Attachment 3

FIRSTCARBONSOLUTIONS™

Addendum
The Terraces of Lafayette Project
City of Lafayette, Contra Costa County, California

State Clearinghouse Number 2011072055

Prepared for:
City of Lafayette
3675 Mount Diablo Boulevard, #210
Lafayette, CA 94549
925.284.1976

Contact: Niroop Srivatsa, Planning and Building Director

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

Contact: Jason Brandman, Project Director

Date: December 18, 2018

THIS PAGE INTENTIONALLY LEFT BLANK

Table of Contents

List of Tables

List of Exhibits

THIS PAGE INTENTIONALLY LEFT BLANK

SECTION 1: INTRODUCTION

This Addendum, checklist, and attached supporting documents have been prepared to determine whether and to what extent The Terraces of Lafayette Project Final Environmental Impact Report (2013 FEIR) (State Clearinghouse No. 2011072055) prepared for the City of Lafayette (City), and certified by the City Council on August 13, 2013, remains sufficient to address the potential environmental impacts of the proposed The Terraces of Lafayette Project, consisting of a maximum of 315 apartments allocated among 14 buildings, along with a clubhouse, leasing office, and parking (Project), or whether additional documentation is required under the California Environmental Quality Act (CEQA) (Pub. Resources Code, Section 21000, et seq. and 14 Cal. Code Regs., Section 15000, et seq.).

The City deemed the Project application complete on July 5, 2011. The applicant "suspended" processing the Project on January 22, 2014, upon the City Council's approval of the Terraces Project Alternative Process Agreement (Process Agreement), and processed an alternative 44-unit, single-family Homes at Deer Hill ("Project Alternative"). On June 5, 2018, following a ballot referendum that invalidated a rezoning for the Project Alternative, the applicant terminated the Process Agreement and resumed processing the Project. The Project is on the same site as was previously analyzed in the 2013 FEIR and proposes the same uses. The maximum overall footprint of the Project does not differ from what was previously analyzed in the 2013 FEIR. In general, as shown herein, the Project would have similar or fewer impacts as disclosed and analyzed in the 2013 FEIR. The Project would not introduce any new significant environmental effects or substantially increase the severity of previously identified significant effects.

1.1 - Environmental Checklist

Pursuant to Public Resources Code Section 21166, and CEQA Guidelines Sections 15162 and 15164, subd. (a), the attached checklist has been prepared to evaluate the Project. The attached checklist uses the standard environmental checklist categories provided in Appendix G of the CEQA Guidelines, but provides answer columns for evaluation consistent with the requirements of CEQA Guidelines Section 15162, subd. (a).

1.2 - Environmental Analysis and Conclusions

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

An Addendum need not be circulated for public review[1] but can be included in or attached to the Final EIR or ND (CEQA Guidelines Section 15164, subd. (c)). The decision-making body shall consider

[1] *See, e.g., Save Our Heritage Organisation v. City of San Diego*, __ Cal.App.5th __ (October 24, 2018) (holding that the addendum process fills a gap in CEQA for projects with a previously certified EIR requiring revisions that do not warrant the preparation of a subsequent or supplemental EIR and that absence of public review reflects the nature of an addendum as a document describing

the Addendum to the Final EIR prior to making a decision on the Project (CEQA Guidelines Section 15164, subd. (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent EIR or ND pursuant to Section 15162 (CEQA Guidelines Section 15164, subd. (e)).

Consequently, once an EIR or ND has been certified or adopted for a Project, no subsequent EIR or ND shall be prepared under CEQA unless, based on substantial evidence:

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

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

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

This Addendum addresses the conclusions of the 2013 FEIR.

1.2.1 - Findings

There are no substantial changes proposed by the Project or in the circumstances in which the Project will be undertaken that require major revisions of 2013 FEIR.

project revisions too insubstantial in their effect to require subsequent environmental review).

[2] CEQA Guidelines Section 15382 defines "significant effect on the environment" as " . . . a substantial, or potentially substantial *adverse* change in any of the physical conditions within the area affected by the Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance . . . ." (see also Public Resources Code, Section 21068) (emphasis added).

The Project is on the same site as was previously analyzed in the 2013 FEIR and proposes the same uses. The maximum overall footprint of the Project does not differ from what was analyzed in the 2013 FEIR. This Addendum identifies the following refinements to existing conditions:

- A Ridgeline Evaluation prepared by ENGEO (Appendix A) concludes that the nearest Class I ridgeline terminates 650 feet west of the Project site, well outside the 400-foot setback required in the Lafayette City Code. Pursuant to Municipal Code Section 6-2006 Modification of Lafayette Area Ridge Map, "if a precise onsite measurement shows that the area within which development is prohibited varies from that shown on the City's map, the area shown by the onsite measurement controls."
- In 2016, the City granted demolition permits and the applicant thereafter demolished all buildings on-site. Therefore, the Project site no longer contains the potential for lead-based paint or asbestos-containing materials, and Mitigation Measure (MM) HAZ-1a and MM HAZ-1b, which relate to the removal of potential lead and asbestos materials, are no longer required.

In addition, several biological surveys (Appendix C) have been completed since the certification of the 2013 FEIR including the following:

- A Bridges' coast range shoulderband snail (BCRSS) survey completed in the Spring of 2013 concluded that there is no evidence of this snail on-site.
- A pre-construction nesting bird and bat survey was conducted in 2016 that resulted in negative findings.

Furthermore, the following environmentally beneficial refinements to the site plan would be implemented:[3]

- Grassland mitigation would include the repropagation of 2.1 acres of native blue wildrye (*Elymus glaucus*) on-site. The applicant salvaged the existing native blue wildrye from the site in 2016 and is holding the plants at a local nursery in preparation for re-establishment on-site.
- The two Project driveways on Deer Hill Road would be relocated westward.
- At the eastern Project driveway on Deer Hill Road, a westbound left turn lane for vehicles entering the site would be constructed as part of the Project.
- The previously proposed median break on Pleasant Hill Road would be removed, altering access at the Pleasant Hill Road Project driveway to southbound right-in/right-out only. Northbound left turns into and out of the site from Pleasant Hill Road would be prohibited by a raised median.
- With the median break closed, the northbound left turn lane of Pleasant Hill Road at Deer Hill Road would be extended to Acalanes Avenue, to fully accommodate existing and Project-related left turning traffic.

[3] A complete list of the design changes related to transportation impacts is provided in Section XVI, Transportation.

- The Project would add a third southbound lane on Pleasant Hill Road, beginning just north of Deer Hill Road—Stanley Boulevard, which would act as a "trap lane" from the State Route 24 (SR-24) westbound on-ramp.

This Addendum evaluates the environmental effects of the Project as proposed, taking into account these refinements to existing conditions, the environmentally beneficial revisions to the site plan, and changes in regulations since certification of the 2013 FEIR.

The Project does not require preparation of a new subsequent or supplemental EIR, due to either the involvement of substantial changes in the Project, substantial changes in the circumstances under which the Project is undertaken, or new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete. As illustrated herein, the Project is consistent with the 2013 FEIR; therefore, an Addendum is the required CEQA compliance for the Project.

1.2.2 - Conclusions

The City of Lafayette may approve the Project based on this Addendum. The impacts of the Project remain within the scope of the impacts previously analyzed in the 2013 FEIR (CEQA Guidelines Section 15164).

1.3 - Mitigation Monitoring Program

As required by Public Resources Code Section 21081.6, subd. (a)(1), a mitigation monitoring and reporting program has been prepared for the Project in order to monitor the implementation of the mitigation measures that have been adopted for the Project. Any long-term monitoring of mitigation measures imposed on the overall development will be implemented through the Mitigation Monitoring and Reporting Program.

SECTION 2: PROJECT DESCRIPTION

2.1 - Location and Setting

2.1.1 - Location

The Project site is located at 3233 Deer Hill Road in the City of Lafayette, Contra Costa County, California (Exhibits 1 and 2). The approximately 22.27-acre Project site (Assessor's Parcel No. 232-150-027) is bounded by Deer Hill Road (west and north), Pleasant Hill Road (east), and SR-24 (south). The Project site is located on the Walnut Creek, California United States Geological Survey 7.5-Minute Topographic Quadrangle, Township 1 North Range 2 West Section (Latitude 37° 53' 58" North; Longitude 122° 5' 55" West).

2.1.2 - Environmental Setting

The Project site is characterized by a previously altered hillside that slopes downhill in a southward direction. The original topography of the site has been severely altered due to grading for Deer Hill Road, SR-24, and an on-site quarry that began operating in the late 1960s. As a result, on-site topography is uneven and consists of four graded terraces ranging in elevation from 330 to 463 feet above mean sea level. As shown on the City's Lafayette Ridge Area Map, the southern terminus of Lafayette Ridge is located immediately north of Deer Hill Road. Exhibit 3 depicts photographs of the Project site from local roadways.

The Project site contains approximately 27,000 square feet in paved surfaces. The site previously contained several buildings, including two single-family residences, three sheds, two garages, and a barn, all of which were removed following the City's approval of demolition permits in 2016.

A paved driveway off Deer Hill Road was previously used to provide access to the former residence and associated buildings that have since been removed from the eastern portion of the site. A gravel road from Deer Hill Road provides access to the middle portion of the site, where a former quarry operated from approximately 1967 to 1970. Materials taken from the site were used for the construction of Pleasant Hill Road, Deer Hill Road, and for portions of the Bay Area Rapid Transit (BART) railway system. A portion of the site adjacent to the intersection of Pleasant Hill Road/Deer Hill Road has served as a seasonal Christmas tree lot since 1997. The highly disturbed site is currently undeveloped.

Approximately 85 percent of the Project site has either been graded or disturbed as a result of these prior uses. Vegetation on the site is dominated by a cover of non-native and native grasslands, with stands of planted and remnant native oak woodland, scattered ornamental tree plantings, and riparian woodland and scrub along the creek that traverses the northern portion of the property. Approximately 69 trees remain concentrated near the paved driveway and drainage in the eastern portion of the site; it is assumed that the coast live oak trees were planted around the time Deer Hill Road was developed in the early 1970s. One mature valley oak, and several nearby younger valley oaks and coast live oaks to the southeast, appear to be naturally occurring. Historic aerial photographs show that the mature valley oak predates the 1950s. This oak has a trunk diameter of

58 inches, with a canopy radius of 30 to 50 feet. The Project applicant's arborist estimates that the tree is more than 200 years old.

The Project site is located approximately 200 feet east of the Las Trampas Fault (sometimes also referred to as the Lafayette Fault), which is not considered to be active but may accommodate slip on the Northern Calaveras Fault located approximately 4.5 miles south of the Project site. The Project site is not located within a State of California Earthquake Fault Zone.

The East Bay Municipal Utilities District (EBMUD) Walnut Creek Tunnel passes underneath the Project site. The tunnel conveys potable water from the Sierra Foothills to the Lafayette Reservoir.

2.1.3 - General Plan and Zoning

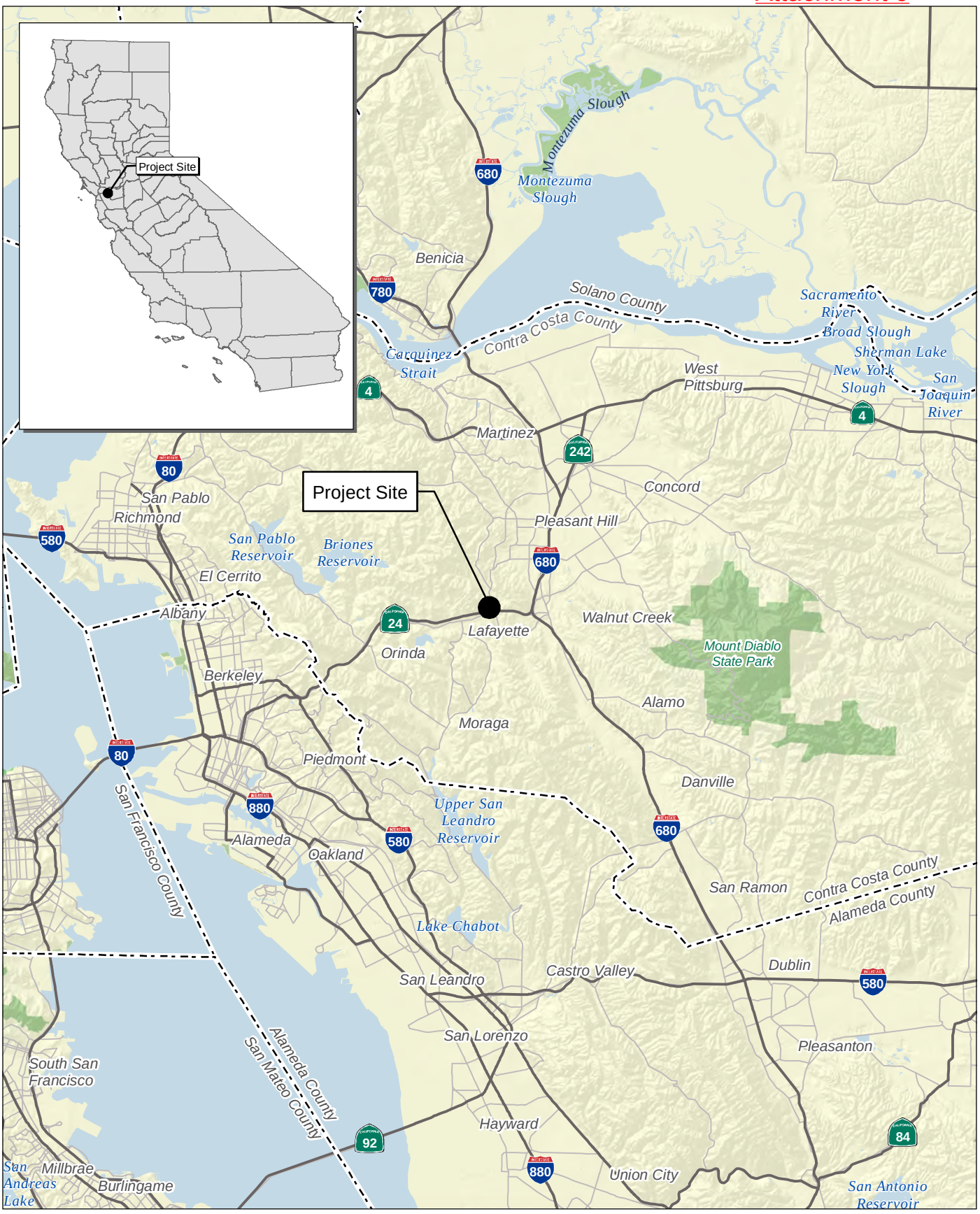
The Project site is located at Pleasant Hill Road, which is designated by the General Plan as a Residential Entryway, as shown on Map I-2. The Plan states "Lafayette's Residential Entryways should be distinctive and attractive, establish a positive image of the community and reflect the semi-rural residential character of the community."[4]

The Project is within the City's Hillside Overlay District (HOD), and formerly contained a Class I Ridgeline, which is considered the most sensitive of the three HOD classifications. The HOD was established to implement the goals, policies, and programs of the General Plan that relate to hillside and ridgeline development, development hazards, and protection of open space lands and hillside residential areas. Each designated ridgeline within the HOD is grouped into one of three Classes (Class I, II, and III), with Class I being the most sensitive and Class III the least sensitive. Factors affecting the classification include location, height, significance in relation to other nearby topographical features, the impact that development on or near the ridgeline would have upon scenic views of ridges and hillsides, and the protection of open space.

As described in a Ridgeline Evaluation prepared by ENGEO in 2011 (Appendix A), the nearest Class I ridgeline terminates 650 feet west of the Project site, well outside the 400-foot setback required in the Lafayette City Code. The City's Hillside Evaluation Map is based on an outdated United States Geological Survey Walnut Creek Quadrangle topographic map. This map has not been updated since 1995 and uses 1959 map contours. Since this map was last updated, extensive alteration to site topography has occurred because of the grading and paving associated with construction of Deer Hill Road and the quarry operations that took place on the Project site; therefore, the current conditions no longer reflect the characteristics of a Class I ridgeline, as described in the Ridgeline Evaluation. Pursuant to Municipal Code Section 6-2006 Modification of Lafayette Area Ridge Map, "If a precise onsite measurement shows that the area within which development is prohibited varies from that shown on the City's map, the area shown by the onsite measurement controls."

In connection with the Project Alternative, the land use designation of the Project site was changed in 2015 from Administrative/Professional/Office/Multi-Family Residential (APO), which allows up to 35 dwelling units per acre, to Low Density Single Family Residential (SFR-LD), which allows up to 2 dwelling units per acre.

[4] City of Lafayette. 2012. City of Lafayette General Plan, Chapter 1: Land Use, page I-11. Website: http://www.lovelafayette.org/Home/ShowDocument?id=1933. Last accessed August 29, 2018.



