CEQA ENVIRONMENTAL CHECKLIST FORM

1.	**Project Title:**	North Richmond Two-Lot Subdivision and Nanawall Warehouse/Manufacturing Development Plan (County Files #CDMS23-00020 & CDDP23-03051)
2.	**Lead Agency Name and Address:**	Contra Costa County Department of Conservation and Development 30 Muir Road Martinez, CA 94553
3.	**Contact Person and Phone Number:**	Grant Farrington, Project Planner (925) 655-2868
4.	**Project Location:**	0 Brookside Drive Richmond, CA 94801 Assessor Parcel No. 408-201-042
5.	**Project Sponsor's Name and Address:**	Todd Wright 1529 Solano Avenue, Suite 519 Berkeley, CA 94707
6.	**General Plan Designation:**	Light Industry (LI)
7.	**Zoning:**	Planned Unit District (P-1)

8. **Description of Project:** The applicant is requesting approval of a Vesting Tentative Subdivision Map for a two-lot subdivision of a vacant 7.23-acre parcel into a 2.92-acre Parcel "A" and a 4.61 acre Parcel "B". Parcel "A" is to be accessed from Brookside Drive and Parcel "B" is accessed by easements across Parcel "A" and APN 409-320-037, an adjacent parcel to the east that is developed with an existing manufacturing and warehousing facility for Nana Wall Systems, Inc. ("NanaWall"). The project also includes a lot line adjustment with APN 409-320-037which will reduce the size of the affected parcel from 3.27 acres to 2.94 acres.

The applicant has also submitted a development plan application for the construction of two warehousing and manufacturing buildings on the project site to be 94,444 square feet and 36,129 square feet respectively with deviations to the maximum height and lot coverage allowed for the North Richmond planned unit district. The development will include frontage improvements, new drive aisles and parking areas as well as new landscaping, totaling approximately 66,702-square-feet. A tree permit for the removal of 13 code-protected trees, the relocation of one code-protected tree and work within the dripline of two code-protected trees is included with this project. The minor subdivision of land, lot line adjustment, development plan and tree permit shall be referred to as "the project" in this initial study.

9. **Surrounding Land Uses and Setting**:

Surrounding Area: The subject property is located along the northern side of Brookside Drive in the Richmond area of unincorporated Contra Costa County where land uses are primarily industrial, with some undeveloped parcels and riparian areas. The Richmond city limit is located approximately 0.13 miles east and 0.08 miles north of the project site and the San Pablo city limit is approximately 0.24 miles to the east. Parcels in the immediate vicinity have all been developed with predominantly industrial uses

with some residential and agricultural uses as well. Beyond the immediate vicinity, lots have been developed with single- and multi-family residential, institutional and commercial uses.

Subject Property: The project site is a 7.226-acre vacant lot that abuts Brookside Drive to the south and San Pablo Creek to the north. The project site is predominantly flat and has several code-protected trees on the lot.

10. Other public agencies whose approval is required (e.g., permits, financing, approval, or participation agreement:

- Contra Costa County Public Works Department
- Contra Costa County Building Inspection Division
- Contra Costa County Fire Protection District
- East Bay Municipal Utility District
- West County Wastewater District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

A "Notice of Opportunity to Request Consultation for Two-Lot Subdivision of 7.23 Acre Parcel and Warehouse and Manufacturing Development Plan Project" was sent to the Wilton Rancheria and Confederated Villages of Lisjan on April 22, 2025. Staff received a request for consultation from the Confederated Villages of Lisjan which commenced on June 18, 2025, and concluded on May 6, 2026.

Environmental Factors Potentially Affected

Without mitigation, the environmental factors checked below would have been potentially affected by this project. Upon incorporation of the mitigation measures identified in the following pages it has been found that the project will not result in any impacts to the environment.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☒ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☒ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Services Systems	☐ Wildfire	☒ Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

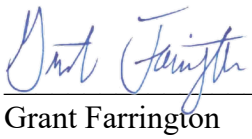
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

☐ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.



10/5/26

Grant Farrington
Planner III
Contra Costa County
Department of Conservation & Development

Date

ENVIRONMENTAL CHECKLIST

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
1. *AESTHETICS* – *Except as provided in Public Resources Code Section 21099,* ***would the project:***				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

SUMMARY:

a) *Would the project have a substantial adverse effect on a scenic vista?*

No Impact: The Conservation, Open Space, and Working Lands Element of the County General Plan identifies major scenic ridges, highways, and routes within the county as shown in Figure COS-12. The project site is located approximately 2.46 miles to the west of a designated scenic ridgeline identified as the Mccosker Trail. The primary viewshed of the Mccosker Trail is to the east and south. In addition, due to the presence of the existing development, natural topography and mature trees, the subject lot is not visible from this ridgeline. Thus, the project will not impact the viewshed of the nearest scenic ridge or any scenic vistas.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?*

Less Than Significant Impact: There are no major rock outcroppings on the subject property and the project is not located within a state scenic highway that would impact a historic building. The site plan identifies several groupings of trees located near the western property line and the project will impact the existing trees on the property. Per the Arborist Report prepared by a licensed arborist, the development of the project site would require removal of 13 code-protected trees and work within the dripline of 3 code-protected trees. However, the findings for granting a tree permit for the removal and work within the dripline of code-protected trees have been established due to trees being in poor health and reasonable development of the property requiring the removal of the trees per Division 816 of the Contra Costa County Ordinance Code. Thus, the project would have less than a significant impact on any scenic resources.

c) *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are*

experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact: The subject property is within a planned unit (P-1) zoning district and the surrounding area is predominantly urban and developed with industrial uses as well as adjacent compatible land uses in the vicinity. The P-1 zoning district does not have any regulations or restrictions regarding scenic quality. Thus, there is no impact with regards to scenic quality.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact with Mitigation: The project includes the subdivision of the existing lot into two new parcels and the subsequent development of the lots into two warehouse and manufacturing facilities. The proposed development is typical of other industrial buildings in the immediate vicinity with limited new sources of glare and light, predominantly during the dusk and evening hours of any given day as a result of the new construction. The implementation of the following mitigation will ensure that any project-related impacts to aesthetics will be less than significant.

Potential Impact

The project will generate limited new sources of light and glare in the immediate vicinity that could potentially have a significant impact unless mitigated. The following mitigation measures will ensure these impacts are less than significant.

AES-1: At least 30 days prior to the issuance of a building permit, the applicant shall submit for review and approval of the Department of Conservation and Development, Community Development Division (CDD) a Lighting Plan for the proposed development. The lighting Plan The lighting plan shall include diagrams of outdoor lighting fixtures no higher than 25 feet in total height with shrouds to eliminate lighting that may fall onto adjacent properties and the San Pablo Creek riparian area. The plan shall comply with the California Energy Commission Building Energy Efficiency Standards and include a photometric site plan to verify that all new lighting remains on the project site with no more than 1.4 foot-candles of illuminance at the property line adjacent to the San Pablo Creek.

Sources of Information

Contra Costa County 2045 General Plan. "Chapter 7: Conservation, Open Space, and Working Lands Element." https://www.contracosta.ca.gov/DocumentCenter/View/84948/Chapter-7--Conservation-Open-Space-and-Working-Lands-Element-PDF

HortScience / Bartlett Consulting. *Preliminary Arborist Report, 611 Brookside Drive Richmond, CA.* August 2022.

Contra Costa County Ordinance Code. Division 816 – Trees. https://library.municode.com/ca/contra_costa_county/codes/ordinance_code?nodeId=TIT8ZO_DIV816TR

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
2. *AGRICULTURAL AND FOREST RESOURCES – Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which due to their location or nature, could result in conversion of farmland, to non-agricultural use?	☐	☐	☐	☒

SUMMARY:

a-e) *Would the project:*

Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

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

Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)?

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

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

No Impact: The project site is located in an area that is defined as Urban and Built-Up as shown on the California Department of Conservation's *California Important Farmland 2022* map. The site is not under a Williamson Act contract with the County. Additionally, the project site is not considered forest land as defined by California Public Resources Code Section 12220(g) or

timberland as defined by California Public Resources Code Section 4526. Therefore, the project will have no impact on agricultural or forest resources.

