

City of Livermore

LIVERMORE GENERAL PLAN 2045

June 2026 | Final Environmental Impact Report



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for City of Livermore

City of Livermore

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1. INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended (Public Resources Code Sections 21000 et seq.), and the CEQA Guidelines (California Code of Regulations Sections 15000 et seq.) and represents the independent judgment of the lead agency, the City of Livermore (City). This document contains responses to comments received on the Draft EIR for the Livermore General Plan 2045 (General Plan 2045) during the public review period, which began March 3, 2026, and closed April 24, 2026.

According to the CEQA Guidelines Section 15132, the Final EIR shall consist of:

- (a) The Draft EIR and Appendices (provided under separate cover).
- (b) Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- (c) A list of persons, organizations, and public agency comments on the Draft EIR.
- (d) The responses of the lead agency to significant environmental points raised in the review process.
- (e) Any other information added by the lead agency.

This document and the circulated Draft EIR comprise the Final EIR, in accordance with CEQA Guidelines Section 15132.

1.1 FINAL EIR ORGANIZATION

The Final EIR is organized into the three chapters described below along with a new EIR appendix, Appendix D, *Public Comment Letters*. Note that the Draft EIR and associated Appendices A through C constitute part of the Final EIR and are provided under separate cover.

Chapter 1, *Introduction*. This chapter describes CEQA requirements and the content of this Final EIR.

Chapter 2, *Response to Comments*. This chapter provides a list of agencies and individuals commenting on the Draft EIR, comments received during the public review period, and responses to comments. Copies of all the letters received regarding the Draft EIR are included as Appendix D, *Public Comment Letters*.

1. INTRODUCTION

Chapter 3, *Revisions to the Draft EIR*. This chapter contains refinements and clarifications to the Draft EIR, which have been incorporated into the document.

Appendix D, *Public Comment Letters*. This appendix includes the letters received during the Draft EIR public comment period.

The responses to comments in Chapter 2 of this Final EIR contain material and revisions that will be added to the text of the Final EIR. City staff have reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of this material indicates that the proposed Project would result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation described in CEQA Guidelines Section 15088.5.

1.2 ENVIRONMENTAL REVIEW PROCESS

1.2.1 Notice of Preparation

Pursuant to CEQA Statute Section 21080(d) and CEQA Guidelines Section 15063, the City determined that the proposed Project could result in potentially significant environmental impacts and that a program EIR would be required. In compliance with CEQA Statute Section 21080.4, the City circulated a Notice of Preparation (NOP) of an EIR for the proposed Project to the Governor's Office of Land Use and Climate Innovation (LCI; previously known as the Office of Planning and Research or OPR) State Clearinghouse and interested agencies and persons on March 7, 2023, for a 30-day review period. A public Scoping Meeting was held on March 21, 2023. The NOP and scoping process solicited comments from responsible and trustee agencies, as well as interested parties regarding the scope of the environmental analysis to be conducted in the Draft EIR. Appendix A, *Notice of Preparation and Scoping Comments*, of the Draft EIR contains the NOP as well as the comments received by the City in response to the NOP.

1.2.2 Draft EIR

The scope of the Draft EIR was determined based on the comments received in response to the NOP. Pursuant to CEQA Guidelines Sections 15126.2 and 15126.4, the Draft EIR identifies potentially significant adverse impacts and recommends feasible mitigation measures to reduce or eliminate these impacts to the extent feasible. The information in Chapter 2, *Project Description*, of the Draft EIR, establishes the basis for analyzing the environmental impacts related to the proposed Project.

1. INTRODUCTION

The Draft EIR was made available for review by the public and interested parties, agencies, and organizations for a 53-day comment period starting March 3, 2026, and ending April 24, 2026. The Planning Commission conducted a public hearing during this period on March 17, 2026, to receive comments on the Draft EIR. During the comment period, the public was invited to submit written comments via mail or email on the Draft EIR to the City of Livermore Community Development Department Planning Division by April 24, 2026. Comments could also be hand-delivered to the Community Development Department by this deadline.

1.2.3 Final EIR

After the review period for the Draft EIR, the City reviewed all written comments received and prepared written responses to each comment related to the adequacy of the Draft EIR. This Final EIR contains all the comments received, responses to comments raising environmental issues, and any changes to the Draft EIR. The Final EIR will first be presented to the Planning Commission at a duly noticed public hearing. This hearing will allow for public comment on the Final EIR and allow the Planning Commission to make a formal recommendation to the City Council regarding certification of the Final EIR. Following the public hearing, the Final EIR will be presented to the City Council for consideration of certification as the environmental document for the proposed Project. All persons who commented on the Draft EIR and provided contact information will be notified of the availability of the Final EIR and the date of the public hearing.

All responses to comments submitted on the Draft EIR by agencies will be provided to those agencies at least 10 days prior to certification of the EIR. The City Council will make findings regarding the extent and nature of the impacts as presented in the Final EIR. The Final EIR will need to be certified as having been prepared in compliance with CEQA by the City prior to approving or denying the proposed Project. If the City Council certifies the EIR, it may then consider action on the proposed Project.

1. INTRODUCTION

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2. RESPONSE TO COMMENTS

Section 15088 of the California Environmental Quality Act (CEQA) Guidelines requires the lead agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft Environmental Impact Report (EIR) and to prepare written responses. This chapter provides all comments received on the Draft EIR and the lead agency's responses to each comment.

2.1 LIST OF COMMENTERS

Table 2-1, *List of Commenters*, lists the agencies and individuals that provided comments on the Draft EIR during the public review period. Comment letters and specific comments are given letters and numbers for reference purposes; comments are arranged by category, date received, and name. Categories and their corresponding abbreviations are:

- Agencies (A)
- Individuals (I)
- Verbal comments (V)

Comments are presented in their original form in Appendix D, *Public Comment Letters*, and annotated to identify each assigned comment number within the comment letter.

Table 2-1 **List of Commenters**

Number Reference	Commenter	Date of Comment
Agencies		
A1	California Department of Transportation	April 23, 2026
A2	Livermore Valley Joint Unified School District	April 23, 2026
A3	Confederated Villages of Lisjan Nation	April 23, 2026
A4	The Alameda County Transportation Commission	April 24, 2026
Individuals		
I1	Phillip Marshall, RPM Holdings LLC	March 17, 2026
I2	David Furst	March 18, 2026
I3	Jean King	March 18, 2026
I4	Jean King	March 21, 2026
I5	Sara Dierking	April 12, 2026
I6	Vic Avila	April 21, 2026

2. RESPONSE TO COMMENTS

Table 2-1 List of Commenters

Number Reference	Commenter	Date of Comment
I7	Jean King	April 21, 2026
I8	John Marchand	April 24, 2026
I9	Alan Burnham	April 28, 2026
Verbal Comments (provided during Public Comment Hearing)		
V1	Jeff Kaskey	March 17, 2026
V2	Jean King	March 17, 2026
V3	Brian Warner	March 17, 2026
V4	Commissioner Jacob Anderson	March 17, 2026
V5	Commissioner Nadine Horner	March 17, 2026
V6	Chair Tracy Kronzak	March 17, 2026

2.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review of and comment on Draft EIRs should be:

... on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

The CEQA Guidelines further advises:

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence. (Section 15204[c])

2. RESPONSE TO COMMENTS

Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility. (Section 15204[d])

This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section. (Section 15204[e])

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be provided to those agencies at least 10 days prior to certifying the EIR.

2.3 TOPICAL RESPONSES

This section provides responses to reoccurring themes raised during the public review period for the Draft EIR. To minimize duplication and provide a more comprehensive discussion, "topical responses" have been prepared. Each topical response begins with a summary of the relevant comments received. Responses to individual comments reference these master responses as appropriate. Topical responses in this Final EIR address the following issues:

1. Standards for Responses and Focus of Review
2. Population Growth

2.3.1 Standards for Responses and Focus of Review

PROJECT MERITS

During review of the EIR, some commenters raised issues related to qualities of the project itself (in this case, the project includes the proposed General Plan 2045) or the project's community consequences or benefits, personal well-being and quality of life, and economic or financial issues (referred to here as "project merits"), rather than the environmental analyses or impacts and mitigations analyzed in the EIR. However, consistent with CEQA Guidelines Section 15131, the Draft EIR is not meant to address these project merits, rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project's potentially significant physical impacts on the environment to the extent feasible.

In accordance with CEQA Guidelines Sections 15088 and 15132, a Final EIR must include a response to comments on the Draft EIR pertaining to environmental issues analyzed under CEQA. Several of the comments provided in response to the Draft EIR express an opinion for or against components of the project, but do not address the adequacy of the analysis or conclusions in the Draft EIR. Rather, these opinions relate to the merits of the project.

2. RESPONSE TO COMMENTS

Lead agency review of environmental issues and project merits are both important in the decision of what action to take on a project, and both are considered in the decision-making process for a project. However, as part of the environmental review process, a lead agency is only required by CEQA to respond to comments regarding environmental issues. The City of Livermore (City) will hold a publicly noticed hearing to consider action on the merits of the proposed Project. The City will consider both the EIR and project merit issues that have been raised prior to acting on the proposed Project.

In accordance with CEQA Guidelines Section 15204(a), as detailed in Section 2.2, *CEQA Requirements Regarding Comments and Responses*, the City is not required to respond to comments that express an opinion about project merits, but do not relate to environmental issues addressed in the Draft EIR. Although such opinions and comments on project merits received during the EIR process do not require responses pursuant to CEQA, they do provide important input for the process of reviewing the project overall.

SPECULATION WITHOUT SUBSTANTIAL EVIDENCE

Various commenters stated or requested significance conclusions of the EIR should be revised but failed to provide substantial evidence in support of their statement or request. Predicting the project's physical impacts on the environment without substantial evidence based on facts to support the analysis would require a level of speculation that is inappropriate for an EIR.

CEQA Statute Section 21082.2(a), *Significant Effect on Environment; Determination; Environmental Impact Report Preparation*, requires that the lead agency:

...determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record." CEQA Guidelines Section 15384(a), clarifies that "'substantial evidence'... means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment, does not constitute substantial evidence.

CEQA Guidelines Section 15384(b) goes on to state that "substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." Where there are no facts available to substantiate a commenter's assertion that the physical environment could ultimately be significantly impacted as a result of the project, the City acting

2. RESPONSE TO COMMENTS

as the lead agency, is not required to analyze that effect, nor to mitigate for that effect. CEQA Guidelines Section 15204(c) advises reviewers that comments should be accompanied by factual support, as detailed in Section 2.2, *CEQA Requirements Regarding Comments and Responses*.

Pursuant to CEQA, the decision of whether an environmental effect should be considered significant is at the discretion of the lead agency based on substantial evidence in the record as a whole. The analysis in the Draft EIR is based on scientific and factual data, which has been reviewed by the lead agency and reflects its independent judgment and conclusions. CEQA permits disagreements of opinion with respect to environmental issues addressed in an EIR. As CEQA Guidelines Section 15151 states, even “[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts.”

CEQA Guidelines Section 15145 provides that:

If, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.

2.3.2 Population Growth

Commenters raised concerns regarding population assumptions used in the Draft EIR. As described in Chapter 2, *Project Description*, and Section 3.14, *Population and Housing*, of the Draft EIR, the analysis assumes development of up to 16,610 net new housing units, which could accommodate approximately 43,820 net new residents.

However, these assumptions do not represent a population forecast or prediction of future growth. Rather, consistent with CEQA requirements, the Draft EIR evaluates a conservative maximum buildout scenario based on the amount of reasonably foreseeable growth the City is required to plan for under State law and regional planning frameworks. These scenarios reflect the level of development the General Plan could accommodate over the planning horizon, rather than a prediction that all such growth will occur. CEQA does not require the City to predict actual population outcomes, only to evaluate the potential physical environmental effects of development capacity.

The proposed General Plan 2045 is a long-range policy document that establishes a framework to accommodate reasonably foreseeable growth in population, housing, and employment over an approximately 20-year horizon, consistent with past growth trends, regional forecasts, and the City’s obligation to ensure adequate land use capacity and infrastructure to support future development. While the General Plan is intended to accommodate reasonably foreseeable growth, the Draft EIR evaluates this growth in a conservative manner to ensure that environmental impacts are not underestimated. Evaluating a maximum theoretical buildout scenario is standard CEQA practice to avoid understating potential impacts.

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The residential capacity evaluated in the Draft EIR is informed by the City's obligation to plan for housing consistent with State law, including the Regional Housing Needs Assessment (RHNA), which allocates housing needs based on regional growth forecasts developed through Plan Bay Area. While the scale of future allocations is uncertain, the Draft EIR conservatively assumes recent trends will continue and the capacity evaluated in the Draft EIR accounts for additional housing units over the approximately 20-year buildout horizon. This assumption is used solely to avoid underestimating potential environmental impacts and does not constitute a forecast of actual future RHNA allocations.

