Protection Zone it shall be done by hand or using the smallest equipment and operate from outside the Tree Protection Zone. The Consulting Arborist shall be on-site during all operations within the Tree Protection Zone to monitor construction activity.
5. Tree(s) to be removed that have branches extending into the canopy of tree(s) to remain must be removed by a qualified arborist and not by construction contractors. The qualified Arborist shall remove the tree in a manner that causes no damage to the tree(s) and understory to remain. Stumps shall be ground below grade.
6. Prune trees to be preserved to clean the crown and to provide clearance. All pruning shall be done by a State of California Licensed Tree Contractor (C61/D49). All pruning shall be done by Certified Arborist or Certified Tree Worker in accordance with the Best Management Practices for Pruning and adhere to the most recent editions of the American National Standard for Tree Care Operations (Z133.1) and Pruning (A300).
7. All tree work shall comply with the Migratory Bird Treaty Act (MBTA) as well as California Fish and Game Code Section 3503—3513 to not disturb nesting birds. To the extent feasible tree pruning and removal should be scheduled outside of the breeding season. Breeding bird surveys shall be conducted prior to tree work. Qualified Biologists shall be involved in establishing work buffers for active nests.
8. Apply and maintain 4–6-inches of wood chip mulch within the Tree Protection Zone.

Tree Protection During Construction

1. Prior to beginning work, the contractors working in the vicinity of trees to be preserved are required to meet with the Consulting Arborist at the site to review all work procedures, access routes, storage areas, and tree protection measures.
2. Fences have been erected to protect trees to be preserved. Fences define a specific Tree Protection Zone for each tree or group of trees. Fences are to remain until all site work has been completed. Fences may not be relocated or removed without permission of the Consulting Arborist.
3. Any excavation within the dripline or other work that is expected to encounter tree roots, such as the resurfacing work within the dripline of trees, should be approved and monitored by the Consulting Arborist. Roots shall be cut by manually digging a trench and cutting exposed roots with a saw, with a vibrating knife, rock saw, narrow trencher with sharp blades, or other approved root pruning equipment. The Consulting Arborist will identify where root pruning is required and monitor all root pruning activities.
4. If injury should occur to any tree during construction, it shall be evaluated as soon as possible by the Consulting Arborist so that appropriate treatments can be applied.
5. No materials, equipment, spoil, waste or wash-out water shall be deposited, stored, or parked within the Tree Protection Zone (fenced area).
6. Any additional tree pruning needed for clearance during construction must be performed by a qualified arborist and not by construction personnel.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.5 Cultural Resources and Tribal Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
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:				
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	☐	☒	☐	☐
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. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Environmental Evaluation

Setting

This section describes the existing cultural resources setting and potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), Northwest Information Center (NWIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historic Landmarks list, California Points of Historical Interest list, California Built Environment Resource Directory (BERD) for Alameda County, the City of Pleasanton Historic, and Heritage resource listings. Non-confidential records search results, pedestrian survey photos, and correspondence with the NAHC and Tribal representatives are included in Appendix C.

Northwest Information Center

A records search and literature review were conducted on January 13, 2021, at the NWIC, located at Sonoma State University at Rohnert Park, for the project site and a 0.5-mile radius surrounding it. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, historic aerial photographs, and historic maps and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the project site.

The results of the records search indicate that one historic-era resource (P-01-011808) has been recorded within the 0.5-mile search radius, however, no resources were recorded within the project boundary. In addition, 24 area-specific survey reports are on file with the NWIC for the project site and its 0.5-mile search radius. Reports S-32780 and S-47534 address portions of the project site, indicating that it has previously been surveyed for cultural resources. A records search map identifying the project boundaries and a 0.5-mile search radius along with relevant non-confidential records search results can be found in Appendix C-1.

Pedestrian Survey/Architectural and Historic Resources Assessment

On February 5, 2021, FCS Senior Archaeologist, Dana Douglas DePietro, PhD, conducted a pedestrian survey for unrecorded cultural resources within the fully-developed shopping center situated at the project site, which consisted at the time of the site visit of approximately 10 connected retail buildings, associated parking lots and infrastructure, and landscaping elements.[34]

The survey began in the southwest portion of the project site at the corner of Springdale Avenue and Stoneridge Drive and moved clockwise around the project site. Given that the project site is almost entirely hardscaped, standard transects spaced at approximately 5-meter intervals were replaced with a direct focus on the build environment and observable soils in landscaping elements that surround the site. Visibility of soils in these areas was moderate (30-50 percent) and consisted of medium brown loam interspersed with gravel and small stones (3-5 centimeters) composed of schist and quartz. It appears these soils are highly disturbed and may have been imported from off-site.

Survey conditions were documented using digital photographs and field notes. During the survey, Dr. DePietro examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). At no point were any historic or prehistoric cultural resources observed within the project site. Survey photographs may be found in Appendix C.2.

[34] Since the time of the pedestrian survey, the City issued a permit for demolition of all existing buildings. Demolition of the buildings occurred in Spring 2021. All buildings and structures were determined to have been built between the years 1979 and 1982, making them less than 45 years in age. Properties less than 45 years in age are typically ineligible for the NRHP, CRHR, or at the local level, and thus do not constitute potential historic resources under CEQA.

Native American Heritage Commission

On December 5, 2020, FCS sent a request to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on December 22, 2020, indicating that the Sacred Lands File search was positive for Native American Tribal Cultural Resources (TCRs) within the area, and recommended the Muwekma Ohlone Indian Tribe be contacted for additional information. The NAHC also provided a list of nine additional tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the proposed project are addressed, a letter containing project information requesting any additional information was sent to all 10 tribal representatives on January 4, 2021. A response was received from the Indian Canyon Mutsun Band of Costanoan Ohlone People on January 4, 2021, requesting additional information about any recorded archaeological resources in the area. A similar response requesting additional information was received from the Confederated Villages of Lisjan Tribe on February 3, 2021. FCS provided the requested information to both tribes on February 19, 2021.

On March 16, 2021, the City of Pleasanton sent letters containing project information and an invitation to consult on the project to Tribal representatives pursuant to AB-52. The same day, the City received a response from the Indian Canyon Band of Costanoan Ohlone People, expressing concern that the project's Area of Potential Effect (APE) may be in close proximity to a potentially eligible cultural site. The tribe recommended that a Native American monitor and an archaeologist be present on-site at all times in order to minimize potential effects on the cultural site and mitigate inadvertent issues. No additional responses have been received to date. NAHC correspondence and copies of NAHC letters can be found in Appendix C-3.

Cultural Resources

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

Less than significant impact with mitigation incorporated. The results of the NWIC records search show that only one potentially historic resource has been recorded within a 0.5-mile radius of the project site, and the resource is not located within the site itself, nor are any other buildings or structures of potential historic significance. For these reasons, the potential for the proposed project to have an adverse effect on historic resources is considered low.

While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered historic resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, implementation of MM CUL-1 will be required to reduce potential impacts to historic resources that may be discovered during project construction. With the incorporation of mitigation, impacts associated with historic resources would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than significant impact with mitigation incorporated. Records search results from the NWIC indicate that no archaeological resources have been recorded within a 0.5-mile radius of the project site. Furthermore, the project site is entirely hardscaped indicating that subsurface soils are likely highly disturbed, and an intensive pedestrian survey of the project site conducted by FCS on February 5, 2021, failed to identify any indications of archaeological resources within the project site. The project site is therefore considered to have low sensitivity for undiscovered archaeological resources.

While the records search and survey data indicate the likelihood of encountering archaeological resources during project construction is low, there is always a possibility that subsurface excavation may encounter previously undiscovered prehistoric archaeological resources. Such resources could consist of but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Accordingly, this is a potentially significant impact. Implementation of MM CUL-1 would ensure that this potential impact is reduced to a less-than-significant level.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact with mitigation incorporated. There are no records of historic cemeteries, Native American burial sites, or other evidence that human remains may exist within the project area. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Accordingly, this is a potentially significant impact. In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. In the unlikely event human remains are discovered, implementation of MM CUL-2 would reduce this potential impact to a less than significant level.

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:

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

Less than significant impact with mitigation incorporated. A review of the CRHR, local registers of historic resources, a records search conducted at the NWIC, failed to identify any listed or eligible TCRs that may be adversely affected by the proposed project. An NAHC sacred lands file search, however, indicated that the project was positive for TCRs within the area, and recommended the Muwekma Ohlone Indian Tribe be contacted for additional information. FCS contacted all 10 tribal representatives and received two requests for additional information, which were provided. No

additional responses have been received to date, and as such, no known listed or potentially eligible TCRs will adversely affected by the proposed project. Furthermore, implementation of MM CUL-1 and MM CUL-2 would ensure any impacts to undiscovered TCRs encountered during project construction would be reduced to a less that significant level.

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. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than significant impact with mitigation incorporated. On March 16, 2021, the City of Pleasanton sent letters containing project information and an invitation to consult on the project to Tribal representatives pursuant to AB-52. The same day, the City received a response from the Indian Canyon Band of Costanoan Ohlone People, expressing concern that the project's APE may be in close proximity to a potentially eligible cultural site. The tribe recommended that a Native American Monitor and an Archaeologist be present on-site at all times in order to minimize potential effects on the cultural site and mitigate inadvertent issues. The lead agency has not identified any additional significant TCRs meeting the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, that may be adversely affected by the proposed project. However, the City concurred with the Tribe's recommendation, which has been included in MM CUL-1 and MM CUL-2, which would ensure any impacts to undiscovered TCRs encountered during project construction would be reduced to a less that significant level.

Mitigation Measures

MM CUL-1 All project related ground disturbance shall be monitored by an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology and a Native American monitor from a culturally affiliated tribe identified by the Native American Heritage Commission (NAHC). If any prehistoric or historic artifacts, or other indication of cultural resources are found once the project construction is underway, all work shall stop within 20-meters (66 feet) of the find. The Archaeologist and Tribal Monitor shall be consulted for an immediate evaluation of the find prior to resuming groundbreaking construction activities within 20-meters of the find. The Applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be an important archaeological resource, the resource shall be either avoided, if feasible, or recovered consistent with the requirements of the State California Environmental Quality Act (CEQA) Guidelines. Potentially significant cultural resources include, but are not limited to, stone, bone, glass, wood, or shell artifacts or features, including hearths, structural remains, or historic waste disposal sites. Any previously undiscovered resources found during construction within the project site shall be recorded on appropriate Department of Parks and Recreation (DPR) 523 forms and will be submitted to the City of Pleasanton, the Northwest Information Center, and the California Office of Historic Preservation (OHP), as required.

MM CUL-2 In the event of an accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the Alameda County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98, or
2. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendent or on the project area in a location not subject to further subsurface disturbance:
   - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission;
   - The descendent identified fails to make a recommendation; or
   - The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.6 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?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Environmental Evaluation

Setting

A discussion of the proposed project's energy use is presented below. Energy use consumed by the proposed project was estimated and includes natural gas, electricity, and fuel consumption for the proposed project construction and operation. Energy calculations are included as part of Appendix D.

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?

Less than significant impact. A discussion of the proposed project's energy use is presented below. The proposed project's energy use was estimated and includes electricity and fuel consumption for the proposed project. Energy calculations are included as part of Appendix D of this Draft IS/MND.

Construction Impacts

The anticipated construction schedule was conservatively assumed to begin in September 2021 and conclude March 2023. If the construction schedule moves to later years, construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment. The proposed project would require site preparation, grading, building construction, architectural coating, and paving. The construction phase would require energy for the manufacture and transportation of building materials, preparation of the site (e.g., site clearing, and grading), and the actual construction of the building. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The types of 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. Construction equipment is estimated to consume a total of 54,533 gallons of diesel fuel over the entire construction duration (Appendix D).

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated including construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB Emissions Factors model (EMFAC) mobile source emission model. Appendix D provides the specific parameters used to estimate fuel usage. In total, the proposed project is estimated to generate 671,483 VMT and a combined 31,078 gallons of gasoline and diesel for vehicle travel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. As described in Section 2.13, Noise, construction activities are restricted to between the hours of 8:00 a.m. and 8:00 p.m. daily, except Sunday and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m. in Section 9.04.100 of the City of Pleasanton Municipal Code. As on-site construction activities would be restricted to these hours, it is anticipated that the use of construction lighting would be minimal. Single-wide mobile office trailers, commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 27,966 kilowatt-hours (kWh) during the roughly 1-year and 9-months construction period (Appendix D).

The overall construction schedule and process are already designed to be efficient to avoid excess monetary costs. This is because equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for future efficiency gains during construction are limited. For the reasons discussed above, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

Operational Impacts

The proposed project would consume energy as part of building operations and transportation activities. Due to the unique nature of the proposed project, electricity and natural gas consumption rates for the proposed project were adjusted to reflect the consumption rates experienced in the existing 10x Genomics facility at 6230 Stoneridge Mall Road, in Pleasanton, California. Electricity and natural gas utility meter data for the existing 10x Genomics facility for March 2018 through April 2019 were utilized to estimate the anticipated electricity and natural gas consumption rates for the proposed project. Please see the Utility Calculations sheet contained in Appendix A for more information.

Table 12 summarizes the existing and proposed operational energy consumption.

Table 12: Estimated Annual Project Energy Consumption

Energy Consumption Activity	Estimated Annual Energy Consumption		
	Existing Operations	Proposed Operations	Net Change in Operations
Electricity Consumption	1,866,820 kWh	12,546,580 kWh	10,679,760 kWh
Natural Gas Consumption	387,495 kBTU	884,064 kBTU	496,569 kBTU
Vehicle Fuel Consumption	56,592 gallons (gasoline, diesel)	419,815 gallons (gasoline, diesel)	363,223 gallons (gasoline, diesel)

Notes:
kWh = kilowatt-hour
kBTU = kilo-British Thermal Unit
Source: FCS 2021 (see Appendix A for the modeling output files used to estimate GHG emissions associated with the proposed project).

As illustrated in Table 12, the proposed project's operation would consume an estimated 12,546,580 kWh of electricity and an estimated 884,064 kilo-British Thermal Unit (kBTU) of natural gas on an annual basis. Current on-site operational energy use from existing land uses includes an estimated 1,866,820 kWh of electricity and an estimated 387,495 kBTU of natural gas on an annual basis. The proposed project would consume an additional 10,679,760 kWh of electricity and 496,569 kBTU of natural gas for 1 year of project operations compared to existing uses. The proposed project's buildings would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Building Energy Efficiency Standards. These are widely regarded as the most advanced building energy efficiency standards and compliance would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

Project-related vehicle trips would consume an estimated 419,851 gallons of gasoline and diesel annually. Current estimated operational vehicle trips from existing on-site uses consume an estimated 56,592 gallons of fuel (gasoline and diesel combined) annually. The proposed project is located in an urbanized portion of the City of Pleasanton. Regional access to the project site is provided via Interstate 680 (I-680), which is approximately 0.3 mile east of the project site. Also, the project site is approximately 0.5 miles from the West Dublin/Pleasanton BART Station, and approximately 0.1 mile from Routes 3 and 53 of Tri-Valley Wheels bus stops, which provide service to the project site and BART Station. The proposed project would further support alternative modes of transportation by including 6 percent of parking as Electric Vehicle (EV) capable and facilitating pedestrian connectivity to adjacent land uses. Thus, transportation fuel consumption would not be wasteful, inefficient, or unnecessary. Impacts would be less than significant.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Construction

Less than significant impact. During the construction phase, the proposed project would adhere to California regulations (CCR Title 13, Sections 2449 and 2485) limit idling from both on-road and off-

road diesel-powered equipment. The proposed project would be required to comply with these regulations, which are enforced by the ARB. Part 11, chapter 4 of the State's Title 24 energy efficiency standards establish mandatory measures for residential buildings, including material conservation and efficiency. The proposed project would also be required to comply with these mandatory measures.

The Energy Element of the Pleasanton General Plan contains a goal and several policies that aim to reduce the City's government and public electricity and natural gas consumption. Building and site designs would be reviewed by the City of Pleasanton for energy impacts, prior to approval of the proposed project. Therefore, it is anticipated that the construction phase of the proposed project would not conflict with State or local renewable or energy efficiency objectives. Construction-related energy impacts would be less than significant.

Operation

The proposed project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Building Energy Efficiency Standards. Energy conservation policies and standards have been established at the State, County, and City level. The proposed project's buildings would be designed and constructed in accordance with the State's mandatory Title 24 energy efficiency standards. These standards, widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. 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. The incorporation of the Title 24 standards into the design of the proposed project would ensure that the proposed project would not result in the use of energy in a wasteful manner. Additionally, the proposed project would need to comply with policies in the City of Pleasanton General Plan pertaining to energy conservation.[35] Consistent with Policies 2, 4, 5, 7, 9, and 10, the proposed project would be required to implement parking lot tree plantings, lighter colored paved areas, energy efficient lighting, and implement green building standards.

The proposed project would have the option to be served with electricity provided by East Bay Community Energy (EBCE) or PG&E. In 2018, PG&E obtained 39 percent of its electricity from renewable energy sources (18 percent solar, 10 percent wind, 4 percent geothermal, 4 percent biomass and biowaste, and 3 percent eligible hydroelectric), while the remaining electricity was sourced from nuclear (34 percent), natural gas (16 percent), and large hydroelectric (13 percent).[36] PG&E also offers a 50 Percent Solar Choice option and a 100 Percent Solar Choice option. Additionally, the future building occupant would have the option to opt-in to EBCE's electricity service program, which provides electricity from 100 percent renewable sources.[37] Therefore, the proposed project's electricity provider meets the State's current objective of 33 percent of electricity

[35] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025. Website: https://www.cityofpleasantonca.gov/gov/depts/cd/planning/general.asp. Accessed February 16, 2021.
[36] Pacific Gas and Electric (PG&E). 2019. 2018 Power Content Label: Pacific Gas and Electric Company. July. Website: https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_PG_and_E.pdf. Accessed November 20, 2020.
[37] East Bay Community Energy. 2021. Power Mix. Website: https://ebce.org/our-power-mix/. Accessed February 16, 2021.

from renewable energy sources. Furthermore, the electricity provider which serves the proposed project would be required to meet the future objective of 60 percent of electricity from renewable energy sources by 2030.

The proposed project would comply with existing State energy standards and with energy conservation policies contained in the Pleasanton General Plan. As such, the proposed project would not conflict with State or local renewable or energy efficiency objectives. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.7 Geology 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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Evaluation

Setting

The information in this section is based, in part, on the Geotechnical Investigation prepared for the proposed project on December 3, 2020, by Langan Engineering and Environmental Services, Inc., the Geotechnical Feasibility Study dated October 6, 2020, by Langan Engineering and Environmental

Services, Inc., and the results of the Paleontological Records Search provided by Kenneth L. Finger, PhD., conducted on December 16, 2020, at the California Museum of Paleontology database. These documents are included as Appendix E of this report.