Sources of Information

California Department of Conservation, *California Important Farmland Finder*. https://maps.conservation.ca.gov/dlrp/ciff/

Contra Costa County 2045 General Plan. "Chapter 7: Conservation, Open Space, and Working Lands Element." https://www.contracosta.ca.gov/DocumentCenter/View/84948/Chapter-7--Conservation-Open-Space-and-Working-Lands-Element-PDF

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

SUMMARY:

a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Less Than Significant Impact: Contra Costa County is within the San Francisco Bay air basin, which is regulated by the Bay Area Air Quality Management District (BAAQMD) pursuant to the *Bay Area 2017 Clean Air Plan*. The purpose of the *Clean Air Plan* is to bring the air basin into compliance with the requirements of Federal and State air quality standards and to protect the climate through the reduction of criteria pollutants and greenhouse gases. The CEQA Guidelines support lead agencies in analyzing air quality impacts. If, after analysis, the project's air quality impacts are found to be below the significant thresholds, then the air quality impacts may be considered less than significant. The potential air quality impacts for this project were evaluated using the BAAQMD 2017 CEQA guidelines screening criteria. Pursuant to these guidelines, if a project does not exceed the screening criteria size it is expected to result in less than significant impacts to air quality.

The operational criteria pollutant screening size for warehouses is 864,000 cumulative square feet and 541,000 square feet for general light industry. Thus, the proposed development would

be well below the BAAQMD screening criteria for this type of project. Therefore, the project would not be in conflict with the Clean Air Plan or obstruct its implementation.

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

Less Than Significant Impact: As discussed above, pursuant to BAAQMD screening criteria, the project is not expected to exceed the threshold for screening criteria for new warehouses or general light industry. Although the project could potentially contribute incrementally to the level of criteria air pollutants in the atmosphere with future development, the project would expectedly have a less than significant adverse environmental impact on the level of any criteria pollutant.

c-d) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

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

Less Than Significant Impact with Mitigation: As proposed, the project involves construction and grading activities which could result in localized emissions typical of light industrial projects. The proposed project will include conditions of approval related to construction activities in order to minimize the impact of any localized emissions on nearby parcels during the construction process. In addition, the project is not expected to produce any major sources of odor and the project is not located in area where impacts would impact a substantial number of people. Therefore, the implementation of the mitigations outlined below will ensure that the project-related impacts to air quality will be less than significant.

Potential Impact

Although temporary, during grading and construction activities, the project could have an adverse environmental impact on sensitive receptors. Consequently, the applicant is required to implement the following *Basic Construction Mitigation Measures* (BAAQMD) during construction in order to reduce impacts due to construction dust and exhaust to less than significant levels.

AIR-1: The following mitigations shall be included on all construction plans and implemented throughout the construction phase of the project:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

4. All vehicle speeds on unpaved roads shall be limited to 15 mph.

5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.

8. The property owner or site contractor shall post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

The Health and Safety Element of the Contra Costa General Plan identifies vehicle exhaust and particulate matter from industrial centers and diesel trucks as having a primary affect on air quality in Contra Costa County. Figure HS-1 of the Health and Safety Element identifies the North Richmond area, where the project is located, as a high percentile ranking of diesel particulate matter relative to the state. With additional truck trips to and from the project site, diesel particulate matter could increase in the North Richmond community which could expose sensitive receptors to these pollutants unless mitigated to less than significant levels.

Potential Impact

The project will introduce additional truck trips to and from the project site through the North Richmond community. Diesel particulate matter could increase in North Richmond beyond the project site unless otherwise mitigated.

AIR-2: Prior to the issuance of a building permit, the applicant shall submit a vehicular movement plan that identifies the following:

On-site zero-emission vehicle parking for all anticipated truck traffic to prevent idling and off-site queuing.

A list of yard equipment to be used on-site. The yard equipment is to be zero-emission and include but is not limited to forklifts, pallet trucks and jacks, and stackers.

Verification that all heavy-duty trucks to and from the project site are model year 2014 or later.

Sources of Information

Bay Area Air Quality Management District *CEQA Air Quality Guidelines*, 2017. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Contra Costa County 2045 General Plan. "Chapter 9: Health and Safety Element." https://www.contracosta.ca.gov/4732/General-Plan#docaccess-fcdd0c1d05846340a5123355cae55ce01033b3d6b9ccf471ddf43b0c4a253d97

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
4. *BIOLOGICAL RESOURCES – Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

SUMMARY:

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact: The project site is not located in a significant ecological area and according to the California Fish and Wildlife Public Access Lands Map, the project site is not indicated to include an area of wildlife or ecological reserve. Although the project site is currently vacant, the lot has previously been disturbed through the rerouting of Brookside drive and evidence of previous development activities. The lot has a General Plan designation of Light Industry which would remain with the approval of this project. Lots in the surrounding vicinity

have been developed with a variety of land uses and portions of the subject property have previously been improved prior to the relocation of Brookside Drive. Due to these cumulative land disturbances as well as the surrounding developments, no direct impacts to sensitive species are expected from this project. Therefore, there is a less than significant impact on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Less Than Significant Impact with Mitigation: As discussed in the previous section, the project site is not located in a sensitive area shown on the California Fish and Wildlife Public Access Lands Map and the project will not alter the existing zoning and land uses of the subject property. There are no identified creeks, drainage or protected wetlands on the project site however San Pablo Creek is located adjacent to the subject lot along the north side of the parcel within a designated Resource Conservation General Plan land use designation and includes a riparian habitat.

A biological resources report prepared by Hufman-Broadway Group, Inc. in 2017 for a development project at 506 Brookside Drive provided a biological survey of the site as well as the surrounding area to determine if development would result in potential impacts for the existing biological resources. The report concluded that although the environment is not conducive to special status plants and animals, existing grass vegetation and mature trees may impact nesting birds during migratory season. The project site is vacant and predominantly covered in grass vegetation, shrubs and several mature trees.

Potential Impact

Project related construction activities during bird nesting season may result in mortality of nesting birds unless mitigated to less than significant levels.

BIO-1: Within 15 days prior to the commencing of construction activities a qualified biologist should conduct a pre-construction breeding bird survey in areas of suitable habitat. If bird nests are found, appropriate buffer zones should be established around all active nests to protect nesting adults and their young from construction disturbance. Buffer zones should be maintained until it can be documented that either the nest has failed or the young have fledged.

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

Less Than Significant Impact: As discussed in the previous section, the project site is not located in a sensitive area shown on the California Fish and Wildlife Public Access Lands Map and the project is for the development of a vacant parcel in an established industrial corridor. There are no California Wetlands on the subject property as shown on the map from the U.S. Fish and Wildlife Service, Division of Habitat and Resource Conservation. The project site is adjacent to

the San Pablo Creek however no portion of the project will require construction activities outside the parcel which could impact the creek. Thus, the project is not expected to have any impact on sensitive natural communities or wetlands.

d) *Would the project 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 wildlife nursery sites?*

Less than Significant Impact with Mitigation: As discussed in Section B, the project site is located in an established industrial corridor however it is adjacent to San Pablo Creek and contains existing grass vegetation and mature trees which may impact nesting birds during migratory season. The project would remove the existing grasslands and mature trees on the lot. Therefore, the implementation of BIO-1 would reduce the impacts on migratory wildlife corridors to less than significant.

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

Less Than Significant Impact: The project site has several trees that are located on the subject lot and are currently protected per Chapter 816-6, Tree Protection and Preservation Ordinance due to the availability to subdivide the lot. An Arborist Report, prepared by a licensed arborist, assessed the health and suitability for preservation for all trees on the subject lot. The development of the subject lot requires the removal of 14 code-protected trees and this could not be reasonably accommodated elsewhere on the lot for this project. In addition, the arborist report does not indicate that the removal of the trees will affect the sustainability of the resource. A landscape plan has been submitted that includes the planting of 56 new trees as part of the development of the subject lot. With the required factors established for the removal of code-protected trees, the project does not conflict with the Tree Protection and Preservation Ordinance. Therefore, as conditioned, the project will have less than significant impact to tree resources in the County.

f) *Will the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact: The East Contra Costa County Habitat Conservation Plan/Natural Community Conservation Plan (ECCC HCP/NCCP) was adopted by the County in October of 2006. The purpose of this plan is to provide a framework to protect natural resources while streamlining the environmental permitting process for impacts to covered special status species within the rapidly expanding region of Eastern Contra Costa. The proposed project site is located outside of the HCP/NCCP urban development area and thus HCP ordinance no. 2007-53 does not apply to the project.