In addition, pursuant to State law and guidance from the California Department of Housing and Community Development, Housing Elements must include a buffer of additional sites—typically ranging from 15 to 30 percent—to account for uncertainty in site development.¹ Some sites identified in the housing inventory may not develop, may develop at lower densities, or may be delayed. Planning for additional capacity helps ensure that the City can maintain an adequate inventory of housing sites and remain in compliance with State housing requirements throughout each Housing Element cycle within the horizon year of the General Plan (i.e., 2045). If the City does not designate adequate residential sites to meet the future requirements as part of the General Plan 2045, the next Housing Element, which must be adopted in January 2031 and could begin preparation in 2028 or 2029, may need to revisit the General Plan land use map and include a process to identify and change the designations on additional sites to accommodate more future housing.

The proposed General Plan 2045 itself does not directly induce population growth, as it does not approve specific development projects. Growth is largely driven by regional economic conditions, housing demand, and State housing policy, and would be expected to occur with or without adoption of the proposed Project. While the General Plan includes planning for infrastructure and roadway improvements that could indirectly support development, these improvements reflect the City's responsibility to plan for anticipated growth rather than to generate new growth beyond what is reasonably foreseeable.

Actual development outcomes will depend on market conditions, infrastructure timing, and decisions by private property owners and developers. As such, the level of development analyzed in the Draft EIR is not expected to be fully realized within the planning horizon. This is consistent with historical experience; prior General Plan projections have not been fully achieved.

¹ A buffer is necessary to ensure that if the sites listed in the housing opportunity sites inventory are developed without housing or are developed with less than the full amount of housing claimed in the inventory, there is remaining capacity to ensure an ongoing supply of sites for the full allocation during the eight years of the Housing Element cycle.

2. RESPONSE TO COMMENTS

The Draft EIR provides a conservative analysis of future housing and population growth that aligns with future state housing requirements and reflects the residential capacity that would be available from the land use designations on the Draft General Plan land use map. The City is obligated to plan for sufficient housing sites and have policies in place to support housing production, but ultimately, as described previously, market conditions and the decisions of private landowners and project applicants will determine the amount of housing that is built over the next 20 years. The population assumptions used for the Draft EIR are not a target or a forecast and do not commit the City to approving or constructing any specific project.

In summary, the population and housing assumptions used in the Draft EIR are appropriate and consistent with CEQA because they reflect the level of growth the City must plan for based on reasonably foreseeable conditions, while conservatively evaluating potential environmental impacts. These assumptions are used solely for environmental analysis and do not constitute a forecast, target, or commitment to any specific level of population growth. Actual population growth over the planning horizon is expected to be lower and will depend on future economic conditions, market factors, and development trends.

2.4 COMMENTS AND RESPONSES

This section includes a reproduction of and response to each comment received during the public review period for the Draft EIR. Responses to individual comments are provided in this chapter following the text of each corresponding comment.

2. RESPONSE TO COMMENTS

2.4.1 Comments from Agencies

A1. California Department of Transportation, April 23, 2026

Comment A1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Livermore General Plan 2045 Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the March 2026 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Response A1-1

This comment serves as an opening remark.

Comment A1-2

Project Understanding

The proposed project is a comprehensive update to the City's existing General Plan. The update will guide the City's development and conservation through 2045 and will include broad community goals for the future of Livermore and specific policies and implementing actions that will help meet the goals. To achieve the proposed General Plan 2045 vision, the City will analyze land use alternatives and will prepare a refined preferred land use scenario that is developed through an extensive public process.

Response A1-2

The comment summarizes the proposed Project.

Comment A1-3

Multimodal Transportation Planning

Please review and include reference to the Caltrans District 4 Pedestrian Plan (2021) and the Caltrans Bay Area Bike Plan Update (2025) in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

2. RESPONSE TO COMMENTS

Response A1-3

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Section 3.16, *Transportation*, of the Draft EIR has been revised to include discussion of the Caltrans District 4 Pedestrian Plan and the Caltrans Bay Area Bike Plan Update. This revision is informational and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment A1-4

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 (link) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

Response A1-4

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Section 3.16, *Transportation*, of the Draft EIR has been revised to reflect the updated Caltrans Director's Policy 37. This revision is informational and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment A1-5

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the General Plan development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low income communities, the elderly, and individuals with disabilities.

2. RESPONSE TO COMMENTS

Response A1-5

The comment has been noted for the record. As explained in Section 2.3.1, *Standards for Responses and Focus of Review*, the comment relates to project merits and does not pertain to the adequacy of the analysis in the Draft EIR or raise an environmental issue under CEQA. Therefore, no further response is warranted.

Comment A1-6

Miscellaneous

Transportation pg 3.16-5, Plan Bay Area: Please update the language for Plan Bay Area 2050+ from “in the process of approval” to “finalized and adopted in March 2026.

Response A1-6

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Section 3.16, *Transportation*, of the Draft EIR has been revised to update language for Plan Bay Area 2050+. This revision is informational and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment A1-7

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner, via [redacted]. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (link) or contact [redacted].

Response A1-7

This comment serves as a closing remark. The City appreciates the input from Caltrans and will rely on their expertise when future development is proposed throughout implementation of the General Plan.

A2. Livermore Valley Joint Unified School District, April 23, 2026

Comment A2-1

Our District has reviewed the Draft EIR for the 2045 General Plan and I have made a few minor notes on the document which I have scanned and attached. I did make a couple of notes on student enrollment that are more current and notably different than the numbers you are using. If you would like to continue to use previous data for consistency that is fine.

Response A2-1

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Section 3.15, *Public Services, Parks, and Recreation*, of the Draft EIR has been revised to reflect more current student enrollment numbers. This revision is informational and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment A2-2

In previous conversations with City staff the District requested that the General Plan include the possibility of housing on the Arroyo Mocho site (1040 Florence Road) and the District Office site (685 E Jack London Blvd) for the future. I was not able to determine if this request is included in the Draft General Plan 2045. If you could confirm that would be helpful? To be clear the District has no immediate or near term plan for any changes but given the long range planning horizon in the General Plan would like to retain that option. Again please confirm this request has been included or call me if we need to discuss further [redacted].

Thank you for the opportunity to review and comment.

Response A2-2

The Draft General Plan land use map designates the property at 1040 Florence Road as Low Density Residential (LDR), category 3. This designation is consistent with the surrounding residential properties. It means that housing would be allowed on the site at densities of 3.0 to 4.5 dwelling units per acre.

The property at 685 E. Jack London Boulevard is designated Medium Density Residential (MDR), category 1, meaning that housing is allowed at densities of six to eight dwelling units per acre.

These designations allow for the future housing option the District referenced. The comment has been noted for the record.

2. RESPONSE TO COMMENTS

Comment A2-3

This comment provides the updated student enrollment numbers provided by the Livermore Valley Joint Unified School District (LVJUSD), as referred to in Response A2-1, as text edits to the Draft EIR.

Response A2-3

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Section 3.15, *Public Services, Parks, and Recreation*, of the Draft EIR has been revised to reflect updated information provided by the LVJUSD. This revision is informational and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

A3. Confederated Villages of Lisjan Nation, April 23, 2026

Comment A3-1

Thank you for the opportunity to provide comments on the DEIR for the Livermore General Plan 2045.

The Confederated Villages of Lisjan Nation is a California Native American Tribe on the Native American Heritage Commission list. Our traditional territory includes the City of Livermore.

Response A3-1

This comment serves as an opening remark.

Comment A3-2

We appreciate the Plan's attention to Tribal Cultural Resources, and we appreciate that a CHRIS records search and sensitivity map were carried out as part of the General Plan. Could you please share more information with the Tribe confidentially about how sensitivity was determined? Could you also please share the distance from creeks that was considered sensitive? The Tribe may have more specific information to share with the City to improve the accuracy of the sensitivity map.

Response A3-2

The cultural and tribal cultural resources analysis presented in Section 3.5, *Cultural and Tribal Cultural Resources*, of the Draft EIR is based in part on the *Livermore General Plan Update Existing Conditions Report* (Existing Conditions Report) prepared in March 2022 (City of Livermore 2022). As detailed in Chapter 8, *Cultural and Tribal Cultural Resources*, of the Existing Conditions Report, the cultural sensitivity analysis was developed by a qualified archaeological consultant using Geographic Information System (GIS) methods consistent with established professional standards for regional planning studies. The analysis relied on multiple data inputs, including California Historical Resources Information System (CHRIS) records, historic United States Geological Survey (USGS) hydrologic mapping, supplemental archival and literature review, and spatial analysis of known cultural resource locations.

Detailed descriptions of the methods and variables used for the sensitivity model are provided in Chapter 8 of the Existing Conditions Report. In summary, the model is based primarily on proximity to freshwater resources and known archaeological sites identified through archival research, including CHRIS records searches. For the Prehistoric Period sensitivity model, proximity to freshwater resources was one of the primary analytical factors. Historic hydrology was derived from early twentieth century USGS quadrangle maps to better represent pre-

2. RESPONSE TO COMMENTS

modern drainage conditions. A buffer of 75 meters around mapped water features was used to define High Sensitivity areas, and a 150-meter buffer was used to define Moderate Sensitivity areas. The map also includes more recent (circa 2000) land cover classifications, such as forested and wetland habitats, which provide additional context regarding potential sensitivity but are not themselves components of the predictive model.

As described in the Existing Conditions Report, the sensitivity mapping is intended to provide a high-level summary of known factors affecting archaeological sensitivity while maintaining the confidentiality of site locations. However, it does not capture all variables influencing resource presence, and areas not identified as sensitive may still contain archaeological or tribal cultural resources. The City recognizes the value of tribal input in refining the accuracy of cultural resource sensitivity mapping.

The City notes that Assembly Bill (AB) 52 consultation was initiated for this project in accordance with CEQA and tribal consultation was conducted in accordance with Senate Bill (SB) 18 in connection with adoption of the General Plan. The City will comply with AB 52 consultation requirements for future projects determined to be subject to CEQA and SB 18 requirements with respect to General Plan and Specific Plan amendments, as applicable.

Comment A3-3

We would also like to remind the City of Livermore that infill development and higher density development in already developed areas still have significant impacts on the environment that are currently unmitigated if this development is occurring within areas of known Tribal Cultural Resources. There are 10 Tribal Cultural Resources significant to our Tribe that are also archaeological resources mentioned in this document. The Tribe would like to work with the City of Livermore to develop specific protocols for any projects taking place within the known boundaries of those Tribal Cultural Resources.

Response A3-3

As described in the Draft EIR, General Plan 2045 is a programmatic document that establishes policy direction and does not authorize specific development projects. The analysis presented in Section 3.5, *Cultural and Tribal Cultural Resources*, of the Draft EIR emphasizes that infill areas have the possibility of encountering archaeological resources and tribal cultural resources (TCRs) during development projects and notes that project-specific assessments under CEQA would need to be completed for future development under this General Plan, including within infill areas.

2. RESPONSE TO COMMENTS

The City recognizes that the Draft EIR and supporting technical documentation identify TCRs that are also archaeological resources and acknowledges the importance of their protection in accordance with CEQA and AB 52 requirements. The City further acknowledges the tribe's identification of 10 TCRs significant to the tribe.

The City appreciates the tribe's request to develop specific protocols for projects occurring within or near the known boundaries of these resources. The City is committed to continued consultation with the tribe and will coordinate, as appropriate, to develop mutually acceptable procedures for future project-level review. Such coordination may include, where feasible and consistent with applicable confidentiality requirements, avoidance and minimization strategies, cultural resource treatment measures, and monitoring protocols informed by tribal input.

Comment A3-4

Lastly, while we generally agree with the mitigation measures that are proposed, we ask that the Tribe's standard language for inadvertent discoveries of Tribal Cultural Resources that include culturally appropriate protocols be incorporated:

We respectfully request that the following mitigation measures be implemented and that Lisjan Nation be notified if any cultural resources of Native American origin are inadvertently discovered during the project.

TCR-1 Inadvertent discovery of Tribal Cultural Resources: If cultural resources of Native American origin are identified during grading or excavation of the proposed project, all ground disturbing activities within 100 feet shall cease until a representative from the Confederated Villages of Lisjan Nation is consulted by the government agency. If the entity in consultation with the consulting Tribe(s), determines that the resource is a Tribal Cultural Resource and thus significant under CEQA, the entity shall retain a Tribal representative and, if applicable, a qualified archaeologist, at the applicant's expense, to prepare a mitigation plan, which shall be implemented in consultation with the consulting Tribe. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe. Examples of appropriate mitigation for Tribal Cultural Resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery.

Response A3-4

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Section 3.5, *Cultural and Tribal Cultural Resources*, of the Draft EIR has been revised to incorporate language provided by the tribe. This revision does not affect any conclusions or significance determinations in the

2. RESPONSE TO COMMENTS

Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment A3-5

TCR-2 Inadvertent discovery of human remains: If human remains are encountered during construction and ground disturbing activities, all work within 100 feet of the remains should be redirected and the County Coroner notified immediately. At the same time, an archeologist shall be contacted to assess the situation. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendent (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and any associated funerary objects. There shall be no pictures taken or testing done on the Native American human remains. All bone, until identified as not human, shall be treated as potential human remains and the appropriate protocols followed. The archaeologist shall record information, as appropriate and in accordance with the recommendations of the MLD and/or Tribal representative. Upon completion of the archeologist's assessment, a report should be prepared documenting methods and results, as well as the MLD's recommendations regarding the treatment of the human remains and any associated funerary objects. The report should be submitted to the lead government agency, the NWIC and the consulting Tribe. Tribal representatives will rebury the Native American human remains and associated funerary objects with the appropriate dignity either; in accordance with the recommendations of the MLD if available or in the project vicinity at a location agreed upon between the Tribe and the entity, where the reburial would be accessible to Tribal members in perpetuity and would not be subject to further disturbance. The discovery and reburial is to be kept confidential and secure to prevent any further disturbance.