Source: Census 2000 Data, The CaSIL

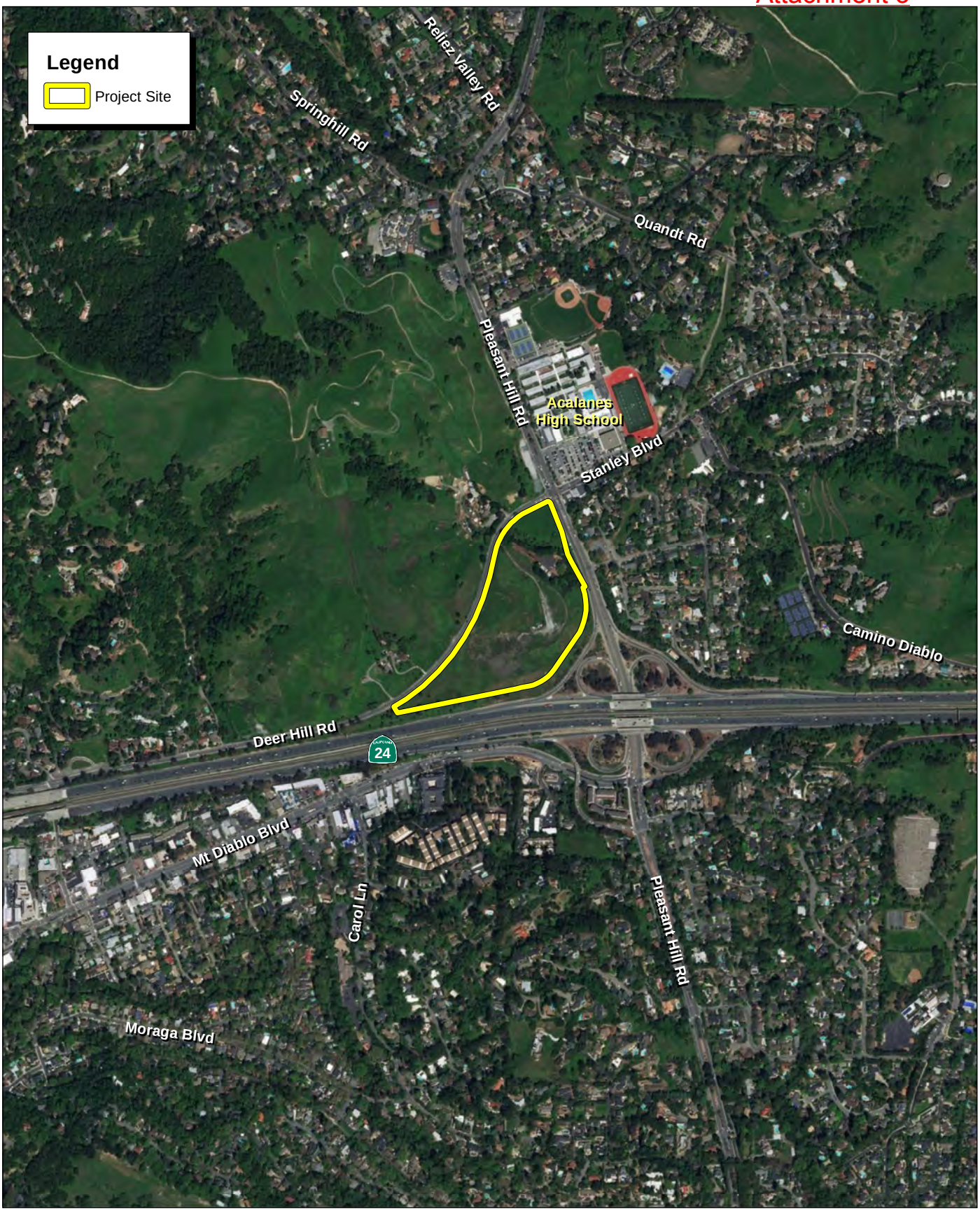
FIRSTCARBON SOLUTIONS™

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

THIS PAGE INTENTIONALLY LEFT BLANK

Attachment 3



Source: ESRI Aeril Imagery.

FIRSTCARBON SOLUTIONS™

1,000 500 0 1,000 Feet

Exhibit 2
Local Vicinity Map
Aerial Base

THIS PAGE INTENTIONALLY LEFT BLANK

Photograph 1: View of project site looking east from Deer Hill Road.

Photograph 2: View of project site from Pleasant Hill Road.

THIS PAGE INTENTIONALLY LEFT BLANK

On July 9, 2018, the City initiated a rezoning of the Project site from Administrative/Professional Office (APO), which allows for multi-family developments with a land use permit[5] and height limits ranging from 22.97 to 36.09 feet depending on the location within the Project site,[6] to Single-family Residential District-65 (R-65) to bring the zoning into conformance with the SFR-LD general plan land use designation.

The City deemed the Project application complete on July 5, 2011. Thus, notwithstanding these changes to the Lafayette General Plan and zoning ordinance, because the Project is a "housing development project" within the meaning of the Housing Accountability Act (HAA), Govt. Code Section 65589.5, "a change to the zoning ordinance or general plan land use designation subsequent to the date the application was deemed complete shall not constitute a valid basis to disapprove or condition approval of the housing development project . . ."

As described in the 2013 FEIR at pages 4.9-16 to 4.9-17, under the APO designation, the maximum allowable residential density is 35 dwelling units per acre (DU/acre) and the maximum allowable floor area ratio (FAR) is 0.4. The Project's proposed development of multiple-family dwelling units on the site is consistent with this designation, which envisions professional office and multi-family residential uses adjacent to Downtown. Development of 315 units on the 22.27-acre site as proposed would result in a residential density of 14 DU/acre. The total area of the proposed buildings is approximately 332,395 gross square feet (gsf), which is equivalent to an FAR of 0.34. Therefore, the proposed Project is consistent with the residential density and FAR provisions of the APO land use designation.

2.2 - Project Background

The Lafayette City Council certified an Environmental Impact Report (EIR) for The Terraces of Lafayette Project in 2013 (2013 FEIR). The Project, as analyzed in the 2013 FEIR, consists of a maximum of 315 apartments allocated among 14 buildings, along with a clubhouse, leasing office, and parking.

Consideration of the Project entitlements (Land Use Permit, Hillside Development Permit, Design Review Permit, Grading Permit, and Tree Permit) was suspended while the City considered an alternative Project consisting of a 44 single-family dwelling unit Project. The City Council certified a Supplemental EIR in 2015 for the Project Alternative. Following a change in the law,[7] a corresponding ballot measure known as "Measure L," related to the Project Alternative, did not receive voter approval and the Project Alternative could not advance.

Thus, in June of 2018, the applicant resumed processing the original entitlements for the 315-unit apartment complex application, which was deemed complete in 2011, pursuant to the 2013 FEIR.

[5] LMC 6-1004, Administrative/Professional Office District.
[6] LMC 5-1006, Administrative/Professional Office District, Figure 6-1006.
[7] Beginning in 1985, under *deBottari v. City Council*, 171 Cal.App.3d 1204 (1985), a zoning referendum was considered invalid if it would result in a general plan inconsistency. In 2017, however, another appellate court reached the opposite result in *City of Morgan Hill v. Bushey*, 12 Cal.App.5th 34 (2017), rejecting the reasoning in *deBottari* and holding that a referendum does not "enact" an ordinance and is thus not invalid if it would result in a general plan inconsistency. On August 23, 2018, the California Supreme Court affirmed the appellate court decision and recognized, in *City of Morgan Hill v. Bushey,* __ Cal.4th __ (2018) (Case No. S243042), that the court's "decision here constituted a change in the law . . . ."

2.3 - Project Characteristics

2.3.1 - Project Summary

The Project is on the same site as the Project previously analyzed in the 2013 FEIR and proposes the same land uses.

The applicant (O'Brien Land Company, LLC) is seeking to develop a 315-unit apartment complex on the Project site. As deemed complete in 2011, the Project would include 14 residential buildings comprised of 2- and 3-stories, a two-story clubhouse with recreational amenities for residents, and a 1-story leasing office, as well as parking provided in carports and garages and on internal roadways. Table 1 summarizes the allocation of dwelling units. Exhibit 4 depicts the refined site plan.

Table 1: Dwelling Unit Summary

Building Type	Count	Stories/Height (feet)	Count		
			1-Bedroom	2-Bedroom	3-Bedroom
Type 1A	4	2/22.97	8	8	2
Type 1B	3	2/29.53	8	8	2
Type 2	7	3/32.81	12	12	3
Total	**14**	**—**	**140**	**140**	**35**
Source: O'Brien Land Company, LLC, 2018.					

Form, Mass, and Scale

The Project's form, massing, and scale are designed to use the existing four terraces and to comply with the height limits required on each of them. Height would be limited to 2- or 3-stories, depending upon location.

Apartments

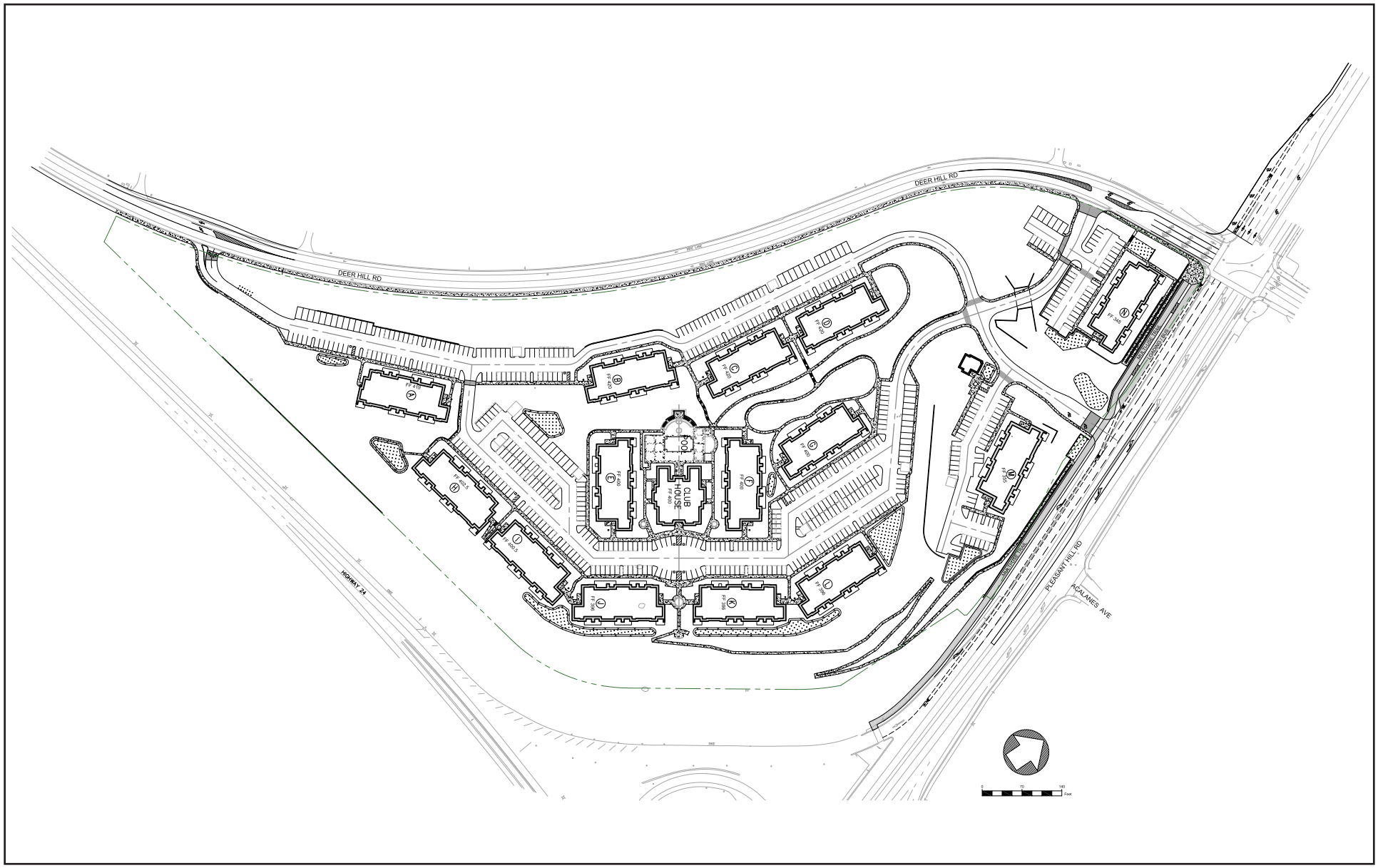
The 315 multi-family apartment units would comprise a total building area of approximately 332,395 square feet. As shown in Table 1, the residential buildings would be a mix of 2- and 3-story buildings with 1-, 2-, and 3-bedroom floor plans.

Clubhouse

The Project would provide a 2-story, approximately 13,300-square-foot clubhouse for use by residents. The clubhouse area would include a variety of amenities, including, but not limited to, fitness facilities, pool, meeting rooms, men and women's showers, and a game room.

Leasing Office

The Leasing Office would be a separate 1-story, approximately 950-square-foot building located on the northeast portion of the site situated near the Pleasant Hill Road and north of Deer Hill Road access points.



Source: BKF Engineers, Surveyors, Planners, December 13, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 4
Refined Site Plan

THIS PAGE INTENTIONALLY LEFT BLANK

Outdoor Amenities

The Project would include an outdoor pool, picnic areas, a turf play area for lawn games, mini dog park, and on-site pedestrian trails.

Lighting

All lighting would conform with the City's exterior lighting requirements. Lighting would be low-level illumination, and exterior lighting would be shielded (downward facing) to minimize light spill, glare and reflection, and maintain 'dark skies.'

Landscaping

Approximately 116 trees were originally inventoried on the Project site: 16 would be preserved, nine would be relocated, and 91 would be removed. Pursuant to Resolution 2015-51, 48 of the trees have been removed, leaving 69 today. Trees that are subject to protection would require a permit to remove. The Project would include the planting of 700 new trees. The proposed landscaping would comply with the City's Landscape Guidelines. All planting would be irrigated with an automatic water conserving irrigation system in compliance with the City's Water Efficient Landscape Ordinance.

Parking

The Project would provide approximately 567 vehicular parking spaces: 60 in garages, 316 in carports, and 191 uncovered stalls on internal roadways. Twelve of the total 567 vehicular parking spaces would be compliant with the standards set forth in the Americans with Disabilities Act.

Circulation

Vehicular access would be provided from Pleasant Hill Road and Deer Hill Road.

Internal access roads would provide access to the residential and recreation areas and associated amenities. In general, all the roads in the internal circulation network would be 20 feet wide, except for the 26-foot-wide driveways that run through the parking lots. Internal circulation would be privately owned and maintained by the property owner.

Pedestrian Access

The Project would include a sidewalk network providing access to the clubhouse and residential areas, and connecting to the frontage sidewalk along Deer Hill Road. Trails would be provided off Pleasant Hill Road to the clubhouse area. Roadway frontage, including curbs, gutters, and sidewalks would be improved along Pleasant Hill Road and Deer Hill Road.

Utilities

The Project would include new utility infrastructure installations to accommodate the new development. The proposed utility infrastructure would connect to the existing sewer system and storm drain systems in the area. The Project would provide wastewater treatment facilities in conformance with Regional Water Quality Control Board (RWQCB) treatment standards for wastewater.

2.4 - Discretionary Approvals

According to the 2013 FEIR, the Project requires the following discretionary approvals from the City:

- Land Use Permit for multi-family buildings in the APO Zone, under Lafayette Municipal Code (LMC) Section 6-1004.
- Hillside Development Permit for development within the HOD, under Chapter 6-20, Hillside Development, LMC.[8]
- Class I Ridgeline Exception for the portion of the Project that would be located within the 400-foot Class I Ridgeline setback, under LMC Section 6-2028.[9]
- Design Review of the aesthetic elements of the Project (e.g. site layout, open space and topography, orientation and location of buildings, vehicular access, circulation and parking, setbacks, height, walls, fences, landscaping, and individual lighting plans), under LMC Article 5, Design Review, Section 6-279.
- Tree Permit for the removal of protected trees, under LMC Section 6-1706.

[8] As noted herein, a Ridgeline Evaluation prepared by ENGEO (Appendix A) concludes that the nearest Class I ridgeline terminates 650 feet west of the Project site, well outside the 400-foot setback required in the Lafayette City Code. Pursuant to Municipal Code Section 6-2006 Modification of Lafayette Area Ridge Map, "if a precise onsite measurement shows that the area within which development is prohibited varies from that shown on the City's map, the area shown by the onsite measurement controls."

[9] As shown in the Ridgeline Evaluation prepared by ENGEO, no part of the Project site is within the 400-foot Class I Ridgeline setback.

SECTION 3: CEQA CHECKLIST

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

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A "no" answer does not necessarily mean there are no potential impacts relative to the environmental category but that there is no substantial change in the condition or status of the impact, within the meaning of CEQA Guidelines Section 15162, since it was analyzed and addressed with mitigation measures in the 2013 FEIR. These environmental categories might be answered with a "no" in the checklist, since the Project does not introduce substantial changes that would result in a major modification to the conclusion of the previously approved CEQA document.

This Addendum addresses the conclusions of 2013 FEIR. All technical studies, websites, and sources cited in the 2013 FEIR are hereby incorporated into this Addendum for reference.

3.1 - Explanation of Checklist Evaluation Categories

(1) Conclusion in the 2013 FEIR

This column summarizes the conclusion of the 2013 FEIR relative to the environmental issue listed under each topic.