Sources of Information

California Department of Fish and Wildlife Lands. *Public Access Lands Map.* Accessed May 28,2026. https://apps.wildlife.ca.gov/lands/

Biological Resources Report 506 Brookside Drive, prepared by Huffman-Broadway Group, Inc. dated November, 2017.

Contra Costa County Ordinance Code. Division 816 – Trees. https://library.municode.com/ca/contra_costa_county/codes/ordinance_code?nodeId=TIT8ZO_DIV816TR

HortScience / Bartlett Consulting. *Preliminary Arborist Report, 611 Brookside Drive Richmond, CA.* August 2022.

HPA Architecture. *Nanawall Production Expansion, Preliminary Landscape Plan*. August 15, 2023.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
5. *CULTURAL RESOURCES – Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

SUMMARY:

a-c) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Would the project cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?

Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant With Mitigation: The Contra Costa County General Plan includes several goals and policies regarding cultural and archeological resources including taking necessary steps to preserve any known or unknown resources. A letter from the California Historical Resources Information System (CHRIS), dated January 2, 2024, references previous archeological studies conducted on the project site and a recorded Native American archeological site on the subject lot. Subsequently, a consultation with the Confederated Villages of Lisjan commenced on June 18, 2025 and concluded on May 7, 2026. During the consultation, an updated cultural resource inventory report, prepared by Archeological Resource Service, was submitted by the applicant which assessed the exact location of the resource on site. Chapter 7: Conservation, Open Space, and Working Lands Element of the County General Plan includes policies to identify and preserve known cultural resources. Therefore, the implementation of the mitigations outlined

below will ensure that project-related impacts to known and potentially unknown cultural resources will be less than significant.

Potential Impact

Upon approval of the project, the future development of the site could include ground disturbance which has the potential for uncovering previously unknown cultural resources. The following mitigation measures will ensure that, in the event cultural resources are discovered, the proper actions are taken to reduce the adverse environmental impacts to cultural resources to a less than significant level.

Mitigation Measures

CUL-1: Should archaeological materials be uncovered during grading, trenching, or other on-site excavation(s), all earthwork within 30 yards of the materials shall be stopped until a professional archeologist who is certified by the Society of Professional Archaeology (SOPA) has had an opportunity to evaluate the significance of the find, and, if deemed necessary, suggest appropriate mitigation(s).

CUL-2: If any significant cultural materials such as artifacts, human burials, or the like are encountered during construction operations, such operations shall cease within 10 feet of the find, the Community Development Division (CDD) shall be notified within 24 hours, and a qualified archaeologist contacted and retained for further recommendations. Significant cultural materials include, but are not limited to, aboriginal human remains, chipped stone, groundstone, shell and bone artifacts, concentrations of fire cracked rock, ash, charcoal, and historic features such as privies or walls and other structural remains.

CUL-3: If human remains are encountered, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Contra Costa County Coroner has been contacted, pursuant to Section 7050.5 of the California Health and Safety Code.

CUL-4: Appropriate mitigation of any discovered cultural resources may include monitoring of further construction and/or systematic excavation of the resources. Any artifacts or samples collected as part of the initial discovery, monitoring, or mitigation phases shall be properly conserved, catalogued, evaluated, and curated, and a report shall be prepared documenting the methods, results, and recommendations. The report shall be submitted to the Northwest Information Center and appropriate Contra Costa County agencies.

Sources of Information

Contra Costa County 2045 General Plan. "Chapter 9: Conservation, Open Space, and Working Lands Element." https://www.contracosta.ca.gov/4732/General-Plan#docaccess-b0d63753a3aeb493acdbe52ed92205ee11bdd9ac84c29685b26745ad5de9e5b1

California Historical Resources Information System. *CDDP23-03051; CDMS23-00020 / APN: 408201042 AT 0 Brookside Dr., Richmond / Todd Wright*. January 2, 2024.

Archeological Resource Service. *Archeological Resource Management Report for the Proposed Subdivision and Industrial Development Along Brookside Drive, Richmond, Contra Costa County, California (APN 408-201-042)*. March 16, 2026

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
6. *ENERGY – Would the project:*				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

SUMMARY:

a-b) *Would the project result in potential significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact: In November 2024, a Climate Action Plan (CAP) update was adopted by the Contra Costa County Board of Supervisors as part of the Contra Costa County 2045 General Plan adoption. The design and operation strategies set forth in the CAP for reducing GHG emissions include measures such as installing energy efficient finishing materials, roofing and lighting that would reduce the project's consumption of energy resources during operation. project will not conflict with the CAP or the County's goal of reducing GHG emissions. During construction, the project may require temporary electrical power. The General Contractor would be required to apply for a temporary power permit from the County and to comply will all applicable building standards for a temporary power connection. Therefore, the project, as conditioned, will not have a significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy.

Sources of Information

California Air Resources Board, *Assembly Bill 32 Overview* https://www.arb.ca.gov/cc/ab32/ab32.htm

California Energy Commission *2025 Building Energy Efficiency Standards* https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency*Climate Action and Adaption Plan 2024 Update,* Contra Costa County, 2024

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
7. *GEOLOGY AND SOILS – Would the project:*				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

SUMMARY:

a) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:*

i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less than Significant Impact: The California Division of Mines and Geology's Special Publication 42 indicates that the State Geologist is required to delineate "Earthquake Fault

Zones" (EFZs) along known active faults in California. The project site is not mapped within an EFZ, nor within an Alquist-Priolo Special Studies Zone however it is approximately within one mile of the Hayward Fault Seismic Hazard Zone. The U.S. Geologic Survey of Contra Costa County prepared by the Department of the interior identifies the subject lot as being flat land with no potential for the formation of slumps, translational slides, or earth flows which could otherwise contribute to the possibility of landslides. Therefore the project has a less than significant impact with respects to rupture of earthquakes or the presence of landslides.

ii) *Strong seismic ground shaking?*
iii) *Seismic-related ground failure, including liquefaction?*

Less Than Significant Impact with Mitigation: The U.S. Geological Survey (2016) indicates that there is a 72 percent chance of at least one magnitude 6.7 or greater earthquake striking the San Francisco Bay region between 2014 and 2043. With that, the County General Plan Health and Safety Element identifies areas that are more or less susceptible to seismic damage as shown in Figure HS-17 Earthquake Hazards. According to Figure HS-17, the subject property is located in an area where violent shaking hazard threats are present as a result of the proximity to the Hayward Fault. A geotechnical report dated April 6, 2023, was prepared for the project by Miller Pacific Engineering Group that assessed the site specific conditions and conducted field exploration and testing. The report referenced eight previous exploration borings and seven Cone-Penetration Tests (CPTs) on the subject lot as well as two new borings conducted by Miller Pacific. In addition, the project has been reviewed by the County Peer Review Geologist and a summary of the potential impacts is below:

- Seismic Shaking

The site will likely experience seismic ground shaking similar to other areas in the seismically active Bay Area. The intensity of ground shaking will depend on the characteristics of the causative fault, distance from the fault, the earthquake magnitude and duration, and site-specific geologic conditions. Estimate of peak ground accelerations are based on either deterministic or probabilistic methods. The Miller Pacific report includes a table (below) showing the deterministic peak ground accelerations for active faults.