Response A3-5

As described under impact discussion (c) on pages 3.5-37 and 3.5-38 in Section 3.5, *Cultural and Tribal Cultural Resources*, of the Draft EIR, impacts related to the discovery of human remains would be less than significant with compliance with existing regulatory requirements. If human remains are encountered during ground-disturbing activities, all work within the vicinity of the discovery is required to cease, and the Alameda County Coroner must be notified immediately pursuant to California Health and Safety Code Section 7050.5. If the Coroner determines the remains to be of Native American origin, the Native American Heritage Commission (NAHC) is required to be notified pursuant to Public Resources Code Section 5097.98, and a Most Likely Descendant (MLD) is designated to provide recommendations for the treatment and disposition of the remains and associated funerary objects.

2. RESPONSE TO COMMENTS

These statutory procedures already establish a mandatory framework for the respectful treatment, evaluation, and disposition of human remains, including Native American remains, and require coordination with appropriate Native American representatives through the NAHC process.

The City further notes that Mitigation Measure CUL-4, as discussed under impact discussion (d) on pages 3.5-38 and 3.5-39 in Section 3.5 of the Draft EIR and as revised in Chapter 3 of this Final EIR, provides for tribal consultation and culturally appropriate treatment if TCRs are discovered during ground-disturbing activities. To the extent human remains are determined to be TCRs, they would be addressed through that consultation process in coordination with applicable State law requirements.

The City recognizes the importance of respectful treatment of human remains and will ensure that all applicable State laws and regulatory procedures are implemented during future development activities. Therefore, no additional mitigation is required beyond compliance with existing legal requirements and implementation of the Draft EIR's cultural and tribal cultural resources mitigation framework.

Comment A3-6

Thank you for your consideration, and please let us know if you have any questions or concerns. The Tribe is happy to set up a meeting to discuss this further.

We would also appreciate an update about the status of the plan itself and opportunities to comment.

Response A3-6

This comment serves as a closing remark. The City appreciates the input from the Confederated Villages of Lisjan Nation and will rely on their expertise when future development is proposed throughout implementation of the General Plan. The Confederated Villages of Lisjan Nation has been added to the notification list for updates about the General Plan.

2. RESPONSE TO COMMENTS

A4. The Alameda County Transportation Commission, April 24, 2026

Comment A4-1

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Livermore General Plan 2045.

The DEIR evaluates the environmental impacts associated with updates to the City's current 2003–2025 General Plan, including revisions to goals, policies, actions, and land use designations affecting the natural and built environment. Two alternatives are evaluated: the No Project Alternative and the Reduced Industrial and Concentrated Residential Alternative. The proposed General Plan Update incorporates regional growth forecasts through 2045 and includes updates to the Livermore Municipal Code and the Livermore Development Code to ensure consistency among these documents.

The City of Livermore is located in eastern Alameda County within the Livermore Valley and is bounded by rolling hills to the north, south, and east, and by the cities of Dublin and Pleasanton to the west. Interstate 580 bisects the City and serves as a major east–west thoroughfare in Alameda County, providing regional access. State Route 84 also provides regional access along the City's southwestern boundary. The EIR Study Area includes all land within the City limits, Urban Growth Boundary, and Sphere of Influence.

The Alameda County Transportation Commission (Alameda CTC) respectfully submits the following comments:

Response A4-1

This comment serves as an opening remark and summarizes the proposed Project.

Comment A4-2

Congestion Management Program (CMP) Review

While Senate Bill 743 changed the metric used to evaluate transportation impacts for purposes of the California Environmental Quality Act (CEQA), the Alameda County Congestion Management Program (CMP) legislation continues to require project sponsors to evaluate project impacts on the CMP roadway network outside of CEQA review. This analysis may be submitted to Alameda CTC as a stand-alone memorandum.

2. RESPONSE TO COMMENTS

Several roadways within the City of Livermore are included in the CMP network. Tier 1 facilities, which include freeways and principal arterials, are as follows:

- State Route 84 (Isabel Avenue)
- Interstate 580
- First Street

The City also includes several Tier 2 facilities (major and minor arterials), which are identified in the Congestion Management Program 2025.

Response A4-2

The General Plan 2045 is a policy-level document and does not directly implement specific transportation improvements or development projects. CMP analysis is conducted at the project level outside of CEQA. However, in response to this comment, the City will coordinate with the Alameda County Transportation Commission (Alameda CTC) to prepare the CMP analysis applicable to the General Plan and the CMP roadway segments identified. Future development enabled by the General Plan would be subject to project-level review, including applicable CMP consistency determinations where required by the Alameda County Transportation Commission (Alameda CTC) at the time of development.

Comment A4-3

Use of Countywide Travel Demand Model

Alameda CTC appreciates that the City of Livermore developed its Travel Demand Model based on the Alameda CTC Travel Demand Model, as stated on page 3.17-22 of the DEIR. The analysis indicates that Vehicle Miles Traveled (VMT) per capita and VMT per employee are projected to decrease compared to existing conditions. These reductions are attributed to the implementation of land use and climate action strategies, transit-supportive and active transportation policies and projects, and the inclusion of Transportation Demand Management (TDM) measures in development planning applications, as discussed on page 3.16-23 of the DEIR.

Response A4-3

The comment confirms that the modeling approach is consistent with regional practices and acknowledges the role of coordinated land use and transportation planning in achieving reduced VMT outcomes.

2. RESPONSE TO COMMENTS

Comment A4-4

Alameda County Transportation Plan

Alameda CTC appreciates the City's use of the Alameda County Transportation Plan (CTP) 2020, which is currently being updated and is expected to be adopted by the Commission in fall 2026. The CTP establishes a 30-year transportation vision for Alameda County and is updated every four years to reflect evolving transportation priorities, policies, and implementation strategies.

As shown on page 3.16-5 of the DEIR, the 2020 CTP identifies the following projects as significant to the City of Livermore within the next 10-year horizon:

- I-580/First Street Interchange Modernization
- I580/Vasco Road Interchange Modernization
- Iron Horse Regional Trail Improvements
- Rail Project-San Joaquin Valley

Alameda CTC also appreciates reference to the Alameda Countywide Multimodal Arterial Plan, Alameda County wide Transit plan, and Alameda Countywide Active Transportation Plan.

Response A4-4

Because the General Plan 2045 is a long-range policy document, it is designed to remain flexible and responsive to future updates of regional plans, including the forthcoming 2026 CTP update. Future transportation projects implemented under the General Plan will be evaluated for consistency with the then-current regional transportation planning framework at the time of project-level review.

Comment A4-5

Transportation Demand Management Program

The DEIR appropriately acknowledges the importance of policies and requirements that encourage active transportation, transit use, and denser development patterns, as well as the inclusion of TDM strategies in development planning applications to mitigate potential VMT generated by new land use projects.

Alameda CTC developed a VMT Reduction Estimator Tool to assist project sponsors in identifying effective TDM strategies to reduce project-generated VMT.

2. RESPONSE TO COMMENTS

Response A4-5

The City acknowledges Alameda CTC's VMT Reduction Estimator Tool as a resource available to project applicants and recognizes its value in identifying and evaluating effective TDM measures during project-level planning and environmental review. The use of such tools may be considered by project applicants, as appropriate, to support demonstration of VMT reduction strategies consistent with applicable thresholds and guidelines.

Comment A4-6

Alameda County Active Transportation Plan (2019)

Alameda CTC appreciates the City's reference to the 2019 Alameda Countywide Active Transportation Plan (ATP), which is currently being updated and is expected to be adopted by the Commission in late 2026. Since the 2019 adoption, Alameda CTC has conducted significant work related to bicycle and pedestrian planning, including updates to the High Injury Network (HIN), development of the County's first Proactive Safety Network (PSN), and adoption of All-Ages and Abilities (AAA) design guidance and policy.

Based on these efforts, Alameda CTC developed a Countywide Bicycle Network (CBN), for which AAA design standards are required. The current ATP update will place greater emphasis on pedestrian planning and accessible design guidance, supporting the goals of the Livermore General Plan 2045 by providing updated standards for pedestrians and people with disabilities. Additional information on the HIN, PSN, CBN, and ATP 2026 update is available on the Alameda CTC Active Transportation webpage.

Within the City of Livermore, Dublin Boulevard to L Street, East Avenue, Vasco Road, and the Iron Horse Trail are identified as part of the Countywide Bicycle Network, and implementation of bicycle facilities along these corridors must comply with AAA design standards.

Response A4-6

The General Plan 2045 is a long-range policy document and provides a framework for future transportation investments. Specific bicycle and pedestrian facility design will be addressed at the project level, consistent with applicable regional guidance, including updates to the Alameda ATP when adopted.

2. RESPONSE TO COMMENTS

Comment A4-7

Transit

Alameda CTC is pleased that the DEIR advances transit use through policies that support transportation alternatives to automobile travel, including the incorporation of mobility hubs, prioritization and funding of transit enhancements and bicycle and pedestrian safety improvement projects, and support for frequent, reliable, cost-efficient, and connected transit service, as detailed on page 3.16-12 of the DEIR.

Response A4-7

The comment expresses appreciation that the General Plan 2045 and Draft EIR promote transportation alternatives. The comment has been noted for the record.

Comment A4-8

Cumulative Transportation Impacts

Based on the analysis presented in the DEIR, implementation of the proposed General Plan 2045 would not conflict with applicable plans, programs, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As stated on page 3.16-26, the proposed General Plan includes goals and policies requiring coordination with Caltrans, the Metropolitan Transportation Commission (MTC), Alameda CTC, and neighboring jurisdictions to ensure a cohesive regional transportation network. Accordingly, the proposed Project would not result in a cumulative transportation impact related to conflicts with adopted circulation-related plans or policies.

Response A4-8

The comment accurately summarizes the DEIR's conclusion that implementation of the proposed Project would not result in cumulative transportation impacts related to conflicts with adopted circulation-related plans or policies. The City appreciates the acknowledgment of the General Plan's goals and policies supporting coordination with regional transportation agencies.

Comment A4-9

Thank you for the opportunity to comment on this DEIR. Please contact me at [redacted] or Aleida Andrino-Chavez at [redacted] if you have any questions.

2. RESPONSE TO COMMENTS

Response A4-9

This comment serves as a closing remark. The City appreciates the input from the Alameda CTC and will rely on their expertise when future development is proposed throughout implementation of the General Plan.

2. RESPONSE TO COMMENTS

2.4.2 Comments from Individuals

I1. Phillip Marshall, RPM Holdings LLC, March 17, 2026

Comment I1-1

Good morning.

I apologize for the delay in sending this comment over, but it did not go out in my email yesterday.

I am hopeful that these comments can be added to the record for the Draft EIR for the Livermore General Plan 2045.

Response I1-1

This comment serves as an opening remark in an email with an attachment. Responses to the email are provided in Responses I1-2 and I1-3 and responses to the attachment are provided in Responses I1-4 through I1-11.

Comment I1-2

As you will see in my letter, I am not opposed to the opportunity to re-zone and add housing to the city. I am opposed to doing so in a manner that is not respectful of the existing industrial base in the city and that will impact businesses that are here now in a detrimental manner. I would like to encourage the city to evaluate an overlay zoning approach rather than a straight re-zoning of the areas in the mid-town specific plan. If proper research were to be conducted, the team preparing this report would understand that the types of housing that they are mandating is not going to be economically viable, and the assumptions that transit will be available in the future is less than certain, especially due to the dire financial condition of BART and the follow on effects of that on proposed future connectivity to BART.

Response I1-2

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment I1-3

I would appreciate an opportunity to further communicate these concerns with the City Planning Staff at the appropriate time.

2. RESPONSE TO COMMENTS

Response I1-3

This comment serves as a closing remark in the email and has been noted for the record.

Comment I1-4

Dear Planning Commission and Staff,

I'm writing to comment on the Draft EIR for the Livermore General Plan 2045, specifically the Midtown Specific Plan and the proposed upzoning of existing industrial areas to high-density residential.

I own and operate businesses and property in this area, so this isn't theoretical for me. I understand the need for housing and I'm not opposed to growth—but I do have serious concerns about how this plan is structured and what it actually means on the ground.

Response I1-4

This comment serves as an opening remark to the formal comment letter.

Comment I1-5

1. Industrial and Residential Uses Are Not Compatible Here

The plan proposes introducing high-density housing into areas that are currently active industrial zones. That's a fundamental mismatch. These industrial areas operate with:

- Truck traffic
- Early start times
- Equipment noise
- Day-to-day operational activity

That's normal and expected for industrial use—but it's not compatible with dense residential living.