(2) Substantial Changes Involving New or More Severe Significant Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(1), this column indicates whether substantial changes in the Project will result in new significant environmental impacts not previously identified or mitigated by the 2013 FEIR or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

(3) Substantial Changes in Circumstances Involving New or More Severe Significant Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(2), this column indicates whether there have been substantial changes with respect to the circumstances under which the Project is undertaken that will require major revisions to the 2013 FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(4) New Information of Substantial Importance Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3)(A–D), this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time 2013 FEIR was certified, shows any of the following:

(A) The project will have one or more significant effects not discussed in the 2013 FEIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the 2013 FEIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the 2013 FEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If the additional analysis completed as part of this Addendum were to find that the conclusions of the 2013 FEIR remain the same and no new significant impacts are identified, or previously identified significant impacts are not found to be substantially more severe than shown in the 2013 FEIR, then the question is answered “no” and no additional environmental document is required or allowed.

(5) Conclusion for Resumed Project

This column summarizes the conclusion of the Addendum relative to the environmental issue listed under each topic.

(6) Mitigation Measures Implemented from 2013 FEIR

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3), this column indicates whether the 2013 FEIR provides mitigation measures to address effects in the related impact category. Any previously adopted mitigation measures will be identified. These mitigation measures will be implemented with the construction of the Project, as applicable. If “None” is indicated, the 2013 FEIR concluded that the impact either does not occur with this Project, or is not significant, and therefore no mitigation measures are needed.

(7) Mitigation Measures for Resumed Project

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3), this column addresses proposed revisions to previously adopted mitigation measures. The revisions to the mitigation measures reflect minor technical changes and additions that result in more effective mitigation and

further reduce impacts when compared to the previously adopted mitigation measures as set forth in the 2013 FEIR. These revised mitigation measures are appropriately discussed in this addendum and incorporated into the MMRP because the revisions do not themselves involve new significant effects or substantially increase the severity of previously analyzed significant effects that would require the preparation of a subsequent environmental document under Guidelines Section 15162. These revised mitigation measures will be implemented with the construction of the Project, as applicable.

If "None" is indicated, the Addendum concluded that the impact either does not occur with this Project, or is not significant, and therefore no mitigation measures are needed.

3.2 - Discussion and Mitigation Sections

(1) Discussion

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the Project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

(2) Mitigation Measures

Applicable mitigation measures from the 2013 FEIR that apply to the Project are listed under each environmental category.

(3) Conclusions

A discussion of the conclusion relating to the analysis is contained in each section.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
I. Aesthetics, Light, and Glare							
Would the project:							
a) Have a substantial adverse effect on a scenic vista?	Significant and Unavoidable	No	No	No	Less than Significant	MM AES-1	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Significant and Unavoidable	No	No	No	Less than Significant	MM AES-3	None
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	Significant and Unavoidable	No	No	No	Less than Significant	MM AES-2	None
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM AES-4	MM AES-4

Discussion

Aesthetic impacts associated with the Project would be reduced when compared to those identified in the 2013 FEIR. The 2013 FEIR identified potential impacts related to scenic vistas, scenic resources within a state scenic highway, and visual character. As described in Impact I(a), I(b), and I(c), this Addendum evaluated these impacts and found them to be less than significant. As such, MM AES-1, MM AES-2, and MM AES-3 would not be applicable to the Project. Consistent with the 2013 FEIR, the Addendum found a potentially significant impact related to lighting and potential glare, and MM AES-4 would thus remain applicable to the Project.

The aesthetics analysis is based, in part, on the Geotechnical Evaluation of the Ridge Ordinance (Ridgeline Evaluation), prepared by ENGEO Incorporated, dated August 3, 2011, and revised August 30, 2011. The study is provided in Appendix A.

a) Summary of 2013 FEIR

The 2013 FEIR concluded significant impacts would occur to scenic views and vistas as a result of development of the Project. Photo simulations concluded that the Project would obstruct or partially obstruct protected scenic corridor and ridgeline views. Furthermore, according to the 2013 FEIR, as seen from Viewpoint 3 (looking southwest from Acalanes High School parking lot), Viewpoint 4 (looking southwest from the intersection of Pleasant Hill Road and Stanley Boulevard), Viewpoint 5 (looking west from Pleasant Hill Road), and Viewpoint 6 (looking North from Mount Diablo Boulevard) the Project's proposed buildings would obstruct protected views and would not comply with General Plan Goal LU-2 that states "Ensure that development respects the natural environment of Lafayette. Preserve the scenic quality of ridgelines, hills, creek areas, and trees."[10] Additionally, the 2013 FEIR concluded that the Project would not comply with General Plan Goal LU-5 that ensures building designs reflect the area's semi-rural character. The 2013 FEIR determined that no mitigation measures would be feasible because of the building heights and grading proposed by the Project. Therefore, the 2013 FEIR concluded that impacts would be significant and unavoidable.

Resumed Project Analysis and Conclusion

The Project contemplates the same maximum Project footprint, building heights, and amount of residential units as previously analyzed in the 2013 FEIR. The 2013 FEIR states that because the project impedes protected views and does not comply with General Plan Goal LU-2 the impact would be significant and unavoidable.

The Project would be consistent with the City's height limits, as defined in Section 6-1006, Height, and depicted in Figure 6-1006 of the City of Lafayette's zoning regulations and as set forth in the Land Use Chapter of the City of Lafayette General Plan (35 feet).[11] Furthermore, the Project would incorporate landscaping including tree species that are native to California and ubiquitous within the City of Lafayette that would be planted in an un-manicured and natural way and would retain the existing organic quality and contours in keeping with the aesthetics of Lafayette. Therefore, the Project would maintain the scenic quality of ridgelines, hills, creek areas, and trees and in compliance with Goal LU-2. As such, the Project would not introduce new or more severe environmental effects and the environmental impacts identified in the 2013 FEIR would be reduced. Similarly, the Project would not substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded the Project would substantially damage scenic resources from SR-24, a State designated Scenic Highway. As viewed from SR-24, according to the 2013 FEIR, the view of Lafayette Ridge, a Class I protected ridgeline designated by the City's HOD would be completely blocked by the buildings along the edge of the upper terrace, which represented a change from current views of the hillside and terraced edges. As a result, impacts on views

[10] City of Lafayette. 2002. City of Lafayette General Plan, Chapter 1-Land Use, amended in part by Resolution 2012-31 in 2012, page I-9.
[11] City of Lafayette. 2002. City of Lafayette General Plan, Chapter 1-Land Use, amended in part by Resolution 2012-31 in 2012, page I-16.

from a scenic highway were found to be significant. In addition, mitigation measures would not be feasible because of the topography of the site and the proposed building heights. The 2013 FEIR concluded that impacts would be significant and unavoidable.

Resumed Project Analysis and Conclusion

The Project site does not contain a Class I Ridgeline, as inaccurately reported in the 2013 FEIR. To the contrary, as shown in the Ridgeline Evaluation prepared by ENGEO (Appendix A), the nearest Class I ridgeline terminates 650 feet west of the Project site, well outside the 400-foot setback required in the Lafayette City Code. The City's overlay used to determine the Class I ridgeline identified on the Project site is based on an outdated United States Geological Survey Walnut Creek Quadrangle topographic map that has not been updated since 1995 and uses 1959 map contours. Since this map was last updated, extensive alteration to site topography has occurred because of the grading and paving associated with Deer Hill Road and prior quarrying of the Project site; therefore, the current conditions do not reflect the characteristics of a Class I ridgeline, contrary to the 2013 FEIR, as shown in the Ridgeline Evaluation.

Section 6-2006 of the Lafayette Municipal Code, Modification of Lafayette Area Ridge Map, states, "each restricted ridgeline area within which development is prohibited by sections 6-2023 and 6-2024 is described in the map adopted by section 6-2004. If a precise on-site measurement shows that the area within which development is prohibited varies from that shown on the City's map, the area shown by the on-site measurement controls."[12] On-site measurements show that the Project would be well outside the 400-foot setback, and, per Section 6-2006, these on-site measurements control. Based on this information, the Ridgeline Evaluation concluded that the Project would not block views of a Class I ridgeline and would not be in conflict with Lafayette Code Section 6-2006. As such, the Project would not block views of Lafayette Ridge from SR-24. Thus, the results of the Ridgeline Evaluation do not result in new or more severe environmental effects and the environmental impacts identified in the 2013 FEIR would be reduced. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR concluded significant impacts would occur to the existing visual character of the site and its surroundings when viewed from off-site locations. Photo simulations for Viewpoint 6 (projected 5 years post construction) show that the Project would change the visual character of the substantially disturbed site from open space and rolling hillsides to 3-story buildings. This change in visual character was considered to be a significant impact because the public considered the open space and rolling hills located on the Project site to be a visual resource. Additionally, the 2013 FEIR concluded no mitigation measures would be feasible to reduce the

[12] City of Lafayette. 2017. City of Lafayette Municipal Code. Website: https://library.municode.com/ca/lafayette/codes/code_of_ordinances?nodeId=TIT6PLLAUS_PT4SPLAUSRE_CH6-20HIDE_6-2006MOLAARRIMA. Last accessed October 9, 2018.

visual prominence of the Project because of the topography and the proposed building heights. As such, the 2013 FEIR concluded that impacts would be significant and unavoidable.

Resumed Project Analysis and Conclusion

The Project site has experienced various substantial forms of quarrying and construction staging uses over the past 40 years and has been heavily disturbed. In addition, the site is located at a major intersection with existing development on the other three corners. As discussed below, the Project would not substantially degrade the existing visual character or quality and would comply with applicable General Plan policies.

Goal LU-1 of the General Plan mandates protection of the pattern of development and character of residential neighborhoods. Residential and residential-supporting uses (i.e. schools and a community park) envelop the Project site. Consistent with the existing uses, the Project would develop the site with residential uses. As such, the Project would conform to the existing pattern of development, and the Project would comply with Goal LU-1.

Policy LU-2.2 of the General Plan states that important visual and functional open space should be preserved by requiring development to be clustered on the most buildable portions of lots and minimizing grading for building sites and roads. The General Plan does not provide a definition of important visual and functional open space. The Project site has been previously disturbed and is surrounded on three sides by development and would not qualify as important visual open space. In addition, as a privately owned property, it is not a publicly accessible functional open space.

Clustering is the grouping of residential buildings on a parcel in a way that creates substantial open space separate from development on the parcel. The Project design reflects the existing man-made terraces to minimize grading required for the establishment of building pads and roadways. As shown in Exhibit 5 (refer to Section IV Biological Resources for further discussion), several portions of the Project site would be left undeveloped, and the apartment buildings would be clustered on the remaining acreage. In addition, Policy LU-2.2 does not specify that the whole development must be clustered, but rather that development must be clustered on the most buildable portions of the site. The Project has been designed so that there are several groupings of buildings clustered together on the most buildable portions of the site in compliance with General Plan Policy LU-2.2.

In addition, the Project would incorporate designs that feature articulation of building components as well as colors that would be harmonious with the surrounding residential development. With incorporation of appropriately detailed building design features, harmonious colors, and dense landscape screening, construction of the Project would not degrade the visual character or quality of the site. In addition, the Project would be subject to the City's design review process to ensure that the final development design meets the City's standards. The City's design review process would provide oversight of the Project design and ensure its compatibility with the existing visual character or quality of the site and its surroundings.

Given that the Project complies with applicable General Plan policies, is on a site that has previously been heavily disturbed, is located at a major intersection with development on the other three corners, would be subject to design review, and would incorporate open space by repropagating 2.1 acres of native blue wildrye on-site, the proposed development would be consistent with the surrounding land uses and would not substantially degrade the site's existing visual character. The development of the Project would result in a less than significant impact on the existing visual character of the site and surrounding area. Moreover, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

The 2013 FEIR found that development of the Project would add new sources of light and glare to the site and surrounding area. The primary source of lighting would be from the multi-family residential buildings and lighting associated with parking and landscaped areas, including streetlights, signage lighting, and decorative lighting. As part of the 2013 FEIR, the nighttime visual analysis created for the Project showed that lights within the Project sight would be largely screened by proposed landscaping and trees. The nighttime lighting study prepared for the Project concluded that spillover lighting impacts were less than significant based on a significance threshold of 0.5 foot-candles.[13] The Project would increase glare due to photovoltaic solar panels, as well as glass and metal used for building windows, roofing, and car windshields. The 2013 FEIR concluded the photovoltaic panels would potentially create a significant source of glare. MM AES-4 would reduce glare by ensuring the panels would be made of low reflective materials, would be angled to minimize glare, and would be sited on the buildings in order to minimize visibility from surrounding roadways. The 2013 FEIR concluded that with implementation of MM AES-4, lighting and glare impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would add the same sources of light and glare to the surrounding area as analyzed in the 2013 FEIR. The amount of lighting would be consistent with the 2013 FEIR and, equally consistent with the 2013 FEIR, the Project would implement MM AES-4 to reduce impacts related to glare from the photovoltaic panels to a less than significant level. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM AES-1 Given the building heights and grading proposed by the Project, there is no feasible mitigation measure that would prevent the blockage of ridgelines from all viewpoints in the Project site vicinity.

[13] The lighting study is included as Appendix O of the Terraces of Lafayette Draft EIR.

MM AES-2 Given the building heights and topography of the Project site, there is no feasible mitigation measure that would reduce the visual prominence of the proposed Project when viewed from off-site locations to a less than significant level.

MM AES-3 Given the building heights and topography of the Project site, there is no feasible mitigation measure that would reduce this impact to a less than significant level.

MM AES-4 Proposed photovoltaic panels shall be designed to ensure the following:

- The angle at which panels are installed precludes, or minimizes to the maximum extent practicable, glare observed by viewers on the ground.
- The reflectivity of materials used shall not be greater than the reflectivity of standard materials used in residential commercial developments.
- Panels shall be sited to minimize their visibility from Mount Diablo Boulevard, Pleasant Hill Road, and Deer Hill Road.

Revised Mitigation Measures for the Resumed Project

MM AES 1, MM AES-2, and MM AES-3 are not applicable to the Project.

Conclusion

As explained above, impacts related to aesthetics, light, and glare would not be more severe or substantially increased compared to the effects analyzed in the 2013 FEIR. For the reasons explained in Impact I(a), I(b), and I(c), contrary to the conclusions of the 2013 FEIR, there would be a less than significant impact with respect to scenic vistas, scenic resources within a State scenic highway, and visual character and MM AES-1, MM AES-2, and MM AES-3 would not apply to the Project. Further, no new mitigation measures or alternatives are required. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
II. Agricultural and Forest Resources							
Would the project:							
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No Impact	None	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No Impact	None	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No Impact	No	No	No	No Impact	None	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	No Impact	None	None

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	No	No Impact	None	None

Discussion

Agricultural and Forest Resource impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified no potential impacts related to agricultural resources, which, as described below, would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

As noted in the 2013 FEIR, the highly disturbed Project site is located within an urbanized area and does not support cultivated agricultural activities. The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) mapping for Contra Costa County designates the Project site as "Grazing" land, which is a non-agricultural designation. The 2013 FEIR concluded that development of the Project would not convert Important Farmland to non-agricultural use and no impact would occur.

Resumed Project Analysis and Conclusion

Because the Project is on the same site as the previously analyzed Project, which has a non-agricultural designation by the FMMP, the Project would not convert Important Farmland to non-agricultural use and no impacts would occur. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded no impacts would occur to a Williamson Act contract and agricultural zoning.

Resumed Project Analysis and Conclusion

The Project site is designated SFR-LD, which is a non-agricultural zoning designation. Consistent with the 2013 FEIR, no impacts would occur. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

As noted in the 2013 FEIR, the Project site was zoned APO, a non-forest zoning classification. As a result, the 2013 FEIR concluded no impacts would occur with respect to forest zoning.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project is within a non-forest zoning classification. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

As described in Impact II(c), the 2013 FEIR determined that the Project would result in no impacts related to forest land because there is no forest land or timberland zoning within the City of Lafayette.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would not be located on forest land or land with timberland zoning. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

e) Summary of 2013 FEIR

As noted in the 2013 FEIR, the Project site is not forest land. As a result, the 2013 FEIR concluded no impacts would occur with respect to forest land.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site would not contain forest land. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

None.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying new significant effects, nor is there a substantial increase in the severity of previously identified significant effects related to agricultural and forestry resources. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR agricultural and forest resources assessment.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
III. Air Quality							
Would the project:							
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No	No	No	Less than Significant	None	None
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Significant and Unavoidable	No	No	No	Less than Significant with Mitigation Incorporated	AQ-1, AQ-2a, AQ-2b	AQ-1, AQ-2a **[revised]**, AQ-2b
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Significant and Unavoidable	No	No	No	Less than Significant with Mitigation Incorporated	AQ-5	AQ-5 (incorporates MM AQ-1, MM AQ-2a **[revised]**, MM AQ-2b, and MM AQ-3 **[revised]**)
d) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	AQ-3, AQ-4	AQ-3 **[revised]**, AQ-4
e) Create objectionable odors affecting a substantial number of people?	N/A	No	No	No	N/A	None	None

Discussion

Air quality impacts associated with the Project would be reduced when compared to those identified in the 2013 FEIR. The 2013 FEIR identified potential impacts related to air quality standards and

cumulatively considerable net increases of criteria pollutants. With implementation of revised MM AQ-2a and AQ-3, such impacts to air quality would be less than significant. As described in more detail below, the Project does not result in new or more severe impacts than disclosed and analyzed in the 2013 FEIR.