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. The project site is located in a regional area of high seismicity. According to the Geotechnical Investigation, the major active faults in the area are the Hayward, Calaveras, Mount Diablo, San Andreas, and Green Valley Faults.[38] The site is not within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the project site. The nearest Alquist-Priolo mapped fault zone is the Calaveras Fault, located 0.37 mile west of the project site,[39] which has a 25 percent probability of a magnitude 6.7 or greater earthquake within 30 years. The next nearest fault is the Mount Diablo Fault, located 5.59 miles northeast of the project site, which has a 4 percent probability of a magnitude 6.7 or greater earthquake within 30 years.

In addition to the active faults, the potentially-active Pleasanton fault terminates approximately 2.6 kilometers northeast of the site.[40] In any seismically active area, the remote possibility exists for future faulting in areas where no faults previously existed; however, based on available evidence, the Geotechnical Investigation concluded the risk of surface faulting and consequent secondary ground failure at the site is considered low.[41] Therefore, the proposed project would not cause substantial adverse effects associated with fault rupture. Impacts associated with fault rupture would be less than significant.

ii) Strong seismic ground shaking?

Less than significant impact with mitigation incorporated. The region in which the project site is located is considered seismically active. Small earthquakes occur within the region every year, and large earthquakes have occurred and are expected to occur in the future; therefore, during a major earthquake, strong seismic ground shaking is expected to occur at the project site.

[38] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California. December 3.

[39] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-5, Alquist-Priolo Earthquake Fault Zone. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[40] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California. December 3.

[41] Ibid.

All structures would be designed using sound engineering judgment and the latest California Building Standards Code (CBC) requirements, at a minimum. The Geotechnical Investigation provides additional recommendations related to earthwork and site preparation, foundation design, floor slabs, pavement and concrete design, and landscaping. MM GEO-1 would ensure implementation of the recommendations from the Geotechnical Investigation, which would reduce hazards associated with strong seismic ground shaking to less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact with mitigation incorporated. Liquefaction can cause the soil beneath a structure to lose strength, which may result in the loss of foundation-bearing capacity and which could cause a structure to settle or tip. Liquefaction can also result in the settlement of large areas because of the densification of the liquefied deposit. According to the General Plan as well as the site-specific Geotechnical Investigation, the project site is not in a liquefaction zone, but the center of the project site is approximately 950 feet west and 1,300 feet south of an area designated as a liquefaction hazard zone. Although the site is outside the mapped liquefaction area, the medium-dense sand present at the site below the design groundwater level may be susceptible to liquefaction.[42,43]

The Geotechnical Investigation includes an analysis of the site's liquefaction potential, performed in accordance with Special Publication 117A, titled Guidelines for Evaluating and Mitigating Seismic Hazard Zones in California.[44] According to the analysis, some of the thin, medium-dense sand layers below the medium-stiff to stiff clay that is located generally between about 30 and 50 feet below ground surface (BGS) are susceptible to liquefaction during a strong earthquake. The analysis estimated that about 0.5-inch of liquefaction-induced settlement could occur at the project site, but that the potential hazards associated with liquefaction and settlement could be mitigated with ground improvement. [45] As such, MM GEO-1 would require implementation of recommendations from the Geotechnical Report pertaining to earthwork, site preparation, and foundation design in order to protect the proposed improvements from the effects of expansive soil and foundation support to control settlement of Building 1. Implementation of MM GEO-1 would reduce impacts associated with seismic-related ground failure and liquefaction to less than significant.

[42] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California. December 3.

[43] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-4, Liquefaction Susceptibility Level. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[44] Parrish, John G. 2008. Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California. September 11. Website: https://www.conservation.ca.gov/cgs/publications/sp117a. Accessed February 1, 2021.

[45] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California. December 3.

iv) Landslides?

Less than significant impact. According to the General Plan and Geotechnical Investigation, the project site is not located in an area that is at risk of earthquake-induced landslides.[46,47] The project site does not contain steep slopes that would be susceptible to landslides. The elevation of the project site ranges from 340 to 350 feet, with a gentle slope to the east, toward the center of the project site.[48] Because the proposed project is not located in an area at risk of landslides and does not contain steep slopes and is not adjacent to any steep slopes, the project site is not at risk of landslides. Impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Less than significant impact. Construction of the proposed project would involve site preparation, grading, and construction activities that would disturb soils on-site and could result in erosion. Because the proposed project would disturb more than 1 acre of land, the proposed project 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 during construction, including implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must identify potential sources of erosion or sedimentation that may be reasonably expected to affect the quality of stormwater discharges, and is also required to identify BMPs to ensure the reduction of these pollutants during stormwater discharges. Prior to construction grading, the project Applicant would file a Notice of Intent to comply with the NPDES General Permit issued to the Regional Water Quality Control Board (RWQCB) and would prepare the SWPPP, including the identification of specific measures to minimize and control construction and post-construction runoff to the maximum extent practicable.

BMPs that would be implemented include but are not limited to source control measures such as labeling on-site inlets, landscaping that retains existing vegetation and minimizes pesticides and fertilizers, efficient irrigation system, measures to prevent stormwater runoff from dumpsters and recycling containers, temporary and permanent erosion control measures, use of sediment controls or filtration to remove sediment when dewatering, and pollutant discharge control and prevention measures. Additionally, the proposed project would utilize bioretention areas to treat stormwater. Implementation of these BMPs would ensure that construction and operation of the proposed project do not result in substantial erosion.

The proposed project would be required to comply with the CBC and with City Municipal Code requirements pertaining to grading and excavation in effect at the time of project approval. The proposed project would also be required to comply with the policies in the Public Safety Element of the General Plan designed to minimize the risk of soil erosion and further mitigate its effects, including Goal 1 Policy 2, which requires an investigation to be conducted for potential seismic

[46] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California, Figure 6, Regional Seismic Hazard Zones Map. December 3.

[47] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-1, Landslide Zones. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[48] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California. December 3.

hazards and implementation of soils engineering and construction standards to minimize danger from earthquakes; and Goal 2 Policy 5, which requires an investigation to be conducted for potential geologic hazards.[49]

With implementation of the SWPPP and BMPs, and compliance with the applicable regulations as discussed in this section, the proposed project would not result in substantial erosion or loss of topsoil. Impacts would be less than significant.

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 with mitigation incorporated.

Landslide

As discussed in Impact(a), above, the project site is not located in an area that is at risk of earthquake-induced landslides.[50] Therefore, the proposed project would not result in on-site or off-site landslides.

Lateral Spreading

Lateral spreading is lateral ground movement, with some vertical component, as a result of liquefaction. In effect, the soil rides on top of the liquefied layer. Lateral spreading can occur on relatively flat sites with slopes less than 2 percent, under certain circumstances, and can cause ground cracking and settlement. Lateral spreading is generally the most pervasive and damaging type of liquefaction-induced ground failure generated by earthquakes. Because the zones of potentially liquefiable soil are thin and not continuous, the potential for lateral spreading at the site is considered low.

Subsidence

Subsidence is a geologic hazard that involves unnatural movement of land or earth, which results in sinking or settling of the ground surface.[51] According to the Geotechnical Investigation, the potential for ground surface settlement at the project site is considered low.[52]

Liquefaction

As discussed in Impact(a), above, some of the soils between about 30 and 50 feet BGS are susceptible to liquefaction and liquefaction-induced settlement during a strong earthquake. Implementation of MM GEO-1 would reduce impacts associated with seismic-related ground failure and liquefaction to less than significant.

[49] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[50] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California, Figure 6, Regional Seismic Hazard Zones Map. December 3.

[51] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[52] Forrest, T.M., Gildea, P., Flessas, M.G. 2020. Geotechnical Investigation, 10x Genomics Building 1, 1701 Springdale Avenue, Pleasanton California, Figure 6, Regional Seismic Hazard Zones Map. December 3.

Collapse

Neither the General Plan nor the Geotechnical Investigation indicate that the project site is on a geologic unit that is at risk of collapse. Therefore, the proposed project would not be expected to result in collapse.

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 with mitigation incorporated. According to the Geotechnical Investigation, a portion of the project site is blanketed by clayey soil with moderate expansion potential. Expansive near-surface soils are subject to volume changes during seasonal fluctuations in moisture content, which can cause cracking of foundations, floor slabs, and pavement sections. Therefore, foundations and concrete flatwork will need to be designed and constructed to resist the effects of the expansive soil. These potential impacts would be mitigated by implementation of MM GEO-1, which would ensure incorporation of the recommendations from the Geotechnical Investigation related to foundation design. With implementation of MM GEO-1, impacts would be less than significant.

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?

No impact. The proposed project would be served by the municipal sanitary system. The proposed project would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur related to septic tanks or alternative wastewater disposal systems.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than significant impact with mitigation incorporated. According to the Paleontological Records Search, the surface of the entire project site and most of the 0.5-mile radius of the project site consist of undivided Holocene-Pleistocene deposits. Although such deposits generally have a low paleontological potential, they have yielded vertebrate fossils in Alameda and Contra Costa counties.[53] Therefore, paleontological monitoring of excavations impacting previously undisturbed sediments would be required during construction, as required by MM GEO-2. Implementation of MM GEO-2 would ensure that any impacts related to paleontological resources would be less than significant.

Mitigation Measures

MM GEO-1 The project Applicant shall adhere to the recommendations set forth in the 2020 Geotechnical Investigation prepared by Langan Engineering and Environmental Services, Inc., dated December 3, 2020, for earthwork, foundation design, floor slabs, pavement and concrete flatwork design, and landscaping. Foundations and concrete flatwork shall be designed and constructed to resist the effects of expansive soil in accordance with the Geotechnical Investigation.

[53] Finger, K.L., PhD. 2020. Paleontological Records Search: 10x Genomics Project (21480024), City of Pleasanton, Alameda County. December 16.

MM GEO-2 A qualified Paleontological Monitor should be present during all project related ground disturbance occurring 5 or more feet below ground surface that have the potential to impact undisturbed Pleistocene deposits. Should any significant paleontological resources (e.g., bones, teeth, well-preserved plants) be unearthed, all construction activities shall be diverted at least 15 feet from the find until a professional Paleontologist has assessed it and, if deemed significant, salvaged the fossil in a timely manner. Collected fossils shall be deposited in an appropriate repository, where they will be properly curated and made available for future research.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.8 Greenhouse Gas Emissions *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 adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☒	☐	☐

Environmental Evaluation

Setting

The State's principal strategy and policies related to combatting climate change and reducing GHG emissions are set forth in Executive Order S-03-05, Assembly Bill 32 (AB 32), and the subsequent Senate Bill 32 (SB 32). The legislative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. AB 32 required the ARB to develop a Scoping Plan that describes California's approach to reduce GHG emissions to achieve the 2020 legislative reduction target. The most recent State Scoping Plan, the 2017 Scoping Plan Update, reflects the 2030 legislative reduction target of a 40 percent reduction below 1990 levels, as set by Executive Order B-30-15 and codified by SB 32. Executive Order No. S-03-05 established a goal of reducing the State's GHG emissions to 80 percent below the 1990 level by the year 2050. However, the State Legislature and ARB have not codified this goal and have not adopted a strategy or regulations designed to meet the 2050 goal.

This GHG emissions analysis is restricted to emissions of the GHGs identified by the State's AB 32, including CO_2, methane, nitrous oxide, hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). The proposed project would generate various GHG emissions during construction and operation, including several defined by AB 32 including CO_2, methane, nitrous oxide, and HFCs. In addition, the proposed project would not involve industrial processes which could result in the generation of HFCs, PFCs, or SF_6 in substantial quantities. As such, CO_2e emissions discussed below are limited to a combination of emissions of CO_2, methane, and nitrous oxide.

Would the project:

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

Less than significant impact. Both construction and operational activities have the potential to generate GHG emissions. The proposed project would generate GHG emissions during temporary (short-term) construction activities such as pavement removal site grading, operation of construction equipment, operation of on-site heavy-duty construction vehicles, hauling of materials to and from

the project site, asphalt paving, and construction worker vehicle trips. On-site construction activities would vary depending on the level of construction activity.

Long-term, operational GHG emissions would result from project generated vehicular traffic, operation of any landscaping equipment, off-site generation of electrical power over the life of the proposed project, the energy required to convey water to and wastewater from the project site, the emissions associated with the hauling and disposal of solid waste from the project site, any fugitive refrigerants from air conditioning or refrigerators, and the operation of stationary sources such as back-up generators.

Neither the City of Pleasanton nor the BAAQMD has an adopted threshold of significance for construction-related GHG emissions. Because construction would be temporary and would not result in a permanent increase in emissions, the proposed project would not interfere with the implementation of AB 32 or SB 32. In the absence of a construction emission threshold, the total emissions generated during construction were amortized based on the assumed life of the development (30 years) and added to the operational emissions to determine the total emissions from the proposed project. Finally, the net change in GHG emissions was determined by subtracting the GHG emissions from the existing site operations from the proposed project's GHG emissions.

The 2017 BAAQMD CEQA Guidelines contain the following thresholds for operational GHG emissions:

> For land use development projects (including residential, commercial, industrial, and public land uses and facilities), the threshold is compliance with a qualified GHG Reduction Strategy; or annual emissions less than 1,100 metric tons (MT) per year of carbon dioxide equivalent (CO_2e); or 4.6 MT CO_2e/service population (residents plus employees)/year.

It should be noted that the BAAQMD's thresholds of significance were established based on meeting the 2020 GHG targets set forth in the AB 32 Scoping Plan. For developments that would occur beyond 2020, the service population threshold of significance was adjusted to a "substantial progress" threshold that was calculated based on the SB 32 target of 40 percent below 1990 levels and the forecasted 2030 service population.

To determine significance, the proposed project's GHG emissions are assessed against the 2020 BAAQMD efficiency threshold of 4.6 MT CO_2e per service population per year and the projected 2030 efficiency threshold of 2.4 MT CO_2e per service population per year.

Project Construction

The proposed project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any vendor and hauling trips that may occur. Appendix A includes the detailed construction assumptions. The BAAQMD does not presently provide a construction-related GHG generation threshold but recommends that construction-generated GHGs be quantified and disclosed. Table 13 presents the total GHG emissions generated during all phases of construction.

Table 13: Construction Greenhouse Gas Emissions

Construction Phase	MT CO_2e per year
Project Phase 1	
Site Preparation 2021	47
Grading 2021	96
Building Construction 2021	219
Paving 2021	13
Architectural Coating 2021	34
Project Phase 1 Total	*410*
Project Phase 2	
Pavement removal 2021	177
Building Construction 2021	35
Building Construction 2022	221
Paving 2022	15
Architectural Coating 2022	40
Project Phase 2 Total	*488*
Project Phase 3	
Building Construction 2022	44
Paving 2022	5
Architectural Coating 2022	10
Project Phase 3 Total	*59*
Total Construction Emissions	**957**
Emissions Amortized Over 30 Years[1]	**32**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent
[1] Construction GHG emissions are amortized over the 30-year lifetime of the project. Totals may not add up due to rounding.
Source: CalEEMod Output (Appendix A).

As shown in Table 13, the proposed project's construction is estimated to generate a total of approximately 957 MT CO_2e. As discussed above, the GHG emissions generated during the construction of the proposed project were amortized over the proposed development's 30-year lifetime and added to the estimated annual GHG emissions during project operation.

Project Operation

Operational or long-term emissions occur over the life of the proposed project. The major sources for operational GHG emissions include:

1. **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site. Vehicle trips associated with project operations would primarily include visitor trips to and from the proposed project. Trip

generation rates used in estimating mobile-source emissions were consistent with those presented in the traffic volume data provided in the TIA (Appendix J).

2. **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the proposed project. The proposed project would be served with electricity by PG&E. The CO_2 intensity factors in the operational runs were adjusted to match the most recent data available for PG&E.[54] The energy intensity factors for electricity and natural gas consumption for the proposed project were derived from the existing 10x Genomics facility. See the Utility Calculations sheet in Appendix A for more information.
3. **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site. Biogenic GHG emissions generated from water transport emission sources are presented but not utilized in this analysis, consistent with the BAAQMD's 2017 CEQA Air Quality Guidelines.[55]
4. **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the proposed project. Biogenic GHG emissions generated from waste emission sources are presented but not utilized in this analysis, consistent with the BAAQMD's 2017 CEQA Air Quality Guidelines.[56]
5. **Stationary Source:** No stationary sources are proposed as part of the proposed project.

Appendix A provides the full assumptions and detailed modeling results. Table 14 shows the land-use operational GHG emissions that would be generated by the proposed project. The proposed project's net long-term operations would generate approximately 3,989 MT CO_2e per year starting in 2022. The estimated net operational emissions for the proposed project were compared with the BAAQMD threshold of 4.6 MT CO_2e per service population per year to determine significance when the proposed project first becomes fully operational in the year 2022. The estimated annual net land-use GHG emissions generated by the proposed project were also modeled for operational year 2030. The results of the proposed project's estimated 2030 operational emissions are compared with the adjusted threshold of 2.6 MT CO_2e per service population per year.

Table 14: Operational Land Use-Related Greenhouse Gas Emissions

Emission Source	Year 2022 Total Emissions (MT CO_2e per year)	Year 2030 Total Emissions (MT CO_2e per year)
Area	0	0
Energy	1,257	1,109
Mobile (Vehicles)	3,382	2,571
Waste	67	67
Water	206	196

[54] Bay Area Air Quality Management District (BAAQMD). 2017. Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines. May. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed January 6, 2021.

[55] Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed January 6, 2021.

[56] Ibid.

Emission Source	Year 2022 Total Emissions ($MT CO_2e$ per year)	Year 2030 Total Emissions ($MT CO_2e$ per year)
Amortized Construction Emissions	32	32
Total Project Emissions	*4,945*	*3,975*
Existing Emissions	*954*	*823*
Annual Net Project Emissions	*3,989*	*3,151*
Service Population (SP)	1,415	1,415
MT CO_2e Per Service Population	**2.8**	**2.2**
Applicable BAAQMD Threshold (MT CO_2e/SP/year)[1]	**4.6**	**2.6**
Does project exceed threshold?	**No**	**No**

Notes:
MT CO_2e = metric tons of carbon dioxide equivalent.
SP = service population (a project's total employees and residents)
[1] Adjusted threshold to account for 2017 Scoping Plan Update 40 percent reduction goal by 2030.
Unrounded results were used to calculate totals.
Source of Emissions: CalEEMod Output (Appendix A).