The EIR includes data on existing conditions, including noise levels, but it doesn't really address what happens when people are living right next to these uses. In reality, what happens is predictable: complaints increase, pressure builds, and eventually businesses are forced to change how they operate—or leave.

That dynamic isn't meaningfully analyzed in the EIR.

2. RESPONSE TO COMMENTS

Response I1-5

The Draft EIR evaluates existing environmental conditions, including noise levels and land use compatibility considerations, and analyzes the potential effects of implementing the General Plan 2045 at a programmatic level. The General Plan 2045 establishes a long-range land use framework intended to guide future development patterns, including areas where mixed-use or higher-density residential development may occur in proximity to existing employment and industrial uses; however, it does not directly mandate the removal or displacement of existing industrial uses.

As discussed under impact discussion (b) on pages 3.11-8 through 3.11-15 in Section 3.11, *Land Use and Planning*, of the Draft EIR, potential land use compatibility issues, including the interaction between residential development and existing industrial operations, are addressed at a policy level through the General Plan's land use compatibility and environmental protection policies. These policies are intended to guide future planning and project-level review to minimize potential conflicts through appropriate design, buffering, site planning, and mitigation where necessary.

The potential effects noted by the commenter are speculative at the programmatic level as such effects would depend on the specific design, siting, and operational characteristics of future projects. Accordingly, these issues are more appropriately evaluated during subsequent project-level planning and environmental review, where site-specific conditions, project design, and applicable performance standards can be assessed more specifically.

Comment I1-6

2. This Will Lead to the Gradual Loss of Existing Businesses

Even if the plan doesn't explicitly say industrial uses will be removed, that's the direction it pushes things.

When residential gets introduced into industrial areas:

- complaints increase
- regulations tighten
- operating conditions get more restrictive

Over time, that creates a situation where businesses can't realistically continue.

That's a foreseeable outcome, and it should be analyzed. The EIR doesn't really address that, and I think that's a major gap.

2. RESPONSE TO COMMENTS

Response I1-6

See Response I1-5 regarding programmatic environmental review of the General Plan 2045. The commenter's assertion that residential development could lead to increased complaints, regulatory changes, or operational restrictions on existing businesses is speculative. CEQA generally does not treat economic or business displacement, or changes in market conditions, as environmental impacts unless they result in secondary physical environmental effects. Such outcomes are dependent on future project design, specific site conditions, operational practices, and applicable regulatory standards, and therefore cannot be reasonably predicted with certainty at the program level. The General Plan includes policies intended to balance housing production with the retention of employment lands and to address land use compatibility through appropriate planning tools, including site design, buffering, and implementation-level review. Any future development proposals that introduce sensitive receptors near industrial uses would be subject to project-level environmental review and applicable regulatory requirements.

Comment I1-7

3. The Plan Assumes Redevelopment That May Not Be Realistic

The EIR assumes that these properties will transition to high-density housing—but there's no discussion of whether that's actually feasible.

From a real-world standpoint, the cost to build this type of housing right now is extremely high. Between construction costs, financing, and market conditions, it's not clear that these projects pencil today—or in the near future.

That creates a real problem:

- The plan assumes redevelopment
- But the economics may not support it

If that's the case, what we're left with is a long period where:

- industrial uses are under pressure
- residential isn't actually getting built

That outcome isn't addressed in the EIR.

Response I1-7

See Response I1-5 regarding programmatic environmental review of the General Plan 2045 and Section 2.3.2, *Population Growth*. Consistent with CEQA requirements for program-level analysis, the Draft EIR uses reasonably foreseeable development assumptions based on the

2. RESPONSE TO COMMENTS

General Plan land use designations and adopted regional growth projections. These assumptions do not constitute project-level approvals or guarantees of development feasibility, timing, or market performance.

Issues related to development economics, financing, costs, and market feasibility are not environmental impacts under CEQA and are therefore not required to be analyzed in an EIR. The timing and extent of future development is uncertain and depends on a variety of factors outside the scope of the environmental review process, including market conditions, project-specific financing, and future regulatory actions.

Comment I1-8

4. The Plan Relies on Transit That Does Not Yet Exist

Another concern is that the Midtown Specific Plan appears to be built around a transit-oriented development model—but the transit needed to support that model does not currently exist, and there is uncertainty around whether it will.

In particular, the plan seems to rely on the future implementation of Valley Link or similar regional transit improvements. However, those projects face real funding and timing challenges, and there is no clear certainty on when—or if—they will be delivered.

Without reliable, high-capacity transit in place, the assumptions underlying this plan become questionable. High-density development in this area will likely remain heavily dependent on cars, which raises concerns about traffic, congestion, and overall functionality.

If the transit does not materialize as assumed, the result is not transit-oriented development—it is simply higher density without the infrastructure needed to support it.

That risk is not adequately addressed in the EIR.

Response I1-8

See Response I1-5 regarding programmatic environmental review of the General Plan 2045. The Draft EIR evaluates the General Plan at a programmatic level using reasonably foreseeable conditions and adopted regional plans, policies, and modeling assumptions. Consistent with CEQA requirements, the analysis is not dependent on the completion or funding certainty of any single future transit project. Instead, it reflects a range of planned and reasonably anticipated multimodal improvements identified in adopted regional transportation planning documents.

2. RESPONSE TO COMMENTS

While future transit enhancements are not guaranteed and are subject to separate funding, approval, and implementation processes, the General Plan does not assume or rely on their completion as a prerequisite for development. Rather, transit-supportive land use policies are intended to support a range of mobility options over time, including existing transit service and complementary strategies such as Transportation Demand Management (TDM), bicycle and pedestrian improvements, and more compact development patterns.

As detailed under impact discussion (b) on pages 3.16-22 through 3.16-24 in Section 3.16, *Transportation*, of the Draft EIR, consistent with SB 743 and CEQA Guidelines Section 15064.3, transportation impacts were evaluated using adopted VMT-based methodologies, which account for land use patterns, trip generation characteristics, and multimodal accessibility under reasonably foreseeable conditions, without assuming the guaranteed delivery of any specific future transit project.

Comment I1-9

5. Too Much Is Being Deferred

I understand this is a program-level EIR, but the impacts we're talking about here are very real and very location-specific.

The conflicts between industrial and residential uses—and the reliance on future transit infrastructure—aren't things that can just be figured out later at the project level. Once the zoning changes are in place, those outcomes are already set in motion.

Deferring that analysis doesn't solve the problem—it just postpones it.

Response I1-9

See Response I1-5 regarding programmatic environmental review of the General Plan 2045 and Responses I1-6 through I1-8 regarding land uses and transit.

While the commenter expresses concern that certain outcomes may be influenced by implementation decisions made after General Plan adoption, CEQA recognizes that program-level planning documents rely on a tiered environmental review process. This approach allows environmental effects to be evaluated at increasing levels of specificity as projects are proposed and refined. The Draft EIR appropriately evaluates environmental impacts at a programmatic level of detail, consistent with the level of specificity of the General Plan 2045, and does not defer analysis improperly under CEQA. Site specific impacts will be evaluated during future project level reviews when sufficient detail is available.

2. RESPONSE TO COMMENTS

Comment I1-10

6. There Are More Practical Ways to Approach This

I'd strongly encourage the City to consider a more flexible approach instead of a full conversion of industrial zoning. One option would be an overlay or transitional zoning approach, where:

- existing industrial zoning stays in place
- residential is allowed as an additional use
- redevelopment happens over time, when it actually makes sense

That would:

- allow existing businesses to continue operating
- reduce immediate conflicts
- align redevelopment with market conditions
- still allow the City to move forward with housing

Right now, the plan feels like it's trying to force a transition that the market may not support, and that depends on infrastructure that may not arrive in the near term.

Response I1-10

The proposed project would change land use designations in the Midtown Specific Plan area. However, adoption of proposed General Plan 2045 would not affect the ability of existing businesses to keep operating. General Plan land use designations do not force the transition of existing uses. Instead, change would be expected to happen gradually over time based on market conditions, infrastructure timing, and decisions by private property owners and developers, as the commenter supports.

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment I1-11

7. Closing

At the end of the day, my concern is that this plan creates a situation where:

- existing businesses are gradually pushed out
- residential development is assumed but not guaranteed

2. RESPONSE TO COMMENTS

- the plan depends on transit that is uncertain
- and we end up with long-term incompatibility instead of a successful transition

I don't think the EIR fully addresses those risks.

I would ask that the City take a closer look at:

- land use compatibility
- the potential for business displacement
- the real-world feasibility of redevelopment
- the assumptions around future transit infrastructure
- and alternatives that allow for a more gradual, workable transition

Thank you for your time and consideration.

Response I1-11

This comment serves as a closing remark. See Responses I1 through I-10. The commenter's concerns have been noted for the record.

2. RESPONSE TO COMMENTS

I2. David Furst, March 18, 2026

Comment I2-1

Your “Land Use Element” says you are going to “maintain the urban growth boundary” yet you plan a study of “east of Greenville.” — this incompatible & contradictory. If the City really supports the urban growth boundary you cannot/should not study an area outside the UGB.

Response I2-1

The General Plan 2045 includes policies that support managed growth, the preservation of open space and agricultural lands, and the continuation of the Urban Growth Boundary (UGB) as a key growth management tool. These policies are intended to direct development inward to existing urbanized areas and limit outward expansion into surrounding open space.

The designation of study areas, including areas referenced east of Greenville, does not constitute an expansion or modification of the UGB, nor does it indicate a commitment to future development in those areas. Study areas are informational in nature and are used to identify locations that may warrant future consideration or analysis as part of separate planning efforts. As such, identifying a study area is informational only and does not authorize, propose, or permit development outside the UGB, nor does it result in any physical environmental impact under CEQA. Any change to the UGB would require voter approval and is not an action City staff or the City Council can undertake.

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not pertain to the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment I2-2

The pop projection is by 2045 there will be an increase of 43,800 people. This projection does not make current sense. You should not simply use a projection without evaluating it. The number is almost a 50% increase in today’s pop. The City needs critically evaluate data from other agencies. Thank you.

Response I2-2

See the topical response in Section 2.3.2, *Population Growth*. The comment has been noted for the record.

I3. Jean King, March 18, 2026

Comment I3-1

Make line defining UGB more prominent.

Response I3-1

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment I3-2

Too much housing.

Response I3-2

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

Comment I3-3

Do not take away agricultural land.

Response I3-3

As discussed under Impact AGR-1 on pages 3.2-14 and 3.2-15 in Section 3.2, *Agricultural Resources*, of the Draft EIR, implementation of the proposed Project could result in the conversion of agricultural land to nonagricultural uses. CEQA requires the City to evaluate these potential impacts, but it does not require the City to avoid all conversion of agricultural land.

Avoiding all conversion of agricultural land would not be feasible or practical, as the City must balance multiple planning objectives, including accommodating population growth, providing housing consistent with State housing law, supporting local employment opportunities, and reducing regional VMT and associated greenhouse gas (GHG) emissions. The General Plan land use framework is intended to direct the majority of growth to existing urbanized areas while allowing for limited and planned transitions where necessary to meet these objectives. The General Plan 2045 also includes policies intended to conserve agricultural land and support the continued viability of agricultural uses, while protecting open space and directing growth inward to the extent feasible as discussed in Section 3.2 of the Draft EIR.

2. RESPONSE TO COMMENTS

Comment I3-4

There should not be any Environmental Impact that are significant and unavoidable.

Response I3-4

CEQA requires lead agencies to identify and disclose significant environmental impacts based on substantial evidence in the record. Where significant impacts cannot be reduced to a less-than-significant level through feasible mitigation, CEQA requires they are disclosed in the EIR as significant and unavoidable. The Draft EIR identifies such impacts consistent with this required analytical framework. I

If the City elects to approve the General Plan 2045, it would be required to adopt the following as part of its final action: 1) CEQA Findings that identify the significant impacts, mitigation measures, and conclusions regarding the feasibility of mitigation, consistent with CEQA Guidelines Sections 15091 and 15092; and 2) a Statement of Overriding Considerations if the City determines that the benefits of adopting the General Plan 2045 outweigh the significant and unavoidable environmental impacts identified in the Draft EIR.

Comment I3-5

Significant Impacts for wildlife and cultural and historical must be mitigated.

Response I3-5

CEQA requires that feasible mitigation be adopted where necessary to reduce significant impacts, and the Draft EIR includes such measures for biological, cultural, and tribal cultural resources.

As analyzed in Section 3.4, *Biological Resources*, of the Draft EIR, compliance with existing regulations and General Plan 2045 policies and implementation of Mitigation Measure BIO-4, as detailed on pages 3.4-42 and 3.4-43 of the Draft EIR, would reduce potentially significant impacts to biological resources to less than significant.

As analyzed in Section 3.5, *Cultural and Tribal Cultural Resources*, of the Draft EIR, compliance with existing regulations and General Plan 2045 policies and implementation of Mitigation Measures CUL-2, CUL-4, and CUL-5, as detailed on pages 3.5-36, 3.5-39, and 3.5-40 of the Draft EIR, would ensure potential impacts to cultural and tribal cultural resources would be less than significant.