Table 1 – Deterministic Peak Ground Accelerations for Active Faults

Fault	Moment Magnitude for Characteristic Earthquake	Closest Estimated Distance (km)	Median Peak Ground Acceleration (g)	Median PGA +1 Std Dev (g)
Hayward / Rodgers Creek	7.6	1.6	0.57	0.96
Concord	6.5	25.0	0.13	0.23

San Andreas	8.0	27.2	0.24	0.41
San Gregorio	7.4	29.0	0.17	0.31
Calaveras	7.4	31.9	0.16	0.29

The calculated accelerations should only be considered as reasonable estimates. Many factors (soil conditions, orientation to the fault, etc.) can influence the actual ground surface accelerations. Ground shaking can result in structural failure and collapse of structures or cause non-structural building elements (such as light fixtures, shelves, cornices, etc.) to fall, presenting a hazard to building occupants and contents. Compliance with provisions of the most recent California Building Code should result in structures that do not collapse in an earthquake. Damage may still occur, and hazards associated with falling objects or non-structural building elements will remain.

- Liquefaction and Related Effects

Liquefaction refers to the sudden, temporary loss of soil strength during strong ground shaking. The strength loss occurs as a result of the build-up of excess pore water pressures and subsequent reduction of effective stress. While liquefaction most commonly occurs in saturated, loose, granular deposits, recent studies indicate that it can also occur in materials with relatively high fines content provided the fines exhibit lower plasticity. The effects of liquefaction can vary from cyclic softening resulting in limited strain potential to flow failure which cause large settlements and lateral ground movements. Lateral spreading refers to a specific type of liquefaction-induced ground failure characterized primarily by horizontal displacement of surficial soil layers as a consequence of liquefaction of a subsurface granular layer. Lateral spreads generally move down gentle slopes or slip toward a free face such as an incised river channel.

Regional liquefaction hazard maps indicate the site is mapped with a zone of “very high” and “high susceptibility to liquefaction as shown in Figure HS-18A Liquefaction Susceptibility of the Health and Safety Element of the County General Plan. Based on the results of previous and more recent exploration, subsurface conditions at the project site are dominated by high plasticity clayey soils that are not susceptible to liquefaction. There are a few discontinuous seams and lenses of dense granular materials (typically representative of historic stream channels) at depths below 15 feet which may have a low to moderate susceptibility to liquefaction.

Liquefaction of deeper soils may be manifested in the form of settlement and/or damage to improvements at the ground surface. Considering the thick cap of non-liquefiable soils and the relatively thin and localized sand layers, even if assumed that liquefaction does occur in the deep sand layers, the analysis in the Miller Pacific report indicates the potential for damaging settlements to occur at the ground surface is low.

Based on the results of the subsurface exploration, laboratory testing, and engineering analyses, the Miller Pacific report concludes that the potential for damage to the proposed improvements due to liquefaction during a strong seismic event is low.

iv) *Landslides?*

No Impact: In a letter dated January 23, 2024, the County Geologist provided details on the potential for landslide hazards on the project site. Based on photointerpretive maps issued the United States Geological Survey (USGS) in 1975 for Contra Costa County, No landslides were present at that time. In addition, Figure HS-18B Landslide Hazards of the Health and Safety Element of the County General Plan does not show any new landslides formed since 1975. It should be recognized that the USGS map is not a substitute for a detailed site-specific investigation. Through boring and CPTs, the Miller Pacific report did not identify the presence of any landslide areas on the subject lot.

Potential Impact

Based on the preliminary assessment of Miller Pacific Engineering Group, there are potentially significant geologic/geotechnical impacts and seismic hazards including the potential for strong seismic shaking at the project site, induced settlement as a result of liquefaction, The significant adverse impact associated with strong seismic shaking is potential damage to structures and improvements unless actions are taken to reduce the adverse environmental impacts to this geologic hazard to a less than significant level.

Mitigation Measures

GEO-1: **Prior to recordation of the parcel map or CDD stamp-approval of plans for issuance of a grading or building permit, whichever is first,** the project proponent shall submit an updated, design-level geotechnical report to the County for review by the CDD and County Peer Review Geologist to confirm (or modify) the Geotechnical Study by Miller Pacific Engineering Group (dated April 6, 2023) and provide final design recommendations and specifications for site grading, drainage, and foundation design.

GEO-2: **Prior to CDD stamp-approval of plans for issuance of a grading or building permit, whichever is first,** the project geotechnical engineer(s) shall review grading, drainage, and foundation plans for consistency with recommendations in the updated, design-level geotechnical report, and issue a letter, providing comments on and confirming consistency of the plans with the geotechnical recommendations.

GEO-3: Structures are to be designed in conformance to the seismic provisions of the California Building Code (CBC). CBC coefficients and site values shown in Table 2 of the Miller Pacific geotechnical report shall be used to calculate the design base shear of the new improvements as applicable.

GEO-4: Where possible, the project is to utilize a rigid shallow foundation system. Rigid shallow foundations may include heavy-reinforced mat slab or continuous, interconnected footings with traditional slab-on-grade. The system shall be designed to bridge over 15-foot diameter areas on non-uniform support to minimize the effects of post-construction consolidation or seismic differential settlements. Design criteria for shallow foundation systems are to be found in Table 3 of the Miller Pacific geotechnical report.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Less Than Significant Impact with Mitigation: Sandy soils on most slopes or clayey soils on steep slopes are susceptible to erosion when exposed to concentrated surface water flow. The potential for erosion is increased when established vegetation is disturbed or removed during normal construction activity. As stated in the Biological Resources section, the project site is undeveloped and predominantly covered in grass vegetation, shrubs and several trees. The site is relatively level, and it is anticipated that much of the site will be covered with buildings, pavements, concrete flatwork, or landscaped grasses and shrubs. Therefore, erosion is not considered to be a significant long-term geologic hazard. However, care should be taken during construction to prevent excess erosion when the soils are exposed.

Potential Impact

During construction activities the project site may susceptible to erosion while the soils are exposed, which could result in a geological hazard unless actions are taken to reduce the adverse environmental impacts as a result of erosion to less than a significant level. Implementation of **GEO-1 and GEO-2** would ensure that any potential impacts regarding erosion would be reduced to less than significant levels.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact with Mitigation: As stated in the section above, the subject property is characterized by sandy and clayey soils as well as being located in an area that is highly prone to liquefaction during a seismic event. Borings and CPTs performed by Miller Pacific Engineering Group indicate that the expansive soils are present and settlement can also occur upon project completion. With the project resulting in the development of the subject property, the presence of the aforementioned geologic units and soils could result in hazards including liquefaction unless otherwise mitigated.

Potential Impact

With the proposed development on the project site, there is a potential for project impacts due to expansive soils and geological hazards. Implementation of **GEO-1** through **GEO-4** in subsection-a above would ensure that any potential impacts due to potential future liquefaction and soil instability would be reduced to a less than significant level.

d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less Than Significant Impact with Mitigation: Expansive soils will shrink and swell with fluctuations in moisture content and are capable of exerting significant expansion pressures on building foundations, interior floor slabs and exterior flatwork. Distress from expansive soil

movement can include cracking of brittle wall coverings (stucco plaster, drywall, etc.) racked door and/or window frames, uneven floors, and cracked slabs. Flatwork, pavements, and concrete slabs-on-grade are particularly vulnerable to distress due to their low bearing pressures.

The Miller Pacific report provided details on subsurface exploration and laboratory testing of the project site. The results indicate the surface (imported fill) layer at the site is a mixture of variable soil types and debris. Some of the fill material contains expansive soil. The risk of damage due to expansive soil movement is potentially moderate.

Potential Impact

Based on the preliminary assessment of Miller Pacific Engineering Group, the presence of expansive soil on the project site may result in damage to the proposed development unless actions are taken to reduce the adverse environmental impacts to this geologic hazard to a less than significant level.