As shown in Table 14, the proposed project's net long-term operational land use emissions would not exceed the BAAQMD recommended threshold of 4.6 MT CO_2e per service population per year or the adjusted 2030 threshold of 2.6 MT CO_2e per service population per year adjusted to accommodate the Statewide emissions reduction goal of a 40 percent below 1990 emission levels by 2030. Therefore, the proposed project would result in a less-than-significant impact related to GHG emissions.

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

Less than significant with mitigation. Significance for this impact was determined by analyzing the proposed project's consistency with the City's General Plan, the City's Climate Action Plan (CAP), and the ARB 2017 Climate Change Scoping Plan Update.

City of Pleasanton General Plan

The City's General Plan Air Quality and Climate Change Element contains several goals, programs, and policies aimed at reducing GHG emissions across the City of Pleasanton.[57] Most notable are those contained under Policy 6, which aims to reduce air pollution and the production of GHGs by increasing energy efficiency, conservation, and the use of renewable resources. While most of the measures contained therein do not apply to the proposed project, Program 6.3 under Policy 6 contains several BMPs intended to reduce GHG emissions in new development. Table 15 displays Program 6.3's BMPs that are most pertinent to reducing GHG emissions and presents an analysis of the proposed project's consistency to each BMP.

[57] City of Pleasanton. 2009. 2005 Pleasanton 2025, 9.0 Air Quality and Climate Change. July 21. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23912. Accessed January 6, 2021.

Table 15: Consistency with Pleasanton General Plan GHG Reduction Measures

General Plan Program 6.3 BMPs	Project Consistency
BMP No. 1. Single- and multi-family residential and commercial development to comply with the City of Pleasanton's *Green Building Ordinance*.	**Consistent.** The proposed project would be required to comply with all applicable municipal codes and ordinance governing the design and implementation of the proposed project.
BMP No. 2. Development shall incorporate energy efficient appliances and systems that meet Energy Star standards.	**Inconsistent**. The proposed project would not explicitly include appliances or building features and mechanical components which would be Energy Star® certified. However, MM GHG-1 requires that the project Applicant include Energy Star® appliances in the proposed project. Incorporation of MM GHG-1 would ensure that the proposed project is consistent with this BMP.
BMP No. 3. Where feasible, incorporate solar roofs (or other alternative energy measures) into commercial development sufficient to meet 12.5 percent of the building's annual energy usage. Calculations of energy saving may be prepared at the construction drawing stage.	**No Conflict.** The proposed project would possibly include solar panels or the use of renewable or alternative energy sources to serve the project building's energy needs. Additionally, the proposed project is not designed in a way that would prevent its potential use of on-site solar energy generation or the use of other alternative energy generation sources. As the proposed project would not result in GHG emissions which exceed BAAQMD thresholds of significance, as displayed in Table 14, the proposed project would not conflict with this BMP.
BMP No. 4. Require transit and bicycle/pedestrian connections in new development, where feasible.	**Consistent.** The proposed project would include pedestrian or mixed use pathways throughout and along the perimeter of the project site. Any passerby or future project employee would be able to access these pathways and connect to adjacent sidewalks and bicycle/pedestrian facilities. The proposed project would be consistent with this measure.
BMP No. 5. For commercial/industrial projects, prepare and implement a voluntary Trip Reduction Plan, using the resources available through the City of Pleasanton's Transportation Systems Management program as described in Chapter 17.24 of the *Pleasanton Municipal Code*. Trip reduction goal of 15 percent within five years and 25 percent within 10 years, compared to "business as usual."	**No Conflict.** While the proposed project would not explicitly include a Trip Reduction Plan, this is a voluntary measure as provided in Chapter 17.24 of the Pleasanton Municipal Code. Nonetheless, the proposed project would not conflict with or obstruct the implementation of this measure or preclude the later implementation of this measure with the proposed project. Therefore, the proposed project would not conflict with this measure.
BMP No. 6. Require priority facilities for alternative-fueled vehicles, such as priority parking and recharging facilities, where feasible.	**No Conflict.** While the proposed project does not designate EV charging stations or priority parking spaces for EVs or other alternative-fueled vehicles in the Illustrative Site Plan used for the basis of this analysis, dated December 18, 2020, the proposed project would be required to provide priority parking facilities for these types of vehicles, as described in Sections 11.36.230 and 20.70.050 of the Pleasanton Municipal Code. In addition, the proposed project would be required to comply with the California Green Building Code, which requires non-residential projects to include 6 percent of parking as EV capable.

General Plan Program 6.3 BMPs	Project Consistency
	Therefore, the proposed project would not conflict with this measure.
BMP No. 9. Incorporate "heat island" treatments that include cool roofs, cool pavements, and/or strategically placed shade trees.	**Consistent.** The proposed project would involve the placement of trees throughout the project site, which would serve to reduce the urban heat island effect. The proposed project would be consistent with this measure.
Notes: Source: City of Pleasanton. 2009. 2005 Pleasanton 2025, 9.0 Air Quality and Climate Change. July 21. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23912. Accessed January 6, 2021.	

City of Pleasanton Climate Action Plan

The City's current CAP contains several strategies aimed at reducing GHG emissions across the City of Pleasanton.[58] The City's CAP identifies policies that will achieve the State-recommended GHG reduction target of 15 percent below 2008 levels by the year 2020 and the locally adopted reduction goal of 15 percent below 2005 levels by 2020. The CAP provides goals, supporting strategies, and associated actions in the topical areas of energy, land use and transportation, solid waste minimization, water and wastewater, and community engagement. It should be noted that the City is currently undergoing an update to the CAP to demonstrate citywide GHG emission reduction strategies consistent with 2030 and 2050 legislative GHG emission reduction goals presented in Senate Bill 32 and Executive Order S-3-05, respectively.[59] Nonetheless, the proposed project is analyzed against the applicable strategies of the current CAP in Table 16 to determine the proposed project's consistency with general GHG reduction strategies adopted by the City. As shown therein, the proposed project would not conflict with the GHG reduction strategies contained in the City's current CAP.

Table 16: Project Consistency with Applicable GHG Reduction Goals and Supporting Actions from the City of Pleasanton CAP

Applicable Goals and Supporting Actions	Project Consistency
Energy	
Goal 1: Reduce Energy Used by the Community	**Consistent.** The State of California has adopted several regulations that will help the City achieve its reduction goal and are applicable to the proposed project. The proposed project would be subject to the latest Title 24 energy efficiency standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces potential fossil fuel consumption and decreases subsequent greenhouse gas emissions.
Supporting Action EC1-1: Continue to implement and improve the City's existing Green Building Ordinance for commercial buildings, according to the California Green	

[58] City of Pleasanton. 2012. Climate Action Plan. Website: http://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=24757. Accessed March 16, 2021.
[59] City of Pleasanton. 2021. Climate Action Plan (CAP) 2.0. Website: http://www.cityofpleasantonca.gov/gov/depts/os/env/cap/default.asp. Accessed March 16, 2021.

Applicable Goals and Supporting Actions	Project Consistency
Building Standards Code. Include new requirements for shade trees, cool roofs, and landscape lighting. Achieve 25% beyond Title 24.	Emissions related to electricity consumption by the proposed project would be further reduced as the electric utility complies with the Renewable Portfolio Standard, which requires utilities to increase its mix of renewable energy sources to 33 percent by 2020 and eventually 100 percent carbon-free by 2045. Additionally, the proposed project would comply with the California Green Building Standards Code, which includes requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, solar panels, and other measures that will reduce greenhouse gas emissions.
Supporting Action EC1-3: Modify municipal code to reduce heat island effects in the City by requiring light-colored paving material for roads and parking areas, as well as parking lot shade trees.	
Land Use and Transportation	
Goal 2: Improve Transit Systems and Ridership	**Consistent.** Transit service in the project area is provided by Wheels, Pleasanton Paratransit and Bay Area Rapid Transit (BART). Continuous pedestrian connections are provided along the perimeter of the project site except for along Stoneridge Mall Road. The closest transit stop to the project site is near the intersection of Stoneridge Mall Road and McWillliams Lane, approximately 100 feet from the project site; therefore, it is expected that a portion of future project employees would use existing nearby transit facilities. Moreover, for employees who will principally drive to the proposed project, motor vehicle emissions associated with the proposed project would be reduced through compliance with state regulations on fuel efficiency and fuel carbon content. The regulations include the Pavley fuel efficiency standards that require manufacturers to meet increasing stringent fuel mileage rates for vehicles sold in California and the Low Carbon Fuel Standard that requires reductions in the average carbon content of motor vehicle fuels. Considering this information, the proposed project would not conflict with the City's goals and strategies aimed to increase non-motorized mobility, improve transportation demand management, increase motor vehicle efficiency, or other goals aimed to reduce GHG emissions from transportation.
Goal 3: Increase Non-motorized Mobility	
Supporting Action NM 1-1: Require appropriate bicycle-related improvements (i.e., work-place provision for showers, bicycle storage, bicycle lanes, etc.) with new development.	
Supporting Action NM 1-18: Preserve rights-of-way needed for local and regional roadway "complete streets" improvements and increased connectivity through dedication of land, as adjacent properties develop.	
Supporting Action NM 1-19: Modify municipal development codes to develop complete street standards to maximize transportation opportunities that serve all mobility modes.	
Goal 4: Improve Transportation Demand Management	
Goal 5: Increase Motor Vehicle Efficiency	
Solid Waste Minimization	
SW Goal: Establish Pleasanton as a Zero Waste Community by 2025	**Consistent.** The proposed project would comply with the California Green Building Standards Code, which includes requirements to increase recycling, reduce waste, reduce water use,
Supporting Action SW 2-2: Develop community zero waste plan—75% diversion by 2015; 85% diversion by	

Applicable Goals and Supporting Actions	Project Consistency
2020; 90% by 2025; that includes strategies and implementation timeline for improving diversion and reducing waste generation.	increase bicycle use, and other measures that will reduce greenhouse gas emissions. The proposed project would also be subject to City requirements, including the Mandatory Recycling Ordinance (2017), which are designed to help the City achieve the target of establishing Pleasanton as a Zero Waste Community by 2025. Future project employees would have access to City and regional programs, educational materials, and other resources aimed to reduce community waste.
Supporting Action SW 2-4: Partner with the PGS to expand commercial recycling program to include the collection and processing of more materials; launch commercial organics program. Note: Commercial recycling will be mandatory by 2012.	
Supporting Action SW 2-6: Implement and enforce Construction and Demolition debris recycling ordinance.	
Supporting Action SW 2-10: Utilize resources available through Stopwaste.org to promote outreach and education to businesses to use less packaging, and more durable, local, and low-impact goods, and reusable shipping containers.	
Supporting Action SW 2-12: For new and remodeled commercial and multifamily buildings, require adequate space and logistics for handling of recyclable and compostable materials.	
Water and Wastewater	
Goal: Reduce Water Use	**Consistent.** As previously described, the proposed project would incorporate landscaping (including trees) throughout the site in accordance with City standards.
Supporting Action WA 1-4: Implement a landscape ordinance requiring new commercial and residential projects to meet prescribed landscape water budgets and ensure that new construction uses the latest irrigation technology, and meet or exceed AB 1881 requirements	
Supporting Action WA 1-7: Restrict landscape watering; encourage xeriscaping and drought-resistant planting in lieu of lawns.	
Community Engagement	
Goal: Influence Personal Behavior	**Consistent.** Implementation of the proposed project would not hinder City in developing or facilitating programs aimed to engage or educate City residents in matters relating to sustainable personal behaviors. Future project employees could participate in community outreach programs promoted by the City.
Supporting Action PE 1-3: In conjunction with the www.PleasantonGreenScene.org website, develop a citywide outreach program that engages, educates, and exchanges information on implementing the measures in the Climate Action Plan and related General Plan policies.	
Supporting Action PE 1-4: Develop user-friendly fact sheets for ways that residents, landlords and/or businesses can reduce GHG emissions by improving energy and water efficiency, reducing waste, and improve home performance using green building techniques; organize information by cost efficiency and type of home or building (apartment, slab foundation, pier foundation, etc.). If available, include funding and implementation resources. Distribute at events and post on web site.	

Applicable Goals and Supporting Actions	Project Consistency
Notes: Source: City of Pleasanton. 2012. Climate Action Plan. Website: http://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=24757. Accessed March 16, 2021.	

SB 32 2017 Scoping Plan Update

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017.[60] Table 17 provides an analysis of the proposed project's consistency with the 2017 Scoping Plan Update measures. As shown in Table 17, none of the measures are applicable to the proposed project.

Table 17: Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 350 50 Percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	**Not applicable.** This measure would apply to utilities and not to individual development projects. The proposed project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	**Not applicable**. This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The proposed project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project Applicant or lead agency. However, vehicles accessing the buildings at the proposed project site would benefit from the standards.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million Zero Emission Vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.	**Not applicable.** This measure is not applicable to the proposed project; however, vehicles accessing the buildings at the project site would be benefit from the increased availability of cleaner technology and fuels.

[60] California Air Resources Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November. Website: https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery. Accessed January 6, 2021.

2017 Scoping Plan Update Reduction Measure	Project Consistency
Sustainable Freight Action Plan The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	**Not Applicable.** The proposed project would not involve any major freight vehicle operations.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	**Not applicable.** The proposed project would not include major sources of black carbon.
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities' strategy for reduction of per capita vehicle miles traveled.	**Not applicable.** The proposed project does not include the development of a Regional Transportation Plan.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	**Not applicable.** The proposed project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the proposed project.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the Governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	**Not Applicable**. The proposed project is in a built-up urban area and would not be considered natural or working lands.
Notes: Source: California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November. Website: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed January 6, 2021.	

As shown in SB 32 2017 Scoping Plan Update

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017. Table 16 provides an analysis of the proposed project's consistency with the 2017 Scoping Plan Update measures. As shown in Table 16, none of the measures are applicable to the proposed project.

Implementation of the proposed project would not conflict with the reduction measures proposed in SB 32 and contained in the State Scoping Plan 2017 Update.

Summary

The proposed project would not conflict with the provisions of SB 32. The proposed project would be consistent with all GHG reduction measures contained in the City of Pleasanton General Plan after incorporation of MM GHG-1. As previously discussed, MM GHG-1 would ensure that the

proposed project would be consistent with the City's General Plan, which is the locally adopted strategy for reducing GHG emissions. Therefore, the proposed project would not conflict with any plans or policies intended to reduce GHG emissions and the proposed project's impact would be less than significant with incorporation of mitigation.

Mitigation Measures

The recommended measures listed below should be implemented in addition to all project design features.

MM GHG-1 Utilizing Energy Star® Certified Appliances

Prior to the issuance of the certificate of occupancy for the proposed project, the project Applicant should provide the City with documentation that demonstrates the proposed project's purchase and intended use of Energy Star® certified appliances including, but not limited to, refrigerators, dishwashers, vending machines, water coolers, heating and ventilation systems, and water heaters, where feasible.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.9 Hazards and Hazardous Materials *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Environmental Evaluation

Setting

The information in this section is based in part on the Phase I Environmental Site Assessment (Phase I ESA), prepared by EKI Environment & Water on September 24, 2020, and included as Appendix F of this report.

Would the project:

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. During the construction of the proposed project, small quantities of hazardous materials such as gasoline, diesel fuel, lubricants for machines, and other petroleum-based products would be used on the project site. Any transport, use, and disposal of hazardous materials would be conducted by an appropriately licensed contractor and in compliance with applicable laws, policies, and programs set forth by federal, State, and local agencies and regulations, including the United States Environmental Protection Agency (EPA) and the City of Pleasanton Municipal Code Chapter 9.21 regarding construction and demolition debris.[61] Common hazardous materials such as herbicides, pesticides, solvents, cleaning agents, and similar materials used for building and landscaping maintenance may be utilized on the project site during the operational phase of the proposed project. The use of these materials is regulated by the EPA to minimize harm to people and the environment. Additionally, the use, handling, and storage of hazardous materials are regulated by the Occupational Safety and Health Administration (OSHA) and the California Occupational Safety and Health Administration (Cal/OSHA). The proposed project would be required to comply with the applicable federal, State, and local laws and regulations (e.g., the Resource Conservation and Recovery Act [RCRA], California Hazardous Waste Control Law, and principles prescribed by the California Department of Health Services, Centers for Disease Control and Prevention, and National Institute of Health).

Compliance with the applicable hazardous material laws and regulations would ensure that construction and operational impacts associated with hazardous materials would not create a significant hazard to the public or environment. Impacts would be less than significant.

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. The project site is developed with parking lots and landscaping. Prior to the development of the project site around 1980, the site was used for agricultural purposes since at least 1939. Based on this historical use, pesticide compounds may be present at residual concentrations in shallow soil. Given that the project site is nearly entirely covered with pavement, residual concentrations of pesticides in soil, if any, would not likely constitute a potentially significant risk to the public or environment. Pursuant to the Phase I ESA, soil sampling would be required in the future as part of any earth moving or off-site soil disposal related to site redevelopment.[62] MM HAZ-1 would require soil sampling to evaluate the presence of pesticides in the soil from former agricultural uses.

Several dry-cleaning establishments operated at the project site between the early 1980s and 2013. The property deed, dated 1979, specifies that dry cleaning businesses can only clean clothing off-

[61] City of Pleasanton. 2009. Pleasanton Municipal Code, Chapter 9.21 Construction and Demolition Debris. Website: https://qcode.us/codes/pleasanton/view.php?topic=9-9_21&showAll=1&frames=on. Accessed January 18, 2021.
[62] EKI Environmental & Water. 2020. Phase I Environmental Site Assessment (ESA). September 24.

site, and that no on-site dry-cleaning activities, such as use of dry-cleaning machines, is allowed. During the site visit conducted as part of the Phase I ESA, there were no obvious visual indications of past dry-cleaning in the tenant space. Files provided by the LPFD did not contain any information pertaining to dry-cleaning establishments at the project site. In 2016, a letter was submitted by the RWQCB to the property owner at the time (Equity One) that requested information pertaining to the past dry cleaners on the property. There is no indication that Equity One responded to the RWQCB's request. It is possible that the RWQCB may issue a similar request for information letter to the current and/or future property owner.[63]

Asbestos sampling completed in 1999 indicated that asbestos was detected in floor tile mastic and vinyl floor tile at the project site. In Spring 2021, the City issued a demolition permit for the site, and required the completion of asbestos and lead based paint and asbestos surveys and abatement, where required, to ensure compliance with State standards prior to the completion of demolition.[64]

According to the Phase I ESA, two former groundwater wells exist on the project site, although no abandonment records were available, and there were no visible indications of the wells on the project site. If these wells are encountered during project construction, the wells would need to be abandoned in accordance with current guidance, pursuant to MM HAZ-2. Additionally, one existing groundwater monitoring well is located on the site and is monitored semi-annually by Alameda County Flood Control and Water Conservation District - Zone 7. Pursuant to MM HAZ-2, the proposed project would be subject to the requirement to coordinate with Zone 7 to abandon or relocate the well as part of future redevelopment.[65]

Implementation of MM HAZ-2 would ensure that wells on the project site are abandoned or relocated in accordance with applicable regulations. With implementation of MM HAZ-1 and MM HAZ-2, impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No impact. The nearest school to the proposed project is the Fountainhead Montessori of Dublin, located 0.67 mile north of the project site. The nearest school within the City of Pleasanton is Lydiksen Elementary School, located 0.76 mile south of the project site. Therefore, the proposed project is not located within 0.25 mile of a school and would not emit hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of a school. Therefore, no impact would occur.