2. RESPONSE TO COMMENTS

Comment I3-6

Mitigate any greenhouse emissions. We must not contribute to climate change.

Response I3-6

As discussed in Section 3.8, *Greenhouse Gas Emissions*, of the Draft EIR, implementation of the proposed Project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

As discussed on pages 3.8-35, 3.8-36, and 3.8-43 through 3.8-45 in Section 3.8 of the Draft EIR, the General Plan 2045 includes Policy OS-7.1, which requires the City to monitor the Climate Action Plan (CAP) and ensure that the CAP aligns with the GHG reduction targets of Assembly Bill (AB) 1279 and the latest applicable statewide legislative GHG emission reduction standards. It would also require the City to track and monitor GHG emissions. In addition, CAP measures and General Plan policies that increase energy efficiency, reduce water use, and offset electricity use through solar panels would reduce GHG emissions to the extent feasible.

However, achieving the substantial reductions required to meet long-term statewide GHG targets depends, in part, on future technological advancements and statewide actions that are outside the City's authority and cannot be imposed as feasible mitigation at the General Plan program level. Therefore, because no feasible mitigation is available and the proposed Project would not meet State GHG reduction targets, GHG emissions under the proposed Project would remain significant and unavoidable.

See Response I3-4 regarding significant and unavoidable impacts.

Comment I3-7

With a change in number of residents per housing unit, more population will have housing.

Response I3-7

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

2. RESPONSE TO COMMENTS

I4. Jean King, March 21, 2026

Comment I4-1

Message: For more than 20 years the citizens of Livermore have supported our Urban Growth Boundary (UGB) through voter approved initiatives, public votes and comments at public meetings. One city wide vote had 72% supporting the UGB. The UGB has protected the Valley's open space, vineyards and agriculture. It is very important that the Plan continues that protection.

The map shows the land east of Greenville outside the UGB as open space. Let's keep it that way. As we do not want Dublin to break its ULL urban growth boundary and commercially develop the open space to its east in Doolan Canyon right up to Livermore's western border, Livermore should not move its UGB to develop east of Greenville.

The Plan states to "focus growth within the Urban Growth Boundary". Better language would be "limit growth to within the Urban Growth Boundary".

Response I4-1

See Response to I2-1 regarding the UGB. See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment I4-2

Last May the State Department of Finance estimated that Livermore's total population decreased by 1,896 residents between April 2020 and January 2025. The population decline isn't because there were fewer housing units because every year the number of housing units of all kinds increased. Instead, the average number of persons per household has declined every year from 2.75 in 2020 to 2.63 in 2025.

Yet, the DEIR projects an increase of more than 43,000 new residents from 2025 to 2045. That is forecasting a 50% increase in population. Half again as many new residents as reside here now.

The most recent set of projections from the State Department of Finance showed that Alameda County's total population is projected to increase by more than 157,000 from 2024 to 2045. If Livermore's population were to grow by the estimate in the Plan, that would represent 27.8% of the entire county's projected growth.

2. RESPONSE TO COMMENTS

According to the US Census figures online, Livermore's population in 2024 was approximately 5.2% of the Alameda County's population.

Why should Livermore, presently with 5 % of the County population, absorb almost 28 % of the growth in Alameda County in the next 20 years? It's not realistic, nor do I believe most residents want to see Livermore's population grow by 50%.

Response I4-2

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

2. RESPONSE TO COMMENTS

15. Sara Dierking, April 12, 2026

Comment I5-1

Dear City Council Members,

I am writing as a long-time resident of Livermore to express my concern about the scale and direction of future growth in our city.

Livermore already feels increasingly crowded, with more traffic, more development, and less of the open, small-town character that has long defined our community. I am especially concerned about continued pressure to develop hillsides and remaining open space areas, which are a core part of Livermore's identity and history.

These landscapes are not just empty land—they represent our agricultural and ranching heritage, support local wildlife, and provide a sense of space and balance that is becoming harder to find as the city grows.

Response I5-1

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment I5-2

I also want to emphasize that many of our views have already been significantly diminished over time due to the construction of stacked houses and apartment buildings in the surrounding area.

What was once an open and enjoyable outlook has been steadily eroded by increasing density. As a result, any additional obstruction would not be minor—it would represent a further and meaningful loss to what little remains of our original views.

Response I5-2

Under CEQA, the obstruction or loss of private views is not considered a significant environmental impact. Section 3.1, *Aesthetics*, of the Draft EIR, evaluates visual and aesthetic impacts at a programmatic level, including potential changes to scenic vistas and overall visual character. As concluded in the Draft EIR, implementation of the proposed Project would not result in a substantial adverse effect on a scenic vista, substantially damage scenic resources within a State scenic highway, or conflict with applicable zoning and regulations governing

2. RESPONSE TO COMMENTS

scenic quality. The General Plan 2045 includes policies intended to protect scenic resources and maintain visual character.

Comment I5-3

While I understand the need for housing and regional planning requirements, I respectfully urge the City to prioritize protecting open space and limiting further expansion into hills and undeveloped areas. Growth should be carefully managed so that it does not overwhelm the infrastructure or permanently change the character of Livermore.

Thank you for your time and consideration.

Response I5-3

See Responses 15-1, 15-2, and Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits and 2.3.2, *Population Growth*. The commenter's concerns have been noted for the record.

2. RESPONSE TO COMMENTS

I6. Vic Avila, April 21, 2026

Comment I6-1

What is Livermore's charm? What makes Livermore a great, appealing place to live? Livermore is spacious--it feels distinctly different from Dublin, Pleasanton, San Leandro, and dozens of other suburban cities. Livermore's spaciousness is due to the fact that Livermore is a donut hole, surrounded by the donut. The DONUT is the open space around the city that creates that spaciousness. This is unique in the Bay Area. Almost all cities had it at one time, but they developed all the land. The ranchers, farmers, vine growers started this spaciousness centuries ago. This is a prized possession this spaciousness! It is the planning commission's responsibility to guard this spaciousness. Your decisions affect 86,000 residents.

Response I6-1

The proposed General Plan 2045 does not include any changes to the city limits or the voter-approved UGB. See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment I6-2

Does Livermore's population need to grow by 50% in the future? The answer is no.

Response I6-2

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

Comment I6-3

Represent the people that live here and PROTECT THE URBAN GROWTH BOUNDARY. If you don't you will look back at your actions in a few years and say: "I could have helped prevent the urban sprawl I now see." I wouldn't want that reality staring at me.

Response I6-3

See Response to I2-1 regarding the UGB. The proposed General Plan 2045 does not change the UGB.

17. Jean King, April 21, 2026

Comment I7-1

Livermore's total population decreased in the last 5 years. The population didn't decline because there were fewer housing units, since the number of housing units of all kinds increased annually. Instead, the average number of persons per household has declined every year for the last 5 years

Yet, the General Plan 2045 DEIR projects an increase of more than 43,000 new residents in the next 20 years. That is a 50% increase in population - half again as many new residents as live here now.

Alameda County's population is projected to increase by more than 157,000 in the next 20 years. If Livermore's population were to grow by the Plan's estimate, that would represent 28% of the entire county's projected growth.

Livermore with presently 5 % of Alameda County's population should not provide 28% of the County's growth in the next 20 years. Livermore does not want that.

Response I7-1

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

Comment I7-2

Do not be in a hurry to rezone industrial to residential. Keep balance between workers and jobs. At one of the General Plan's meeting, one of the members made a comment something like - 'It would be good if we could get some of the empty nesters to move out of their houses.' Being an empty nester, I wasn't sure what she had in mind for me. But, she had a point.

When I moved into the Jackson School area in the 1960's, Livermore was going through a fast population growth with many new houses and double sessions in the schools. The houses in the neighborhood were newly built and almost every house had a young family with school age children, usually 2 but sometimes, 1 or 3, and some with between 4 and 12. The average number of residents per household was certainly more than 4, much higher than the present 2.63.

Now there are only 2 homes on my adjoining street with young children. Most houses have 2 adult residents and some with 1 and some with 3, Those residents who have lived here since the 60's are very unlikely to be here until 2024. I think these empty nesters will give way to younger residents.and will raise the average number of residents per household from the

2. RESPONSE TO COMMENTS

present 2.63. The housing built during Livermore's rapid growth in the 60's and 70's can absorb more population.

Livermore's housing, population and residents per household need to be evaluated periodically along with the workers/job ratio.

We need more affordable housing but it needs public financing, not just through nonprofits.

Response I7-2

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

18. John Marchand, April 24, 2026

Comment I8-1

Question for Imagine Livermore 2045:

It has long been acknowledged that California's Department of Water Resources will not be able to meet the long-term Table A contractual demands for the State Water Project in its current configuration. This year, the snow pack was recently reported to be only 18% of average. The most recent forecast for the State Water Project allocation percentage is 35%. The cities supplied by the State Water Project contractors are dependent upon the State to meet its contractual demands.

Two of the pillars of the General Plan are *sustainability and quality of life*. What relief is available to the cities with respect to the Housing Element and the Regional Housing Needs Assessment numbers when the State is unable to meet its contractual demands for water?

Response I8-1

The City acknowledges the concern regarding long-term State Water Project reliability and its relationship to State housing requirements. Under CEQA, the Draft EIR evaluates whether adequate water supplies are expected to be available to serve development throughout the General Plan 2045 planning horizon, consistent with applicable State law requirements. As analyzed under impact discussions (a) and (b) on pages 3.17-48 through 3.17-55 in Section 3.17, *Utilities and Service Systems*, of the Draft EIR, both Cal Water and Livermore Municipal Water have sufficient water supplies available during normal years, single-dry year, and a five-year drought period to accommodate future development under the General Plan 2045. The General Plan 2045 also includes policies to reduce water demand and ensure adequate water supplies.

The issues raised regarding State Water Project contractual obligations and Regional Housing Needs Allocation adjustment mechanisms are governed by separate State regulatory and legislative frameworks and fall outside the scope of CEQA and the Draft EIR.

Comment I8-2

Cities in the Tri-Valley have recently experienced black-outs and brown-outs due to the inability of the Independent System Operators or the local utilities to meet the demands placed upon the grid. What relief is available to the cities with respect to the Housing Element and the Regional Housing Needs Assessment numbers when the power grid is unable to meet the system demands for power?

2. RESPONSE TO COMMENTS

If the State cannot meet the demands upon which the cities, and their contractors, are relying for water and power, then the quality of life for the current residents will be diminished. This will go against two of the pillars of the General Plan.

Response I8-2

The City recognizes the concern regarding recent blackouts and the broader issue of long-term grid reliability. Under CEQA, the Draft EIR evaluates whether adequate energy supplies and infrastructure are expected to be available to serve development under the General Plan 2045. As discussed under impact discussion (a) on pages 3.17-59 through 3.17-62 in Section 3.17, *Utilities and Service Systems*, of the Draft EIR, energy demand under buildout of the General Plan 2045 would be taken into consideration by the utility providers that serve future development, and future development would not be expected to require or result in new or expanded electricity or natural gas infrastructure beyond what is already planned or under construction. The General Plan 2045 also includes policies to improve energy infrastructure and reduce electricity and natural gas consumption. The City does not have direct regulatory control over the power grid; this authority is held by State and federal agencies.

As detailed in Section 3.6.1, *Regulatory Framework*, on pages 3.6-4 through 3.6-12 in Section 3.6, *Energy*, of the Draft EIR, several State regulations and long-range planning efforts address the long-term reliability of power supplies. For example, the load-serving entities that provide energy service to the EIR Study Area are subject to requirements under the California Independent System Operator (CAISO) to ensure resource adequacy and grid stability. In addition, as detailed on page 3.6-10 in Section 3.6 of the Draft EIR, CAISO develops and facilitates implementation of the Integrated Resource Plan, a comprehensive planning document that outlines CAISO's forecasts for electricity demand, supply, and transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs.

The issues raised regarding Regional Housing Needs Allocation adjustment mechanisms are governed by separate State regulatory and legislative frameworks and fall outside the scope of the CEQA and the Draft EIR.

I9. Alan Burnham, April 28, 2026

Comment I9-1

I have two comments on the EIR. The first is a very minor one. There is a typo in Table 3.17-3, where there is an extra zero inserted into one of the table entries: 550,300 vs 55,300.

Response I9-1

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Section 3.17, *Utilities and Service Systems*, of the Draft EIR has been revised to correct the typo in Table 3.17-3, *Zone 7 Water Agency Projected Supply and Demand for Years 2025-2045*. This revision does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment I9-2

The second comment is more significant. Table 3.8-6 has 2023 GHG emissions from building electricity being 75% of building natural gas in 2023, which seemed very high considering advertising from AVA (<https://avaenergy.org/your-energy-options/plans-and-rates/compare-service-plans/>) and PG&E (<https://www.pge.com/en/newsroom/currents/future-of-energy/articles-3962-pge-customers-electricity-100-greenhouse-gas-free-2023.html>).