The Air Quality supporting information is provided in Appendix B.

a) Summary of 2013 FEIR

As discussed in the 2013 FEIR, the Project is below the Bay Area Air Quality Management District (BAAQMD) operational screening threshold of 494 units and is not considered a regionally significant Project. In addition, the Project would not exceed the level of population or housing foreseen in City or regional planning efforts and, therefore, would not have the potential to substantially affect housing, employment, and population projections within the region, which is the basis of the Clean Air Plan projections. Therefore, the 2013 FEIR found that the Project would not conflict with or obstruct implementation of the 2010 Bay Area Clean Air Plan and that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Since the 2013 FEIR, BAAQMD has adopted the 2017 Clean Air Plan: Spare the Air, Cool the Climate. The 2017 Clean Air Plan incorporates the level of development assumed in the General Plan. In addition, the Project proposes to develop the same maximum number of housing units compared to the 2013 FEIR. Therefore, similar to the 2013 FEIR, the Project would not exceed the level of population or housing foreseen in City or regional planning efforts and would result in a less than significant impact. Therefore, the Project would not conflict with or obstruct implementation of the Clean Air Plan. The Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

Construction

Grading and other ground-disturbing activities would produce fugitive dust emissions from particulate matter less than 10 microns in diameter (PM_{10}) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Therefore, fugitive dust emissions, which could add to the amount of airborne particulates and contribute to the nonattainment designation of the air basin, were considered to be significant. MM AQ-1 in the 2013 FEIR requires compliance with the BAAQMD Basic Control Measures for reducing construction emissions of PM_{10} and $PM_{2.5}$. Implementation of MM AQ-1 would ensure that ground-disturbing activities would not generate a significant amount of fugitive dust. Therefore, the 2013 FEIR found that fugitive dust impacts would be reduced to less than significant.

To determine exhaust-related air quality impacts during construction, the 2013 FEIR compared criteria air pollutant emissions generated by Project-related construction activities to the

BAAQMD significance thresholds. Average daily emissions in the 2013 FEIR were based on the annual construction model run estimated using California Emissions Estimator Model (CalEEMod), Version 2011.1.1 and then divided by the total number of construction days. As discussed in the 2013 FEIR, nitrogen oxide (NO_X) emissions exceeded the BAAQMD's average daily thresholds. Consequently, the 2013 FEIR found that construction-related criteria air pollutant emissions would result in a significant impact. MM AQ-2a and MM AQ-2b in the 2013 FEIR would require the use of more efficient Tier III construction equipment to reduce on-site criteria air pollutant emissions and reduce on-road emissions from soil hauling, respectively. However, the 2013 FEIR found NO_X emissions would continue to exceed the recommended threshold of significance. Therefore, the 2013 FEIR determined that the impact would be significant and unavoidable.

Operational Emissions

Long-term air pollutant emissions generated by a residential development are typically associated with the burning of fossil fuels in cars and trucks (mobile sources); energy use for cooling, heating, and cooking (energy); and landscape equipment (area sources). As discussed in the 2013 FEIR, the BAAQMD adopted screening criteria for operation-related criteria air pollutant emissions. The applicable screening criteria included in the BAAQMD CEQA Guidelines for a low-rise apartment (1 to 2 stories) is 451 units and for a mid-rise apartment (3 to 10 stories) is 494 dwelling units. The Project is 2 to 3 stories and falls within both the low-rise and mid-rise categories. The proposed 315-unit Project is under both of these thresholds. Therefore, the 2013 FEIR found that the operational phase criteria air pollutant emissions associated with the Project would not exceed the BAAQMD's screening criteria, and regional operational phase air quality impacts would be less than significant.

Resumed Project Analysis and Conclusion

Construction

Construction-related emissions associated with the Project would result from on-site and off-site activities. On-site emissions would consist principally of exhaust emissions from the heavy-duty off-road construction equipment, on-site motor vehicle operation, and fugitive dust (mainly PM_{10}) from disturbed soil. Off-site emissions would be caused by motor vehicle exhaust associated with delivery and haul truck vehicles, construction worker traffic, and road dust.

Since the adoption of the 2013 FEIR, the recommended version of the model to estimate criteria pollutant emissions has been updated to CalEEMod, Version 2016.3.2. The current version of the CalEEMod model represents two generations of improvement in technical details and error corrections compared to CalEEMod Version 2011, which was used to estimate emissions in the 2013 FEIR. The current version presents the most current understanding of the science and engineering for accurately estimating emissions from various land use projects. Construction phases, duration, and equipment assumptions used to estimate criteria pollutant emissions are consistent with those used to estimate unmitigated emissions in the 2013 FEIR with modifications to the start and end dates (see Appendix B of this Addendum) that reflect the Project's history.

Table 2 shows the annual and average daily construction emissions associated with the Project. Consistent with the approach in the 2013 FEIR, the average daily construction emissions were compared with BAAQMD's regional Project-level thresholds of significance.

Table 2: Annual and Daily Average Emissions During Construction—Unmitigated

Construction Activity	Annual Emissions (tons/year)			
	ROG	NO_X	PM_{10} (exhaust)	$PM_{2.5}$ (exhaust)
2020	0.92	13.48	0.38	0.35
2021	3.01	9.73	0.26	0.24
Total Annual Construction Emissions	3.93	23.21	0.64	0.59
Construction Activity	**Daily Average Emissions (pounds/day)**			
	ROG	**NO_X**	**PM_{10} (exhaust)**	**$PM_{2.5}$ (exhaust)**
Average Daily Emissions (lbs/day)[1]	18.94	**111.86**	3.08	2.84
BAAQMD Average Daily Emissions Significance of Thresholds	54	54	82	54
Exceeds thresholds?	No	**Yes**	No	No

Notes:
[1] The average daily construction emissions were estimated based on the total annual emissions divided by the number of working day (415 working days).
ROG = reactive organic gases; NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Totals may not appear to add exactly due to rounding.
Source: BAAQMD CEQA Guidelines, 2017; CalEEMod 2016.3.2 version. See Appendix B

Consistent with the 2013 FEIR, construction emissions from the Project prior to mitigation would be anticipated to exceed the thresholds of significance. Implementation of MM AQ-1, MM AQ-2a, and MM AQ-2b from the 2013 FEIR would be required. Considering the changes to the availability of more efficient construction equipment with substantially improved emission factors, MM AQ-2a has been revised to require Tier IV Final engines for off-road construction equipment (as compared to Tier III engines required in the 2013 FEIR). Tier IV standards require that NO_X and PM emission rates (grams per brake horsepower-hour), the prime targets of the federal "Tier" regulations, be reduced by approximately 90 percent compared to Tier III emission standards.[14] Table 3 shows the annual and average daily emissions for construction of the Project incorporating revised MM AQ-2a and MM AQ-2b.

[14] California Air Resources Board. 2018. Non-road Diesel Engine Certification Tier Chart. Website: https://ww2.arb.ca.gov/resources/documents/non-road-diesel-engine-certification-tier-chart-pdf. Last accessed on

Table 3: Annual and Daily Average Emissions During Construction—Mitigated

Construction Activity	Annual Emissions (tons/year)			
	ROG	NO_X	PM_{10} (exhaust)	$PM_{2.5}$ (exhaust)
2020	0.35	6.27	0.04	0.04
2021	2.64	4.90	0.04	0.04
Total Annual Construction Emissions	2.98	11.17	0.08	0.08
Construction Activity	**Daily Average Emissions (pounds/day)**			
	ROG	NO_X	PM_{10} (exhaust)	$PM_{2.5}$ (exhaust)
Average Daily Emissions (lbs/day)[1]	14.37	53.83	0.39	0.39
BAAQMD Average Daily Emissions Significance of Thresholds	54	54	82	54
Exceeds thresholds?	No	No	No	No

Notes:
[1] The average daily construction emissions were estimated based on the total annual emissions divided by the number of working days (415 working days).
ROG = reactive organic gases; NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Totals may not appear to add exactly due to rounding.
Source: BAAQMD CEQA Guidelines, 2017; CalEEMod 2016.3.2 version. See Appendix B.

As shown in Table 3, criteria pollutant emissions would be reduced to less than significant with implementation of revised MM AQ-2a and MM AQ-2b. Therefore, there would not be new significant impacts to air quality or a substantially increase the severity of previously analyzed significant effects. The revisions to MM AQ-2a reflect minor technical changes and additions that result in more effective mitigation and further reduce impacts to air quality when compared to the previously adopted MM AQ-2a. This revised mitigation measure is appropriately discussed in this addendum and incorporated into the Mitigation, Monitoring, and Reporting Program (MMRP) because the revisions do not themselves involve new significant effects and do not substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Operational Emissions

Consistent with the analysis in the 2013 FEIR, the Project would operate a maximum of 315 low- to mid-rise apartments, which is less than the BAAQMD-adopted screening criteria for operation-related criteria air pollutant emissions of 451 (low-rise) and 494 dwelling units (mid-rise). Therefore, the Project would not introduce new environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR determined that activities associated with the Project would result in a temporary increase in criteria air pollutants that exceed the BAAQMD's regional significance thresholds and, when combined with the construction of cumulative projects, would further degrade regional and local air quality. The 2013 FEIR found that this would be a significant cumulative impact. Even with the implementation of MM AQ-1, MM AQ-2a, MM AQ-2b, and MM AQ-3, Project-related construction emissions would continue to exceed the BAAQMD significance thresholds. Therefore, the 2013 FEIR found that the Project's contribution to cumulative air quality impacts during construction activities would be significant and unavoidable.

Resumed Project Analysis and Conclusion

As discussed in Impact III(b) above, without mitigation the Project would exceed thresholds of significance during construction activities and result in significant and unavoidable impacts. With implementation of MM AQ-1 and revised MM AQ-2a, MM AQ-2b, and MM AQ-3, as required by MM AQ-5, however, criteria pollutant emissions would be reduced to cumulatively less than significant. Therefore, the proposed Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

Construction

The 2013 FEIR included an analysis of increased concentrations of toxic air contaminants (TACs) and $PM_{2.5}$ emissions in the vicinity of sensitive land uses during construction activities. A construction health risk assessment (HRA) was conducted for diesel particulate matter (DPM), $PM_{2.5}$, and acrolein. The results of the HRA indicate that the incremental cancer risk for sensitive receptors would be less than the BAAQMD recommended significance threshold. The acute and chronic non-carcinogenic hazards were also within acceptable limits. The HRA in the 2013 FEIR indicated that without the use of Tier III construction equipment during the construction period, as required by MM AQ-2a, the Project could pose a risk to nearby off-site receptors, which would result in a significant impact. However, with implementation of MM AQ-4 and the use of Tier III engines for the off-road construction equipment, the 2013 FEIR concluded that that annual $PM_{2.5}$ concentrations would be reduced by approximately 60 percent, to a level below BAAQMD thresholds. Therefore, the 2013 FEIR concluded that this impact would be less than significant with mitigation.

Operational Emissions

Pursuant to the BAAQMD guidance, prior to *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (2015), as discussed below, the 2013 FEIR evaluated on-site health risks and hazards imposed by existing sources (e.g., stationary sources, traffic) on the sensitive receptors of the Project (i.e., residents in the apartment development) methodology. The 2013 FEIR conducted a site-specific analysis and found that the incremental cancer risk, acute, and chronic non-carcinogenic hazards would be less than

significant. However, the 2013 FEIR concluded that the average annual $PM_{2.5}$ concentration for a maximally exposed on-site receptor would exceed the BAAQMD significance threshold. This would be a significant impact. MM AQ-3 in the 2013 FEIR would require the use of MERV filters with a rating of 9 to 12 in the ventilation systems of the dwelling units to reduce $PM_{2.5}$ concentrations. With implementation of this measure, the 2013 FEIR found that $PM_{2.5}$ impacts would be less than significant.

Resumed Project Analysis and Conclusion

Recommended Thresholds of Significance

Analysis requirements for construction- and operation-related pollutant emissions are contained in the BAAQMD's 2017 CEQA Guidelines, which contain thresholds of significance for $PM_{2.5}$ and TAC emissions.[15] The BAAQMD's 2017 CEQA Guidelines recommends two levels of significance thresholds—project level and cumulative. The project-level thresholds are designed to ensure that no single emission source would cause a significant health impact on an individual basis to surrounding sensitive receptors. The cumulative threshold is designed to ensure that the cumulative impact from sources surrounding a project would not expose sensitive receptors to significant health impacts. Table 4 provides the appropriate project-level and cumulative health risk significance thresholds.

Table 4: BAAQMD Health Risk Significance Thresholds

Metric	Project-Level Threshold
Qualified Community Risk Reduction Plan	Compliance with Plan
Cancer Risk	10 in one million
Non-Cancer Hazard Index	1.0
Annual $PM_{2.5}$	0.3 µg/m^3
Metric	**Cumulative-Level Threshold**
Qualified Community Risk Reduction Plan	Compliance with Plan
Cancer Risk	100 in one million
Non-Cancer Hazard Index	10.0
Annual $PM_{2.5}$	0.8 µg/m^3
Note: µg/m^3 = microgram per cubic meter Source: BAAQMD	

[15] The Receptor Thresholds in BAAQMD's 2017 CEQA Guidelines address the analysis of exposing new receptors to existing sources of toxic air pollution and odors. These Thresholds were the subject of litigation brought by the California Building Industry Association. The California Supreme Court's decision in that litigation states that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents . . . Despite the statute's evident concern with protecting the environment and human health, its relevant provisions are best read to focus almost entirely on how projects affect the environment." *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (2015).

Construction HRA Methodology

The State of California Office of Environmental Health Hazards Assessment (OEHHA) develops methods for conducting health risk assessments. As defined under the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588 [Chapter 1252, Statutes of 1987, California Health and Safety Code Section 44306]), "A health risk assessment means a detailed comprehensive analysis prepared pursuant to Section 44361 to evaluate and predict the dispersion of hazardous substances in the environment and the potential for exposure of human populations and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure."

The cancer risk from DPM is calculated by multiplying the average air concentration of DPM calculated at each receptor location using an air dispersion model and an inhalation exposure factor as expressed in Equation 1 (EQ-1) below.

$$\text{Cancer Risk} = C_{DPM} \times \text{Inhalation Exposure Factor} \quad \text{(EQ-1)}$$

Where:

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

C_{DPM} = Period average DPM air concentration calculated from the air dispersion model in $\mu g/m^3$

Inhalation is the most important exposure pathway to impact human health from DPM and the inhalation exposure factor is defined as follows based on the cancer risk guidance from the California Office of Environmental Health Hazards Assessment OEHHA (OEHHA 2015)[16]:

$$\text{Inhalation Exposure Factor} = \text{CPF} \times \text{EF} \times \text{ED AAF/AT} \quad \text{(EQ-2)}$$

Where:

CPF = Inhalation cancer potency factor for the TAC: 1.1 $(mg/kg\text{-}day)^{-1}$ for DPM
EF = Exposure frequency (days/year)
ED = Exposure duration (years)
AAF = set of age-specific adjustment factors that include age sensitivity factors (ASF), daily breathing rates (DBR), and time at home factors (TAH).
AT = Averaging time period over which exposure is averaged (25,550 days)

[16] California Office of Environmental Health Hazards Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Website: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0

Cancer Risk Age-Specific Adjustment Factors (AAF)

This assessment incorporated the HRA assessment guidance contained within the BAAQMD Air Toxics New Source Review (NSR) Program HRA Guidelines[17] as it applies to risk assessments under the BAAQMD's new source review program based on the OEHHA 2015 risk guidance.

The BAAQMD guidance incorporates early-in-life cancer risk adjustment factors that account for the increased sensitivity and susceptibility of infants and young children to exposures to airborne carcinogens. These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. Table 5 provides the BAAQMD recommend values for the various cancer risk parameters shown in Equation 2 for sensitive receptors.

Table 5: Exposure Assumptions for Cancer Risk

Receptor Scenario	Exposure Frequency		Exposure Duration (years)	Age Sensitivity Factors (ASF)	Time at Home Factor (TAH) (%)	Daily Breathing Rate[(1)] (DBR) (L/kg-day)
	Hours/day	Days/year				
Sensitive/Residential Receptor—Infant to Adult						
3rd Trimester	24	350	0.25	10	85	361
0-2 years	24	350	2	10	85	1,090
3 to 16 years	24	350	14	3	72	572
17 to 30 years	24	350	14	1	73	261

Notes:
(1) The daily breathing rates recommended by the BAAQMD for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th breathing rates for all older individuals.
(2) Construction-related health risks are estimated over the duration of the construction activities, which is approximately 2 years; operational risks are estimated over a lifetime of 30 years.
(L/kg-day) = liters per kilogram body weight per day
Source: BAAQMD 2016; OEHHA 2015

Non-Cancer Hazards

Risk characterization for non-cancer health hazards from TACs is expressed as a hazard index (HI). The HI is a ratio of the predicted concentration of a project's emissions to a concentration considered acceptable to public health professionals, termed the Reference Exposure Level (REL). This is a separate and distinct analysis from the analysis conducted for cancer risk. A significant risk is defined by the BAAQMD as an HI of 1 or greater. For chronic or long-term exposures to DPM, the California OEHHA has assigned a chronic non-cancer REL of 5 µg/m^3 for DPM. DPM has effects on the respiratory system, which accounts for essentially all of its potential chronic non-cancer hazards. Therefore, the only HI calculated was for DPM and the respiratory system.