Mitigation Measures

GEO-5: Site grading shall be performed under the planned buildings to remove the upper 36 inches of existing variable fill and native soils and replaced with compacted non-expansive fill. As an alternative, lime-cement treatment of the soils can be performed to reduce the expansion potential and improve stability. At least 18 inches of compacted non-expansive fill or lime-cement treated soil shall be applied to the proposed parking areas and driveways. Verification of such actions shall be provided to DCD prior to the development of any structures or paving of any driveway or parking areas.

e) No Impact: The subject property is within an area served by the Central Contra Costa Sanitary District. There will not be installation of a septic system as result of this project.

f) Less Than Significant Impact: The USDA NRCS soil survey for the area does not identify any unique geologic features which would be directly or indirectly destroyed by the project. No known paleontological resources are located at the project site and the area is characterized by sandy and clayey soils which are typical in the surrounding North Richmond area. There are no known paleontological resources located at the project site that would be designated as unique.

Sources of Information

California Division of Mines and Geology - *Special Publication 42.*
https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Publications/SP_042.pdf

California Department of Conservation. *California Earthquake Hazards Zone Map*.
https://maps.conservation.ca.gov/cgs/EQZApp/app/

Contra Costa County 2045 General Plan. "Chapter 9: Health and Safety Element."
https://www.contracosta.ca.gov/4732/General-Plan#docaccess-fcdd0c1d05846340a5123355cae55ce01033b3d6b9ccf471ddf43b0c4a253d97

United States Geologic Survey. *Earthquake Outlook for the San Francisco Bay Region 2014-2043.* August, 2016. https://pubs.usgs.gov/fs/2016/3020/fs20163020.pdf

Miller Pacific Engineering Group. *Geotechnical Investigation Seaver Enterprises, LLC Nanawalls Expansion Richmond, California*. April 6, 2023.

United States Department of Agriculture, Natural Resources Conservation Service. *Web Soil Survey Map*. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
8. *GREENHOUSE GAS EMISSIONS – Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

SUMMARY:

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

Less Than Significant Impact with Mitigation: As discussed in the Air Quality section of this study, the Bay Area Air Quality Management District (BAAQMD) adopted the *Bay Area 2017 Clean Air Plan* that, in addition to various criteria air pollutants, addresses GHG emissions at a regional scale. The project would be subject to the operational criteria pollutant screening as well as the construction-related screening sizes; however, the amount generated would not result in a significant adverse environmental impact. This determination has been made using the screening criteria provided in the 2017 BAAQMD CEQA Guidelines. The screening criteria are not thresholds of significance but were developed to provide a conservative indication of whether a proposed project could result in potentially significant air quality impacts. Pursuant to these guidelines, the project would be significantly less than the 72-acre and 1249 employee Operational GHG Screening Sizes as well as the 11-acre and 549 employee Construction-Related screening sizes. Thus, the potential future development is not expected to result in significant environmental impacts relating to the generation of GHG.

As stated in the Air Quality Section above, the project will result in additional truck trips to and from the project site, which is located in an area with a 70% diesel particulate matter ranking relative to the state. Even though the total number of trips generated by the project would be 89/97 peak hour trips, thus under the threshold of 100 or more peak hour trips required for a traffic analysis, the truck trips may result in an increase in greenhouse gas emissions in this area to a significant level unless otherwise mitigated. The mitigation measures listed in AIR-2 are satisfactory to reduce greenhouse gas emission levels to less than significant. Therefore, this project would expectedly have a less than significant impact with mitigation respect to the generation of GHG.

b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less Than Significant Impact: Within the *2017 Clean Air Plan* is an ambitious GHG reduction target to reduce Bay Area GHG emissions to 80% below 1990 levels by the year 2050. The 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors – reactive organic gases (ROG) and nitrogen oxides (NO_x) – and reduce transport of ozone and its precursors to neighboring air basins. In addition, the plan builds upon and enhances BAAQMD's efforts to reduce emissions of fine particulate matter and toxic air contaminants. BAAQMD's approach to developing a threshold of significance for GHG emissions is to identify emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions. For land use development projects, the threshold is 1,100 metric tons per year (MT/yr) of CO_2e. If a project would generate GHG levels above the threshold, it would be considered to contribute substantially to a cumulative impact and would be considered significant. The proposed project would not exceed the 72-acre and 1249 employee screening sizes of operating screening criteria. Therefore, the project would not substantially conflict with policies or regulations within the *2017 Clean Air Plan*.

Sources of Information

Bay Area Air Quality Management District *CEQA Air Quality Guidelines*, 2017. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
9. *HAZARDS AND HAZARDOUS MATERIALS – Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☐	☒

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

SUMMARY:

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

b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less Than Significant Impact: The project will expand the existing NanaWall facility on the adjacent parcel to the east. No substantial amounts of hazardous materials are used on the site and the project does not propose any use that involves the use, transport, or disposal of a significant amount of hazardous materials. Although glass production can produce hazardous waste materials, no glass is to be manufactured on the project site. Small quantities of commercially available hazardous materials may be used for cleaning and general maintenance purposes as well as the potential for landscape maintenance however, these materials would not be used in sufficient quantities to pose a threat to human or environmental health. Any potential future changes to the land uses on the project site would be subject to the provisions and standards of Chapter 84-63 Land Use Permits for Development Projects Involving Hazardous Waste or Hazardous Material of the Contra Costa County Ordinance Code.

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

Less Than Significant Impact: One school, Verdi Elementary School, is located approximately 0.25 miles from the project site. No hazardous materials are proposed to be used on the project site as a result of the project. The primary method of manufacturing utilizes electrical power for material assembly with little to no emissions or waste resulting from daily operations. Therefore, the project will have a less than a significant impact on hazardous emissions and the handling of hazardous materials, substances, or waste within one-quarter mile of Verdi Elementary school.

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

No Impact: The California Environmental Protection Agency maintains an updated list of Hazardous Waste and Substance Sites (Cortese List). The subject property is not listed on the Cortese List and is not categorized as a hazardous materials site. Therefore, the project will have no impact in this respect.

e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact: There are no airports in the vicinity of the project site and therefore, no impact.

f) *Would the project impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact: The project is located on Brookside Drive in the unincorporated North Richmond area of Contra Costa County. According to Figure HS-19 of the Health and Safety Element of the General Plan, Brookside Drive is identified as a minor road for the purposes of evacuation routes within Contra Costa County. The project would not interfere with the existing infrastructure of Brookside Drive and any future development would not be significant enough to require a transportation analysis for the purpose of emergency response and evacuation plans. The project will not impact the minimum sight distances for vehicles entering and exiting the site. The project will not affect any existing communication/utility structures such as power poles or telecommunications towers, which may be necessary for an existing emergency response or evacuation plan. Accordingly, the project would have a less than significant impact on emergency response and emergency evacuation plans.

g) *Would the project expose or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires*

Less Than Significant Impact: The project site is an urbanized developed industrial area and the parcel as well as the surrounding area is characterized as a Non-Wildland Severity Zone within a Local Responsibility Area on the California Department of Forestry and Fire Protection Fire and Resource Assessment Program map for Contra Costa County. The area is served by the Contra Costa County Fire Protection District (CCCFPD). CCCFPD staff has previously reviewed the project and provided no comments regarding the project as it relates to wildfire risk. Separate approval of the proposal by the CCCFPD will be required prior to the issuance of building permits. CCCFPD approval of the project ensures a less than significant risk of loss, injury, or death involving wildland fire.