[63] EKI Environmental & Water. 2020. Phase I Environmental Site Assessment (ESA). September 24.
[64] Ibid.
[65] Ibid.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No impact. The Phase I ESA found that no current or historic Recognized Environmental Conditions (RECs) exist on the project site. No evidence of soil or groundwater impairment or evidence of the presence of aboveground or underground storage tanks were identified on the project site.

According to the Phase I ESA, the project site does not have any RECs; there are no known hazardous substances or petroleum products on the project site. Therefore, the project site is not on a list of hazardous materials sites and would not create a significant hazard to the public. There no impact would occur.

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?

No impact. The nearest airport to the project site is the Livermore Municipal Airport, located 4.9 miles east of the project site. The Livermore Municipal Airport's Airport Influence Area is the planning boundary for the airport, in which current or future airport-related noise, overflight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses, as well as lands on which the uses could negatively affect the airport. According to Livermore Airport Land Use Compatibility Plan, the project site is not located within the Airport Influence Area.[66]

The proposed project is not located within an airport land use plan or within 2 miles of a public airport. This condition precludes the possibility that the proposed project would result in a safety hazard or excessive noise associated with an airport. Therefore, no impact would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. The City of Pleasanton has in place several emergency plans regarding public safety and emergency evacuations, including the General Plan Safety Element, Emergency Management Plan (EMP), and Local Hazard Mitigation Plan. The EMP provides safety measures for the community in the event of a natural disaster (earthquake, flood, or fire), human-caused emergencies, or hazardous materials spill. The EMP provides a framework for coordination of response and recovery efforts within the City in coordination with local, State and federal agencies. The City General Plan Safety Element also provides information, policies, and programs directed toward reducing the potential for human injury and loss of life, and to minimize property damage and economic and social disruption due to natural and human-made hazards.

[66] Alameda County Community Development Agency. 2012. Livermore Executive Airport, Airport Land Use Compatibility Plan, Figure 3-1, Airport Influence Area. August. Website: http://www.acgov.org/cda/planning/generalplans/documents/LVK_ALUCP_082012_FULL.pdf. Accessed January 18, 2021.

The proposed project would be adequately served by fire and police services. The proposed buildings would be constructed in compliance with the California Fire Code. Primary access to the project site would be provided via Springdale Avenue, as well as from a driveway on the northern side of the project site along Stoneridge Mall Road and a second driveway along the eastern side of the site along Stoneridge Mall Road. All driveways and internal roadways would be designed in accordance with the City's Standards and Specifications guidebook to accommodate large emergency vehicles such as fire engines. The proposed project would be designed to avoid any impacts to Fire Station No. 2, including any interference with ingress and egress from the station.

Alameda County Emergency Operations Plan, Pleasanton Emergency Management Plan, Local Hazard Mitigation Plan, and the Safety Element of the 2025 General Plan do not list emergency evacuation routes. In the event of an emergency, the most likely evacuation route would be I-680 via Stoneridge Drive. The Safety Element of the General Plan and the Emergency Operations Plan has emergency preparedness policies and plans in case an emergency takes place. The proposed project would not involve any changes to potential evacuation routes and would not otherwise block or redirect any potential evacuation routes and would therefore not interfere with evacuation or otherwise conflict with an adopted emergency response plan or evacuation plan. Impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No impact. As noted in the Pleasanton General Plan Public Safety Element, over 7,000 acres of the Pleasanton planning area are identified as special fire protection areas.[67] Grassland fires in California are easily ignited, particularly in dry seasons. Wildfire is a serious hazard in undeveloped areas, particularly near areas of natural vegetation and steep slopes since fires tend to burn more rapidly on steeper terrain.

As indicated by Figure 5-6 of Section 5, Public Safety of the City's General Plan, the project site is not located in a special fire protection area. Additionally, Figure 5-6 indicates that the project site is located within the area with a travel time equal to 5 minutes or less from the nearest fire station. Furthermore, according to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone maps, the project site is not located within an area that is at risk of wildland fires.[68] Additionally, the project site is in an urban and developed area and is not located adjacent to areas of natural vegetation or steep slopes.

The proposed project is located just 250 feet west of LPFD Station No. 2, located at 6300 Stoneridge Mall Road.

The proposed project would be adequately served by Fire Station No. 2. In addition, the proposed project would comply with the California Fire Code with regard to site access and building materials.

[67] City of Pleasanton. 2013. Pleasanton General Plan 2005 – 2025 Public Safety Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed January 18, 2021.

[68] Alameda County Community Development Agency. 2016. Safety Element of the Alameda County General Plan. September.

Therefore, the proposed project would not expose people or structures to wildland fires, and no impact would occur.

Mitigation Measures

MM HAZ-1 Prior to the issuance of grading permits, the project Applicant shall provide evidence of soil testing within the project boundary to confirm presence or absence of pesticide compounds (e.g., organochlorine pesticides). If hazardous levels of pesticide compounds are found, the project Applicant shall complete any residual soil remediation. In addition, if pesticides related to the former agricultural use of the site are found, a construction worker health and safety plan shall be prepared and shall be implemented during project construction.

MM HAZ-2 Any wells that are encountered during project construction shall be abandoned in accordance with current guidance. The existing groundwater monitoring well shall be abandoned or relocated in coordination with Zone 7 as part of any future redevelopment.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.10 Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) 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	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Environmental Evaluation

Setting

The information in this section is based on the supporting hydrological information prepared for the proposed project and included as Appendix G of this Draft IS/MND.

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than significant impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharges into stormwater drainage systems. Water quality within the City of Pleasanton is regulated by the San Francisco Bay RWQCB.

The proposed project would include ground-disturbing activities such as grading and excavation during project construction. These activities have the potential to result in erosion, sedimentation, and runoff, which could adversely affect water quality during construction. Improperly managed construction activities can lead to substantially accelerated rates of erosion that are considered detrimental to the environment.

The NPDES Program was established through the federal Clean Water Act to control and reduce pollutant discharges to surface water bodies. Construction activities, including grading, that would result in the disturbance of 1 acre or more would require compliance with the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activity (Construction General Permit). The proposed project is 14.75 acres and would therefore be required to comply with the Construction General Permit. The California State Water Resources Control Board (State Water Board) adopted a requirement for obtaining an NPDES Construction General Permit. To obtain coverage under the Construction General Permit, a project Applicant must submit a Notice of Intent and a SWPPP. Activities subject to the Construction General Permit include clearing, grading, and ground disturbance. The purpose of the SWPPP is to identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges and to describe and implement BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges resulting from construction activities.

As mentioned in Section 2.7, Geology and Soils, the proposed project would comply with the NPDES Program and would obtain coverage under the Construction General Permit and implement a SWPPP and BMPs to control and reduce pollutant discharges to surface water bodies. Additionally, the proposed project would be subject to the RWQCB's Municipal Regional Permit (MRP), implemented in October 2009 by Order R2-2009-0074, and updated in November 2015 by Order R2-2015-0049. Because the proposed project would include new impervious surfaces greater than 10,000 square feet, the proposed project would be a C.3 Regulated Project. Under the C.3 requirements, the proposed project would be required to prepare and submit a Stormwater Control Plan (SCP) that discusses the design elements and implementation measures necessary to meet the post-construction stormwater control requirements of the MRP. Under the C.3 Permit, the proposed project would include appropriate site design measures and source controls and hydraulically sized stormwater treatment measures, as well as Low Impact Development (LID) measures.

Site design measures would include directing runoff onto vegetated areas and maximizing permeability through site design. Source control measures would include signage for inlets, drainage plumbed to storm water treatment facilities, efficient irrigation, minimization of pesticides and fertilizers, and covered trash enclosures. Construction BMPs would include measures such as

temporary erosion controls, sediment control, runoff diversion, vegetative buffers, designated and contained vehicle maintenance areas, training and instruction for employees and subcontractors, and pollutant prevention and control. Additionally, the proposed project would include bioretention areas.

According to the Illustrative Storm Water Quality Control Plan prepared for Phase 1 of the proposed project (Appendix G), interceptor trees would be used in combination with bioretention areas for stormwater and pollutant control pursuant to the guidance in the Alameda Countywide Clean Water Program's C.3 Stormwater Technical Guidance Manual. According to the Guidance Manual, interceptor trees can reduce runoff and pollution by intercepting stormwater and retaining captured water and can be used as part of Storm Water Control Plan (SCP).[69]

Compliance with the C.3 Permit, the SWPPP, and implementation of BMPs, would ensure that the proposed project would not result in substantial soil erosion that would violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during the construction or operation of the proposed project. Therefore, impacts would be less than significant.

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

Less than significant impact. The proposed project would not result in a net increase of impervious surfaces in areas previously penetrable for groundwater recharge purposes. Furthermore, the proposed project would not require the use of groundwater. The City of Pleasanton has an agreement with Zone 7 that allows the City to pump up to 3,500 acre-feet per year from three groundwater wells owned and operated by the City. Local water is extracted from the Livermore Valley Main Groundwater Basin. The City's groundwater wells provide about 20 percent of the City's water supply; the remaining 80 percent is purchased from Zone 7.[70] Because the proposed project would not exceed the projected water supplies (see Section 2.18, Utilities and Public Services), the proposed project would not cause overdraft of the groundwater supply. Therefore, the proposed project would not substantially decrease groundwater supplies, interfere with groundwater recharge, or impede sustainable groundwater management of the Livermore Valley Main Groundwater Basin. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

[69] Alameda Countywide Clean Water Program. 2019. C.3 Stormwater Technical Guidance Manual. September. Website: https://cleanwaterprogram.org/businesses/development.html

[70] City of Pleasanton. 2016. 2015 Urban Water Management Plan. June. Website: http://admin.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=28207. Accessed March 11, 2021.

Less than significant impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project.

At Phase 1 buildout, the proposed project would have a total of 245,059 square feet of impervious areas, 125,397 square feet of landscaped area, and 370,456 square feet of drainage management area (DMA) divided into seven drainage sub-management areas and six bioretention areas. DMA 06 would rely on interceptor tree credits rather than a bioretention area. The bioretention areas would cover 10,051 square feet, which would exceed the 9,802 square feet of bioretention required per C.3 guidance, and the interceptor tree credits equate to 44,451 square feet of treatment area thus exceeding the required 44,100 square feet.

At full buildout, the proposed project would include a total of 400,973 square feet of impervious areas, 234,380 square feet of landscaped area, and 635,353 square feet of drainage management area divided into eight drainage management areas and eight bioretention areas. The bioretention areas would cover 18,657 square feet, which would exceed the 16,039 square feet of bioretention required per C.3 guidance.

As previously discussed in this section, the proposed project would comply with the C.3 Permit and the SWPPP, and would implement BMPs to reduce runoff and pollution; these measures would also prevent erosion and siltation. Furthermore, as discussed in Section 2.7, Geology and Soils, the proposed project would be required to comply with the current CBC and with City Municipal Code requirements pertaining to grading and excavation in effect at the time of project approval. The proposed project would also be required to comply with the policies in the Public Safety Element of the General Plan designed to minimize the risk of soil erosion and further mitigate its effects, including Goal 1 Policy 2, which requires implementation of soils engineering and construction standards.[71]

With implementation of the SWPPP and BMPs and compliance with the General Plan Safety Element, the proposed project would not alter the drainage patterns such that substantial erosion or siltation would occur. Impacts would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than significant impact. The proposed project would install an on-site storm drainage system. Implementation of BMPs as previously discussed, such as efficient irrigation systems, minimization of impervious areas, and bioretention treatment areas, would ensure that the proposed project would not contribute to surface runoff that could result in flooding. Therefore, the proposed project would not substantially increase surface runoff on the project site. Impacts would be less than significant.

[71] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

(iii) 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. Consistent with the requirements of the Construction General Permit, the proposed project would implement a SWPPP during construction that would include structural and non-structural BMPs to prevent significant volumes of polluted runoff during construction. The proposed project's bioretention treatment areas and drainage management areas would prevent significant amounts of pollutants from entering the storm drainage system at buildout. Collectively, these features would ensure that the proposed project would not contribute runoff that would exceed the capacity of downstream stormwater drainage systems or contribute substantial volumes of polluted runoff to the storm drainage system. Therefore, the proposed drainage would not exceed the capacity of the City's existing stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

(iv) impede or redirect flood flows?

Less than significant impact. The General Plan indicates that the project site is not located in a flood hazard zone as mapped by the Federal Emergency Management Agency (FEMA). [72] The nearest Special Flood Hazard Area is located adjacent to I-680, 0.29 miles east of the project site.[73] Additionally, the project site is not in a dam inundation area.[74]

As discussed above, the proposed project would include BMPs such as minimization of impervious areas and bioretention treatment areas, in compliance with Municipal Regional Permit Provision C.3 guidance. Therefore, the proposed project would not impede or redirect flood flows and would not expose people or structures to significant risks involving flooding. Impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No impact. As previously discussed, the General Plan indicates that the project site is not located in a flood hazard zone as mapped by FEMA. [75] The nearest Special Flood Hazard Area is located adjacent to I-680, 0.29 mile east of the project site.[76] Additionally, the project site is not in a dam inundation area.[77] The nearest tsunami inundation zone as mapped by the California Emergency

[72] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-7, Flood Hazard Zones. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[73] Federal Emergency Management Agency (FEMA). 2020. FEMA Flood Map Service Center. Website: https://msc.fema.gov/portal/search?AddressQuery=2391%20Moorpark%20Avenue%2C%20San%20Jose%2C%20CA#searchresultsanchor. Accessed February 2, 2021.

[74] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-8, Del Valle Dam Inundation Area. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[75] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-7, Flood Hazard Zones. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[76] Federal Emergency Management Agency (FEMA). 2020. FEMA Flood Map Service Center. Website: https://msc.fema.gov/portal/search?AddressQuery=2391%20Moorpark%20Avenue%2C%20San%20Jose%2C%20CA#searchresultsanchor. Accessed February 2, 2021.

[77] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-8, Del Valle Dam Inundation Area. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

Management Agency is 11.5 miles southwest of the project site.[78] Therefore, the proposed project is not at risk of inundation from a tsunami or seiche. The proposed project is not likely to result in impacts because there is a low risk of flooding, tsunami, and seiche at the project site and the site is therefore not at risk of inundation. Therefore, the proposed project would not result in the release of pollutants due to project inundation. There would be no impacts.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No impact. Because project construction would disturb more than 1 acre of land, the proposed project would be required to comply with the terms of the Construction General Permit, which require the preparation and implementation of a SWPPP and associated BMPs to minimize the risk of pollutants from construction activities entering surface waters or groundwater basins. Therefore, the proposed project would not conflict with or obstruct a water quality control plan or groundwater management plan. There would be no impacts.

Mitigation Measures

None required.

[78] California Emergency Management Agency. 2009. Tsunami Inundation map for Emergency Planning – Newark Quadrangle, Redwood Point Quadrangle. July 31. Website: https://www.conservation.ca.gov/cgs/Documents/Publications/Tsunami-Maps/Tsunami_Inundation_NewarkRedwoodPoint_Quads_Alameda.pdf. Accessed February 2, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.11 Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Environmental Evaluation

Setting

The project site is designated "Commercial and Offices (retail, highway, and service; commercial business and professional offices)" within the Industrial, Commercial and Offices designation of the General Plan, and is also within the Stoneridge Mall Road Periphery sub-area.[79] Additionally, the project site is zoned C-R (p). Uses that are permitted within the C-R (p) zone include retail and office uses.[80] The project site would be rezoned to PUD-C-O to allow R&D and light laboratory manufacturing uses.

The project site is bound on the north by parking lots, office buildings, and the Stoneridge Shopping Center. Beyond the Stoneridge Shopping Center to the north is the West Dublin/Pleasanton BART station. To the south, the project site is bound by Stoneridge Drive and multi-family residential communities. To the east, the project site is bound by Stoneridge Mall Road, LPFD Fire Station No. 2, multi-family residential housing, the Pleasanton Commons Business Center, and beyond this area to the east is I-680. To the west, the project site is bound by Springdale Avenue, parking lots, and a Kaiser Permanente Medical Center. The project site is located in an urbanized and developed area.

Would the project:

a) Physically divide an established community?

No impact. A significant impact could occur if the proposed project would result in the physical division of an established community through construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access that would impact mobility within an existing community. The project site does not contain residential units; however, there are some multi-family residential communities to the south and east of the project site. The proposed project would not create any barriers to the residential communities in the area and would not impact

[79] City of Pleasanton. 2005. Pleasanton General Plan 2005-2025, Chapter 2 – Land Use Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23896. Accessed December 17, 2020.
[80] City of Pleasanton. 2020. Pleasanton Municipal Code 18.44.080 Permitted and Conditional Uses. Website: http://qcode.us/codes/pleasanton/view.php?topic=18-18_44-18_44_080&frames=on. Accessed December 17, 2020.

mobility in the area. Construction of the proposed project would not involve the construction of new structures that would restrict access to or require closure of roadways that provide access to and within the residential communities. Existing residents of the communities in the area would not lose access to area roadways or sidewalks. Therefore, the proposed project would not divide an established community. No impact would occur.

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. The proposed project would be consistent with the General Plan. The proposed project includes a proposal to rezone the project site from C-R (p) to PUD-C-O to allow R&D and light laboratory manufacturing uses on the project site. The proposed rezoning would be reviewed and approved by the City of Pleasanton. Prior to approval of the zone change, the City would evaluate land use changes in the context of overall City welfare and goals, as well as the impacts on surrounding neighborhoods.[81] When a project includes an amendment to the zoning, inconsistency with the existing designation or zoning is an element of the project itself, which then necessitates a legislative policy decision by the agency and does not signify a potential environmental effect. As such, the proposed project would be consistent with the permitted land uses of the PUD-C-O zone upon approval of the requested zone change, and the rezoning would not result in an environmental impact. Impacts would be less than significant.