[17] BAAQMD 2016. BAAQMD Air Toxics NSR Program HRA Guidelines. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en

The 2013 FEIR included acrolein as a marker for the estimation of acute non-cancer hazards. However, in its Air Toxics NSR Program HRA Guidelines, the BAAQMD has discontinued the use of acrolein in the determination of health impacts due to inaccurate test methods casting doubt as to the validity of acrolein emission factor data.

Annual $PM_{2.5}$

The BAAQMD has included significance thresholds for annual $PM_{2.5}$ due to recent studies that show health impacts from exposure to this pollutant. $PM_{2.5}$ can result from both exhaust emissions (DPM as $PM_{2.5}$ exhaust) and from fugitive dust.

Construction Health Risk Assessment

Construction of the Project would involve the use of diesel-fueled off-road construction equipment including graders, scrapers, bulldozers, cranes, and on-road construction haul, vendor, and worker vehicles. As noted above, the focus of the construction health risk assessment was on quantifying the emissions of DPM (as $PM_{2.5}$ exhaust) and fugitive dust and estimating the resulting health risk impacts to nearby sensitive receptors from these emissions.

Construction DPM emissions and $PM_{2.5}$ fugitive emissions were estimated using the CalEEMod land use emission model (Version 2016.3.2) and were averaged over the duration of the Project construction and over the construction area. An exhaust emission release height of 5 meters was assumed for the off-road construction equipment to account for the physical height of the emission releases and the increase in height above the ground due to the heated nature of the emissions. Fugitive dust emissions were assumed to be released at a height of 1 meter. In addition, DPM and fugitive dust emissions from haul, vendor, and worker vehicles were also accounted for as they travel from SR-24 to the Project site.

The estimates of health risks in terms of cancer risk, non-cancer hazards, and annual $PM_{2.5}$ impacts during construction were determined at sensitive receptors surrounding the Project site using an air dispersion model (United States Environmental Protection Agency [USEPA] AERMOD air dispersion model Version 18161), the estimates of DPM and fugitive dust construction emissions, and appropriate meteorological data. The sensitive receptors were located at the existing residences to the east of the Project site across Pleasant Hill Road, to the south of the Project site across SR-24, and to the north of the Project site at the Sienna Ranch.

Table 6 shows the health risks in terms of cancer risk, non-cancer hazard index, and annual $PM_{2.5}$ prior to the application of mitigation. As noted from Table 6, the project's construction emissions would exceed the BAAQMD's significance thresholds for cancer risk and annual $PM_{2.5}$. Therefore, without mitigation, the project's construction emissions could result in a significant health impact. Note that the fugitive dust measures reflect the application of Best Management Practices (BMPs) as required by BAAQMD rules.

Table 6: Summary of Construction Health Risks—Unmitigated

Metric[1]	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[3]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the Maximum Impacted Sensitive Receptor (MIR)[2]	**37.3**	0.026	0.26
BAAQMD Significance Threshold	10	1	0.30
Exceeds Project-Level Source Threshold?	**Yes**	No	No

Notes:
(1) Health risk impacts from construction reflect the application of CalEEMod default construction equipment inventory.
(2) Maximum impacted sensitive receptor is a residence located approximately 200 feet east of the Project across Pleasant Hill Road.
(3) Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$

Table 7 summarizes the Project's construction health impacts after mitigation. Table 7 reflects the resulting health risks after the application of revised MM AQ-2a that requires the application of offroad construction equipment meeting EPA Tier IV engine standards and Basic Control Measures for fugitive dust. As noted in Table 7, the Project's construction emissions would not exceed the BAAQMD's health risk significance thresholds.

Table 7: Summary of Construction Health Impacts—Mitigated

Metric[1]	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[3]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the Maximum Impacted Sensitive Receptor (MIR)[2]	4.6	0.003	0.15
BAAQMD Significance Threshold	10	1	0.30
Exceeds Project-Level Source Threshold?	No	No	No

Notes:
(1) Health risk impacts from construction reflect the application of Tier IV emission standards for off-road construction equipment and the application of Best Management Practices (BMPs) for control of fugitive dust.
(2) Maximum impacted sensitive receptor is a residence located approximately 200 feet east of the Project across Pleasant Hill Road.
(3) Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$

Operational Health Risk Assessment

The Project itself, given its nature as a residential development, is not expected to be a generator of TAC emissions. However, the sensitive receptors noted as the Project's future residents may be impacted by TAC emissions from regional sources surrounding the Project

site. To assess such regional impacts on the Project site, the BAAQMD recommends identifying emission sources located within a 1,000-foot radius and quantifying their health impacts. Such sources are defined as freeways, high volume roadways (with a volume of 10,000 vehicles or more per day or 1,000 trucks per day), and stationary emission sources permitted by the BAAQMD. Any individual regional source located within a radius of 1,000 feet from the Project site that exceeds any of the project-level or cumulative thresholds shown earlier in Table 4 above would represent a significant cumulative impact.

To assist in quantifying cumulative health impacts, the BAAQMD has developed a series of internet-based screening tools that are employed in estimating the health risks from freeways, local roadways, gas stations, permitted stationary sources, and diesel emergency generators[18]. The BAAQMD screening tools appropriate to Contra Costa County were utilized for this purpose.

Two stationary sources were identified within 1,000 feet of the Project:

- Shell Gasoline Station at 3255 Stanley Boulevard (235 feet northeast of the Project site), and;
- Svensson Automotive located at 3297 Mount Diablo Boulevard (480 feet south of the Project site).

The mobile sources identified within 1,000 feet of the Project site are SR-24, Pleasant Hill Road, and Deer Hill Road.

Table 8 shows the screening level estimates of cancer risk, non-cancer hazard index, and $PM_{2.5}$ from the identified sources within 1,000 feet of the Project site using the BAAQMD screening tools without the implementation of mitigation. These results were extracted from the 2013 Draft EIR air quality analysis[19].

Table 8: Health Risk Impacts from Regional Sources Located Within 1,000 feet of the Project—Unmitigated

Source	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[(2)]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
State Highway 24	**51.4**	0.05	**0.48**
Pleasant Hill Road	3.5	<1.0	0.13
Deer Hill Road	2.3	<1.0	0.09
Svensson Automotive	0	0	0
Shell Gas Station	3.1	0.004	NSR
BAAQMD Project-Level Threshold	10	1.0	0.3
Exceeds Project-Level Thresholds	**Yes**	No	**Yes**

[18] Bay Area Air Quality Management District (BAAQMD) 2018. Tools and Methodologies. Website: http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools

[19] City of Lafayette. 2012. Terraces of Lafayette Draft Environmental Impact Report. Section 4.2 Air Quality, Table 4.2-8.

Table 8 (cont.): Health Risk Impacts from Regional Sources Located Within 1,000 feet of the Project—Unmitigated

Source	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[(2)]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Cumulative Total	60.3	<1.0	0.70
BAAQMD Cumulative Threshold	100	10	0.8
Exceeds Cumulative Threshold	No	No	No

Notes:
(1) Maximum impacted sensitive receptor is a residence located approximately 200 feet east of the Project site across Pleasant Hill Road.
(2) Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$

As indicated in Table 8, the cancer risk and $PM_{2.5}$ screening levels from SR-24 exceed the project-level thresholds of 10 in one million and 0.3 $\mu g/m^3$, respectively and would potentially significantly impact the future residents of the Project site without the implementation of mitigation. However, the cumulative impacts would not exceed the BAAQMD's cumulative significance thresholds.

Because the BAAQMD screening analysis tools indicate a potential health risk from vehicle traffic on SR-24, a refined HRA was performed that applied the most up-to-date site-specific traffic information and associated emission data, meteorological information, and location-specific receptor locations. To accomplish this refined HRA, traffic data from the California Department of Transportation (CDOT) and mobile source emission rates from the California Air Resources Board (ARB) EMFAC2017 mobile source emission model were utilized for the anticipated Project build-out year 2022. $PM_{2.5}$ impact levels included $PM_{2.5}$ running exhaust emissions, brake and tire wear emissions, and paved road dust emissions.

Recent traffic data from the CDOT indicate that the portion of SR-24 that passes near the Project site at Pleasant Hill Road experienced an annual average of 200,000 vehicles per day in 2016[20], of which about 2.5 percent consisted of truck traffic. An hour-by-hour profile of traffic along SR-24 at Pleasant Hill Road was developed using measured traffic from the CDOT Performance Measurement System (PeMs)[21]. The PeMs system collects various traffic data in real-time from nearly 40,000 individual detectors spanning the freeway system across all major metropolitan areas of the State of California. Specifically, hour-by-hour traffic data consisting of traffic volumes, average vehicle speeds, and truck proportions were collected from detectors near SR-24 and Pleasant Hill Road interchange for the freeway mainline vehicle lanes in each

[20] California Department of Transportation (CDOT) 2016. 2016 Traffic Volumes on California State Highways. Website: http://www.dot.ca.gov/trafficops/census/docs/2016_aadt_volumes.pdf.
[21] California Department of Transportation (CDOT) 2018. Performance Measurement System (PeMS). SR24 Eastbound and Westbound Mainline Data at Pleasant Hill Road for 2016

direction in 2016. Additional information derived from other CDOT freeway summaries[22] and from the ARB EMFAC2017 mobile source emission model[23] were used to breakdown the traffic data into individual vehicle classes (passenger cars, light duty trucks, and heavy duty trucks and gas vs diesel fuel vehicles).

Using the above information, vehicle emission factors for DPM and $PM_{2.5}$ were extracted from the ARB EMFAC2017 mobile source emission model for each hour of the day. This information was then used to estimate total DPM and $PM_{2.5}$ emissions as a function of time of day for all traffic along SR-24 section near the proposed Project. In addition, as noted above, the traffic data for SR-24 was collected in 2016. The 2016 traffic volume data were "grown" to be representative of traffic volumes in 2022, the anticipated Project opening year. This was accomplished by using the traffic projections for the Bay area from 2010 to 2040 as contained in the Plan Bay Area 2040[24] that was developed to forecast regional travel conditions within the entire Bay area for the forecast year 2040.

An air dispersion model (the AERMOD model) was then used to estimate the DPM and $PM_{2.5}$ concentrations and potential health risks impacts to the Project's future residents in the Project anticipated opening year, 2022. DPM and $PM_{2.5}$ emissions from SR-24 were conservatively assumed to remain constant at their 2022 levels, even though mobile source emission levels will be lower in future years as various state-mandated emission control programs are required to be met. Table 9 provides a summary of the health risk impacts from SR-24 mobile emission sources on the Project's future residents from the refined HRA prior to the implementation of mitigation.

Table 9: Results of the Refined Health Risk Assessment for State Route 24—Unmitigated

Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the Maximum Impacted Sensitive Receptor (MIR)(1)	5.5	0.002	**0.74**
BAAQMD Significance Threshold	10	1	0.30
Exceeds Individual Source Threshold?	No	No	**Yes**

Notes:
(1) Maximum impacted sensitive receptors are located at Buildings A, H, and I.

As noted in Table 9, the highest cancer risks are less than the BAAQMD cancer risk significance threshold. However, the annual $PM_{2.5}$ levels from SR-24 continue to exceed the BAAQMD annual $PM_{2.5}$ significance threshold, representing a significant operational impact to the

[22] CDOT 2018. 2016 Annual Average Daily Truck Traffic on the California State Highway System. Website: http://www.dot.ca.gov/traffic cops/census/docs/2016_aadt_truck.pdf
[23] ARB. 2018. EMFAC2017 Web Database. Website: https://www.arb.ca.gov/emfac/2017/
[24] Plan Bay Area 2040. 2017. Draft Environmental Impact Report. Section 2.1 Transportation. Website: http://2040.planbayarea.org/sites/default/files/2017-07/PBA%202040%20DEIR_0_1.pdf

Project's future residents. The highest $PM_{2.5}$ impacts were found to occur at the buildings closest to the highway (Buildings A, H, and I).

Many heating/vacuum/air condition (HVAC) filters available in the U.S. are rated for their particle removal efficiency using a laboratory test procedure described in the American Society of Heating, Refrigerating, and Air Conditioning Engineers (ASHRAE) Standard 52.2-2012, Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size. Minimum removal efficiency values in these three size bins are used to assign HVAC filters a single efficiency metric known as Minimum Efficiency Reporting Value, or "MERV." In general, the higher the MERV rating for a filter, the greater the removal efficiency for one or more particle size bins. Average values for approximated outdoor-origin $PM_{2.5}$ removal efficiencies for several MERV-rated filters were derived from Stephens, Brennan, and Harriman[25]. Single-pass outdoor-origin $PM_{2.5}$ removal efficiencies range from less than 10 percent for MERV 6 to over 95 percent for MERV 16 and HEPA filters.

To reduce the risk to future residents, MM AQ-3 has been revised to require the installation of MERV 13 filters to address the annual $PM_{2.5}$ levels. MERV 13 filters would trap particles at an efficiency rate of 60 percent. After the installation and maintenance of an air filtration system rated at MERV 13, the annual $PM_{2.5}$ concentration is estimated at 0.28 $\mu g/m^3$ as shown in Table 10, which is less than the BAAQMD recommended significance threshold of 0.3 $\mu g/m^3$.

Table 10: Results of the Refined Health Risk Assessment for State Route 24—Mitigated

Metric	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the Maximum Impacted Sensitive Receptor (MIR)(1)	0.28
BAAQMD Significance Threshold	0.30
Exceeds Individual Source Threshold?	No

Therefore, future residents of the Project would not be exposed to substantial health risks. As a result, implementation of revised MM AQ-3 would reduce potential impacts to less than significant. As explained above, impacts to air quality would not be more severe or substantially increased compared to the effects analyzed in the 2013 FEIR and impacts would, in fact, be reduced to below significant with incorporation of the revised mitigation measure. No additional analysis is required.

e) Summary of 2013 FEIR

As discussed in the 2013 FEIR, the BAAQMD does not consider odors generated from use of construction equipment and activities to be objectionable. For operational phase odor

[25] Stephens, Brent, Brennan, Terry, and Harriman, Lew, 2016. Selecting Ventilation Air Filters to Reduce PM2.5 Of Outdoor Origin. Website: http://www.conforlab.com.br/wp-content/uploads/2016/10/2016Sep_012-021_HarrimanFiltersToReducePM2.5.pdf.

impacts, a project that would result in the siting of a new source of odor or exposure of a new receptor to existing or planned odor sources should consider odor impacts. The 2013 FEIR found that operation of this type of project would not generate substantial odors or be subject to odors that would affect a substantial number of people. Therefore, the 2013 FEIR found that the impact would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the land uses associated with the proposed Project would be residential, which are not typically a generator of odor emissions, and there is nothing to indicate the Project would generate odor emissions. Therefore, the Project would not create objectionable odors affecting a substantial number of people. The Project would not introduce new environmental impacts or substantially increase the severity of previously analyzed significant effects.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM AQ-1 The Project shall comply with the following BAAQMD Basic Control Measures for reducing construction emissions of PM_{10}:

- Water all active construction areas at least twice daily. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 24 inches of freeboard (i.e. the minimum required space between the top of the load and the top of the trailer).
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep streets (with water sweepers using reclaimed water if possible) at the end of each day if visible soil material is carried onto adjacent paved roads.
- Suspend ground-disturbing activities when wind speeds exceed 25 mile per hour.
- Install three-sided enclosures for storage piles on-site for more than five days. The enclosures shall be designed with a maximum 50 percent porosity.

MM AQ-2a The construction contractor shall implement the following measures to reduce off-road exhaust emissions during grading and construction activities. To assure compliance, the City of Lafayette shall verify that these measures have been implemented during normal construction site inspections:

- Large off-road construction equipment with horsepower (hp) ratings of 50 hp or higher shall meet the United States Environmental Protection Agency-Certified emission standard for Tier 3 off-road equipment. Tier 3 engines between 50 and 750 horsepower are available for 2006 to 2008 model years. A list of construction

equipment by type and model year shall be maintained by the construction contractor on-site.
- All construction equipment shall be properly serviced and maintained to the manufacturer's standards to reduce operational emissions.
- Nonessential idling of construction equipment shall be limited to no more than five consecutive minutes.
- Construction activities shall be suspended on "Spare the Air" days.

MM AQ-2b The construction contractor shall implement one of the following measures to reduce on-road emissions from soil hauling. To assure compliance, the City of Lafayette shall verify that these measures have been implemented during normal construction site inspections.

- The construction contractor shall contract with haulers for soil export that use engines certified to 2007 or newer standards. Prior to construction, the Project engineer shall ensure that grading plans clearly show the requirement for 2007 engines for soil haul trucks; Or
- Off-site disposal of soil shall be transported in trucks that can carry a minimum of 12 cubic yards (CY) of soil and shall be limited to no more than 252 truck trips per day (1,512 CY/day).