From here I discovered several problems in the input values from Appendix B, which are detailed below. I also learned that AVA is not primarily a clean energy provider as implied in its advertising. They are substantially more carbon intensive than PG&E. That being said, given that AVA provides far more power to the non-lab customers than PG&E, changing the inputs to more defensible values will not markedly affect the final conclusions, but the calculation should be done properly, nonetheless.

Response I9-2

As discussed in Responses I9-3 through I9-5, the assumptions used for forecasting energy emissions in the Draft EIR are based on a conservative interpretation of information directly provided by the City's utility providers, Ava Community Energy (Ava Energy) and Pacific Gas and Electric Company (PG&E). The assertions in this comment do not identify specific deficiencies with the analysis in the Draft EIR but provide context for the following comments.

Comment I9-3

Here are the specific problems in the EIR and its Appendix B.

2. RESPONSE TO COMMENTS

1. The Table heading in the EIR says 2023, when the actual numbers used are apparently an average of 2019-2023. The EIR should accurately reflect the calculation actually done.

Response I9-3

As disclosed under the “Methodology” subheading in Section 3.8.4, *Project Impact Analysis*, on pages 3.8-22 through 3.8-24 in Section 3.8, *Greenhouse Gas Emissions*, of the Draft EIR, the information provided about the building energy sector relied on information provided by PG&E and Ava Energy. As shown on page 15 of Appendix B, *Air Quality and Greenhous Gas Emissions Data*, of the Draft EIR, the analysis uses the average annual energy consumption rate based on the service area’s 2019-2023 annual data provided by PG&E and Ava Energy. This methodology normalizes annual anomalies in the consumption data to provide a representative annual consumption rate for the 2023 baseline year. Appendix B of the Draft EIR further details the calculations and data used to generate this baseline while Table 3.8-6, *GHG Emissions Forecast in the EIR Study Area*, in Section 3.8 of the Draft EIR compiles and summarizes the results. Table 3.8-6 of the Draft EIR includes the table heading “Existing Land Uses (2023)” because the existing conditions baseline for this analysis is 2023. Therefore, the Draft EIR accurately reflects the calculations used to determine the baseline energy consumption and no revisions are necessary.

Comment I9-4

2. According to my reading of PG&E documents, the number used was actually for 2018, which is not appropriate given the rapid reduction of fossil fuel electricity usage in California in the following years. This is especially important given that AVA numbers are for an average of later years. PG&E claims to be carbon free in 2023 for this area.

Response I9-4

The comment references a marketing page from PG&E’s website dated 2023 that states the utility provided 100 percent carbon-free electricity (see Comment I9-2). However, this information is not consistent with the carbon intensity factors PG&E provided directly to the City for use in the Draft EIR or the carbon intensity factors reported by PG&E to the California Energy Commission (CEC) for its 2023 power content label. As identified in Section 3.8, *Greenhouse Gas Emissions*, on page 3.8-22 of the Draft EIR, the electricity consumption data for the City was retrieved directly from Ava Energy, formerly known as East Bay Community Energy, and PG&E. As shown on page 15 of Appendix B, *Air Quality and Greenhous Gas Emissions Data*, of the Draft EIR, and further explained under Response I9-3, energy consumption data was retrieved for the last five years and then averaged to identify the General Plan baseline year annual consumption rates. PG&E’s provided carbon intensity factors that accompanied the provided energy consumption data reflected high variability over several years, ranging from 12 to 206 pounds per megawatt-hour (lbs/MWh) for 2018-2023. Because there was significant

2. RESPONSE TO COMMENTS

variability in the reported carbon intensity from PG&E, and given that utility reporting for power content labels for Renewable Portfolio Standard (RPS) program compliance uses a three-year average, the highest provided carbon intensity factor provided by PG&E of 206 pounds per megawatt hour (lbs/MWh) was used to not underreport potential GHG emissions associated with electricity generation.

While SB 100, via the RPS program, requires 100 percent of in-state sales of electricity be sourced from eligible renewable and carbon-free sources by 2045, the RPS provides year-to-year flexibility and bases compliance on three-year averages, allowing some years to peak while remaining in compliance. In addition, SB 100 identifies a final compliance date of December 31, 2045; therefore, because the General Plan's horizon year is 2045 and not 2046, following the RPS compliance date, it cannot be guaranteed that PG&E's 2045 carbon intensity would be zero. Nor is it clear how the CEC and California Public Utilities Commission (CPUC) will impose compliance reporting in that final year or work with load-serving entities (e.g., PG&E, Ava Energy) to correct violations and achieve the ultimate RPS target. Therefore, the 206 lbs/MWh carbon intensity for PG&E's electricity supply for both the baseline and horizon year to provide a conservative analysis and avoid elevating existing GHG emissions from PG&E power generation in comparison to 2045 emissions.

The information provided by the commenter does not require revisions to the Draft EIR and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment I9-5

3. The same PG&E number is used for 2045 as "2023" even though the document takes on faith that AVA will eliminate fossil fuel electricity by 2030. This is particularly unbalanced, and even unfair to PG&E, because PG&E says it already has eliminated CO2 emissions for this market. It is inappropriate to use one set of rules for one vendor and a different set of rules for another.

Response I9-5

As discussed in Response I9-4, the use of 206 lbs/MWh carbon intensity for PG&E's electricity supply for both the baseline and horizon year is substantiated by data provided directly from PG&E and a conservative assessment of regulatory processes influencing the carbon intensity of PG&E's energy sources at the horizon year of the proposed Project.

Unlike PG&E, Ava Energy had reported carbon intensity that showed sequential annual reductions for the same timeframe and had officially reported 2023 carbon intensity that could be used in the Draft EIR while PG&E's 2023 carbon intensity was an unofficial estimate at the time the analysis was prepared. For example, Ava Energy's reported carbon intensity was 564

2. RESPONSE TO COMMENTS

pounds of carbon dioxide equivalent per megawatt-hour (lbs CO₂e/MWh) in 2021 (the earliest year of CEC-provided publicly available information for Ava Energy/East Bay Community Energy), 496 lbs/MWh in 2022, and 370 lbs/MWh in 2023. Ava Energy also has a 100 percent carbon-free electricity procurement target for 2030, 15 years before the General Plan's horizon year in 2045. In contrast with the uncertainty associated with PG&E's 2045 carbon intensity reductions, this information shows reasonable certainty that Ava Energy's carbon intensity would be zero by 2045.

Additionally, it should also be noted that according to energy consumption data provided by PG&E and Ava Energy, PG&E's share of power supply for the EIR Study Area was very small. As shown on page 15 of Appendix B to the Draft EIR, the Livermore area predominantly purchased electricity from Ava Energy. PG&E constituted approximately 6 percent of the total electricity consumption in the area and Ava Energy approximately 94 percent.

The information provided by the commenter does not require revisions to the Draft EIR and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

Comment I9-6

4. The calculation used grossly incorrect estimates for emissions from the national laboratories. Document LLNL-SR-871361 (Ottaway et al.) states that LLNL used 367,542 MWh in FY23 (Oct23-Oct24) and 442,626 MWh in FY2024, which are roughly twice the total commercial and industrial usage estimated in Appendix B. In addition, the Appendix numbers are reported with an amazing number of significant figures, which is itself a problem. Furthermore, this power does not come from either AVA or PG&E. It comes primarily from WAPA. The carbon-free portion was estimated at 60% of the total, and the goal is to reach carbon neutrality by 3035 by including carbon capture. Given that LLNL is by far the largest user of electricity in the Tri-Valley, it should be treated separately and more accurately. Obviously, the City of Livermore has little influence on carbon emissions from LLNL or Sandia.

Response I9-6

The City thanks the commenter for sharing information regarding the Lawrence Livermore National Laboratory's annual electricity consumption. The City has reviewed the referenced document (Document LLNL-SR-871361); however, the annual electricity consumption estimates contained in the referenced document and provided by the commenter aggregate consumption data from both the Lawrence Livermore National Laboratory campus in Livermore and Site 300, which is outside the EIR Study Area. As a result, it is unknown how much electricity consumption is attributable to the campus inside the EIR Study Area. As noted on page 15 of Appendix B, *Air Quality and Greenhouse Gas Emissions Data*, of the Draft EIR, the

2. RESPONSE TO COMMENTS

Lawrence Livermore and Sandia National Laboratories are excluded from the aggregate energy consumption data provided by Ava Energy and PG&E. This is because the CPUC 15/15 Rule (Decision 97-10-031) requires that data provided by load-serving entities, including Ava Energy and PG&E, represent at least 15 customers and no single customer's energy demand constitutes greater than 15 percent of the total energy demand. As a result, Ava Energy and PG&E were unable to provide any information related to how much energy consumption the two laboratories had for the requested years of data. Moreover, as shown on page 20 of Appendix B of the Draft EIR, the electricity consumption for the two laboratories used CalEEMod consumption factors, which are based on the CEC's 2018-2030 Uncalibrated Commercial Sector Forecast, using the known facilities' square footages in the absence of known energy consumption data. As shown on page 20 of Appendix B of the Draft EIR, the facilities' electricity consumption totaled an estimated 56,901 MWh, or approximately 21 percent of the total electricity consumption for the EIR Study Area, including the laboratories, that is shown on page 18 of Appendix B of the Draft EIR. Therefore, the estimated electricity consumption used in the analysis for the two laboratories is consistent with Ava Energy's and PG&E's assertion that the CPUC 15/15 Rule prevented them from providing the facilities' consumption data.

The commenter is correct that the Western Area Power Administration (WAPA) generates electricity at federal facilities and distributes to utilities, such as Ava Energy and PG&E, and other entities; however, it is unknown how much energy is purchased directly from WAPA versus Ava Energy and PG&E for these facilities. As the commenter points out, in the referenced Document LLNL-SR-871361, WAPA is noted as having an accelerated renewable procurement goal of achieving 100-percent carbon-free annual electricity procurement by 2030, consistent with Ava Energy's 2030 carbon neutrality goal for electricity procurement. In addition, as shown on page 15 of Appendix B of the Draft EIR, the Livermore area predominantly purchased electricity from Ava Energy, with approximately 94 percent of the City's electricity being provided by Ava Energy. Therefore, the forecast General Plan 2045 GHG emissions from electricity consumption would not substantially change such that a new impact would occur by assuming the laboratories consume electricity provided by WAPA with a 100-percent carbon-free procurement goal by 2030 instead of predominantly Ava Energy, also with a 100-percent carbon neutral procurement goal by 2030.

The information provided by the commenter does not require revisions to the Draft EIR and does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a).

2. RESPONSE TO COMMENTS

2.4.3 Verbal Comments

V1. Jeff Kaskey, March 17, 2026

Comment V1-1

The commenter said he was speaking as a private citizen, not as City Historian. He argued the population projections in the EIR are too high and not plausible. He asked the Commission to re-examine the numbers.

Response V1-1

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

V2. Jean King, March 17, 2026

Comment V2-1

The commenter argued the EIR's population and housing impact findings are wrong and should be "very significant." She stated the population projections are too high, noting that Livermore's population has gone down since 2020 and household size is shrinking. She said the EIR projects a 50 percent population increase, which would make Livermore absorb 27 percent of the county's growth, despite being only 5 percent of the county's population today.

Response V2-1

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

Comment V2-2

The commenter also believes the significant and unavoidable impacts to agricultural and mineral resources that have been identified simply do not need to occur.

Response V2-2

See Response I3-4 regarding significant and unavoidable impacts. The comment has been noted for the record.

Comment V2-3

The commenter believes the city has a UGB for a reason, it protects the valley open space, vineyards, and agriculture, and that should remain. The commenter is glad to see that land east of Greenville will remain as open space. However, she takes issue with the language on page 3 of the staff report, which says the City will "continue to focus growth in the UGB." She believes it should state that the City will continue to "limit growth" within the UGB. That wording better reflects the protective intent of the boundary.

Response V2-3

See Response to I2-1 regarding the UGB. See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

2. RESPONSE TO COMMENTS

V3. Brian Warner, March 17, 2026

Comment V3-1

The commenter is testifying as a business representative for sheet metal workers and states his position that the development should promote both sustainability and equality.

Response V3-1

This comment serves as an opening remark to a verbal comment.

Comment V3-2

The commenter raised a specific concern: the City has a deal with the Archdiocese of Oakland to develop 700 housing units. As it stands, there is no requirement for union work on that project, and he feels as though local labor is getting shut out. They are the ones who live there, who pay taxes there, and they want to work there. He asks the Commission to make a project labor agreement or some form of union labor requirement a condition of the Development Agreement.

Response V3-2

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

V4. Commissioner Jacob Anderson, March 17, 2026

Comment V4-1

Commissioner Anderson sees a lot of great stuff in the plan and is optimistic for the future of Livermore.

Response V4-1

The comment expresses support for the proposed General Plan 2045. The comment has been noted for the record.

Comment V4-2

Commissioner Anderson raises a procedural point regarding post-adoption implementation. Commissioner requests that the City prepare a roadmap or schedule for updating other key policy documents, such as the Zoning Ordinance, Specific Plans, and Design Guidelines, to ensure they are reviewed and brought into consistency with the new General Plan once it is adopted.