Mitigation Measures

None required.

[81] City of Pleasanton. 2010. Pleasanton Genera Plan 2005 – 2025 General Plan, Land Use Element, Goal 2 Policy 5. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23896. Accessed January 18, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.12 Mineral Resources *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?	☐	☐	☐	☒

Environmental Evaluation

Setting

According to the Conservation and Open Space Element the General Plan Land Use Map identifies approximately 1,750 acres of regionally significant sand and gravel deposits in the eastern portion of the City, more than 3.0 miles west of the project site. This land generally lies east of Martin Avenue, west of Isabel Avenue, and north of Vineyard Avenue.[82] The California Division of Mines and Geology has designated the sand and gravel land that lies in and adjacent to the Pleasanton Planning Area as an Aggregate Resource Area of Regional Significance.[83]

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?

No impact. The project site is not designated or zoned for mineral resource extraction. The nearest regionally important mineral resource is located in the eastern portion of the City, 3.40 miles east of the project site. The project site does not contain any known mineral resources as documented by the California Department of Conservation and the City of Pleasanton.[84] Therefore, development of the proposed project would not result in the loss of availability of a known mineral resource. There no impact would occur.

[82] City of Pleasanton. 2009. 2005 Pleasanton Plan 2025, Conservation and Open Space Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23910. Accessed February 2, 2021.
[83] Alameda County Board of Supervisors. 1981. Specific Plan for Livermore-Amador Valley Quarry Area Reclamation, adopted Nov. 5.
[84] City of Pleasanton. 2009. 2005 Pleasanton Plan 2025, Conservation and Open Space Element, Figure 7-2 Aggregate Resources and Reclamation. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23910. Accessed February 2, 2021.

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. According to the General Plan, the nearest aggregate resource area boundary is located near the eastern Pleasanton City limit line adjacent to Martin Avenue, 3.40 miles east of the project site.[85] Because there are no known mineral resource recovery sites within or near the project site, the proposed project would not result in the loss of availability of known mineral resources. Therefore, no impact would occur.

Mitigation Measures

None required.

[85] City of Pleasanton. 2009. 2005 Pleasanton Plan 2025, Conservation and Open Space Element, Figure 7-2, Aggregate Resources and Reclamation. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23910. Accessed January 20, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.13 Noise *Would the project result in:*				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Evaluation

This noise analysis has been prepared by FCS to determine the short-term construction and long-term operational noise and vibration impacts associated with the proposed project. Supporting noise data and calculations are provided in Appendix H of this Draft IS/MND.

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of less than 3 A-weighted decibel (dBA) are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments.[86]

[86] California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol.

Since the human ear is not equally sensitive to sound at all frequencies, dBA was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level (L_{dn}) and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and the L_{max} is the maximum instantaneous noise level occurring over a sample period.

Regulatory Framework

The project site is located within the City of Pleasanton, in the County of Alameda. The City of Pleasanton addresses noise in the Noise Element of its General Plan[87] and in the City's Municipal Code.[88]

General Plan

The Pleasanton General Plan 2005-2025 establishes noise standards and policies for various land uses. The City's General Plan addresses land use compatibility, acceptable interior noise levels, and substantial permanent increase criteria. These standards and policies are summarized below.

The City has established land use compatibility standards for residential and non-residential land uses (shown in Table 18). The land use category that is applicable to this project is Office Buildings, Business, Commercial, and Professional. Under this designation, noise environments with ambient noise levels up to 70 dBA L_{dn} are considered "Normally Acceptable" for Office Buildings, Business, Commercial, and Professional land use developments. Noise environments with ambient noise levels from 70 dBA L_{dn} to 80 dBA L_{dn} are considered "Conditionally Acceptable" for Office Buildings, Business, Commercial, and Professional land use developments; under this circumstance, development may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features are included in the design. Conventional construction, but with closed windows and a fresh air supply system or air conditioning, will normally suffice as a noise insulation feature for these conditionally acceptable environments.

The City has established its own criteria governing the evaluation of substantial increases in permanent noise. According to the City's General Plan, an exterior increase of more than 4 decibels is considered significant.

The following goals, policies, and programs of the City of Pleasanton General Plan 2005-2025 are applicable to the proposed project:

Goal 1 Reduce noise to acceptable levels throughout the community.

[87] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025. July 21. Website: https://www.cityofpleasantonca.gov/gov/depts/cd/planning/general.asp. Accessed December 18, 2020.
[88] City of Pleasanton. 2019. Pleasanton Municipal Code. Website: https://qcode.us/codes/pleasanton/. Accessed December 18, 2020.

Policies

Policy 1 Require new projects to meet acceptable exterior noise level standards.

- Program 1.1: Use the normally acceptable designation and text description contained in Table 11-5 [Table 18 in this document] "Noise and Land-Use Compatibility Guidelines," to determine the acceptability of new development and to determine when noise level standard of 60 dBA L_{dn} for exterior noise in private or shared outdoor use areas studies are required. For new single-family residential development, maintain a maximum day/night average excluding front yards. For new multi-family residential development, maintain a maximum standard of 65 dBA L_{dn} in community outdoor recreation areas (or 60 dBA L_{dn} when the outdoor noise is due to aircraft). Noise standards are not applied to balconies or front yards. In the Downtown, the City Council will evaluate the requirement to achieve these standards on a case-by-case basis.
- Program 1.3: Use noise guidelines and contours to determine the need for noise studies, and require new developments to construct or pay for noise attenuation features as a condition of approving new projects. An exterior increase of more than 4 decibels is considered significant.
- Program 1.5: Encourage the use of setbacks, landscaped earth berms, and frontage roads where feasible to reduce exterior noise levels. The use of sound walls should only be used where other mitigation measures are not feasible. Where sound and frontage road walls are needed, design and high quality materials, as well as landscaping, should be used to mitigate their visual impact.

Policy 4 Control noise at its source to maintain existing noise levels, and in no case to exceed acceptable noise levels as established in the Noise and Land Use Compatibility Guidelines.

- **Program 4.6:** Require developers of new projects that would significantly increase noise in nearby homes to mitigate noise impacts with walls, berms or other measures, and/or to provide noise attenuating measures in the homes.

Table 18: Noise and Land Use Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (L_{dn})					
	55	60	65	70	75	80
Single-Family Residential[a]						
Multi-Family Residential, Hotels, and Motels[a]						

Land Use Category	Exterior Noise Exposure (L_{dn})					
	55	60	65	70	75	80
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds						
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches						
Office Buildings, Business, Commercial, and Professional						
Auditoriums, Concert Halls, Amphitheaters						

Notes:
L_{dn} = day/night sound level
[a] In noise environments resulting primarily from railroad trains, exterior noise levels up to 70 dBA L_{dn} are normally acceptable recognizing that day-night average noise levels are controlled by intermittent, loud events.
[b] <65 dBA outdoors = < 45 dBA indoors

	Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special insulation requirements
	Conditionally Acceptable: Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design.
	Unacceptable: New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies.

Municipal Code

The City of Pleasanton Municipal Code Chapter 9.04 establishes noise performance standards for residential, commercial, and industrial land uses.[89] Additionally, the Municipal Code establishes acceptable noise levels and permissible hours for construction activities. These ordinances are summarized below.

Stationary Noise Limits (Section 9.04.035)

- **Noise Limits—Commercial or industrial use adjacent to residential zone.**
  Any commercial or industrial use, not including a special downtown accessory entertainment use in the downtown hospitality transition area, which is located within 300 feet from any residential zone, and which remains open for business at any time between the hours of 10:00 p.m. and 6:00 a.m. shall adhere to the following standards of performance:
  A. The noise level produced on the business premises between the hours of 10:00 p.m. and 6:00 a.m. shall not exceed the residential noise standard at the property plane between the residential zoning district and the commercial zoning district.

[89] City of Pleasanton. 2020. Municipal Code, Chapter 9.04.

- **Noise Limits—Commercial property.**
  No person shall produce or allow to be produced by any machine, animal, device, or any combination of the same, on commercial property, a noise level in excess of 70 dBA at any point outside of the property plane, unless otherwise provided in this chapter. (Ord. 2055 § 2, 2012; Ord. 1880, 2003; prior code § 4-9.04)

Construction Noise (Section 9.04.100)

- Between the hours of 8:00 a.m. and 8:00 p.m. daily, except Sunday and holidays, when the exemption shall apply between 10:00 a.m. and 6:00 p.m., construction, alteration or repair activities which are authorized by a valid city permit shall be allowed if they meet at least one of the following noise limitations:
  A. No individual piece of equipment shall produce a noise level exceeding 83 dBA at a distance of 25 feet. If the device is housed within a structure on the property, the measurement shall be made outside the structure at a distance as close to 25 feet from the equipment as possible; or
  B. The noise level at any point outside of the property plane of the project shall not exceed 86 dBA.

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Source Noise Impacts

Less than significant impact with mitigation incorporated. For purposes of this analysis, a significant impact would occur if construction activities would result in a substantial temporary increase in ambient noise levels outside of the City's permissible hours for construction that would result in annoyance or sleep disturbance of nearby sensitive receptors, or if construction noise levels exceed 86 dBA as measured at any point outside of the property plane of the project. While the City does not define the noise metric for this standard, for purposes of this analysis the noise metric is assumed to be an hourly average L_{eq}.

Construction-related Traffic Noise

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. One type of short-term noise impacts that could occur during project construction would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site.

The transport of workers and construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to

existing vehicle-generated noise on these local roadways. Typically, a doubling of the Average Daily Traffic (ADT) hourly volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels; which, as discussed in the characteristics of noise discussion above, is the lowest change that can be perceptible to the human ear in outdoor environments. Project-related construction trips would not be expected to double the hourly traffic volumes along any roadway segment in the project vicinity. For this reason, short-term intermittent noise from construction trips would be minor when averaged over a longer time-period and would not be expected to result in a perceptible increase in hourly- or daily-average traffic noise levels in the project vicinity. Therefore, short-term construction-related noise impacts associated with the transportation of workers and equipment to the project site would be less than significant.

Construction Equipment Operational Noise

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings. Impact equipment such as pile drivers is not expected to be used during construction of this project.

The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery and compacting equipment, such as bulldozers, draglines, backhoes, front loaders, roller compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three or four minutes at lower power settings.

Construction of the project is expected to require the use of scrapers, bulldozers, water trucks, haul trucks, and pickup trucks. According to the City's noise ordinance, the project must comply with limitations on construction equipment noise levels of 83 dBA L_{max} at a distance of 25 feet. A characteristic of sound is that each doubling of sound sources with equal strength increases a sound level by 3 dBA. Assuming compliance with the City's equipment noise limitations and that each piece of construction equipment operates at a minimum distance from each other, a reasonable worst-case combined noise level during this phase of construction would be 85 dBA L_{max} at a distance of 25 feet from the acoustic center of a multiple pieces of construction equipment operating simultaneously at full power. The acoustical center reference is used because construction equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a single point on the project boundary would be the worst-case maximum noise level. This would result in a reasonable worst-case hourly average of 81 dBA L_{eq}. All construction noise level calculations are provided in Appendix H.

Based on the site plans, the footprint where the heaviest construction equipment would operate would be setback from the project boundaries by a minimum of 25-feet. As described above, at this distance construction activity would result in reasonable worst-case maximum noise levels of 85 dBA L_{max} as measured at the property plane of the project. Therefore, compliance with the City's noise limit restrictions on individual pieces of construction equipment would ensure the proposed project would not result in an exceedance of the City's construction noise performance standard of 86 dBA L_{eq} as measured at any point outside of the property plane of the project.

However, construction activities could result in a substantial temporary increase in ambient noise levels that could result in annoyance or sleep disturbance of nearby sensitive receptors, unless restricted to daytime hours. The closest noise-sensitive receptor to the project site is a residential unit located within the multi-family residential development located southwest of the project site on Stoneridge Mall Road. The façade of this residence would be located approximately 300 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would operate simultaneously during site preparation of the proposed project site. At this distance, the reasonable worst-case construction noise levels could range up to approximately 68 dBA L_{max}, intermittently, and could have an hourly average of up to approximately 58 dBA L_{eq}, at the façade of the nearest residential receptor.

According to the Section 9.04.100 of the Municipal Code, construction activities are prohibited between the hours of 8:00 p.m. and 8:00 a.m. Monday through Saturday, and between the hours of 6:00 p.m. and 10:00 a.m. Sunday and holidays. Therefore, implementation of MM NOI-1 requires compliance with the City's construction noise regulations and the implementation of best management noise reduction measures, which would ensure that project construction activities would not result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors or exceedance of the City's construction noise thresholds, and the impact would be reduced to less than significant.

Operational/Stationary Source Noise Impacts

Less than significant impact. A significant impact would occur if operational noise levels generated by stationary noise sources at the proposed project site would result in a substantial permanent increase in ambient noise levels in excess of the maximum sound levels established in the City's Municipal Code. The City's Municipal Code restricts commercial land use operational noise levels to 70 dBA L_{eq} for daytime hours, and to 65 dBA L_{eq} for nighttime hours as measured the property line shared with residential land uses. As indicated in the General Plan, an increase in exterior noise levels of more than 4 decibels is considered significant. Therefore, for purposes of this analysis, an increase of greater than 4 dBA above the established noise performance thresholds would be considered a substantial permanent increase in ambient noise levels.

The proposed project would generate noise from parking lot activities, new exterior mechanical equipment sources, such as rooftop ventilation systems, and from truck loading and unloading activities. Potential impacts from these noise sources are discussed below.

Parking Lot Activities

A surface parking lot would be located in the southeastern portion of the project site. Parking activities, including vehicles cruising at slow speeds, doors shutting, or vehicles starting, would

generate approximately 60 dBA to 70 dBA L_{max} at 50 feet. Conversation between two persons at a distance of 3 to 5 feet apart would generate a noise level of 60 dBA L_{eq} at 5 feet, or approximately 40 dBA L_{eq} as measured at 50 feet. In a reasonable worst-case scenario, assuming one parking movement per parking stall within an hour, parking lot activities could result in intermittent noise levels ranging up to 43 dBA L_{eq} as measured at the property boundary of the nearest residential land use to the parking lot, the multi-family residential receptor southwest of the project site. All operational noise level calculations are provided in Appendix H.

It should be noted that these calculations and noise impact conclusions would also apply to the proposed interim parking lot that would be located on the southern portion of the project site.

Thus, noise from these activities would not exceed the City's most restrictive noise performance standard (the standard for nighttime hours) of 65 dBA L_{eq} as measured at the property boundary of the nearest residential land use. Therefore, noise impacts from operational parking lot activity would not result in a substantial permanent increase in ambient noise levels in excess of any of the noise performance thresholds and would be less than significant.

Mechanical Equipment Operations

The proposed project would not utilize ventilation units larger or noisier than standard commercial-grade ventilation systems; therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from typical rooftop mechanical ventilation equipment are anticipated to range up to approximately 60 dBA L_{eq} at a distance of 25 feet. The mechanical ventilation equipment would be setback at least 10 feet from the edge of the proposed building's rooftop. Thus, rooftop mechanical ventilation systems could be located as close as 225 feet from the property line of the nearest noise sensitive receptor, which are the multi-family residences on Stoneridge Mall Road east of the project site. Based on distance attenuation, noise generated by rooftop mechanical ventilation equipment would attenuate to approximately 41 dBA L_{eq} as measured at the property boundary of the nearest residential land use. All operational noise level calculations are provided in Appendix H.

Thus, noise from mechanical equipment operations would not exceed the City's most restrictive noise performance standard (the standard for nighttime hours) of 65 dBA L_{eq} as measured at the property boundary of the nearest residential land use.

Truck Loading Activities

Noise would be generated by loading and unloading activities at the loading zones of the proposed commercial buildings. Typical noise levels from truck loading and unloading activity can range from 70 dBA to 80 dBA L_{max} as measured at 50 feet. A reasonable worst-case scenario assumes that multiple trucks at the nearest loading bays to the nearest off-site receptor could produce simultaneous loading and unloading activities within a single hour.

The proposed loading areas are positioned such that noise generated by loading and unloading activities would be shielded by the intervening proposed buildings. This shielding would provide an expected minimum 10 dBA reduction in truck loading noise levels. The nearest residential property line is located approximately 350 feet from the nearest proposed loading area. Therefore, due to distance attenuation and shielding reduction, truck loading and unloading activities would result in reasonable

worst case noise levels of up to 53 dBA L_{max} as measured at the nearest residential property line. All operational noise level calculations are provided in Appendix H.

However, the closest sensitive receptor that would have a direct line of sight to the loading areas would be the multi-family residential property at the southwest corner of the Springdale Avenue and Stoneridge Drive intersection, approximately 630 feet from the nearest proposed loading area. At this distance, reasonable worst-case loading and unloading activities could result in intermittent noise levels ranging up to 58 dBA L_{max}. Assuming reasonable worst-case conditions of truck loading and unloading activities occurred throughout an entire hour period would result in an hourly average noise level of 50 dBA L_{eq}, as measured at the residential property line of this residential land use. Therefore, noise from these activities would not exceed the City's most restrictive noise performance standard (the standard for nighttime hours) of 65 dBA L_{eq} as measured at the property boundary of the nearest residential land use that would have a direct line of sight to the nearest loading and unloading area.

Combined Operational/Stationary Source Noise Impacts Summary

Table 19 provides a summary of the combined stationary source operational noise impacts.

Table 19: Stationary Operational Noise Impact Summary

Source (Reference Noise Levels)	Reasonable Worst-Case Operational Noise Level as Measured at the Nearest Residential Property Line	Combined Noise Levels as Measured at the Nearest Residential Property Line	City's Nighttime Noise Performance Threshold	Exceed Threshold? (Yes/No)
Parking Lot Activities (60 dBA to 70 dBA L_{max} at 50 feet)	43 dBA L_{eq}	51 dBA L_{eq}	65 dBA L_{eq}	No
Mechanical Ventilation Equipment (60 dBA L_{eq} at a distance of 25 feet)	41 dBA L_{eq}			
Truck Loading and Unloading Activities (70 dBA to 80 dBA L_{max} as measured at 50 feet)	50 dBA L_{eq}			
Notes: dBA = A-weighted decibel L_{max} = maximum sound level L_{eq} = equivalent continuous sound level Source: FCS 2021.				

As shown in the table above, the combined noise levels from project stationary operational noise sources would not result in an exceedance of the City's most restrictive noise performance threshold (nighttime threshold of 65 dBA L_{eq}) as measured at the exterior of the nearest residential receptor.