Sources of Information

Contra Costa County Ordinance Code. Chapter 84-63 – Land Use Permits for Development Projects Involving Hazardous Waste or Hazardous Material.

https://library.municode.com/ca/contra_costa_county/codes/ordinance_code?nodeId=TIT8ZO_DIV84LAUSDI_CH84-63LAUSPEDEPRINHAWAHAMA

California Department of Toxic Substances Control EnviroStor. *Hazardous Waste and Substances Site List*. https://www.envirostor.dtsc.ca.gov/public/search.asp

Contra Costa County 2045 General Plan. "Chapter 9: Health and Safety Element." https://www.contracosta.ca.gov/4732/General-Plan#docaccess-fcdd0c1d05846340a5123355cae55ce01033b3d6b9ccf471ddf43b0c4a253d97

California Department of Forestry & Fire Protection, Fire and Resource Assessment Program. *Contra Costa County Very High Fire Hazard Severity Zones* https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
10. *HYDROLOGY AND WATER QUALITY – Would the project:*				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

SUMMARY:

a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Less Than Significant Impact: The proposed project must comply with applicable Contra Costa County C.3 requirements. Contra Costa County, the Contra Costa County Flood Control and Water Conservation District, and 16 incorporated cities in the County have formed the Contra Costa County Clean Water Program. In October of 2023, the Regional Water Quality Control Board (RWQCB) adopted the third reissuance of the National Pollutant Discharge Elimination System (NPDES) Municipal Regional Permit for the Program, which regulates discharges from municipal storm drains. Provision C.3 of the Municipal Regional Permit places requirements on site design to minimize creation of impervious surfaces and control stormwater runoff. The County has the authority to enforce compliance with its Municipal Regional Permit through the County's adopted C.3 requirements. The C.3 requirements stipulate that projects creating and/or redeveloping at least 10,000 square feet of impervious surface shall treat stormwater runoff with permanent stormwater management facilities, along with measures to control runoff rates and volumes. The project site is served the East Bay Municipal Utility District (EBMUD) and the West County Wastewater District (WCWD). EBMUD and WCWD staff were provided a copy of the project plans and have indicated that service for the proposed warehousing and manufacturing facilities is available and will provide water and sanitary services that are compliant with current standards. Therefore, the possibility of the project violating any water quality standards or waste discharge requirements or otherwise substantially degrading surface or ground water quality is less than significant.

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

Less Than Significant Impact: As stated in the section above, the subject property presently receives water service from EBMUD and CCWD. CCWD and EBMUD staff have reviewed the project and did not indicate any concerns with the increased municipal water service to the subject property. Therefore, there is less than significant potential for the project to substantially decrease groundwater supplies, interfere with groundwater recharge, or impede sustainable groundwater management of the basin. Furthermore, there is no evidence in the record that the project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

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

Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact: The project includes new impervious surface for off-street parking and associated development. Therefore, the project has the potential to alter the existing drainage patterns on site, however the plans include the implementation of three bioretension areas at the north and south of the project site. The Contra Costa County Public Works (PW) department has reviewed the project including the preliminary Stormwater Control Plan (SWCP) prepared by

David R. Brown and adobe associates, inc. The SWCP provides for maintenance requirements of the bioretension areas in order to prevent erosion on the project site. PW staff has also required as a condition of approval that the applicant submit a final SWCP for their review and approval prior to the issuance of a building permit. Thus, with compliance of Title 9 of the County Ordinance code, the project is anticipated to have less than a significant impact on substantial erosion or siltation on- or off-site.

Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact: As stated above, the project proponent has submitted a preliminary SWCP that is satisfactory and PW staff has issued conditions of approval for the project that includes the submittal of a final SWCP that further addresses stormwater management, discharge and pollutants prior to the issuance of a building permit. With the implementation of these conditions of approval, the project will have less than a significant impact on the rate or amount of surface runoff in a manger which would result in flooding on- or off-site.

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

Less Than Significant Impact: The project is located at site which has an existing drainage pattern towards Drainage Area 19A Line B along Brookside Drive to flow west until it turns north at Fred Jackson Way to outflow into San Pablo Creek. The proposed bioretension areas will maintain this existing drainage pattern and a final SWCP is required to be reviewed and approved by PW prior to the issuance of a building permit. The final SWCP shall comply with all National Pollutant Discharge Elimination System (NPDES) and Stormwater Management and Discharge Control Ordinance requirements. With these implementations, the project will have less than a significant impact on existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff.

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

No Impact: The project site is not located within a 100-year or 500-year flood plain as determined by the Federal Emergency Management Agency. Brookside Drive in the North Richmond area is not included in tsunami inundation areas identified by the California Geological Survey (CGS) hazard maps. According to the Health and Safety Element of the County General Plan, the project site is not located in a hazard zone for mudflows. A seiche is a water wave in a standing body of water such as a large lake or reservoir that is caused by an earthquake, a major landslide, or strong winds. This hazard does not exist within the North Richmond area as there are no large lakes or reservoirs in the area. As such, there would be no risk of pollutants being released from the site due to inundation through flooding, tsunamis, mudflows, or seiche, therefore, there would be no impact in this regard.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact: As stated above, the project proponent has submitted a preliminary SWCP that has been reviewed by PW. PW has issued conditions of approval for the proposed project that includes submittal of a final SWCP to be reviewed and approved prior to the issuance of a building permit. No portion of the project would prevent the implementation of the SWCP. Therefore, the project would have less than a significant impact on the implementation of a water quality control plan or sustainable groundwater management plan.

Sources of Information

Contra Costa Clean Water Program, *C3 Guidance: Development,* https://www.cccleanwater.org/construction-business/development

East Bay Municipal Utility District. *Review of Agency Planning Application*. January 2, 2024.

West County Wastewater District. *CDDP23-03051/CDMS23-00020 0 Brookside Drive, Richmond, CA 94801*. December 6, 2023.

David R. Brown, adobe associates, inc. *Stormwater Control Plan For NanaWall Production Expansion.* August 15, 2023.

Contra Costa County Public Works *Development Plan Permit DP23-3051 / Subdivision MS23-0020 Staff Report & Recommended Conditions of Approval* dated November 27, 2024.

Contra Costa County Tsunami Hazard Areas, California Department of Conservation, 2021. *https://www.conservation.ca.gov/cgs/tsunami/maps/contra-costa*

Contra Costa County 2045 General Plan. *Health and Safety Element.* https://www.contracosta.ca.gov/4732/General-Plan#docaccess-fcdd0c1d05846340a5123355cae55ce01033b3d6b9ccf471ddf43b0c4a253d97

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
11. *LAND USE AND PLANNING – Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

SUMMARY*:*

a) Would the project physically divide an established community?

No Impact: The project site is located in an established light industrial corridor of North Richmond. The project would not alter the existing land use and thus not divide the established community.

b) *Would the project cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant Impact: The project is subject to the land use plans and policies below:

Land Use Element

The subject property is in a Light Industry (LI) General Plan land use designation. The proposed uses of the project are permitted in LI land use designations and will not alter or conflict with the land use with regards to normal operation in the proximity to residences or other sensitive receptors.

Zoning

The project is located in the North Richmond Planned Unit (P-1) district. Per the North Richmond Land Use Matrix, warehousing and manufacturing are permitted uses with administrative review in Light Industry General Plan land use designation areas.

Therefore, the project has less than significant potential for conflict with any applicable land use, policy, General Plan, Specific Plan, or zoning ordinance adopted for the purpose of avoiding or mitigating an environmental effect.

Sources of Information

Contra Costa County 2045 General Plan. *Land Use Element.* https://www.contracosta.ca.gov/4732/General-Plan#docaccess-c37311ec987ce1266579e21b692a936e9af3155a6d7b6bf095797304c7ee9382

Contra Costa County Zoning Code and Area Wide Planned Unit Development Plans. *North Richmond Land Use Matrix*. https://www.contracosta.ca.gov/4736/Zoning-Code-and-Area-Wide-Planned-Unit-D#docaccess-1f5358292413fd500224fa583d50e219288ada0d9a98afbbe360c0010e5c797d

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
12. *MINERAL RESOURCES – Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐

SUMMARY:

a-b) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Less Than Significant Impact: Pursuant to Figure COS-13 (Mineral Resource Areas) of the County General Plan Conservation Element, the project site is not located within any area of the County identified as a significant mineral resource area. No known mineral resources have been identified in the project vicinity, and there is no reason to believe that they exist at the project site. Therefore, the project would have a less than significant potential for impacts resulting in the loss of availability of any known mineral resource or impact any mineral recovery site.