Response V4-2

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

2. RESPONSE TO COMMENTS

V5. Commissioner Nadine Horner, March 17, 2026

Comment V5-1

Commissioner Horner acknowledges the public comments received during the hearing. Commissioner specifically references Ms. King's concerns regarding population and wish to assure her that her comments will be noted and responded to as the process moves forward.

Response V5-1

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

Comment V5-2

Commissioner Horner acknowledges Mr. Warner's comments and confirms that they are part of the official record. While the speaker notes that they did not fully understand every point raised, the comments have been heard and will be included for consideration.

Response V5-2

The comment confirms that a previous verbal comment is noted for the record (see Comment V3).

V6. Commissioner Tracy Kronzak, March 17, 2026

Comment V6-1

Commissioner Kronzak suggests the City consider developing an Lmax noise standard.

Response V6-1

See Section 2.3.1, *Standards for Responses and Focus of Review*, regarding project merits. The comment has been noted for the record. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

Comment V6-2

Commissioner Kronzak notes that population projections are based on current trends and observes that the situation involves “several gears turning at once,” implying a complex interplay of demographic factors and states their understanding that the intent of a programmatic EIR is to plan for full buildout. Commissioner notes that the actual projected population numbers in the EIR are keyed off Association of Bay Area Government (ABAG) data. Commissioner requests an explanation of the assumptions the EIR made with respect to population projections.

Response V6-2

See Section 2.3.2, *Population Growth*. The comment has been noted for the record.

2. RESPONSE TO COMMENTS

2.5 REFERENCES

Livermore, City of. 2022, March 7. *Livermore General Plan Update Existing Conditions Reports*.
<https://imaginelivermore2045.org/documents/>, accessed October 21, 2025.

3. REVISIONS TO THE DRAFT EIR

3.1 INTRODUCTION

This chapter contains revisions to the Draft Environmental Impact Report (EIR) in response to comments from agencies, organizations, and the public, as well as staff-directed changes. These text revisions include typographical corrections, insignificant modifications, and amplifications and clarifications of the Draft EIR. For each revision, the Draft EIR page and location on the page are identified, followed by the textual, tabular, or graphical revision.

Double underlined text represents language that has been added to the EIR; text with ~~strikethrough~~ represents language that has been deleted from the Draft EIR. None of the revisions to the Draft EIR constitute significant new information, as defined in California Environmental Quality Act (CEQA) Guidelines Section 15088.5; therefore, the Draft EIR does not need to be recirculated.

3.2 DRAFT EIR REVISIONS

Revisions to Mitigation Measures

The following table presents revisions to Table ES-1, *Summary of Significant Impacts and Mitigation Measures*, of the Draft EIR.

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
AGRICULTURE RESOURCES			
Impact AGR-1: Implementation of the proposed Project could result in the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to nonagricultural uses.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
Impact AGR-2: Implementation of the proposed Project could conflict with existing zoning for agricultural use and Williamson Act contracts.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
Impact AGR-3: Implementation of the proposed Project could involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
Impact AGR-4: Implementation of the proposed Project could result in a significant cumulative impact with respect to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), existing zoning for agricultural uses, and Williamson Act properties, and farmland to nonagricultural uses.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
AIR QUALITY			
Impact AQ-2: Implementation of the proposed Project could 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 during construction and operation.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
Impact AQ-5: Implementation of the proposed Project could result in cumulative air quality impacts with respect to generation of criteria pollutants and exposure of substantial pollutant concentrations at sensitive receptors.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
BIOLOGICAL RESOURCES			
Impact BIO-4: Implementation of the proposed Project could substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	Significant	Mitigation Measure BIO-4: Prior to the issuance of entitlements for a project, applicants or sponsors of projects on sites where migratory or nesting birds are present shall implement bird-safe design measures for all development projects where a qualified biologist, approved by the City of Livermore (City), determines that migratory or resident birds could be affected. This requirement shall apply to projects adjacent to or incorporating riparian corridors, wetlands, open-space areas, or other natural habitat features, or as otherwise determined by the qualified biologist.	Less Than Significant

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
		Bird-safe design considerations and management strategies shall include avoiding the use of highly reflective glass that appears to reproduce natural habitat and may attract birds; limiting reflectivity and using non-attractive surface treatments; applying low-reflectivity glass or other glazing treatments across the entirety of the building's glass surfaces, not only at lower levels; reducing interior light during evening hours through lighting control systems for commercial buildings; directing exterior lighting downward and screening it to minimize night-time illumination of the building exterior, except as needed for safety and security; avoiding glass skyways, freestanding glass walls, and transparent building corners; eliminating transparent glass at rooflines, including in conjunction with green roofs; and covering roof mechanical equipment with low-profile angled roofing to minimize obstacles to bird flight. Project applicants shall demonstrate incorporation of bird-safe design measures in project plans and provide documentation of biologist review during entitlement or permitting stages. The City shall verify compliance before issuance of building or grading permits.	
CULTURAL AND TRIBAL CULTURAL RESOURCES			
Impact CUL-2: Implementation of the proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5.	Significant	Mitigation Measure CUL-2: If any buried historical or archaeological resources are discovered during construction, operations shall stop within a 100-foot radius of the find and the qualified archaeologist shall be consulted to determine whether the resource requires further study. If it is determined that the find is	Less Than Significant

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
		significant, then the qualified archaeologist shall make recommendations to the Lead Agency (City of Livermore) on the feasible measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant historical or archaeological resources consist of, but are not limited to, stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. <u>If the discovered resource is determined or suspected to be of Native American origin, Mitigation Measure CUL-4 shall apply, and consultation with a representative from the consulting Tribe(s) shall be conducted in accordance with that measure.</u> Any previously undiscovered resources found during construction within a project site shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA Guidelines. If the relevant resources (if any) are determined to be historical resources as defined under Section 15064.5 of the CEQA Guidelines or a unique archaeological resource in Section 21083.2 of the Public Resources Code, feasible mitigation measures and an archaeological treatment plan shall be developed by the qualified archaeologist and recommended to the project applicant or sponsor and the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open	

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
		space, or data recovery excavations of the find(s) as detailed in the archaeological treatment plan. No further grading or ground disturbance shall occur within 100 feet of the discovery of a significant historical or archaeological resource until the relevant mitigation measures are approved by the Lead Agency and implemented by the project applicant or sponsor to protect these resources. Work may proceed on other parts of the project site while mitigation for unique archaeological resources is being carried out.	
Impact CUL-4: Implementation of the proposed Project could cause a substantial adverse change in the significance of a tribal cultural resource (TCR) 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).	Significant	Mitigation Measure CUL-4: If any buried tribal cultural resources TCRs are discovered, or are suspected to be of Native American origin, during construction grading or excavation, the construction contractor shall stop operations halt all ground-disturbing activities within a 100-foot radius of the find. The contractor shall immediately notify the Lead Agency (City of Livermore). <u>and the City shall notify and consult with a representative from the consulting the appropriate Tribe(s), consistent with applicable confidentiality provisions under the California Environmental Quality Act (CEQA), to determine significance and appropriate treatment measures.</u> <u>If the City, in consultation with the consulting Tribe(s), determines that the resource is a TCR and significant pursuant to CEQA, the City shall require the retention of a Tribal representative and, if appropriate, a qualified archaeologist, at the applicant's expense, to prepare a mitigation plan.</u>	Less Than Significant

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
		<u>The mitigation plan shall be developed and implemented in consultation with the consulting Tribe(s) and shall prioritize avoidance of the resources. If avoidance is not feasible, the plan shall identify appropriate culturally sensitive treatment measures in coordination with the consulting Tribe(s). Such measures may include, but are not limited to, protection of the cultural character and integrity of the resources, protection of traditional uses, confidentiality of sensitive information, or heritage recovery.</u> The City/tribe(s) may require tribal or other qualified cultural resource monitors during construction to ensure that resources are properly identified and protected. Documentation of consultations, treatment measures, and resource protection actions shall be maintained in the project record. <u>Ground-disturbing activities within the buffer area shall not resume until the resource has been evaluated and appropriate treatment measures, developed in consultation with the Tribe(s), have been approved by the City and implemented.</u> Work may proceed on other parts of the project site while mitigation for TCRs is being carried out.	
Impact CUL-5: Implementation of the proposed Project could cause a substantial adverse change in the significance of 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.	Significant	See Mitigation Measure CUL-4.	Less Than Significant

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
GREENHOUSE GAS EMISSIONS			
Impact GHG-1: Implementation of the proposed Project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
Impact GHG-2: Implementation of the proposed Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
Impact GHG-3: Implementation of the proposed Project could result in a significant cumulative impact with respect to generation of greenhouse gas (GHG) emissions that may have a significant impact on the environment and conflict with an applicable plan adopted for the purpose of reducing GHG emissions.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
MINERAL RESOURCES			
Impact MIN-1: Implementation of the proposed Project could result in the loss of availability of known mineral resources that would be of value to the region and the residents of the State.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable

3. REVISIONS TO THE DRAFT EIR

Table 3-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measure	Level of Significance with Mitigation
Impact MIN-3: Implementation of the proposed Project could result in a significant cumulative impact with respect to the loss of availability of known mineral resources that are of value to the region and the residents of the State.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
NOISE			
Impact NOI-1: Implementation of the proposed Project could 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, or applicable standards of other agencies.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable
Impact NOI-4: Implementation of the proposed Project could 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, or applicable standards of other agencies, resulting in a significant cumulative impact.	Significant	No feasible mitigation measures at the programmatic level	Significant and Unavoidable

3. REVISIONS TO THE DRAFT EIR

Revisions to Other Text in the Draft EIR

Since publication of the Draft General Plan and Draft EIR, the Planning Commission and City Council have held several public hearings and provided direction to revise certain proposed General Plan policies and actions. These revisions clarify and refine the Draft General Plan, including minor typographical corrections, and do not result in any new or substantially more severe environmental impacts than those analyzed in the Draft EIR, nor do they change the conclusions of the environmental analysis.

In response to Comment Letter A1, the last paragraph under the “Plan Bay Area” subheadings in Section 3.3, *Air Quality*, Section 3.5, *Energy*, Section 3.8, *Greenhouse Gas Emissions*, Section 3.11, *Land Use and Planning*, Section 3.14, *Population and Housing*, and Section 3.16, *Transportation*, of the Draft EIR are hereby amended as follows:

Plan Bay Area 2050 ~~is currently undergoing~~ recently underwent an update, which is called Plan Bay Area 2050+. Plan Bay Area 2050+, finalized and adopted in March 2026, contains 35 strategies representing public policies and investments that can be implemented in the Bay Area by 2050 to help the region build more homes, reduce commute times, and create vibrant downtowns and natural areas for everyone to enjoy. The strategies in Plan Bay Area 2050+ also aim to keep people safe from natural hazards, support a strong economy, and provide stable housing for those who need it most. Unique to the Plan Bay Area 2050+ cycle is the parallel Transit 2050+ planning effort, which culminated in the first-of-its-kind plan to re-envision the future of Bay Area public transit, in partnership with transit operators across the region. ~~While not in effect at the time of this Draft EIR, it is anticipated that the Plan Bay Area 2050+ will be in effect over the course of the General Plan 2045 horizon.~~

CHAPTER 1, INTRODUCTION

To correct a typographical error, the second paragraph in Section 1.3.2, *Draft EIR*, on page 1-3 of the Draft EIR, is hereby amended as follows:

This Draft EIR will be available for review by the public and interested parties, agencies, and organizations for a ~~45~~53-day comment period starting March 3, 2026, and ending April 24, 2026. The Planning Commission will conduct a public hearing during this period to receive comments on the Draft EIR. During the comment period, the public is invited to submit written comments via mail or email on the Draft EIR to the City of Livermore Community Development Department Planning Division by April 24, 2026. Comments may also be hand-delivered to the Community Development Department by this deadline.

3. REVISIONS TO THE DRAFT EIR

To correct a typographical error, the first paragraph in Section 1.3.3, *Final EIR*, on pages 1-3 and 1-4 of the Draft EIR, is hereby amended as follows:

After the ~~45~~⁵³-day review period for the Draft EIR, the City will review all written comments received and prepare written responses to each comment related to the adequacy of the Draft EIR. A Final EIR will then be prepared, which contains all the comments received, responses to comments raising environmental issues, and any changes to the Draft EIR. The Final EIR will first be presented to the Planning Commission at a duly noticed public hearing. This hearing will allow for public comment on the Final EIR and allow the Planning Commission to make a formal recommendation to the City Council regarding certification of the Final EIR. Following the public hearing, the Final EIR will be presented to the City Council for consideration of certification as the environmental document for the proposed Project. All persons who commented on the Draft EIR and provided contact information will be notified of the availability of the Final EIR and the date of the public hearing.

SECTION 3.5, CULTURAL AND TRIBAL CULTURAL RESOURCES

In response to Comment Letter A3, Mitigation Measure CUL-2 under impact discussion (b) in Section 3.5.4, *Project Impact Analysis*, on page 3.5-36 of the Draft EIR, is hereby amended as follows:

Impact CUL-2: Implementation of the proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5.