Therefore, the project stationary operational noise sources would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance; and the impact of stationary operational noise sources to off-site sensitive receptors would be less than significant.

Operational/Mobile Source Noise Impacts

Less than significant impact. A significant impact would occur if implementation of the proposed project would result in a substantial increase in traffic noise levels compared with traffic noise levels existing without the project. Similar to the stationary source noise impact analysis above, for purposes of this analysis, an increase of 4 dBA or greater above noise levels that would exist without the proposed project would be considered a substantial permanent increase in traffic noise levels.

The FHWA highway traffic noise prediction model (FHWA RD-77-108) was used to evaluate existing, near-term and far-term traffic noise conditions in the vicinity of the project site. The daily traffic volumes were obtained from the traffic analysis prepared for the project by Fehr & Peers.[90] The resultant noise levels were weighed and summed over a 24-hour period in order to determine the CNEL values. The traffic noise modeling input and output files are included in Appendix H of this document. Table 20, Table 21, and Table 22 show a summary of the traffic noise levels for existing, near-term, and far-term traffic conditions, respectively, as measured at 50 feet from the centerline of the outermost travel lane.

Table 20: Existing Traffic Noise Model Results Summary

Roadway Segment	CNEL (dBA) 50 feet from Centerline of Outermost Lane		
	Existing (dBA) CNEL	Existing Plus Project (dBA) CNEL	Increase over Existing (dBA) CNEL
Stoneridge Mall Road–north of Stoneridge Drive	64.8	64.8	0.0
Stoneridge Drive–west of Springdale Avenue	67.1	67.4	0.3
Stoneridge Drive–Springdale Avenue to Stoneridge Mall Road	68.8	69.2	0.4
Stoneridge Drive–east of Stoneridge Mall Road	71.5	71.7	0.2

Notes:
dBA = A-weighted decibel
CNEL = Community Noise Equivalent Level
[1] Modeling results do not take into account mitigating features such as topography, vegetative screening, fencing, building design, or structure screening. Rather it assumes a worst case of having a direct line of site on flat terrain.
Source: FCS 2021.

Table 21: Near-term Traffic Noise Model Results Summary

Roadway Segment	CNEL (dBA) 50 feet from Centerline of Outermost Lane		
	Near-term (dBA) CNEL	Near-term Plus Project (dBA) CNEL	Increase over Near-term (dBA) CNEL
Stoneridge Mall Road–north of Stoneridge Drive	64.9	65.0	0.1
Stoneridge Drive–west of Springdale Avenue	67.9	68.1	0.2

[90] Fehr & Peers. 2021. 10x Genomics Traffic Impact Analysis. February 5.

Roadway Segment	CNEL (dBA) 50 feet from Centerline of Outermost Lane		
	Near-term (dBA) CNEL	Near-term Plus Project (dBA) CNEL	Increase over Near-term (dBA) CNEL
Stoneridge Drive–Springdale Avenue to Stoneridge Mall Road	69.6	69.9	0.3
Stoneridge Drive–east of Stoneridge Mall Road	71.9	72.1	0.2

Notes:
dBA = A-weighted decibel
CNEL = Community Noise Equivalent Level
Source: FCS 2021.

Table 22: Far-term Traffic Noise Model Results Summary

Roadway Segment	CNEL (dBA) 50 feet from Centerline of Outermost Lane		
	Far-term (dBA) CNEL	Far-term Plus Project (dBA) CNEL	Increase over Far-term (dBA) CNEL
Stoneridge Mall Road–north of Stoneridge Drive	65.0	65.0	0.0
Stoneridge Drive–west of Springdale Avenue	68.1	68.3	0.2
Stoneridge Drive–Springdale Avenue to Stoneridge Mall Road	69.8	70.0	0.2
Stoneridge Drive–east of Stoneridge Mall Road	72.0	72.2	0.2

Notes:
dBA = A-weighted decibel
CNEL = Community Noise Equivalent Level
Source: FCS 2021.

The highest traffic noise level increase with implementation of the proposed project would be an increase of 0.4 dBA along Stoneridge Drive from Springdale Avenue to Stoneridge Mall Road, during Existing Plus Project conditions. This increase is well below a 4 dBA increase that would be considered a substantial permanent increase in traffic noise levels compared with traffic noise levels that would exist without the proposed project. Therefore, project-related traffic noise impacts would not result in a substantial permanent increase in ambient noise levels in the project vicinity and the impact would be less than significant.

It should also be noted that the highest traffic noise levels along roadway segments adjacent to the project site would be 70 dBA CNEL, under cumulative conditions, as measured at 5-feet from the centerline of the outermost travel lane. These noise levels are considered normally acceptable for new office land use development according to the City's noise and land use compatibility guidelines. Therefore, traffic noise levels would not result in a land use compatibility conflict for the proposed project and the impact would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The City of Pleasanton has not adopted criteria for groundborne vibration impacts. Therefore, for purposes of this analysis, the Federal Transit Administration (FTA's) vibration impact criteria are utilized. The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment Manual.[91]

Groundborne noise is an effect of groundborne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves. In general, if groundborne vibration levels do not exceed levels considered to be perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects such as the shaking of a building can be notable. When assessing annoyance from groundborne vibration, vibration is typically expressed as root mean square (rms) velocity in units of decibels of 1 micro-inch per second. To distinguish these vibration levels referenced in decibels from noise levels referenced in decibels, the unit is written as "VdB."

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving and operating heavy earthmoving equipment. However, construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes of this analysis, project related impacts are expressed in terms of PPV.

Short-term Construction Vibration Impacts

Of the variety of equipment that would be used during construction, small vibratory rollers would produce the greatest groundborne vibration levels. Impact equipment such as pile drivers is not expected to be used during construction of this project. Small vibratory rollers produce groundborne vibration levels ranging up to 0.101 inch per second (in/sec) PPV at 25 feet from the operating equipment.

The off-site structure nearest to the proposed construction areas where heavy construction equipment would operate is the LPFD Fire Station No. 2 at 6300 Stoneridge Mall Road, east of the project site. The façade of this structure would be located approximately 230 feet from the proposed construction footprint where heavy equipment would operate. At this distance, groundborne vibration levels would attenuate to 0.004 in/sec PPV from the operation of a small vibratory roller. This is well below the industry standard vibration damage criteria of 0.2 in/sec PPV for this type of structure, a building of non-engineered timber construction.

[91] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

The closest residential receptor to the project site is the multi-family residential home located northeast of the project site on Stoneridge Mall Road. The façade of this residence would be located approximately 240 feet from the footprint of construction activity where heavy construction equipment would operate during site preparation of the proposed project site. At this distance, groundborne vibration levels would attenuate to 0.003 in/sec PPV from the operation of a small vibratory roller. This is well below the industry standard vibration damage criteria of 0.2 in/sec PPV for this type of structure, a building of non-engineer timber and masonry construction.

Therefore, project construction activities would not generate groundborne vibration or groundborne noise levels in excess of the FTA impact assessment criteria for construction-related groundborne vibration. Therefore, construction-related groundborne vibration impacts to existing off-site receptors would be less than significant.

Operational Vibration Impacts

Implementation of the proposed project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. Therefore, project operational activities would not generate excessive groundborne vibration levels as measured at off-site receptors, and the impact would be less than significant.

In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity to which the proposed project would be exposed.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No impact. The nearest airport to the project site is the Livermore Municipal Airport, located approximately 5 miles east of the project site. Because of the distance to the project site and the orientation of the airport runways, the project site is located outside of the airport's 60 dBA CNEL airport noise contours. The project site is not located within the vicinity of a private airstrip. While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people working at the project site to excessive noise levels. No impact would occur.

Mitigation Measures

MM NOI-1 Implementation of the following multi-part mitigation measure is required to reduce potential construction period noise impacts:

- The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
- The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes) is prohibited.

- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from adjacent residences.
- The construction contractor shall ensure that the construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the project site.
- The construction contractor shall ensure that construction activities not occur between the hours of 8:00 p.m. and 8:00 a.m. Monday through Saturday, and between the hours of 6:00 p.m. and 10:00 a.m. Sunday and holidays.
- The construction contractor shall ensure that no individual piece of equipment shall produce a noise level exceeding 83 dBA at a distance of 25 feet.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.14 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Evaluation

Setting

The project site does not include any residential uses, and no residential structures are proposed as part of the project. As of July 1, 2019, the City of Pleasanton had an estimated population of 81,777, an average of 2.81 persons per household, and 29,011 households.[92]

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. Because the proposed project would not include any residential uses, the proposed project would not directly induce population growth. The Association of Bay Area Governments (ABAG) forecasts a total population of 78,370 for the City of Pleasanton by 2030 and a population of 87,875 by 2040. The proposed project would employ approximately 1,415 employees at full buildout.[93] The proposed project's employment requirements would be met partially by employees from the existing 10x Genomics facilities located in the City of Pleasanton. ABAG forecasts that total jobs in the City of Pleasanton will be 66,940 by 2030 and 75,440 by 2040. Additionally, ABAG forecasts that there will be 47,770 employed residents by 2030 and 51,545 employed residents by 2040. [94] As such, the proposed project's construction and operational employment requirements could be met by the region's existing labor force without substantial numbers of people needing to relocate into the region. The indirect population growth induced by

[92] United States Census Bureau. 2019. QuickFacts, Pleasanton city, California. Website: https://www.census.gov/quickfacts/pleasantoncitycalifornia. Accessed January 19, 2021.
[93] Grewal, I., Burton, B., Tellez, K. 2021. Final Memorandum: 10x Genomics Transportation Analysis Assumptions. January 8.
[94] Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission. 2017. Projections 2040. Website: https://mtc.data.socrata.com/api/views/grqz-amra/files/bf2d7a33-b68e-473d-800f-956d08207b77?download=true&filename=formated_tables_juris.xlsx. Accessed January 19, 2021.

the proposed project would be consistent with the planned growth as estimated by ABAG. Furthermore, the operations of the proposed project would create more employment opportunities for the area and would improve the City's job to housing ratio. As such, the project's temporary and permanent employment requirements could be met by the region's existing labor force without substantial numbers of people needing to relocate into the project region. Because the proposed project would not displace substantial numbers of people or induce substantial unplanned population growth in the area or region, impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No impact. The project site is currently developed with a surface-paved parking lot and landscaping. There are no residential housing units on the project site, and the proposed project would not include the removal of existing housing units. Therefore, no existing residents would be displaced by the proposed project, and no impact would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.15 Public Services *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:*				
a) Fire protection?	☐	☒	☐	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Environmental Evaluation

Setting

The information in this section is based, in part, on correspondence with public service providers in the City of Pleasanton that occurred during February 2021; copies of the correspondence are included as Appendix I of this document.

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:

a) Fire protection?

Less than significant impact with mitigation incorporated. Fire services in the City of Pleasanton are provided by the Livermore Pleasanton Fire Department (LPFD). The nearest fire station to the project site is the Livermore-Pleasanton Fire Department -Station No. 2, located at 6300 Stoneridge Mall Road, approximately 250 feet east of the project site.

The LPFD has a daily operational staffing level of 34 personnel each day. These personnel occupy 10 fire stations between the cities of Livermore and Pleasanton. The project site is located in the City of Pleasanton, which has five fire stations. The daily operational staffing level for the LPFD in the City of Pleasanton is 17 personnel each day. Fire Station No. 2, located across the street from the construction project, has four personnel assigned each day (Fire Captain, Engineer, Firefighter-Paramedic, and Firefighter-EMT). Fire Station No. 2 has one primary Type 1 Fire Engine, and cross-

staffs, one Type 3, and one Hazardous Materials Unit.[95] Fire Station No. 2 has an average response time of 5 minutes and 46 seconds.[96]

According to the LPFD, development within the area has increased the number of vehicles present in the vicinity of Fire Station No. 2, which has affected the emergency response times from this station. However, the LPFD has provided service to the site over the past decade and the redevelopment of the site would not constitute a new impact on the LPFD's ability to provide service. Furthermore, the proposed project is located just 250 feet west of Fire Station No. 2, allowing for efficient response in the event of a fire.

Consistent with the recommendations from the LPFD (Appendix I), a Transportation Impact Analysis (TIA) has been prepared for the proposed project and is included as Appendix J of this report. The TIA estimates that the proposed project would generate a total of 3,680 net-new daily trips. The TIA also includes recommendations to mitigate any traffic impacts as a result of implementation of the proposed project. These recommendations are included as MM TRANS-1 through MM TRANS-2 and are discussed in further detail in Section 2.17, Transportation. As such, impacts would be less than significant with mitigation incorporated.

b) Police protection?

Less than significant impact. The project site is located in District 1 of a five-district system. Police services in the City of Pleasanton are provided by the Pleasanton Police Department. The nearest Pleasanton Police Department station to the project site is the main station, a full-service station located approximately 4.4 miles southeast of the project site at 4833 Bernal Avenue in Pleasanton. In 2019, the Pleasanton Police Department erected a new substation, Pleasanton/BART Joint Service Station, located at 650 Stoneridge Mall Road, which is approximately 0.5 mile away. This substation helps deal with the new construction/safety at Workday, the BART Station, and overall calls for service directly related to the Stoneridge Mall. This substation acts as location for patrol to handle in-custody calls for service from the Stoneridge Mall, issues surrounding the overall area, and report writing needs. It should be noted that the Pleasanton/BART Joint Service Station is not a full-service station and is a location for other officers to complete follow-up investigations, re-supply documents, and other non-emergency services.[97]

The Pleasanton Police Department is currently authorized to employ 83 sworn officers and 35 civilian employees. There are currently approximately 1,047 citizens per sworn officer and the target ratio would be a fully-staffed department with 83 sworn officers, which would reduce the ratio to 984 citizens per sworn officer. On average there are 5 to 10 officers assigned to patrol Pleasanton at any given day or time period. There are 6 to 10 employees on duty at any given time. The average Pleasanton Police Department response time for the project area is 23 minutes and 43 seconds for non-emergency calls for service and 3 minutes and 51 seconds for emergency calls for service.[98]

[95] Lacey, Aaron, Deputy Chief. Livermore-Pleasanton Fire Department. Personal communication: e-mail. February 2, 2021.
[96] Livermore-Pleasanton Fire Department (LPFD). 2019. Year End Report – 2019. Website: https://www.cityoflivermore.net/civicax/filebank/documents/20769/. Accessed February 2, 2021.
[97] Swing, David, Chief of Police. Pleasanton Police Department. Personal communication: letter. January 25, 2021.
[98] Ibid.

According to correspondence with the Pleasanton Police Department (Appendix I), it does not appear that the proposed project would negatively impact the Pleasanton Police Department's current levels of service or response. No construction of new or expanded facilities is anticipated to be necessary in order to serve the propose project. As such, impacts would be less than significant.

c) Schools?

Less than Significant. The project site is within the boundaries of the Pleasanton Unified School District (PUSD), which has 9 elementary schools, three middle schools, and three high schools. The nearest PUSD school to the project site is Lydiksen Elementary School, located 0.76 mile south of the project site. As discussed in Section 2.14, Population and Housing, the proposed project would not induce any unplanned population growth because the proposed project would not include any residential uses. Because the proposed project would not directly or indirectly induce any unplanned population growth, the number of public school students would not increase as a result of the project, and there would not be a need for new or physically altered governmental facilities.

In accordance with SB 50 and related California laws, all new residential and commercial construction projects are required to pay developer fees to the PUSD before a building permit will be issued.[99] The developer fees offset the costs associated with construction or expansion of school facilities, obtaining equipment, and the hiring and training of additional personnel. As part of the project entitlement process, the Applicant will be responsible for paying its share of developer fees. Therefore, impacts would be less than significant.

d) Parks?

No impact. As discussed in Section 2.16, Recreation, the proposed project would not create the need for new or expanded parks or other recreational facilities because the proposed project would not include any residential uses that would directly or indirectly induce unplanned population growth. As a non-residential development, the proposed project would not result in a significant increased use of existing parks or park facilities as employees would use the City's existing recreational facilities, including trails and athletic fields, significantly less often than residents. the nearest of which is Moller Neighborhood Park, located at 5500 Pleasant Hill Road, 0.27 mile southwest of the project site, and Muirwood Community Park, located at 4701 Muirwood Drive, 0.7 mile southeast of the project site. The General Plan aims to achieve a level of park facilities equal to 5 acres per 1,000 population or 0.005 acre per person. As noted previously, the City currently provides approximately 5.1 acres of improved neighborhood and community parks per 1,000 residents.[100] The proposed project does not include any housing and would not therefore introduce new residents that could affect the City's ability to maintain its parkland ratio. Additionally, the proposed project would pay the required Capital Facilities Fee to offset the potential use of recreational facilities by employees. No impact would occur.

[99] Pleasanton United School District (PUSD). 2020. Developer Fees. Website: https://www.pleasantonusd.net/apps/pages/index.jsp?uREC_ID=296967&type=d&pREC_ID=685581. Accessed January 20, 2021.

[100] City of Pleasanton. 2009. 2005 General Plan 2025, Public Facilities and Community Programs Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23909. Accessed January 19, 2021

e) Other public facilities?

No impact. The proposed project would not result in impacts to other public facilities, such as the Pleasanton Library, because the proposed project would not involve the construction of any additional housing or infrastructure that would directly or indirectly induce unplanned population growth. Therefore, there would be no impacts related to other public facilities.

Mitigation Measures

Implement MM TRANS-1 and MM TRANS-2.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.16 Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Environmental Evaluation

Setting

The Conservation and Open Space Element and the Public Facilities and Community Program Element of the General Plan set forth goals and policies regarding the preservation of open space and recreational areas within the City. The City of Pleasanton currently offers 44 community and neighborhood parks, approximately 24 miles of trails, and over 600 acres of undeveloped open space.[101] The City currently provides about 5.1 acres of improved neighborhood and community parks per 1,000 people, slightly above the national standard and General Plan goal of 5 acres per 1,000 people.[102]

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No impact. The proposed project would not directly induce unplanned population growth in the City because it would not add residential units to the site. The proposed project would include the redevelopment of a site for commercial and office, R&D, and light laboratory manufacturing uses. As such, the proposed project would not create the need for new or expanded parks or other recreational facilities as employees would use the City's existing recreational facilities, including trails and athletic fields, significantly less often than residents. The nearest park to the proposed project is Moller Neighborhood Park, located at 5500 Pleasant Hill Road, 0.27 mile southwest of the project site, and Muirwood Community Park, located at 4701 Muirwood Drive, 0.7 mile southeast of the project site. The proposed project would not measurably increase the use of existing parks or recreational facilities or result in substantial deterioration of facilities because the proposed project

[101] City of Pleasanton. 2020. Parks & Trails. Website: http://www.cityofpleasantonca.gov/gov/depts/cs/parks/default.asp. Accessed January 19, 2021.
[102] City of Pleasanton. 2009. 2005 General Plan 2025, Public Facilities and Community Programs Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23909. Accessed January 19, 2021.

would not induce unplanned population growth. Additionally, the proposed project would pay the required Capital Facilities Fee to offset the potential use of recreational facilities by employees. Therefore, no impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No impact. The proposed project does not include the expansion or construction of parks or recreational facilities. As discussed above, the proposed project would include the redevelopment of the project site and would not induce unplanned population growth. No parklands, recreational facilities, or community parks would be impacted by the proposed development. The proposed project would not result in the construction of recreational facilities. Therefore, no impact would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.17 Transportation *Would the project:*				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

Environmental Evaluation

Setting

The information in this section is based, in part, on the 10x Genomics TIA Report prepared by Fehr & Peers dated March 2021 which is included as Appendix J of this document. The following is a summary of the results of the TIA prepared for the proposed project.