MM AQ-3 The applicant shall install high efficiency Minimum Efficiency Reporting Value (MERV) filters with a rating of 9 to 12 in the intake of the residential ventilation systems. MERV 9 to 12 filters have a Particle Size Efficiency Rating that results in a 40 percent up to 80 percent reduction of particulates in the 1.0 to 3.0-micron range, which includes $PM_{2.5}$. To ensure long-term maintenance and replacement of the MERV filters in the individual units, the owner/property manager shall maintain and replace the MERV 9 to 12 filters in accordance with the manufacturer's recommendations, which typically is after two to three months. The developer, sales, and/or rental representative also shall provide notification to all affected tenants/residents of the potential health risk from State Highway 24 and shall inform renters of increased risk of exposure to $PM_{2.5}$ from State Highway 24 when the windows are open.

MM AQ-4 Implement Mitigation Measure AQ-2a.

MM AQ-5 Implement Mitigation Measure AQ-1, AQ-2a, AQ-2b, and AQ-3.

Revised Mitigation Measures for the Resumed Project

MM AQ-2a The construction contractor shall implement the following measures to reduce off-road exhaust emissions during grading and construction activities. To assure compliance, the City of Lafayette shall verify that these measures have been implemented during normal construction site inspections:

- Large off-road construction equipment with horsepower (hp) ratings of 50 hp or higher shall meet the United States Environmental Protection Agency-Certified emission standard for Tier IV Final off-road equipment. A list of construction equipment by type and model year shall be maintained by the construction contractor on-site. If engines that comply with Tier IV Final off-road emission standards are not commercially available, then the construction contractor shall use the next cleanest piece of off-road equipment (e.g., Tier IV Interim) available. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier IV Final engines taking into consideration factors such as (i) critical-path timing of construction; and (ii) geographic proximity of equipment to the Project site. The contractor can maintain records for equipment that is not commercially available by providing letters from at least two rental companies for each piece of off-road equipment where the Tier IV Final engine is not available.
- All construction equipment shall be properly serviced and maintained to the manufacturer's specifications to reduce operational emissions.
- Nonessential idling of construction equipment shall be limited to no more than five consecutive minutes.
- Construction activities shall be suspended on "Spare the Air" days.

MM AQ-3 The applicant shall install high efficiency Minimum Efficiency Reporting Value (MERV) filters with a rating of 13 in the intake of the residential ventilation systems. MERV 13 filters have a Particle Size Efficiency Rating that results in a 60 reduction of particulates in the 1.0 to 3.0-micron range, which includes $PM_{2.5}$. To ensure long-term maintenance and replacement of the MERV filters in the individual units, the owner/property manager shall maintain and replace the MERV 13 filters in accordance with the manufacturer's recommendations, which typically is after two to three months. The developer, sales, and/or rental representative also shall provide notification to all affected tenants/residents of the potential health risk from SR-24 and shall inform renters of increased risk of exposure to $PM_{2.5}$ from SR-24 when the windows are open.

Conclusion

As explained above, impacts to air quality would not be more severe or substantially increased compared to the effects analyzed in the 2013 FEIR and would, in fact, reduce impacts to below significant with incorporation of the revised mitigation measures based on more effective technology. The revisions to MM AQ-2a and AQ-3 reflect minor technical changes and additions that result in more effective mitigation and further reduce impacts to air quality when compared to the previously adopted mitigation measures MM AQ-2a and AQ-3. These revised mitigation measures are appropriately discussed in this addendum and incorporated into the MMRP because the revisions do not themselves involve new significant effects or substantially increase the severity of previously analyzed significant effects that would require the preparation of a subsequent environmental document.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
IV. Biological Resources							
Would the project:							
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM BIO-1 through BIO4	MM BIO-1 **[revised]**, BIO-2, MM BIO-3 **[revised]**
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Significant and Unavoidable	No	No	No	Less than Significant with Mitigation Incorporated	MM BIO-5 and MM BIO-6	MM BIO-5 **[revised]** and MM BIO-6 **[revised]**
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant with Mitigation Incorporated	No	MM BIO-6a, MM BIO-6b, and MM BIO-6c	No	Less than Significant with Mitigation Incorporated	None	MM BIO-6a, MM BIO-6b, and MM BIO-6c MM, and MM BIO-6d **[subpart (d) has been included in MM BIO-6]**

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM BIO-8 (MM BIO-8 incorporates MM BIO-1 through MM BIO-7)	MM BIO-8 (MM BIO-8 incorporates MM BIO-1 through MM BIO-7; excluding MM BIO-4) **[MM BIO-8 has been revised; in addition MM BIO-1, MM BIO-3, MM BIO-5, and MM BIO-7 have been revised and subpart (d) has been included in MM BIO-6]**
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Significant and Unavoidable	No	No	No	Less than Significant with Mitigation Incorporated	MM BIO-7	MM BIO-7 **[revised]**
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No	No	No	No Impact	None	None

Discussion

The 2013 FEIR identified no impact to Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs). The 2013 FEIR concluded that there would be potentially significant

impacts related to wetlands, special status species, wildlife corridors, and local policies or ordinances protecting biological resources and significant and unavoidable impacts with respect to "protected trees" and natural communities. The 2013 FEIR identified mitigation measures that reduced impacts to wetlands, special status species, wildlife corridors, and local policies or ordinances protecting biological resources to less than significant.

MM BIO-1 has been revised to broaden the scope of this mitigation measure. MM BIO-3 has been revised to reflect current site conditions and ensure the City is responsible for review and approval of the "report of findings," (described in detail in Impact IV(a)). MM BIO-5 has been revised to reflect refined grassland mitigation that would provide mitigation on-site, MM BIO-6b has been refined to provide clarity and include reference to the creek drainage that the Project may impact, subpart (d) has been included in MM BIO-6 to further establish enforceability of wetland mitigation MM BIO-7 has been revised to emphasize the installation of native tree species indigenous to the site and vicinity, and MM BIO-8 has been revised to clarify the location of the natural area surrounding the creek. With these revisions and updates, the Addendum concluded that impacts related to protected trees and natural communities would be less than significant with mitigation incorporated. As described in more detail below, the Project does not result in new or more severe impacts than disclosed and analyzed in the 2013 FEIR.

FCS Biologist Robert Carroll conducted a site visit on August 14, 2018, to confirm that the conditions presented in the 2013 FEIR are still consistent with current conditions within the Project site. The site visit confirmed that the previously existing buildings on-site were removed in 2016. All other current conditions are consistent with those identified in 2013 FEIR. A Bridges' coast range shoulderband snail (BCRSS) survey completed on March 13 and 22, April 26, and May 23, 2013, that there is no evidence of this snail on-site, and MM BIO-4 is no longer applicable to the project. MM BIO-8 has also been revised to note that MM BIO-4 is not applicable to the Project. Additionally, a 2016 pre-construction nesting bird and bat survey that resulted in negative findings, and a 2016 City-approved tree removal permit are included in Appendix C and support the analysis and conclusions of the Addendum detailed below.

a) Summary of 2013 FEIR

The 2013 FEIR determined that no special-status plant species were encountered during surveys or are expected to occur on-site; however, there is a possibility that undetected populations may occur in the vicinity of off-site wetland and native grassland mitigation areas. As such, the 2013 FEIR concluded that implementation of MM BIO-1, which requires the implementation of confirmation surveys on any off-site mitigation property prior to site development, would ensure impacts to special-status plant species would be reduced to a less than significant level.

The 2013 FEIR also determined potential for the following special-status wildlife species on-site: nesting raptors and other migratory birds, roosting bats, and Bridges' coast range shoulderband snail (*Helminthoglypta nickliniana bridgesi*). The 2013 FEIR concluded that impacts to these species would be considered a significant impact. As such, according to the 2013 FEIR, implementation of MM BIO-2 through MM BIO-4, which requires pre-construction surveys for nesting raptors and other migratory birds, roosting bats, and Bridges' coast range

shoulderband snail, would ensure impacts to special-status wildlife species would be reduced to a less than significant level.

Resumed Project Analysis and Conclusion

Similar to the conclusions of the 2013 FEIR, significant impacts could occur during construction activities. When the 2013 FEIR was certified, it was anticipated that a specific off-site property would be suitable for off-site mitigation. However, subsequent to the certification of the 2013 FEIR, it was determined that off-site mitigation on that property would not be feasible. Therefore, MM BIO-1 has been revised to broaden the scope of this mitigation measure.

A 2016 pre-construction nesting bird and bat survey resulted in negative findings. However, future surveys would still need to be completed 2 weeks prior to tree and vegetation clearing to ensure no nesting birds or bats are on-site, and MM BIO-3 would still be applicable to the Project. MM BIO-3 has been revised to recognize that the previously existing buildings on-site were removed in 2016, in accordance with State and federal regulations. In addition, the mitigation measure was revised to require City review and approval of the "report of findings," which details the findings of the completed surveys.

As discussed above a BCRSS survey completed on March 13 and 22, April 26, and May 23, 2013, concluded that there is no evidence of this snail on-site, and MM BIO-4 is no longer applicable to the project.

Implementation of MM BIO-1 and MM BIO-3, as revised, and MM BIO-2 would reduce potentially significant impacts to a less than significant level. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded that significant and unavoidable impacts would occur to approximately 2 acres of native blue wildrye within the Project site. This is considered a sensitive natural community, and impacts to this plant community would be considered significant. In addition, the 2013 FEIR proposes MM BIO-5, which includes a blue wildrye native grassland avoidance and replacement program, to address the anticipated loss of native grasslands within the Project site. MM BIO-5 would require compensatory mitigation to provide a minimum 1:1 replacement ratio for grasslands lost as a result of Project construction. The preservation of the entire 2 acres of native blue wildrye would not be feasible due to the Project design. Therefore, the 2013 FEIR concluded that impacts would be significant and unavoidable, with respect to a natural community.

The 2013 FEIR noted that the Project would fill an estimated 295 linear feet of creek channel. The filling of this riparian habitat would be considered a significant impact. MM BIO-6 would require the authorization for proposed modifications to be obtained by the United States Army Corps of Engineers (USACE), RWQCB, and California Department of Fish and Wildlife (CDFW). All conditions required as part of the authorization by USACE, RWQCB, and CDFW shall be

implemented as part of the Project. The 2013 FEIR concluded implementation of MM BIO-6 would reduce potential impacts to riparian habitat to a less than significant level.

Resumed Project Analysis and Conclusion

As stated above, with the environmentally beneficial site refinements, reestablishment of 2.1 acres of native wildrye would occur on-site, and a blue wildrye Native Grassland Replacement Program (Program) would be developed. This Program would mitigate for the removal of native blue wildrye by repropagating 2.1 acres on-site and would provide a 1:1 compensatory replacement ratio for the acreage of native grasslands impacted by the Project. The proposed grassland mitigation is depicted in Exhibit 5, and MM BIO-5 is revised to reflect this environmentally beneficial site refinement. Implementation of this Program would not result in new or more severe environmental effects and the environmental impacts identified in the 2013 FEIR would, in fact, be reduced. With implementation of the revised MM BIO-5, impacts to native blue wildrye would be less than significant. With respect to riparian habitats, consistent with the 2013 FEIR, the Project would implement MM BIO-6 (revised as described in impact IV(c)) that would reduce impacts to a less than significant level. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The proposed Project would fill an estimated 295 linear feet of creek channel on the site, eliminating about half of the central portion of the intermittent creek channel and all of the tributary ephemeral drainage. Potential indirect effects could also degrade the existing habitat functions and values of downstream Las Trampas Creek and other jurisdictional waters as a result of accidental spills, contamination from fertilizers and other urban pollutants, and increased runoff volumes and possible erosion in waters of the United States and State. The 2013 FEIR requires the implementation of MM BIO-6a, which requires the applicant to obtain authorization for proposed modifications from the USACE, RWQCB, and CDFW in places where jurisdictional waters of the United States and State are present and cannot be avoided. In addition, MM BIO-6b requires that a qualified wetland specialist prepare a Wetland/Riparian Protection and Replacement Program. The applicant would implement that program to ensure any jurisdictional waters affected by the Project would be replaced. Finally, MM BIO-6c requires a Storm Water Pollution Prevention Plan (SWPPP) be prepared and implemented. The SWPPP would employ Best Management Practices (BMPs) to control both construction-related erosion and sedimentation, and Project-related non-point discharge into waters on site. The 2013 FEIR concluded that with implementation of MM BIO-6a, MM BIO-6b, and MM BIO-6c, impacts to protected wetlands as defined by Section 404 of the Clean Water Act would be less than significant.

Resumed Project Analysis and Conclusion

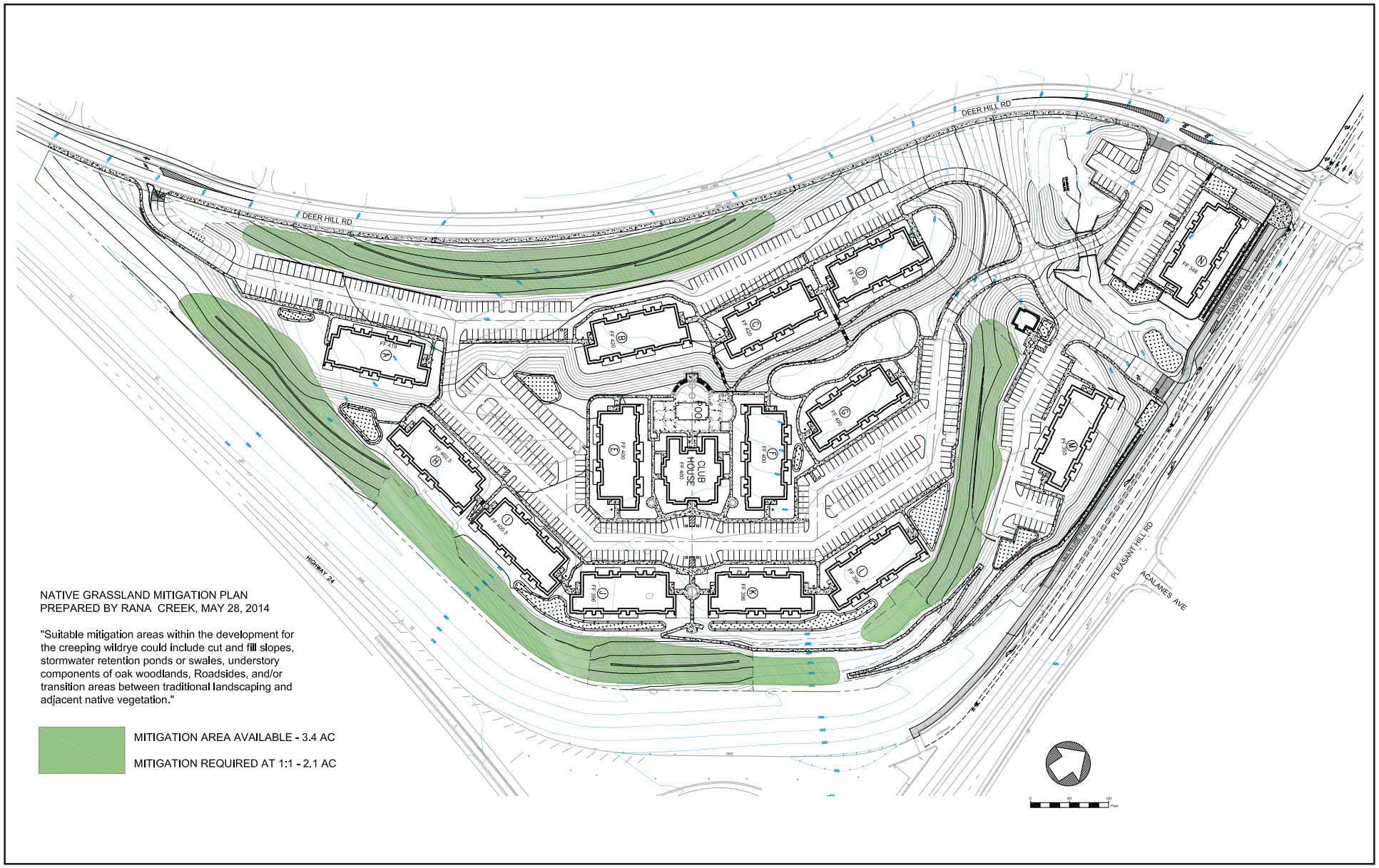
Consistent with the 2013 FEIR, the proposed Project could fill an estimated 295 linear feet of creek channel on the site, eliminating about half of the central portion of the intermittent creek channel and all of the tributary ephemeral drainage. MM BIO-6b has been refined to

provide clarity and reference the drainage that the Project may impact. Using a conservative approach, subpart (d) has been included in MM BIO-6 to further establish enforceability of the wetland mitigation. With implementation of MM BIO-6a, MM BIO-6b, as revised, MM BIO-6c, and the additional subpart (d), consistent with the 2013 FEIR, impacts to wetlands would be less than significant.[28] Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

[28] Though MM BIO-6a states "consultation or incidental take permitting may be required under the California and Federal Endangered Species Acts, and all legally required permits or other authorizations for the potential 'take' of species listed under the Endangered Species Acts shall be obtained," it should be noted that no suitable habitat for special-status species occurs on the Project site (see Appendix F of the 2013 FEIR).