Mitigation Measure CUL-2: If any buried historical or archaeological resources are discovered during construction, operations shall stop within a 100-foot radius of the find and the qualified archaeologist shall be consulted to determine whether the resource requires further study. If it is determined that the find is significant, then the qualified archaeologist shall make recommendations to the Lead Agency (City of Livermore) on the feasible measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant historical or archaeological resources consist of, but are not limited to, stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. If the discovered resource is determined or suspected to be of Native American origin, Mitigation Measure CUL-4 shall apply, and consultation with the appropriate Tribe(s) shall be conducted in accordance with that measure.

Any previously undiscovered resources found during construction within a project site shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA Guidelines.

3. REVISIONS TO THE DRAFT EIR

If the relevant resources (if any) are determined to be historical resources as defined under Section 15064.5 of the CEQA Guidelines or a unique archaeological resource in Section 21083.2 of the Public Resources Code, feasible mitigation measures and an archaeological treatment plan shall be developed by the qualified archaeologist and recommended to the project applicant or sponsor and the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the find(s) as detailed in the archaeological treatment plan. No further grading or ground disturbance shall occur within 100 feet of the discovery of a significant historical or archaeological resource until the relevant mitigation measures are approved by the Lead Agency and implemented by the project applicant or sponsor to protect these resources. Work may proceed on other parts of the project site while mitigation for unique archaeological resources is being carried out.

In response to Comment Letter A3, Mitigation Measure CUL-4 under impact discussion (d) in Section 3.5.4, *Project Impact Analysis*, on page 3.5-39 of the Draft EIR, is hereby amended as follows:

Impact CUL-4: Implementation of the proposed Project could cause a substantial adverse change in the significance of a tribal cultural resource (TCR) 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).

Mitigation Measure CUL-4: ~~If any buried tribal cultural resources (TCRs) are discovered, or are suspected to be of Native American origin, during construction grading or excavation, the construction contractor shall stop operations halt all ground-disturbing activities within a 100-foot radius of the find. The contractor shall immediately notify the Lead Agency (City of Livermore), and the City shall notify and consult with a representative from the consulting the appropriate Tribe(s), consistent with applicable confidentiality provisions under the California Environmental Quality Act (CEQA), to determine significance and appropriate treatment measures.~~

If the City, in consultation with the consulting Tribe(s), determines that the resource is a TCR and significant pursuant to CEQA, the City shall require the retention of a Tribal representative and, if appropriate, a qualified archaeologist, at the applicant's expense, to prepare a mitigation plan.

The mitigation plan shall be developed and implemented in consultation with the consulting Tribe(s) and shall prioritize avoidance of the resources. If avoidance is not feasible, the plan shall identify appropriate culturally sensitive treatment measures in coordination with the consulting Tribe(s). Such measures may include, but are not limited to, protection of the cultural character and integrity of the resources, protection

3. REVISIONS TO THE DRAFT EIR

of traditional uses, confidentiality of sensitive information, or heritage recovery. The City/~~the~~Tribe(s) may require tribal or other qualified cultural resource monitors during construction to ensure that resources are properly identified and protected.

Documentation of consultations, treatment measures, and resource protection actions shall be maintained in the project record. Ground-disturbing activities within the buffer area shall not resume until the resource has been evaluated and appropriate treatment measures, developed in consultation with the Tribe(s), have been approved by the City and implemented. Work may proceed on other parts of the project site while mitigation for TCRs is being carried out.

SECTION 3.15, PUBLIC SERVICES, PARKS, AND RECREATION

In response to Comment Letter A2, the following text under the “Livermore Valley Joint Unified School District subheading in Section 3.15.2, *Existing Conditions*, on pages 3.15-11 and 3.15-12 of the Draft EIR, is hereby amended as follows:

The LVJUSD serves more than 13,050 students from transitional kindergarten through 12th grade at ~~10-9~~ elementary campuses, 2 TK-8 schools, 3 middle schools, ~~3-2~~ comprehensive high schools, and 2 alternative schools. These schools offer specialized programs, including International Baccalaureate Programs; Green Engineering Academy; Dual Immersion Programs; and Science, Technology, Engineering, Arts, & Math (STEAM) pathways. The school names, student enrollment, and school capacity of each school are shown in Table 3.15-3, *Livermore Valley Joint Unified School District Schools*.

Table 3.15-3 Livermore Valley Joint Unified School District Schools

Schools	Student Enrollment	School Capacity	Student Enrollment of School Capacity
Altamont Creek Elementary	620	680	91%
Arroyo Seco Elementary	584	708	82%
Christensen Elementary Middle School	592	965	61%
Del Valle High	87	185	47%
East Avenue Middle School	581 <u>629</u>	725	80% <u>87%</u>
Emma C. Smith Elementary	648	744	87%
Granada High School	2,157	2,850	76%
Jackson Avenue Elementary	489 <u>503</u>	668	73% <u>75%</u>
Joe Michell (TK-8)	786 <u>800</u>	795	99% <u>100%</u>
Junction Avenue (TK-8)	801	1,125	71%
Lawrence Elementary	494	520	95%

3. REVISIONS TO THE DRAFT EIR

Table 3.15-3 Livermore Valley Joint Unified School District Schools

Schools	Student Enrollment	School Capacity	Student Enrollment of School Capacity
Leo R. Croce Elementary	537 <u>630</u>	828	65% <u>76%</u>
Livermore High School	1,827	2,325	79%
Livermore Adult Education	160	384	42%
Marylin Avenue Elementary	430 <u>441</u>	525	82% <u>84%</u>
Rancho Las Positas Elementary	586 <u>612</u>	630	93% <u>97%</u>
Sunset Elementary	759 <u>775</u>	796	95% <u>97%</u>
Vineyard Alternative School	92	384	25%
William Mendenhall Middle School	876	1,175	75%

Source: LVJUSD 2025.

Schools in the LVJUSD are operating within the existing capacity; however, there are five schools at or close to meeting school capacity: Altamont Creek Elementary, Joe Mitchell (TK-8), Lawrence Elementary, Rancho Las Positas Elementary, and Sunset Elementary. As of the 2024-25 school year, these schools have over a 90-percent student enrollment to school capacity ratio. Capacity is regularly reviewed and adjusted as changes in program impact the number of students that can be served.

Funding

LVJUSD funding primarily comes from the State Local Control Funding Formula, property taxes, federal revenue, other state revenue, Measures J and G, and other local revenue (City of Livermore 2022). Approximately 80 percent of the school district's funding is from state revenue

The Livermore community has financially supported students in the LVJUSD through the passage of Measure J, a general obligation bond, and Measure G, a parcel tax. Measure J, the facilities bond provides financial support to upgrade school sites, and create infrastructure and systems needed to outfit twenty-first century classrooms to maximize student success. At the time of Draft EIR publication, LVJUSD noted that Measure J funds were nearly exhausted. Measure G, the parcel tax enhances STEAM programs and opportunities funds elementary school specialists who deliver hands-on lab experiences for students, supports the Project Lead the Way program throughout K-12 grade levels. These programs incorporate computer science, design, and engineering experiences and engage all age groups in captivating curriculum.

3. REVISIONS TO THE DRAFT EIR

SECTION 3.16, TRANSPORTATION

In response to Comment Letter A1, the following text is hereby added as the last paragraph under the California Complete Streets Act subheading in Section 3.16.1, *Regulatory Framework*, on page 3.16-3 of the Draft EIR:

In December 2021, Director’s Policy 37 was adopted which establishes an implementation structure to streamline complete street projects. This policy also stipulates that all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved. This policy supersedes Deputy Directive 64-R1 and carries forward its goals of creating a safe and reliable transportation network.

In response to Comment Letter A1, the following text is hereby added after the Senate Bill 743 subheading in Section 3.16.1, *Regulatory Framework*, on page 3.16-4 of the Draft EIR:

Caltrans District 4 Pedestrian Plan

Adopted in 2021, the Caltrans District 4 Pedestrian Plan for the Bay Area identifies pedestrian needs on Caltrans roadways in District 4. This plan analyzes the frequency and quality of crossing opportunities, as well as sidewalk coverage and conditions. Needs were then prioritized and areas for improvement were identified. The next steps in the plan include leveraging local partnerships and identifying and initiating projects.

Caltrans Bay Area Bike Plan

Updated in 2025, the Caltrans Bay Area Bike Plan intends to use complete streets concepts to address the needs and mobility of all travel modes, with a specific focus on bicycling along, across, and parallel to the State Highway System. The plan provides a framework for identifying, prioritizing, and implementing bicycle infrastructure improvements on approximately 1,400 centerline miles of state highways across the nine-county Bay Area. The plan also identifies a prioritized list of location-based needs, needs for crossing highways, and needs for traveling along highways, based on three equally weighted metrics: safety (severity-weighted crash density), mobility (short-trip density, transit proximity, network connectivity), and equity (MTC Equity Priority Communities and CalEnviroScreen-designated Disadvantaged Communities).

3. REVISIONS TO THE DRAFT EIR

SECTION 3.17, UTILITIES AND SERVICE SYSTEMS

To correct a typographical error, Table 3.17-3, *Zone 7 Water Agency Projected Supply and Demand for Years 2025-2045*, on page 3.17-33 of the Draft EIR, is hereby amended as follows:

Table 3.17-3 Zone 7 Water Agency Projected Supply and Demand for Years, 2025-2045

	AFY				
	2025	2030	2035	2040	2045
Normal Year					
Supply Total	76,700	90,700	84,700	83,200	83,200
Demand Total	50,300	52,800	53,800	55,300	55,300
<i>Surplus</i>	<i>26,400</i>	<i>37,900</i>	<i>30,900</i>	<i>27,900</i>	<i>27,900</i>
Single Dry Year					
Supply Total	65,600	92,100	94,200	92,500	92,300
Demand Total	50,300	52,800	53,800	55,300	55,300
<i>Surplus</i>	<i>15,300</i>	<i>39,300</i>	<i>40,400</i>	<i>37,200</i>	<i>37,000</i>
Multiple Dry Years					
First Year					
Supply Total	89,200	116,600	118,500	117,100	116,800
Demand Total	50,300	52,800	53,800	55,300	55,300
<i>Surplus</i>	<i>38,900</i>	<i>63,800</i>	<i>64,700</i>	<i>61,800</i>	<i>61,500</i>
Second Year					
Supply Total	74,800	105,800	108,000	106,600	106,800
Demand Total	51,700	53,360	54,200	55,300	55,300
<i>Surplus</i>	<i>23,100</i>	<i>52,440</i>	<i>53,800</i>	<i>51,300</i>	<i>51,500</i>
Third Year					
Supply Total	69,100	100,600	102,700	102,300	102,300
Demand Total	52,000	53,520	54,400	55,300	55,300
<i>Surplus</i>	<i>17,100</i>	<i>47,080</i>	<i>48,300</i>	<i>47,000</i>	<i>47,000</i>
Fourth Year					
Supply Total	63,600	96,700	99,500	98,900	99,200
Demand Total	52,250	53,580	54,700	55,300	55,300
<i>Surplus</i>	<i>11,350</i>	<i>43,120</i>	<i>44,800</i>	<i>43,600</i>	<i>43,900</i>

3. REVISIONS TO THE DRAFT EIR

Table 3.17-3 Zone 7 Water Agency Projected Supply and Demand for Years, 2025-2045

	AFY				
	2025	2030	2035	2040	2045
<i>Fifth Year</i>					
Supply Total	58,200	94,100	96,500	95,900	96,100
Demand Total	52,500	53,740	55,000	55,300	55,300
<i>Surplus</i>	<i>5,700</i>	<i>40,360</i>	<i>41,500</i>	<i>40,600</i>	<i>40,800</i>

Source: Zone 7 Water Agency 2021a.

Note: AFY = acre-feet per year

CHAPTER 4, ALTERNATIVES

To provide clarification, the last paragraph under Section 4.5, *Alternative A: No Project Alternative*, on page 4-8 of the Draft EIR, is hereby amended as follows:

As shown in Table 4-1, Alternative A would result in ~~less residential and fewer housing units and jobs but greater~~ population growth when compared to the proposed Project, ~~but higher job growth since the existing General Plan would continue the nonresidential land use designations in the Midtown Specific Plan Area and Vasco Row area. The existing General Plan overestimated job growth and the projections for the proposed Project are based on the past 20 years of data and are more realistic.~~

Table 4-1 Projected Buildout Under the Proposed Project and Alternative A

Category	Proposed Project	Alternative A: No Project	Difference between Proposed Project and Alternative A
Housing Units	49,640	48,078	1,562 less fewer housing units
Total Population	131,750	136,079	4,329 more people
Jobs	63,330	62,499	831 less fewer jobs

Source: Kittelson and Associates Inc. 2023.

Note: Numbers are rounded from original sources. Under Alternative A, when compared to the proposed Project, there would be more people but less housing units and jobs. This reflects the demographic assumptions embedded in the traffic modeling database, which assigns different average household sizes to different residential categories.

3. REVISIONS TO THE DRAFT EIR

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