Sources of Information

Contra Costa County 2045 General Plan. *Conservation, Open Space, and Working Lands Element.* https://www.contracosta.ca.gov/4732/General-Plan#docaccess-b0d63753a3aeb493acdbe52ed92205ee11bdd9ac84c29685b26745ad5de9e5b1

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

SUMMARY:

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

Less Than Significant Impact With Mitigation: The project site is located a Light Industry area of the North Richmond P-1 zoning district. According to Table HS-3, >81 decibels (dBA) can be

conditionally acceptable for industrial and manufacturing land use areas. The subject property and the surrounding area are currently experiencing noise levels in the 60 to 75 dB range due to other industrial activities in the area and rail traffic along the nearby Southern Pacific Railroad right of way. The nearest residential development is located approximately 1,300 feet to the east of the project site and is physically separated by the Southern Pacific Railroad right of way, several existing industrial buildings and the Giant Highway thoroughfare. At this distance, noise generated by on-site operations such as parking lot activities and deliveries would be negligible.

There may be a temporary increase in noise levels from the grading and construction phases for the project. The site is not in close proximity of residential areas however 60 decibel is the maximum noise level considered to be "Normally Acceptable" for residential land uses according to Table HS-3 of the Health and Safety Element.

Potential Impact

Construction equipment noise is measured at a higher decibel range than what is considered "Normally Acceptable" for residential land use areas. The project has the potential to increase beyond the "Normally Acceptable" noise limits for the surrounding areas unless mitigations are implemented.

Mitigation Measures

NOISE-1: The project contractor and/or developer shall comply with the following construction, noise, dust and litter control requirements:

1. The applicant shall require their contractors and subcontractors to fit all internal combustion engines with mufflers which are in good condition and shall locate stationary noise-generating equipment such as air compressors as far away from existing residences as possible.

2. The site shall be maintained in an orderly fashion. Following the cessation of construction activity, all construction debris shall be removed from the site.

3. A publicly visible sign shall be posted on the property with the telephone number and person to contact regarding construction-related complaints. This person shall respond and take corrective action within 24 hours. The CDD phone number shall also be visible to ensure compliance with applicable regulations.

4. Unless specifically approved otherwise via prior authorization from the Zoning Administrator, noise-generating construction activities are restricted to the hours of 7:30a.m. to 5:00p.m., Monday through Friday, and prohibited on the calendar dates that the State and Federal holidays listed below are observed:

   New Year's Day (State and Federal)

   Birthday of Martin Luther King, Jr. (State and Federal)

   President's Day (State)/Washington's Birthday (Federal)

Memorial Day (State and Federal)

Juneteenth National Independence Holiday (State and Federal)

Independence Day (State and Federal)

Labor Day (State and Federal)

Veterans Day (State and Federal)

Thanksgiving Day (State and Federal)

Day after Thanksgiving (State)

Christmas Day (State and Federal)

5. Prohibit unnecessary idling of internal combustion engines.

6. Locate stationary noise generating equipment as far from surrounding residential properties as possible.

b) Would the project generate of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact with Mitigation: The project is not expected to generate significant groundborne vibrations or noise levels, however temporary vibration and groundborne noise may increase during temporary construction activities. The implementation of **NOISE-1** will mitigate any potential impacts of temporary construction with regards to groundborne vibration and noise levels to a less than significant impact.

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

No Impact: The project site is not located within two miles of a public airport or private airstrip, nor is it located within an area covered by the County's Airport Land Use Compatibility Plan. The nearest airport facility is the Buchanan Field, approximately 16.5 miles east of the project site. Thus, the project would not expose people to excessive noise levels from either Buchanan Field or a private airstrip and there is no impact.

Sources of Information

Contra Costa County 2045 General Plan. *Health and Safety Element.* https://www.contracosta.ca.gov/4732/General-Plan#docaccess-fcdd0c1d05846340a5123355cae55ce01033b3d6b9ccf471ddf43b0c4a253d97

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
14. *POPULATION AND HOUSING – Would the project:*				

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUMMARY:

a-b) *Would the project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?*

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

No Impact: The project does not include the construction of any new residences. No residential uses exist on the site, and no residential structures will be removed as a result of this project. The project is located in an existing industrial area and no residential structures are located on any of the adjacent parcels. Thus, the project has no impact on inducing substantial unplanned population growth or the displacement of existing people or housing.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
15. *PUBLIC SERVICES – Would the project* *result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services*:				
a) Fire Protection?	☐	☐	☒	☐
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☒	☐

SUMMARY:

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) *Fire Protection?*

Less Than Significant Impact: The project site is located within a 1.4-mile driving distance of Contra Costa Fire Station 70. The anticipated response time from Station 70 to the project site would be approximately 5 minutes which is adequate in a developed urban area. No portion of the project would require the provision of new or expanded facilities to serve the site or surrounding area. The project plans have been reviewed by the Contra Costa County Fire Protection District (CCCFPD) and CCCFPD staff have not indicated that additional facilities are required for this project. Thus, the proposed project would have a less than significant impact on existing fire protection facilities.

b) *Police Protection?*

Less Than Significant Impact: Police protection and patrol services in the North Richmond area and the project vicinity are provided by the Contra Costa County Sheriff's office however responses may be received by the San Pablo police department which is an approximately 6-minute drivetime from the project site. The project does not include any new residences which would increase the population in the County requiring additional police protection facilities. Thus, the project will have less than significant impact on police services and will not result in the need for expanded police protection facilities or services in the County.

c) *Schools?*

No Impact: Since the project does not include any new residences, it will have no impact on enrollment at existing local schools.

d) *Parks?*

No Impact: The policy for Parks and Recreation in the Public Facilities and Services Element of the County General Plan indicates that a standard of 3 acres of neighborhood parks per 1,000 persons should be maintained within the County. As stated previously, the project would not increase the population in the North Richmond community as there are no residences proposed. Thus, the project would have no impact on the existing ratio of parkland to residents in Contra Costa County.

e) *Other Public Facilities?*

Less Than Significant Impact: The project would not significantly affect existing public facilities (e.g. Hospital, Library, etc.) because it is not expected to substantially induce population growth in the area.

Sources of Information

Contra Costa County 2045 General Plan. *Public Facilities and Services Element.* https://www.contracosta.ca.gov/4732/General-Plan#docaccess-5cf233c3d756319d16b1250b5c3f2f8d565081c62a3a3e1f3818097379524077

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

SUMMARY:

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

Less Than Significant Impact: The project does not include any development which would increase the use of existing neighborhood and regional parks. No portion of the project will result in an increase in the local population. Accordingly, there is no expectation for the project to substantially increase the use of existing parks such that substantial physical deterioration of a facility would occur. Therefore, the project will have less than a significant impact in this regard.

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

No Impact: The project does not include, nor require, the construction or expansion of recreational facilities. Therefore, no adverse physical effects on the environment resulting from such activity would occur in relation to this project.

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

SUMMARY:

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

Less Than Significant Impact: Chapter 82-32 (Transportation Demand Management) requires a traffic impact analysis of any project that is estimated to generate 100 or more AM or PM peak-hour trips. Transportation Planning Section staff have reviewed the project and concluded that the peak hour trips generated by the new development would be 89/97 peak hour trips using the Institute of Transportation Engineers (ITE) land use code for "manufacturing". Therefore, a traffic impact analysis is not required. In 2016, Contra Costa County adopted its Complete Streets Policy that includes Complete Streets principles and implementation guidelines. Transportation Planning Staff has indicated that the project could comply with the Complete Streets Policy with the incorporation of a sidewalk along Brookside Drive. Thus, the project has less than significant potential to conflict with a program, plan, ordinance or policy addressing the circulation system.

b) *Would the project Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?*

Less Than Significant Impact: Pursuant to CEQA Guidelines Section 15064.3(b), a lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles travelled (VMT) for the purpose of determining the significant of transportation impacts. The Governor's Office of Planning and Research has provided the following guidance on evaluating such impacts for small projects: "Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact." As discussed in Section 17a above, the project was reviewed by Transportation planning staff and the project was determined to produce a maximum of 89/97 peak hour trips per day for "manufacturing" land uses. Since there is no reasonable expectation that a project of this scale could exceed 110 daily trips, the project is assumed to have a less than significant impact on traffic. Therefore, the project does not conflict with CEQA guidelines section 15064.3(b).