THIS PAGE INTENTIONALLY LEFT BLANK

Attachment 3



Source: BFK Engineers, Surveyors, Planners, December 14, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 5
Grassland Mitigation

THIS PAGE INTENTIONALLY LEFT BLANK

d) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project would alter the existing habitat on the site by filling a large portion of the creek channel that would eliminate most of the oak woodland and convert grassland to ruderal cover. The 2013 FEIR concluded that wildlife movement opportunities along the existing creek would be reduced and fragmented as a result of Project construction. The 2013 FEIR also concluded that implementation of MM BIO-8 (which incorporates MM BIO-1 through MM BIO-7) would reduce the potential impacts of the Project on wildlife habitat and wildlife movement opportunities to a less than significant level.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would implement MM BIO-8 (which incorporates MM BIO-1 through MM BIO-7 excluding MM BIO-4) to address potential impacts related to wildlife movement corridors. MM BIO-8 has been revised to note that MM BIO-4 is not applicable to the Project and to clarify the location of the natural area surrounding the creek. Revisions to MM BIO-7 are provided in more detail in Impact VI(e). Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project would remove 91 of the 116 inventoried trees on the site that qualify as "protected trees" under the City's Tree Protection Ordinance. An additional nine trees are proposed for relocation on the site and 16 would be preserved. The 2013 FEIR concluded loss of healthy trees on-site would conflict with the policies and programs in the City's General Plan that call for preservation of healthy trees and native vegetation to the "maximum extent feasible." As such, the 2013 FEIR concluded that impacts to the City's "protected trees" would be a significant and unavoidable impact. The 2013 FEIR requires the implementation of MM BIO-7, which proposes the development of a tree replacement program to mitigate for the removal of the 91 "protected trees" on the Project site. However, the preservation of all "protected trees" would not be feasible due to the Project design. Therefore, the 2013 FEIR concluded that impacts would be significant and unavoidable.

Resumed Project Analysis and Conclusion

MM BIO-7 is revised to emphasize the installation of native tree species indigenous to the site and vicinity. While the General Plan does call for requiring site planning, construction, and maintenance of new development to preserve existing healthy trees and native vegetation to the maximum extent feasible, this Open Space and Conservation Element program (Program OS-4.4.1) is not a threshold of significance under CEQA and has not been adopted as such by the City as required by CEQA Guidelines section 15064.7.[29] In addition, other applicable General Plan

[29] CEQA Guidelines section 15064.7, subd. (a) encourages public agencies "to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects." However, under CEQA Guidelines section 15064.7, subd. (b), such thresholds "must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence."

provisions call for the replacement of native trees when a project results in the loss of woodland habitat (Program OS-4.3), and while the Project would remove 91 of 116 existing trees on the Project site, the Project would also add 700 additional trees on the entire site, including existing areas with bare soil, for a total of 725 trees planted at Project buildout. Moreover, the Project is preserving existing healthy trees to the maximum extent feasible under the proposed site plan. Thus, with implementation of the revised MM BIO-7, impacts to "protected trees" would be reduced to a less than significant level. The Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

f) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project site is not located within an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. As such, the 2013 FEIR concluded that no impacts would occur due to Project construction.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would not be located within any HCP, NCCP, or other approved local, regional, or State habitat conservation plan. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM BIO-1 Confirmation surveys shall be conducted on any off-site mitigation properties prior to future development on the site to determine whether any special-status plant species are present. The surveys shall be conducted by a qualified botanist and shall be appropriately timed to allow for detection of all species of concern (typically between March and July). In the event that confirmation surveys identify any federally- or State-listed plant species on the site that cannot be avoided, the applicant shall obtain all necessary permits and/or authorizations from the CDFW[30] and USFWS as required by federal and State law for incidental take of those species. This shall include preparation of a mitigation program acceptable to the respective agencies depending on the State and/or federal-listing status of the species in question. The mitigation program shall define avoidance and long-term conservation measures to permanently protect and manage habitat around the occurrence(s), and provide for a minimum of 5 years of monitoring following installation of mitigation improvements at the off-site location to demonstrate that the occurrence(s) has not been adversely affected during construction. If a special-status species is encountered that is not a federally- or State listed species but is maintained on List 1B or List 2 of the California Native Plant Society's Inventory of

[30] Previously known as California Department of Fish and Game.

Rare and Endangered Plants of California and the occurrence(s) cannot be avoided, a salvage/relocation plan shall be developed and approved by CDFW as part of the mitigation program prior to any disturbance in the vicinity. Evidence that the applicant has secured any required authorization from these agencies shall be submitted to the City's Planning and Building Services Division prior to issuance of any grading or building permits for the Project.

MM BIO-2 Adequate measures shall be taken to avoid inadvertent take of raptor nests and other nesting birds protected under the Migratory Bird Treaty Act when in active use. This shall be accomplished by taking the following steps.

- If vegetation removal and initial construction is proposed during the nesting season (March to August), a focused survey for nesting raptors and other migratory birds shall be conducted by a qualified biologist within 7 days prior to the onset of vegetation removal or construction, in order to identify any active nests on the proposed Project site and in the vicinity of proposed construction. The site shall be resurveyed to confirm that no new nests have been established if vegetation removal has not been completed or if construction has been delayed or curtailed for more than 7 days during the nesting season.
- If no active nests are identified during the construction survey period, or if development is initiated during the non-breeding season (September to February), vegetation removal and construction may proceed with no restrictions.
- If bird nests are found, an adequate setback shall be established around the nest location and vegetation removal and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the CDFW,[31] and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated on the remainder of the development site.
- A report of findings shall be prepared by the qualified biologist and submitted to the City for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season (March to August). The report shall either confirm absence of any active nests or should confirm that any active young are located within a designated no-disturbance zone and construction can proceed.

MM BIO-3 Measures shall be taken to avoid possible loss of bats during Project construction. This shall be accomplished using the following provisions:

- Existing buildings should be demolished between February 15 to April 15 or from August 15 to October 15 to minimize the likelihood of removal during the winter

[31] Formerly known as the California Department of Fish and Game

roosting period when individuals are less active and more difficult to detect, and the critical pupping period (April 16 to August 14) when young cannot disperse.

- Buildings shall be surveyed by a qualified bat biologist no more than two weeks before demolition to avoid "take" of any bats that may have begun to use the structures for day-roosting.
- If the pre-demolition survey reveals bats or bat roosting activity, all doors and windows shall be opened and left open continually until demolition. Additional recommendations may be made by the qualified bat biologist following the pre-demolition survey, including monitoring of demolition and other measures to avoid take of individual bats.
- A tree roost habitat assessment shall be conducted by a qualified bat biologist for trees to be removed as part of the Project. The habitat assessment shall be conducted no more than two weeks prior to tree removal and vegetation clearing. Additional detailed measures may be required based on the results of the habitat assessment if evidence of bat roosting is observed. This may include supervision of tree removal by the qualified bat biologist, and systematic removal of select trees and major limbs to encourage dispersal and avoid "take" of individual bats.

MM BIO-4 Measures shall be taken to avoid possible inadvertent loss of Bridges' coast range shoulderband snail, if present on the site. A qualified entomologist or invertebrate biologist shall conduct a preconstruction survey to verify whether this subspecies is present or absent on the site. The survey shall be conducted during the time of year when snails are most easily detected, generally during the late winter and early spring (February through May) in advance of construction. If absent, no additional measures shall be required. If present, a Bridges' Coast Range Shoulderband Snail Protection and Relocation Program (Program) shall be prepared by the qualified entomologist or invertebrate biologist and implemented as part of the Project. The Program shall contain the following provisions and performance standards:

- Following completion of the preconstruction surveys, a report of findings shall be prepared by the qualified entomologist/invertebrate zoologist and submitted to the City for review and approval prior to initiation of vegetation removal and construction. The report shall either confirm absence of this subspecies from the site, or if individuals are encountered, shall follow details of the Program as outlined below.
- The preserved and enhanced creek corridor shall be established as permanent secure habitat for this subspecies, with essential cover habitat (i.e. logs, loose rocks, and thick layers of duff) incorporated into the enhancement plans. A minimum 1:1 acreage of habitat shall be preserved and/or re-created on-site along the creek channel for locations occupied by this subspecies during the preconstruction survey.
- Temporary measures shall be implemented during construction to prevent this subspecies from dispersing from preserved occupied habitat into areas to be graded and disturbed during construction. A secured containment area should be

created along the creek segment to be retained, with fencing surrounding the containment area to prevent dispersal into the construction zone.

- Individuals of the subspecies located within the limits of construction shall be collected and temporarily relocated by the qualified entomologist/invertebrate biologist to the temporary containment area prior to any vegetation removal or grading on the site.
- A worker training program shall be given by the qualified entomologist/invertebrate biologist to all construction personnel involved in grading, temporary construction containment structures, and creek enhancement measures. The training shall describe and include photographs of the subspecies and its vulnerability, explain the importance of avoiding inadvertent take and instruct personnel on what to do if additional individuals of the subspecies are encountered during construction outside the temporary containment area.
- Habitat enhancement activities within the creek corridor, including the temporary containment area, shall be designed to provide essential habitat characteristics for this subspecies. The qualified entomologist/invertebrate biologist shall review and provide input into wetland and native grassland mitigation programs to ensure they do not conflict with the long-term goal of protecting essential habitat for this subspecies as well.
- Temporary construction disturbance within the temporary containment area required as part of habitat enhancement shall be overseen by the qualified biologist/invertebrate biologist to ensure activities do not adversely affect individuals of the subspecies.

MM BIO-5 A blue wildrye Native Grassland Avoidance and Replacement Program (Program) shall be developed by a qualified biologist to address the anticipated loss of native grasslands on the site, and ensure no native grasslands are destroyed or damaged as part of any off-site mitigation. The Program shall contain the following provisions and performance standards:

- The proposed limits of grading shall be modified to avoid additional areas of the stands of native grassland on the site to the maximum extent feasible and a compensatory mitigation component prepared and implemented to provide a minimum 1:1 replacement ratio for grasslands lost as a result of the Project. A higher replacement ratio would not be warranted because of the extent of apparent past disturbance to the remaining native grasslands on the site, and relative ease with which this particular species can be salvaged, replanted, and reestablished at alternative locations.
- Areas retained or restored as native grassland shall be permanently protected as open space and managed as native grassland by deed restriction or conservation easement, whether on-site or off-site. The Program shall define short-term construction controls and long-term maintenance requirements necessary to ensure that the native grasslands are successfully reestablished and existing and restored native grasslands remain viable. The maintenance and management

requirements shall include provisions for annual invasive species removal, and control on the establishment of both native and non-native trees and shrubs that could eventually shade out the grassland to be protected.

- Areas of native grassland to be preserved shall be flagged in the field prior to any vegetation removal or grading, and temporary orange construction fencing installed under supervision of the qualified biologist around all areas to be retained.
- Construction personnel operating grading and construction equipment and/or involved in habitat restoration activities shall be trained by the qualified biologist over the sensitivity of the native grasslands, purpose of the temporary orange construction fencing, and that all construction-related disturbance should be restricted outside of the fence.
- Areas of native grassland within the limits of proposed grading and construction shall be salvaged and used in revegetation efforts implemented as part of the Program. Salvage material shall include both intact stem and root material, which shall be stored and maintained until ready for reinstallation in the late fall/early winter when conditions are optimal for successful reestablishment.
- A monitoring program shall be implemented by the qualified biologist to oversee successful establishment of any native grasslands to be restored, either on or off-site, and shall define both short-term and long-term requirements. Permanent monitoring transects shall be established as part of the program and vegetation data collected in the spring and summer months when plant identification is possible. Photo stations shall be established along each monitoring transect, and photographs taken every year during the required monitoring period. Performance standards, success criteria, and contingency measures shall be defined as part of the Program. Monitoring transects shall be established over each location to be vegetated as native grassland, and monitored on an annual basis. Within a 5-year period, native grass shall be successfully established over all treatment areas and shall comprise a minimum 60 percent of the relative cover. Monitoring shall be extended where the success criteria are not met, and the minimum 1:1 replacement ratio is not reached.
- Annual monitoring reports shall be prepared by the qualified biologist and submitted to the City's Planning and Building Services Division by December 31 of each monitoring year, for a minimum of 5 years or until the defined success criteria are met. The annual report shall summarize the results of the monitoring effort, performance standards, and any required contingency measures, and shall include photographs of the monitoring transects and program success. Maps shall be included in the monitoring report to show the location of monitoring transects and photo stations.

MM BIO-6a Where jurisdictional waters of the United States and State are present and cannot be avoided, authorization for proposed modifications shall be obtained from the USACE, RWQCB, and CDFW. All conditions required as part of the authorizations by the USACE, RWQCB, and CDFW shall be implemented as part of the Project. Consultation or incidental take permitting may be required under the California and

federal Endangered Species Acts, and all legally required permits or other authorizations for the potential "take" of species listed under the Endangered Species Acts shall be obtained. Copies of all authorizations shall be provided to the City's Planning and Building Services Division prior to issuance of a grading or other permit for the Project to ensure that the applicant has adequately coordinated with jurisdictional agencies.

MM BIO-6b A Wetland/Riparian Protection and Replacement Program (Program) shall be prepared by a qualified wetland specialist and implemented to replace any jurisdictional waters affected by the Project. The Program shall include appropriate implementation measures to prevent inadvertent loss and degradation of jurisdictional waters to be protected, and replacement for those features eliminated or modified as a result of development. This shall be accomplished as part of revegetation of the channel segment(s) disturbed during construction. The Program shall contain the following components:

- Jurisdictional waters shall be avoided to the maximum extent feasible, and where avoidance is infeasible, shall be replaced at a minimum 2:1 ratio, preferably on-site. This could be achieved by reducing the extend of fills currently proposed and expanding a low elevation wetland terrace along the bottom of the channel bottom where possible without adversely affecting existing riparian and upland trees along the creek corridor. Out-of-kind mitigation may be necessary given the limited opportunities for recreating creek channel habitat on the site.
- Cuttings from any willows removed as part of the Project shall be stored properly during construction, to be installed along the edge of the channel bottom and mid-bank to provide additional protective cover and replace willow removed as part of the Project.
- Additional native tree, shrub, and groundcover species shall be installed and maintained in areas enhanced or restored as part of the Program, and a mix of native grassland species should be hydro-seeded throughout the area to provide temporary erosion control. Tree and shrub plantings shall be irrigated for a minimum of 2 years during the dry summer months to ensure successful establishment.
- Temporary construction fencing shall be installed around the boundary of all wetlands, riparian, and trees to be preserved along the creek channel so that they are not disturbed during construction. Fencing shall remain in place until construction has been completed.
- Success criteria, maintenance and long-term management responsibilities, monitoring requirements, and contingency measures in the Program shall be specified. Monitoring shall be conducted by the qualified wetland specialist for a minimum of 5 years and continue until the success criteria are met. Permanent monitoring transects shall be established as part of the program and vegetation data collected in the spring and summer months when plant identification is

possible. Photo stations shall be established along each monitoring transect, and photographs taken every year during the required monitoring period.

- Annual monitoring reports shall be prepared by the qualified wetland specialist and submitted to resource agency representatives and the City's Planning and Building Services Division by December 31 of each monitoring year for a minimum of 5 years, or until the defined success criteria are met. The annual report shall summarize the results of the monitoring effort, performance standards, and any required contingency measures, and shall include photographs of the monitoring transects and program success. Maps shall be included in the monitoring report to show the location of monitoring transects and photo stations.

MM BIO-6c A SWPPP shall be prepared and implemented using BMPs to control both construction-related erosion and sedimentation and project-related non-point discharge into waters on the site.

MM BIO-7 The Project shall comply with City of Lafayette Tree Protection Ordinance, Chapter 6-17 of the Lafayette Municipal Code, and a Tree Protection and Replacement Program (Program) should be developed by a certified arborist and implemented to provide for adequate protection and replacement of native and planted trees larger than 6 inches dbh (diameter at breast height) possibly affected by proposed improvements. A category II permit should be obtained for the removal of any "protected tree," and replacement plantings should be provided as approved by the City. If permitted, an appropriate in-lieu fee should be paid to the City of Lafayette as compensation for "protected trees" removed by the Project, where sufficient land area is not available on-site for adequate replacement. The Program shall include the following provisions:

- Pursuant to the requirements of Section 6-1707.F of the Tree Protection and Preservation Ordinance, adequate measures should be defined to protect all trees to be preserved. This should include installation of temporary construction fencing at the perimeter of the protected area, restrictions on construction within the fenced areas unless approved as a condition of the application and performed under the supervision of the certified arborist, and prohibition on parking or storing of vehicles and other construction equipment within the protected area.
- All grading, improvement plans, and construction plans prepared for building permits should clearly indicate trees proposed to be removed, altered, or otherwise affected by development construction. The tree information on grading and development plans should indicate the number, size, species, assigned tree number and location of the dripline of all trees on the property that are to be retained/preserved.
- Details on relocation of any protected trees shall be defined as part of the Program. This shall include procedures for root system excavation, tree protection during relocation, planting bed preparation, short-term irrigation and monitoring, and compensatory mitigation if severely damaged during relocation or lost following planting.