Potential project impacts on the transportation network were evaluated based on the City of Pleasanton's standards of significance and the Governor's Office of Planning and Research (OPR) recommendations for VMT impacts (The City of Pleasanton has yet to develop VMT guidelines). These include assessments of the project's effects on VMT, pedestrian facilities, transit services, bicycle facilities, potential hazards, and emergency vehicle access. In addition, intersection Levels of Service (LOS) were calculated to assess the proposed project's consistency with City General Plan operational thresholds. This was determined by measuring the effect Project traffic would have on 16 intersections in the vicinity of the site during the morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) peak periods. Conditions were evaluated under Existing, Near-term and Cumulative conditions without and with the Project. Operations of intersections internal to the site were also evaluated and lane configuration and traffic control recommendations were developed.

To assess the project's consistency with the City's General Plan policies, level of service and queuing assessments were undertaken. These analyses identified several inconsistencies with General Plan policies. However, the proposed project would not degrade an intersection beyond established level of service standards that was operating within the level of service standards prior to the addition of project traffic. In addition to paying all local and regional transportation impact fees, the proposed project would be required to construct improvements at the intersections of Stoneridge Drive at

Springdale Avenue (Condition of Approval 1) and Stoneridge Mall Road at Fabian Way (Condition of Approval 2) upgrade traffic signal control and timing on Stoneridge Drive between Foothill Road and the I-680 Northbound Ramps to better coordinate travel flows through the corridor and install conduit for the potential installation of a traffic signal at the project driveway intersection with Springdale Avenue. Detailed discussions, including other operational recommendations, are provided in Appendix J.

Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than significant with mitigation incorporated. The proposed project would create a significant impact related to the roadway system if at unsignalized intersections, the proposed project would result in any of the traffic signal warrants included in the CA Manual on Uniform Traffic Control Devices (MUTCD) to be satisfied, or for a location where any of the warrants are satisfied prior to the project, the proposed project would increase overall travel volume through the intersection by more than 1 percent. Springdale Avenue at the Project Driveway satisfies the peak hour signal warrant with the addition of project traffic in the near-term and cumulative conditions. However, the addition of project traffic would only marginally increase delay at the intersection, which operates at a LOS A or B in all scenarios.

The proposed project would create a significant impact related to the roadway system if the project creates the potential for excessive vehicle queue spillback that could periodically block or interfere with pedestrian, bicycle or transit facilities. The proposed project would contribute to excessive vehicle queue spillback on Springdale Avenue (southbound) between Stoneridge Drive and the project driveway entrance, Stoneridge Drive (eastbound left turn lane) at Springdale Avenue and Stoneridge Drive (eastbound) between Stoneridge Mall Road and Springdale Avenue. These locations could periodically block or interfere with pedestrian, bicycle, or transit facilities, which would be considered a potentially significant impact. Implementation of MM TRANS-1 would require modification of the intersection of Stoneridge Drive at Springdale Avenue to convert the southbound through and left turn lane into a left turn only lane and convert the southbound right turn only lane into a through and right turn lane. In addition, the eastbound left-turn pocket would be required to be extended to provide 200 feet of vehicle storage. The installation of a conduit for a future traffic signal would be required at the intersection of Springdale Avenue at the Project Driveway for Phase 1. The City's Traffic Engineering Division would monitor delays and queuing at the intersection. The installation of a traffic signal would be required prior to the buildout of Phase 2.[103] Implementation of MM TRANS-2 would require the City's Traffic Engineering Division to monitor and manage traffic signal timings on Stoneridge Drive between Foothill Road and I-680 Northbound ramps to better coordinate travel flows through the corridor and minimize vehicle queue spillback. This requirement includes any necessary upgrading of traffic signal controller equipment and timing on Stoneridge Drive between Foothill Road and the I-680 Northbound Ramps to better coordinate travel flows through the corridor and minimize vehicle queue spillback. This measure would also include

[103] Fehr & Peers. 2021. 10x Genomics Transportation Impact Analysis Report. February.

reprogramming of the traffic signal at Springdale Avenue at Stoneridge Drive to provide conditional southbound left-turn phasing which could serve the southbound left-turn movement twice per cycle during the PM peak hour; however, these timings would need to consider the eastbound through movement queue on eastbound Stoneridge Drive extending from Stoneridge Mall Road. Implementation of the improved southbound left turn phasing would necessitate modifications to the geometry and median on the south leg of the intersection to allow for concurrent northbound and southbound left turns. Operations at this intersection would be required to be monitored between project Phases 1 and 2 to determine the appropriate level of signal timing modifications and improvements necessary to eliminate queue overflow issues. Additionally, the Applicant would be required to contribute fair share funding towards improvements under construction at Stoneridge Drive and Stoneridge Mall Road intersection to extend the southbound left turn storage.[104] Implementation of MM TRANS-1 and TRANS-2 would reduce potential queueing impacts to less than significant.

Pedestrian access is currently provided on Springdale Avenue and Stoneridge Drive. No pedestrian facilities are proposed to be removed as a part of the development, and new pedestrian facilities would be constructed. The proposed project would construct pedestrian access to all off-site public sidewalks. Existing sidewalks and off-site pedestrian facilities are proposed to remain in place. The proposed project would not create any inconsistencies with adopted pedestrian system plans, guidelines, or standards. Bus stops are currently located on Stoneridge Mall Road and Springdale Avenue. Pedestrian connections would be provided from the site to the bus stops.[105]

Existing Class 2 bicycle facilities are provided in the immediate vicinity of the project site on Foothill Road and Stoneridge Drive, except for the westbound direction of travel along the project frontage. The project does not propose to eliminate existing bicycle facilities in the vicinity of site. The Bicycle and Pedestrian Master Plan proposes changes to Bicycle facilities on Stoneridge Drive and Stoneridge Mall Road. The proposed project would include construction of planned bicycle facilities along the project frontage and would not interfere with any planned bicycle facilities in the area. The proposed project does not create any inconsistencies with the adopted bicycle system plans, guidelines, policies or standards.[106] Furthermore, MM TRANS-3 would require the Applicant to coordinate with the City of Pleasanton to develop a bicycle facility concept for Stoneridge Drive between the I-680 southbound ramps and Foothill Road that considers intersection treatments and access to bicycle facilities on Stoneridge Mall Road that would connect to the BART station. The Applicant would be required to construct the identified improvements along the project frontage and at the intersections of Springdale Avenue and Stoneridge Mall Road. This concept would be required to be consistent with the 2018 City of Pleasanton Bicycle and Pedestrian Master Plan, which identified construction of buffered bike lanes in the near-term and separated bikeways in the long-term. To the extent feasible, the long-term improvements shall be constructed along the project frontage. Furthermore, the Applicant would be required to contribute to the construction of a Class IV facility on the eastside of Stoneridge Mall Road connecting Stoneridge Drive to the West Pleasanton BART Station. The Applicant would be required to construct bicycle and pedestrian

[104] Ibid.
[105] Fehr & Peers. 2021. 10x Genomics Transportation Impact Analysis Report. February.
[106] Ibid.

improvements at the intersection of Stoneridge Mall Road at Fabian Court to improve access to the project site to/from the BART station. A Class IV facility would be required to be constructed along the south side of Stoneridge Mall Road from Springdale Avenue to Fabian Court. Bicycle and pedestrian improvements would be required to be constructed at the intersection of Springdale Avenue and Stoneridge Mall Road to provide safe and convenient access for nonmotorized travel across the intersection's' southern approach. With implementation of MM TRANS-3, impacts related to bicycle facilities would be less than significant.

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

Less than significant impact. The City of Pleasanton has yet to develop VMT guidelines, therefore the OPR recommendations were used to assess VMT impacts. The OPR guidance suggests the use of screening criteria to assess whether land use development projects can be presumed to have a less-than-significant impact on VMT. Three of these screening criteria are relevant to the proposed project:

1. Small Projects: Projects that generate fewer than 110 vehicle trips per day may be presumed to have a less-than-significant impact on VMT.
2. Map-Based Screening: Residential and office projects that are located in areas with low VMT based on maps created with existing VMT data may be presumed to have a less-than-significant impact on VMT.
3. Near Transit Stations: Projects that are within 0.5-mile of an existing major transit stop[107] or an existing stop along a high-quality transit corridor[108] may be presumed to have a less-than-significant impact on VMT, except in cases where the project:
   - Has a Floor Area Ratio (FAR) of less than 0.75;
   - Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
   - Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
   - Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Criteria 1: The proposed project would generate over 3,680 net-new vehicle trips per day and so does not meet Criterion 1.

Criteria 2: VMT per employee maps have been prepared for the East Planning Area by the Alameda County Transportation Commission (CTC), which includes the project site, as presented in Appendix J of this report. The existing average vehicle miles traveled per employee in the East Planning Area is 15.2 miles and in Alameda County is 15.9. Based on the significance Criteria 1, the proposed project would

[107] A major transit stop is a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[108] A high-quality transit corridor is a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

need to generate no more than 12.9 VMT per employee if the East Planning Area average is selected as the target (0.85 of 15.2) or 13.5 VMT per employee if the Alameda County average is selected as the target (0.85 of 15.9). Based on the East Planning Area maps, the Travel Analysis Zone (TAZ) that is project is within generates an average of 11.71 VMT per employee. This is an indication of the expected VMT per employee associated with the proposed project. All other employment TAZs in the general project area generate less than 12.54 VMT per employee. Thus, the proposed project passes screening Criteria 2 and may be presumed to have a less than significant impact on VMT.

Criteria 3: The project site is within 0.5-mile of the West Pleasanton BART Station, as well as existing bus stops on Stoneridge Mall Road and Springdale Avenue, which qualifies as a high-quality transit corridor. Additionally, the proposed project would:

- Have an FAR of greater than 0.75;
- Provide 1,190 parking spaces for an estimated 1,415 employees, which corresponds to 0.84 spaces per employee, assuming employees would work alternating schedules. The City of Pleasanton's Municipal Code Section 18.88.030 (Schedule of Off-Street Parking Space Requirements) indicates that the Zoning Administrator and/or Planning Commission shall establish parking requirements on a case-by-case basis for projects in a zoned CR-District.
- Be consistent with the Metropolitan Transportation Commission's Sustainable Communities Strategy; and
- Would not replace any affordable residential units.

Therefore, the proposed project also meets Criterion 3.

Based on the screening criteria, as well as the proposed project's location and proximity to high-quality transit, impacts would be less than significant impact pertaining to VMT.

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

Less than significant impact with mitigation incorporated. The proposed project would be constructed to meet existing City design standards. Access to the project site would be provided from three driveways, one on Springdale Avenue, one on Stoneridge Mall Road (north), and one on Stoneridge Mall Road (east). The site is currently served by four driveways; with the project, the existing northeastern driveway would be removed.

Based on the conceptual site plan for Phase 1 of the proposed project, the eastern driveway on Stoneridge Mall Road into the project site is shown to be decommissioned. To minimize disruptions to the pedestrian travel way during subsequent phases of construction, the proposed project would construct the decommissioned project driveway at Stoneridge Mall Road to its ultimate width/dimensions, including curb ramps during Phase 1. Additionally, barriers would be provided to prevent vehicles from entering into the area during Phase 1.

The intersection of Springdale Avenue at the Project Driveway operates within an acceptable LOS as an all-way stop intersection through project buildout. The proposed project would provide one

inbound lane and two outbound lanes. The two outbound lanes would be configured as left and through-right. Under MM TRANS-2, operations would be required to be monitored after completion of Phase 1 and before project buildout to determine if the through-right lane should be reconfigured as a left-through-right lane. With a left-turn and a left-through-right lane, additional intersection improvements to accommodate the dual left would be required, including signalization to better allocate right-of-way and improve pedestrian safety. All conduit and other infrastructure for a signal should be constructed as a part of Phase 1 to minimize future disruptions to people walking, bicycling and driving (MM TRANS-1). As such, impacts would be less than significant with mitigation incorporated.

d) Result in inadequate emergency access?

Less than significant impact with mitigation incorporated. The project site is in an existing developed portion of the City of Pleasanton and would not change the location of emergency facilities. The site access is proposed from three existing driveways that would not be marginally changed with implementation of the proposed project. All project driveways would serve as access points for emergency vehicles. Project driveways are proposed to be at least 20-feet wide, and the internal drive aisles are proposed to be at least 24-feet wide. While these dimensions meet regulations for emergency vehicle widths, an emergency vehicle turning movement assessment is recommended to ensure the adequate vehicle has been designed for and would be provided full access to the project site. Additionally, the Applicant would be required to provide emergency vehicle turning movement analysis that demonstrates the ability of a standard LPFD Fire Truck to maneuver through the project site under MM TRANS-4. As such, the proposed project would provide adequate emergency access with mitigation incorporated.

Mitigation Measures

MM TRANS-1 The Applicant shall modify the intersection of Stoneridge Drive at Springdale Avenue to convert the existing southbound through and left turn lane into a left turn only lane and convert the southbound right turn only lane into a through and right turn lane. In addition, the eastbound left turn pocket shall be required to be extended to provide 200 feet of vehicle storage. The Applicant shall install a conduit for a future traffic signal at the intersection of Springdale Avenue at the Project Driveway for Phase 1 of the proposed project. The City's Traffic Engineering Division shall monitor delays and queuing at the intersection. The installation of a traffic signal by the Applicant in conjunction with the City shall be required prior to the buildout of Phase 2.

MM TRANS-2 The City's Traffic Engineering Division shall monitor and manage traffic signal timings on Stoneridge Mall Road Drive between Stoneridge Mall Road and Springdale Avenue Foothill Road and I-680 Northbound ramps to better coordinate travel flows through the corridor and minimize vehicle queue spillback. This requirement includes any necessary upgrading of traffic signal controller equipment and timing on Stoneridge Drive between Foothill Road and the I-680 Northbound Ramps to better coordinate travel flows through the corridor and minimize vehicle queue

spillback. The traffic signal at Springdale Avenue at Stoneridge Drive shall be reprogrammed to provide conditional southbound left-turn phasing which could serve the southbound left-turn movement twice per cycle during the PM peak hour; however, these timings shall consider the eastbound through movement queue on eastbound Stoneridge Drive extending from Stoneridge Mall Road. Implementation of the improved southbound left turn phasing shall necessitate modifications to the geometry and median on the south leg of the intersection to allow for concurrent northbound and southbound left turns. Operations at this intersection shall be monitored between project Phases 1 and 2 to determine the appropriate level of signal timing modifications and improvements necessary to eliminate queue overflow issues.

The Applicant shall contribute fair share funding towards improvements under construction at Stoneridge Drive at Stoneridge Mall Road intersection to extend the southbound left turn storage.

MM TRANS-3 The Applicant shall coordinate with the City of Pleasanton to develop a bicycle facility concept for Stoneridge Drive between the I-680 southbound ramps and Foothill Road that considers intersection treatments and access to bicycle facilities on Stoneridge Mall Road that would connect to the BART station. The Applicant shall construct the identified improvements along the project frontage and at the intersections of Springdale Avenue and Stoneridge Mall Road. This concept shall be consistent with the 2018 City of Pleasanton Bicycle and Pedestrian Master Plan, which identified construction of buffered bike lanes in the near-term and separated bikeways in the long-term. To the extent feasible, the long-term improvements shall be constructed along the project frontage. Furthermore, the Applicant shall contribute to the construction of a Class IV facility on the eastside of Stoneridge Mall Road connecting Stoneridge Drive to the West Pleasanton BART Station. The Applicant shall construct bicycle and pedestrian improvements at the intersection of Stoneridge Mall Road at Fabian Court to improve access to the project site to/from the BART station. A Class IV facility shall construct along the south side of Stoneridge Mall Road from Springdale Avenue to Fabian Court. Bicycle and pedestrian improvements shall be constructed at the intersection of Springdale Avenue and Stoneridge Mall Road to provide safe and convenient access for nonmotorized travel across the intersection's' southern approach.

MM TRANS-4 The Applicant shall provide emergency vehicle turning movement analysis that demonstrates the ability of a standard LPFD fire truck to maneuver through project site.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.18 Utilities and Service Systems *Would the project:*				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Environmental Evaluation

Setting

The information in this section is based on the City of Pleasanton Urban Water Management Plan (UWMP) and the Zone 7 UWMP.[109, 110]

Would the project:

[109] City of Pleasanton. 2016. 2015 Urban Water Management Plan. May. Website: https://www.cityofpleasantonca.gov/civica/inc/displayblobpdf.asp?blobID=27835. Accessed March 13, 2021.

[110] Alameda County Flood Control and Water Conservation District - Zone 7 Water Agency Staff. 2016. 2015 Urban Water Management Plan. February 4. Website: http://www.zone7water.com/images/pdf_docs/water_supply/2-4-16_draft-uwmp-w-appdcs.pdf. Accessed March 13, 2021.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than significant impact.

Water

A significant impact may occur if a project would increase water consumption to such a degree that the capacity of facilities currently serving the project site would be exceeded. Water for the City of Pleasanton is supplied by Zone 7, which is predominantly sourced from the South Bay Aqueduct, surface runoff collected in the Del Valle Reservoir, and local groundwater. Zone 7 has a current sustainable water supply of about 86,100 acre-feet per year and manages a local groundwater basin with a capacity of 240,000 acre-feet.[111] As a water retailer, the City of Pleasanton provides potable water service to businesses and homes within the City.

According to the General Plan Water Element, the current sustainable water supply is 86,100 acre-feet per year. Zone 7 predicts a long-term demand throughout its service area of 82,313 acre-feet in the year 2025, and maintains a 100 percent reliability policy for existing development for the next 20 years through average, single dry, and multiple dry years. Accordingly, estimated demand can be adequately served by existing and forecasted supplies.