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

Less Than Significant Impact: The project will include new ingress and egress from Brookside Drive for the proposed development. Design features proposed with this development include site improvements such as grading and new drive aisles. No portion of the project will alter Brookside Drive or include development that includes a geometric hazard. The project plans will be reviewed by the appropriate County agencies at the time of application for building permits for compliance with established standards to prevent the construction of improvements which would otherwise cause safety hazards. Therefore, the project improvements would not present a significant design hazard or incompatible use.

d) *Would the project result in inadequate emergency access?*

Less Than Significant Impact: The applicant is required to comply with the requirements and standards of the Contra Costa County Fire Protection District (CCCFPD). The project plans include designated fire access routes for each of the proposed buildings. The project will have primary access on Brookside Drive which is a 50-foot public right-of-way and thus is already able to accommodate emergency service vehicles. Compliance with all applicable fire safety measures ensure that the projects' potential to result in inadequate emergency access or services is less than significant.

Sources of Information

Contra Costa County Ordinance Code. Chapter 82-32 Transportation Demand Management. https://library.municode.com/ca/contra_costa_county/codes/ordinance_code?nodeId=TIT8ZO_DIV82GERE_CH82-32TRDEMA

Transportation Planning Section, *NanaWall Expansion (DP23-03051)*. January 30, 2024

Institute of Transportation Engineers. *Common Trip Generation Rates, Trip Generation Manual, 10th Edition.* https://www.troutdaleoregon.gov/sites/default/files/fileattachments/public_works/page/966/ite_land_use_list_10th_edition.pdf

Governor's Office of Planning and Research, State of California. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

HPA Architecture. *NanaWall Production Expansion. Fire Access Plan*. August 15, 2023

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
18. *TRIBAL CULTURAL RESOURCES – Would the project* *cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*				
a) 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)?	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?	☐	☒	☐	☐

SUMMARY:

a-b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural*

landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)

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?

Less than Significant Impact With Mitigation: As discussed in the Cultural Resources section of this Initial Study, a recorded Native American archeological site is located at the project site. Additionally, the California Historical Resources Information System (CHRIS) has identified the site as containing an archeological site on the project site in a letter dated January 2, 2024. On April 22, 2025, a Notice of Opportunity to Request Consultation for the proposed minor subdivision and development of the two warehousing and manufacturing buildings on the subject parcel was sent to the Wilton Rancheria and the Confederated Villages of Lisjan, California Native American tribes that are traditionally and culturally affiliated with the geographic area,. A request for consultation was received from the Confederated Villages of Lisjan. A consultation with the Confederated Villages of Lisjan commenced on June 18, 2025 and concluded on May 7, 2026. The consultation included discussion regarding the identification of existing cultural resources and project construction measures to be implemented in order to avoid these resources. Therefore, the implementation of mitigation measures ***Cultural Resources 1, Cultural Resources 2, Cultural Resources 3, and Cultural Resources 4*** will ensure that project-related impacts to previously undiscovered cultural resources will be less than significant.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
19. *UTILITIES AND SERVICE SYSTEMS – Would the project:*				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

SUMMARY:

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

Less Than Significant Impact: The project site is served by the WCWD. District staff has reviewed the project plans and have indicated that the existing wastewater system can adequately accommodate the added capacity demand from the project and no new facilities will be required to be constructed. The District's approval will be required prior to the issuance of a building permit. Therefore, the project will have no impact on the relocation or construction of new or expanded utility facilities.

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

Less Than Significant Impact: The project site is presently served by municipal water supplies from CCWD and EBMUD. As stated in Section 10, CCWD and EBMUD staff have reviewed the project plans and have indicated that service for the project is available and will provide water services that are compliant with current standards. Thus, the project is expected to have a less than significant impact on the existing demand for water resources during dry, or multiple dry years.

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

No Impact: The project site is served by WCWD. As stated in previous sections, WCWD staff has reviewed the project and determined that the proposed development is not anticipated to significantly impact the existing wastewater facility capacity of the subject lot or the surrounding neighborhood. Therefore, there would be a less than significant impact to the adequate capacity on existing wastewater facilities to serve the project's projected demand.

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

Less Than Significant Impact: The project includes construction that would generate construction solid waste and post-construction solid waste. Any potential future construction on the project site would be subject to the CalGreen Construction and Demolition Debris Recovery Program administered by the Department of Conservation and Development. The Debris Recovery Program requires that at least 65% of construction job site debris (by weight) for most construction types, that would otherwise be sent to landfills, be recycled, reused, or otherwise diverted to appropriate recycling facilities. Thus, although future development of the project site would incrementally increase construction waste in Contra Costa County, the administration of the CalGreen program ensures that the impact of the project-related increase would be less than significant. Therefore, the impact of the project-related waste would be considered less than significant.

e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less Than Significant Impact: As mentioned above, future construction on the project site would be subject to the CalGreen Construction and Demolition Debris Recovery Program administered by the Department of Conservation and Development. The Debris Recovery Program requires that at least 65% of construction job site debris (by weight) for most construction types, that would otherwise be sent to landfills, be recycled, reused, or otherwise diverted to appropriate recycling facilities. The project will not result in the generation of unique types of solid waste that would conflict with the existing regulations applicable to solid waste. Therefore, the potential for conflict with Federal, State, and local management and reduction statutes and regulations related to solid waste is less than significant.

Sources of Information

East Bay Municipal Utility District. *Review of Agency Planning Application*. January 2, 2024.

West County Wastewater District. *CDDP23-03051/CDMS23-00020 0 Brookside Drive, Richmond, CA 94801*. December 6, 2023.

CalGreen / Construction & Demolition Debris Recovery Program http://www.cccounty.us/4746/CalGreen-Construction-Demolition-Debris-

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
20. *WILDFIRE –* *If located in or near the state responsibility areas or lands classified as very high fire hazard severity zones,* ***would the project:***				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby, expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

SUMMARY:

a-d) *If located in or near the state responsibility areas or lands classified as very high fire hazard severity zones,* ***would the project:***

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

Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby, expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

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

No impact: The project site is located in an area classified as a *Non-Wildland Fire Hazard Severity Zone* (LRA Non-Wildland) for the Local Responsibility Area on the California Department of Forestry and Fire Protection's Very High Fire Hazard Severity Zone map and is not located near any state responsibility lands classified as a *Very High Fire Hazard Severity Zone*. Therefore, it would have no impact on emergency response or evacuation plans or project occupants due to wildfire. Likewise, the project does not alter existing infrastructure and would not require the installation or maintenance of additional infrastructure such as roads or fuel breaks that may exacerbate fire risk, or expose people or structures to significant risks as a result of post-fire slope instability or runoff.

Sources of Information

California Department of Forestry & Fire Protection, Fire and Resource Assessment Program. *Contra Costa County Very High Fire Hazard Severity Zones* https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
21. *MANDATORY FINDINGS OF SIGNIFICANCE*				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

SUMMARY:

a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

Less Than Significant Impact With Mitigation: The project has the potential for significant impacts regarding biological resources, cultural resources, and geology/soils as identified throughout this Initial Study but can be mitigated to less than significant levels. Incorporation of the mitigation measures would preserve the natural environment and prevent the potential elimination of important examples of the major periods of California history or prehistory.

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

Less Than Significant Impact: The project site is located in an urban area that has previously been developed with industrial uses. Any potential impacts related to the development of the subject lot would be related to industrial construction and temporary. No long-term adverse impacts are anticipated to occur, and as such, the incremental effects of the project would not be considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects. The County is not currently processing any discretionary applications for non-residential development for properties that are

contiguous to the project site. In addition, there are no other applications for the subdivision of parcels currently being processed within the immediate vicinity of the subject property. With the implementation of the mitigations described in the sections above, the project would not result in cumulatively considerable impacts on the environment.

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

Less Than Significant Impact: This Initial Study has disclosed potential impacts on human beings that would be less than significant with the implementation of mitigation measures. All identified mitigation measures will be included as conditions of approval for the proposed project, and the applicant will be responsible for implementation of the measures. As a result, there would not be any environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

ATTACHMENTS

1. **Vicinity Map**
2. **Tentative Parcel Map**
3. **Project Plans**