The UWMP indicates that the City projected total water demand is a total of 20,167 acre-feet per year by 2035 and 21,064 acre-feet per year by 2040.[112] Thus, in the long-term, Zone 7 has sufficient water to maintain full water deliveries through General Plan build-out of its customers—including Pleasanton.[113] According to the City of Pleasanton's Water Master Plan Update, the water demand factor for Industrial and Service developments is 0.09 gallons per day (gpd).[114] Based on the demand factor, the proposed project would create a demand for 34,295.58 gallons per day, or 38.42 acre-feet per year. This is a conservative estimate based on the highest water demand rate for the land use types that are proposed; therefore, the actual water demand of the proposed project would likely be lower. The estimated water demand would represent less than 0.2 percent of the City's projected 2040 total water demand, which is a nominal percentage of the City's projected water demand.

The proposed project would be consistent with the General Plan and the City's 2015 UWMP and would utilize existing water facilities, therefore not requiring construction of new facilities or the expansion of current facilities. Therefore, impacts would be less than significant.

Wastewater Treatment

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded, or if the RWQCB

[111] City of Pleasanton. 2009. Pleasanton Plan 2005-2025, Chapter 8 Water Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23911. Accessed March 11, 2021.
[112] City of Pleasanton. 2016. 2015 Urban Water Management Plan. June. Website: http://admin.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=28207. Accessed March 11, 2021.
[113] City of Pleasanton. 2009. Pleasanton Plan 2005-2025, Chapter 8 Water Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23911. Accessed March 11, 2021.
[114] City of Pleasanton. 2004. Water Distribution System Master Plan Update, November.

treatment requirements are exceeded. The City of Pleasanton provides its own sewage collection facilities within the City limits. The DSRSD provides wastewater treatment services under contract with the City. The LAVWMA—a joint powers agency between the City of Pleasanton, City of Livermore, and the DSRSD—provides export/treated wastewater disposal services for treated sewage effluent.[115] Wastewater from the proposed project would consist mostly of effluent typical of the commercial and office uses; packaging, warehousing, and distribution uses; as well as light industrial uses such as R&D and light laboratory manufacturing uses of the proposed project and as such would not substantially increase pollutant levels in the wastewater or exceed RWQCB standards. The City of Pleasanton has an average annual wastewater flow of approximately 6 million gallons per day (mgd), leaving 2.5 mgd of remaining capacity.

The City's 2.5 mgd of remaining capacity would be sufficient to serve Pleasanton's planned buildout growth as anticipated in the General Plan.[116] The wastewater that the proposed project would generate would be consistent with General Plan buildout and would therefore be consistent with the City's remaining 2.5 mgd capacity and within the permitted capacity of the DSRSD. Additionally, the proposed project would not exceed wastewater treatment requirements established by the RWQCB. Therefore, impacts would be less than significant.

Stormwater

As discussed in Section 2.10, Hydrology and Water Quality, the proposed project would prepare and implement a SWPPP with BMPs. Additionally, the proposed project would comply with the RWQCB's MRP and Provision C.3 requirements, which require preparation of an SCP. With implementation of the SCP that was prepared for the proposed project, stormwater drainage would not be substantially increased such that new or expanded facilities or relocation would be required. Therefore, impacts would be less than significant.

Electric Power

PG&E provides electricity service to the City of Pleasanton and to the project site. The proposed project would connect to the City's existing electrical infrastructure and would be served by PG&E. Impacts associated with electricity required by the proposed project are discussed in further detail in Section 2.6, Energy.

Natural Gas

PG&E provides natural gas service to the project site. Impacts associated with natural gas required by the proposed project are discussed in further detail in Section 2.6, Energy.

Telecommunications

Xfinity and AT&T would provide cable services to the proposed project. The proposed project would connect to the existing telecommunications infrastructure. Therefore, the proposed project would

[115] City of Pleasanton. 2015. Pleasanton Plan 2005–2025. January 6.
[116] City of Pleasanton. 2009. Pleasanton Plan 2005-2025, Chapter 8 Water Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23911. Accessed March 11, 2021.

not require the installation or development of new or improved telecommunications facilities such that environmental impacts would occur. Impacts would be less than significant.

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

Less than significant impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City of Pleasanton UWMP provided a forecast of the City's water supplies and water demands in normal, dry, and multiple dry years through 2040. According to the City of Pleasanton's UWMP, the available water supply will be sufficient to meet the City's projected demand through 2040, which is anticipated to be 18,699 acre-feet.[117] The proposed project's anticipated water demand would be within the demand assumed in the UWMP for the site. Therefore, the City would have the available water supply to serve the proposed project, and development of the proposed project would not require the City of Pleasanton to obtain new or expanded water facilities and would not exceed the projected water supplies. Impacts would be less than significant.

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

Less than significant impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. As discussed previously, the wastewater treatment system has the available capacity to accommodate the proposed project's wastewater generation. Therefore, impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than significant impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Trash, recyclables, and green waste within the City are collected by PGS. PGS provides solid waste collection services under an exclusive franchise agreement with the City of Pleasanton. These services include collection of solid waste from commercial, industrial, and residential customers within the City. Collected solid waste is sorted at the Pleasanton Transfer Station and Recycling Center, which is also operated by PGS. The Pleasanton Transfer Station and Recycling Center has a design capacity of 720 tons per day. PGS transports solid waste to the Vasco Road Sanitary Landfill in Livermore. The Vasco Road Sanitary Landfill has a maximum permitted throughput of 2,518 tons per day and has remaining capacity through the end

[117] City of Pleasanton. 2016. 2015 Urban Water Management Plan. June. Website: http://admin.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=28207. Accessed March 11, 2021.

of 2022.[118] The proposed project would not generate solid waste in excess of the daily permitted capacity of the Vasco Road Sanitary Landfill. Therefore, impacts would be less than significant.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

No impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable management and reduction regulations. The proposed project would comply with all applicable federal, State, County, and City statutes and regulations related to solid waste and solid waste reduction, including Chapter 9 of the Pleasanton Municipal Code, which requires a waste management plan prior to demolition or construction[119], as well as the County's Mandatory Recycling Ordinance for recyclable materials and compostable organics collection.[120] Therefore, no impacts would occur.

Mitigation Measures

None required.

[118] California Department of Resources Recycling and Recovery (CalRecycle). 2019. SWIS Facility/Site Details, Vasco Road Sanitary Landfill (01-AA-0010). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/9?siteID=8. Accessed March 11, 2021.

[119] City of Pleasanton. 2021. Pleasanton Municipal Code, Chapter 9.21 - Construction and Demolition Debris. Website: https://qcode.us/codes/pleasanton/. Accessed March 11, 2021.

[120] See Alameda County Waste Management Authority (StopWaste.org) Ordinances 2008-01 and 2012-01.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.19 Wildfire *If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:*				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Environmental Evaluation

Setting

The project site is not within a State Responsibility Area, and the site is not classified as a Very High Fire Hazard Severity Zone.[121] Over 7,000 acres of the Pleasanton planning area are identified as special fire protection areas.[122] Grassland fires in California are easily ignited, particularly in dry seasons, and wildfire is therefore of particular concern near areas of natural vegetation and steep slopes.

Figure 5-6 of Section 5, Public Safety, of the City's General Plan, indicates that the project site is not located in a special fire protection area and that the project site is located within a travel time equal to 5 minutes or less from the nearest fire station.[123] Furthermore, the proposed project is located approximately 250 feet west of LPFD Station No. 2, located at 6300 Stoneridge Mall Road.

[121] California Department of Forestry and Fire Protection (CAL FIRE). 2019. California State Responsibility Area. June. Website: https://www.arcgis.com/home/webmap/viewer.html?layers=5ac1dae3cb2544629a845d9a19e83991. Accessed: November 10, 2020.
[122] City of Pleasanton. 2013. Pleasanton General Plan 2005 – 2025 Public Safety Element. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed January 18, 2021.
[123] Ibid.

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. As previously discussed in Section 2.9, Hazards and Hazardous Materials, the proposed project would not impair an adopted emergency response plan or emergency evacuation plan, such as the General Plan Safety Element, EMP, and Local Hazard Mitigation Plan. The proposed buildings would be constructed in compliance with the California Fire Code and the 2016 Pleasanton Fire Code, and all driveways and internal roadways would be designed in accordance with the City's Standards and Specifications guidebook to accommodate large emergency vehicles such as fire engines. The LPFD has provided service to the site over the past decades and the redevelopment of the site would not constitute a new impact on its ability to provide service. Furthermore, the proposed project is located approximately 250 feet west of LPFD Station No. 2, located at 6300 Stoneridge Mall Road, allowing for efficient response in the event of a fire.

Consistent with the recommendations from the Livermore-Pleasanton Fire Department (Appendix I), a TIA has been prepared for the proposed project and is included as Appendix J of this report. The TIA estimates that the proposed project would generate a total of 3,680 net-new daily trips. The TIA also includes recommendations to mitigate any traffic impacts as a result of implementation of the proposed project. These recommendations are included as MM TRANS-1 through MM TRANS-2 and are discussed in further detail in Section 2.17, Transportation. As such, impacts would be less than significant with mitigation incorporated.

Additionally, prior to issuance of a building permit, the Applicant would be required to coordinate with the Building and Safety Division and the LPFD to ensure the project meets Building and Fire Code requirements and would submit the site plan and building information for use by the LPFD.

In the event of an emergency, the most likely evacuation route would be I-680 via Stoneridge Drive. The proposed project would not involve any changes to evacuation routes and would not otherwise block or redirect any evacuation routes and would therefore not interfere with evacuation or otherwise conflict with an adopted emergency response plan or evacuation plan. Additionally, the proposed project would be required to pay the applicable capital facilities development fees, which partly fund fire department projects, pursuant to the City of Pleasanton Master Fee Schedule to offset any potential impacts of the project. Therefore, impacts would be less than significant.

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?

No impact. The project site is relatively flat and level and does not contain slopes. The project site is currently developed and in an urbanized area; it is not surrounded by any vacant or undeveloped areas. The proposed project would not introduce new fuel sources and would not increase the risk of wildfire on the project site due to slope, prevailing winds, or other factors. CAL FIRE does not classify the site as being in a Very High Fire Hazard Severity Zone and the site is not located in a

special fire protection area as mapped by the General Plan.[124] Additionally, the proposed project would be designed in a manner consistent with California Building Standard Codes and applicable provisions of the California Fire Code with regard to fire and emergency access and types of building materials, and the proposed project would be reviewed by the LPFD prior to approval. Therefore, the proposed project would not exacerbate wildfire risks. No impact would occur.

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?

Less than significant impact. The proposed project would not require the installation of infrastructure that may exacerbate fire risk or result in environmental impacts because the project site is currently developed and is not in an area that is at risk of wildfire as mapped by CAL FIRE[125] or the General Plan.[126] The design of the proposed project and associated infrastructure would be consistent with California Building Standard Codes and applicable provisions of the California Fire Code with regard to fire and emergency access and building materials. Therefore, impacts related to infrastructure that could exacerbate fire risk would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No impact. As previously discussed, the project site is relatively flat and level and is not located near slopes. The site is surrounded by developed urban lands, which would not cause drainage changes or slope instability in the event of fire. Because the General Plan indicates that the site is outside of the special fire protection area, the proposed project would not likely be subject to exposure of fire or floods. Furthermore, the proposed project is located outside of the FEMA FIRM 100-year and 500-year flood hazard zones.[127] Therefore, the proposed project would not be subject to flooding hazards.

Compliance with the applicable State and local plans and regulations, including the California Building Code and California Fire Code, would ensure that the project is not at risk of impacts related to fire hazards. Therefore, no impact would occur.

Mitigation Measures

None required.

[124] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-6, Special Fire Protection Areas and Fire Response Travel Times. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[125] California Department of Forestry and Fire Protection (CAL FIRE). 2019. California State Responsibility Area. June. Website: https://www.arcgis.com/home/webmap/viewer.html?layers=5ac1dae3cb2544629a845d9a19e83991. Accessed: November 10, 2020.

[126] City of Pleasanton. 2009. Pleasanton General Plan 2005-2025, Chapter 5, Public Safety Element, Figure 5-6, Special Fire Protection Areas and Fire Response Travel Times. Website: https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23899. Accessed February 2, 2021.

[127] Federal Emergency Management Agency (FEMA). 2009. FEMA Flood Map Service Center. Website: https://msc.fema.gov/portal/firmette?latitude=37.691149664320996&longitude=-121.92471933691792. Accessed January 19, 2021.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.20 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?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Environmental Evaluation

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. Based on the analysis provided in Section 2.4, Biological Resources, the proposed project's impacts related to special-status species would be less than significant with mitigation incorporated. Additionally, the proposed project's impacts on trees would be less than significant with mitigation incorporated. Because there is a potential for migratory birds, including protected birds and nesting raptors, to occur on the project site, MM BIO-1 would be implemented. Implementation of MM BIO-1, which would require pre-construction surveys and avoidance and minimization measures, would reduce impacts to special-status species. Implementation of MM BIO-2, which would require the Applicant to adhere to the Tree Preservation Guidelines, would reduce impacts to trees.

With implementation of MM BIO-1 and MM BIO-2, the proposed project would not substantially degrade the quality of the environment, reduce fish or wildlife habitat, reduce fish or wildlife populations below self-sustaining levels, eliminate a plant or animal community, or reduce the number or range of a rare or endangered plant or animal.

Based on the analysis provided in Section 2.5, Cultural Resources, the proposed project's impacts related to California history or prehistory would be less than significant with mitigation incorporated. While there are no known historic resources on the project site, there is a low likelihood that subsurface construction activities could destroy previously undiscovered historic resources. Implementation of MM CUL-1 would ensure that potential impacts on historic resources are reduced to a less-than-significant level. Additionally, there are no known archaeological resources on the project site, but there is always a possibility that subsurface excavation could result in the discovery of previously undiscovered prehistoric archaeological resources. Implementation of MM CUL-1 would ensure that potential impacts on prehistoric archaeological resources are reduced to a less-than-significant level. Additionally, there is a low potential that subsurface construction activities, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains. MM CUL-2 specifies the procedures to follow in the event human remains are uncovered. In addition to compliance with required guidelines and statutes, implementation of MM CUL-2 would reduce potential impacts on human remains to a less-than-significant level. In addition to reducing impacts on historic and prehistoric resources, implementation of MM CUL-1 and MM CUL-2 would also reduce any impacts on TCRs.

Based on the discussion provided above, compliance with required guidelines and statutes and implementation of the mitigation measures, the proposed project would not 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. Therefore, impacts would be less than significant with incorporation of MM BIO-1, MM BIO-2, MM CUL-1, and MM CUL-2.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than significant with mitigation incorporated. The analysis presented in this Draft IS/MND includes a review of proposed project's potential impacts related to air quality, biological resources, cultural resources, noise, and transportation, among other environmental issue areas. As presented throughout this IS/MND, the proposed project's cumulative impacts would either be less than significant with mitigation incorporated, less than significant, or there would be no impacts.

Section 2.3, Air Quality, analyzed cumulative impacts related to pollutants and determined that cumulative impacts would be less than significant with mitigation incorporated. Regional cumulative impacts would be the result of the non-attainment status of regional pollutants is a result of past

and present development within the Air Basin; however, the proposed project's contribution would only be an incremental increase from the prior land use. MM AIR-1 would require implementation of BMPs recommended by the BAAQMD to reduce fugitive dust emissions. Additionally, Section 2.3, Air Quality, provided an analysis of cumulative health risks and determined that cumulative health risk impacts would be less than the BAAQMD's cumulative thresholds of significance after implementation of MM AIR-2. Implementation of MM AIR-2 would require minimization of impacts to sensitive receptors during construction activities and would reduce health risk impacts of the proposed project. With implementation of MM AIR-1 and MM AIR-2, the proposed project would not result in any potentially significant and unavoidable cumulative impacts related to air quality.

Section 2.13, Noise, determined that impacts related to operational and mobile source noise under cumulative conditions would be less than significant, and that no mitigation measures are needed. The proposed project would not result in any potentially significant and unavoidable cumulative impacts to noise.

Section 2.17, Transportation, included an analysis of impacts related to cumulative conditions with project traffic. According to the Transportation analysis, the addition of project traffic is anticipated to contribute to excessive vehicle queue spillback on Springdale Avenue (southbound) between Stoneridge Drive and the project driveway entrance, Stoneridge Drive (eastbound left turn lane) at Springdale Avenue and Stoneridge Drive (eastbound) between Stoneridge Mall Road and Springdale Avenue. Implementation of MM TRANS-1 and MM TRANS-2 would reduce impacts related to queueing under the cumulative traffic condition. Therefore, cumulative transportation impacts would be less than significant with mitigation.

Implementation of MM AIR-1, MM AIR-2, MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, MM TRANS-1, and MM TRANS-2 would reduce the proposed project's cumulative impacts to less than significant. No additional mitigation measures would be required to reduce cumulative impacts. Therefore, with implementation of the specified mitigation measures, the proposed project would cause less than significant cumulative impacts.

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. Based on the discussion provided in the Project Description and the analysis presented in Sections 2.1 through 2.19 of this Draft IS/MND, 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. Therefore, with implementation of MM AIR-1, MM AIR-2, MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, MM GEO-1, MM GEO-2, MM GHG-1, MM HAZ-1, MM HAZ-2, MM NOI-1, MM TRANS-1, MM TRANS-2, MM TRANS-3, and MM TRANS-4 the proposed project would not result in substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Implementation of MM AIR-1, MM AIR-2, MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, MM GEO 1, MM GEO-2, MM GHG-1, MM HAZ-1, MM HAZ-2, MM NOI-1, MM TRANS-1, MM TRANS-2, MM TRANS-3, and MM TRANS-4.

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 3: LIST OF PREPARERS

FirstCarbon Solutions
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
Phone: 925.357.2562

Project Director ..... Mary Bean
Project Manager ..... Cecilia So
Environmental Analyst ..... Stephanie Shepard
Senior Archaeologist ..... Dana DePietro
Archaeologist ..... Stefanie Griffin
Air Quality Specialist ..... Lance Park
Air Quality Scientist ..... Kimber Johnson
Biologist ..... Robert Carroll
Senior Biologist ..... Bernhard Warzecha
Senior Attorney ..... Megan Starr
Senior Editor ..... Susie Harris
Word Processor ..... Melissa Ramirez
GIS/Graphics ..... Karlee McCracken

THIS PAGE INTENTIONALLY LEFT BLANK