- The Landscape Plan for the Project shall be revised to eliminate the planting of California bay (*Umbellularia californica*) because it is slow growing and could contribute to the establishment of sudden oak death on the site, which could then spread to surrounding coast live oaks.
- The Landscape Plan for the Project shall consider the vehicle sight distance requirements for motorists at access points along Deer Hill Road and Pleasant Hill Road, and tree and shrub plantings that could impede the minimum requirements shall be prohibited in these areas. No native trees planted to meet the requirements of Section 6-1707.G of the Tree Protection and Preservation Ordinance shall be installed in locations that would require future pruning or topping to provide adequate sight distance for motorists.

MM BIO-8 MM BIO-1 through MM BIO-7 would all serve to partially reduce the potential impacts of the Project on wildlife habitat and wildlife movement opportunities. The following additional measures shall be implemented to further reduce the impacts of the Project on movement opportunities and habitat values along the existing creek.

- The Project shall be revised to limit any crossing of the existing creek to a single bridge or arched culvert with as narrow a width as possible that allows for continued movement of wildlife under the structure.
- Uses on top of the new creek overcrossing shall be limited to the vehicle roadway and pedestrian sidewalk crossing to minimize the width of the structure. Parking, partial garage structures, and landscaping included in the creek crossing under the Project shall be eliminated.
- A natural area of at least 25 feet from the creek centerline shall be provided along both creek banks and enhanced as natural habitat as part of the Wetland/Riparian Protection and Replacement Program recommended in MM BIO-7. Detention basins and other improvements shall be restricted outside this minimum setback distance. Any detention basins located along the periphery of the creek corridor shall be enhanced as natural habitat for wildlife to the maximum extent feasible through plantings of native trees, shrubs, and ground cover species. Enhancement plantings shall also be located and designed to not interfere with minimum sight distance requirements for vehicle access along Deer Hill Road, to prevent the need for future clearing and topping.

Revised Mitigation Measures for the Resumed Project

MM BIO-4 is not applicable to the Project. The following mitigation measures have been revised:

MM BIO-1 Should off-site mitigation be necessary to offset impacts to waters of the United States, waters of the State and/or the creek drainage, authorization for proposed modifications and jurisdictional impacts shall be obtained from the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB),

and California Department of Fish and Wildlife (CDFW).[32] All conditions required as part of the authorizations by the USACE, RWQCB, and CDFW shall be implemented as part of the Project through a mitigation program. The mitigation program shall include a minimum of 5 years of monitoring following installation of mitigation improvements. The mitigation plan and biological monitoring reports shall be subject to review and approval by the City, including peer review by a qualified biologist selected by the City.

MM BIO-3 Measures shall be taken to avoid possible loss of bats during Project construction. This shall be accomplished using the following provisions:

- A tree roost habitat assessment shall be conducted by a qualified bat biologist for trees to be removed as part of the Project. The habitat assessment shall be conducted no more than two weeks prior to tree removal and vegetation clearing. Additional detailed measures may be required based on the results of the habitat assessment if evidence of bat roosting is observed. This may include supervision of tree removal by the qualified bat biologist, and systematic removal of select trees and major limbs to encourage dispersal and avoid "take" of individual bats.
- A report of findings shall be prepared by the qualified biologist and submitted to the City for review and approval prior to initiation of demolition or tree removal. The report shall either confirm absence of any roosting bats or define required measures to be taken to avoid inadvertent take of roosting bats.

MM BIO-5 A blue wildrye Native Grassland Replacement Program (Program) shall be developed by a qualified biologist to address the anticipated loss of native grasslands on the site. The Program shall be subject to review and approval by the City, including peer review by a qualified biologist selected by the City. The Program shall contain the following provisions and performance standards:

- A compensatory mitigation component shall be prepared and implemented to provide a minimum 1:1 replacement ratio for grasslands lost as a result of the Project. A higher replacement ratio would not be warranted because of the extent of apparent past disturbance to the remaining native grasslands on the Project site, and relative ease with which this particular species can be salvaged, replanted, and re-established at alternative locations.
- Areas restored as native grassland shall be permanently protected as open space and managed as native grassland by deed restriction. The Program shall define short-term construction controls and long-term maintenance requirements necessary to ensure that the native grasslands are successfully reestablished and restored native grasslands remain viable. The maintenance and management requirements shall include provisions for annual invasive species removal, and control on the establishment of both native and non-native trees and shrubs that could eventually shade out the grassland to be protected.

[32] Previously known as California Department of Fish and Game.

- Areas of native grassland within the limits of proposed grading and construction shall be salvaged and used in revegetation efforts implemented as part of the Program. Salvage material shall include both intact stem and root material, which shall be stored and maintained until ready for reinstallation in the late fall/early winter when conditions are optimal for successful reestablishment.
- A monitoring program shall be implemented by the qualified biologist to oversee successful establishment of any native grasslands to be restored and shall define both short-term and long-term requirements. Permanent monitoring transects shall be established as part of the program and vegetation data collected in the spring and summer months when plant identification is possible. Photo stations shall be established along each monitoring transect, and photographs taken every year during the required monitoring period. Performance standards, success criteria, and contingency measures shall be defined as part of the Program. Monitoring transects shall be established over each location to be vegetated as native grassland, and monitored on an annual basis. Within a five-year period, native grass shall be successfully established over all treatment areas and shall comprise a minimum 60 percent of the relative cover. Monitoring shall be extended where the success criteria are not met, and the minimum 1:1 replacement ratio is not reached. The Program and its requirements may be modified to require further measures if monitoring shows that performance standards are not being met.
- Annual monitoring reports shall be prepared by the qualified biologist and submitted to the City's Planning and Building Services Division by December 31 of each monitoring year, for a minimum of five years or until the defined success criteria are met. The annual report shall summarize the results of the monitoring effort, performance standards, and any required contingency measures, and shall include photographs of the monitoring transects and program success. Maps shall be included in the monitoring report to show the location of monitoring transects and photo stations.

MM BIO-6b A Wetland/Riparian Protection and Replacement Program (Program) shall be prepared by a qualified wetland specialist and implemented to offset any impacts by the Project to jurisdictional waters or the creek drainage. The Program shall include appropriate implementation measures to prevent inadvertent loss and degradation of jurisdictional waters to be protected, and replacement for those features eliminated or modified as a result of development. This shall be accomplished as part of revegetation of the channel segment(s) disturbed during construction. The Program shall contain the following components:

- Jurisdictional waters shall be avoided to the maximum extent feasible, and where avoidance is infeasible, shall be replaced at a minimum 2:1 ratio, preferably on-site. This could be achieved by reducing the extend of fills currently proposed and expanding a low elevation wetland terrace along the bottom of the channel bottom where possible without adversely affecting existing riparian and upland

trees along the creek corridor. Out-of-kind mitigation may be necessary given the limited opportunities for recreating creek channel habitat on the site.

- Cuttings from any willows removed as part of the Project shall be stored properly during construction, to be installed along the edge of the channel bottom and mid-bank to provide additional protective cover and replace willow removed as part of the Project.
- Additional native tree, shrub, and groundcover species shall be installed and maintained in areas enhanced or restored as part of the Program, and a mix of native grassland species should be hydro-seeded throughout the area to provide temporary erosion control. Tree and shrub plantings shall be irrigated for a minimum of 2 years during the dry summer months to ensure successful establishment.
- Temporary construction fencing shall be installed around the boundary of all wetlands, riparian, and trees to be preserved along the creek channel so that they are not disturbed during construction. Fencing shall remain in place until construction has been completed.
- Success criteria, maintenance and long-term management responsibilities, monitoring requirements, and contingency measures in the Program shall be specified. Monitoring shall be conducted by the qualified wetland specialist for a minimum of 5 years and continue until the success criteria are met. Permanent monitoring transects shall be established as part of the program and vegetation data collected in the spring and summer months when plant identification is possible. Photo stations shall be established along each monitoring transect, and photographs taken every year during the required monitoring period.
- Annual monitoring reports shall be prepared by the qualified wetland specialist and submitted to resource agency representatives and the City's Planning and Building Services Division by December 31 of each monitoring year for a minimum of 5 years, or until the defined success criteria are met. The annual report shall summarize the results of the monitoring effort, performance standards, and any required contingency measures, and shall include photographs of the monitoring transects and program success. Maps shall be included in the monitoring report to show the location of monitoring transects and photo stations.

MM BIO 7 The Project shall comply with the City of Lafayette Tree Protection Ordinance, Chapter 6-17 of the Lafayette Municipal Code, and a Tree Protection and Replacement Program (Program) shall be developed by a certified arborist and implemented to provide adequate protection and replacement of native and planted trees larger than 6 inches dbh (diameter at breast height) that would be affected by proposed improvements. A category II permit shall be obtained for the removal of any "protected tree," and replacement plantings shall be provided as approved by the City. If permitted, an appropriate in-lieu fee shall be paid to the City of Lafayette as compensation for "protected trees" removed by the Project, where sufficient land area is not available on-site for adequate replacement. The Program shall include the following provisions:

- Pursuant to the requirements of Section 6-1707.F of the Tree Protection and Preservation Ordinance, adequate measures shall be defined to protect all trees to be preserved. This shall include installation of temporary construction fencing at the perimeter of the protected area, restrictions on construction within the fenced areas unless approved as a condition of the application and performed under the supervision of the certified arborist, and prohibition on parking or storing of vehicles and other construction equipment within the protected area.
- All grading, improvement plans, and construction plans prepared for building permits shall clearly indicate trees proposed to be removed, altered, or otherwise affected by development construction. The tree information on grading and development plans shall indicate the number, size, species, assigned tree number and location of the dripline of all trees that are to be retained/preserved.
- Details on relocation of any protected trees shall be defined as part of the Program. This shall include procedures for root system excavation, tree protection during relocation, planting bed preparation, short-term irrigation and monitoring, and compensatory mitigation if a protected tree is severely damaged during relocation or lost following planting.
- The replacement trees shall emphasize the installation of native tree species indigenous to the site and vicinity, including the use of California buckeye and a greater number of valley oak trees, rather than the large number of plantings with non-native species.
- The Landscape Plan for the Project shall consider the vehicle sight distance requirements for motorists at access points along Deer Hill Road and Pleasant Hill Road, and tree and shrub plantings that could impede the minimum requirements shall be prohibited in these areas. No native trees planted to meet the requirements of Section 6-1707.G of the Tree Protection and Preservation Ordinance shall be installed in locations that would require future pruning or topping to provide adequate sight distance for motorists.

MM BIO-8 MM BIO-1 through MM BIO-7 (excluding MM BIO-4) would all serve to partially reduce the potential impacts of the Project on wildlife habitat and wildlife movement opportunities. The following additional measures shall be implemented to further reduce the impacts of the Project on movement opportunities and habitat values along the existing creek.

- The Project shall be revised to limit any crossing of the existing creek to a single bridge or arched culvert with as narrow a width as possible that allows for continued movement of wildlife under the structure.
- Uses on top of the new creek overcrossing shall be limited to the vehicle roadway and pedestrian sidewalk crossing to minimize the width of the structure. Parking, partial garage structures, and landscaping included in the creek crossing under the Project shall be eliminated.
- A natural area within the 100-year flood plain along the creek shall be provided and enhanced as natural habitat as part of the Wetland/Riparian Protection and

Replacement Program recommended in MM BIO-6. Detention basins and other improvements shall be restricted outside this minimum setback distance. Any detention basins located along the periphery of the creek corridor shall be enhanced as natural habitat for wildlife to the maximum extent feasible through plantings of native trees, shrubs, and ground cover species. Enhancement plantings shall also be located and designed to not interfere with minimum sight distance requirements for vehicle access along Deer Hill Road, to prevent the need for future clearing and topping.

Additional Subpart to MM BIO-6

MM BIO-6d Prior to construction or grading activities, the Project shall be revised to avoid and minimize impacts to wetlands to the maximum extent feasible. In addition, the Project shall be revised to limit any crossing of the existing creek to a single bridge or arched culvert with as narrow a width as possible that allows for continued movement of wildlife under the structure.

Conclusion

MM BIO-1 has been revised to broaden the scope of this mitigation measure. The revision to MM BIO-3 reflects current, actual conditions on-site and specifies the City is responsible for review and approval of the "report of findings." MM BIO-5 has been revised to reflect refined grassland mitigation and MM BIO-6b has been refined to provide clarity and include reference to the creek drainage that the Project may impact. MM BIO-7 has been revised to emphasize the installation of native tree species indigenous to the site and vicinity. MM BIO-8 has been revised to clarify the location of the natural area surrounding the creek and acknowledge that MM BIO-4 is not applicable to the Project. The revisions to MM BIO-1, MM BIO-3, MM BIO-5, MM BIO-6b, MM BIO-7, and MM BIO-8 reflect minor technical changes and additions that result in more effective mitigation and further reduce impacts to wetlands, native grassland, and protected trees when compared to the previously adopted mitigation measures. Subpart (d) has been included in MM BIO-6 to further establish enforceability of wetland mitigation. The revisions to MM BIO-1, MM BIO-3, MM BIO-5, MM BIO-6, MM BIO-7, and MM BIO-8 are appropriately discussed in this addendum and incorporated into the MMRP because the revisions do not themselves involve new significant effects or substantially increase the severity of previously analyzed significant effects.

There is no new information identifying significant new effects nor is there a substantial increase in the severity of previously identified significant effects related to biological resources. Further, no new mitigation measures or alternatives are required. Therefore, impacts associated with natural communities, and removal of "protected trees" would be reduced when compared with those identified in the 2013 FEIR assessment of biological resources. However, the residual impacts would remain the same as those identified in the 2013 FEIR.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
V. Cultural and Tribal Cultural Resources							
Would the project:							
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM CULT-1	MM CULT-1
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM CULT-1	MM CULT-1
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM CULT-2	MM CULT-2 **[revised]**
d) Disturb any human remains, including those interred outside of formal cemeteries?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM CULT-3	MM CULT-3
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:							
e) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	This checklist question did not exist at the time the EIR was certified (2013).	No	No	No	This checklist question did not exist at the time the EIR was certified (2013).	Less than Significant with Mitigation Incorporated	MM CULT-1 and MM CULT-3
f) A resource determined by the lead agency, in its discretion and supported by	This checklist question did not exist at the time the	No	No	No	This checklist question did not exist at the time the	Less than Significant with Mitigation Incorporated	MM CULT-1 and MM CULT-3

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	EIR was certified (2013).				EIR was certified (2013).		

Discussion

The maximum overall footprint of the Project does not differ from the Project analyzed in the 2013 FEIR; therefore, Cultural Resource impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified no potential impacts related to historical, archeological, paleontological, or human remains with the incorporation of mitigation, which, as described below, would not substantially change as a result of the Project.

Cultural Resources

a) Summary of 2013 FEIR

The 2013 FEIR determined that none of the previously existing buildings located on the Project site meet the criteria for inclusion on the California Register of Historical Resources and are, therefore, not historical resources pursuant to CEQA. No other historical resources were identified within the Project site. Although no known historical resources are present on the Project site, there is always potential to uncover previously unrecorded historical resources during project-related ground disturbing activities resulting in significant impacts. As such, the 2013 FEIR concluded that implementation of MM CULT-1, which requires the implementation of proscriptive treatment procedures in the unlikely circumstance that sensitive artifacts are found, would ensure impacts would be reduced to a less than significant level.

Resumed Project Analysis and Conclusion

Similar to the conclusions of the 2013 FEIR, no historical resources are known to exist on the Project site, but significant impacts could occur during ground-disturbing activities. Consistent with the 2013 FEIR, the Project would implement MM CULT-1, which would reduce potentially significant impacts to a less than significant level. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR did not identify any archeological sites within the Project site. In addition, the Project site was previously extensively quarried and graded and the possibility of discovering unknown resources was therefore considered minimal. However, the potential for unrecorded archeological sites exists in the northeastern portion of the site and project-related ground disturbing activity could result in significant impacts. With implementation of MM CULT-1, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, no known archeological resources are known to exist on the site. Similar to the 2013 FEIR, ground-disturbing activity could uncover unknown archeological resources and result in significant impacts. Consistent with the 2013 FEIR, the Project would implement of MM CULT-1. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The Project site was formerly used as a quarry and the majority of the site has been graded. The 2013 FEIR determined that due to previous disturbance, the likelihood of uncovering paleontological resources is low. However, Pleistocene sediments underlie the Project site and ground-disturbing activity could uncover paleontological resources resulting in a significant impact. With implementation of MM CULT-2, which requires the implementation of proscriptive treatment procedures in the unlikely event that paleontological resources are found, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Similar to the 2013 FEIR, Project ground-disturbing activity could uncover paleontological resources and result in significant impacts. Consistent with the 2013 FEIR, the Project would implement MM CULT-2 to ensure impacts would be reduced to a less than significant level. MM CULT-2 is revised to specify the types of resources included in this mitigation and to reflect language from the Appendix G Checklist Question as well as Public Resources Code 21803.2. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

The 2013 FEIR found that the Project would not disturb human remains. The likelihood of uncovering human remains is low due to the Project site's previous quarrying activity and grading. However, the potential for uncovering human remains could result in significant impacts. With implementation of MM CULT-3, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site is not known to contain human remains, but however unlikely, the potential exists to uncover human remains during earth-moving activity. Consistent with the 2013 FEIR, the Project would implement MM CULT-3 to ensure impacts would be less than significant. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Tribal Cultural Resources

e), f) Resumed Project Analysis and Conclusion

A review of the California Register of Historical Resources, local registers of historic resources, North Central Information Center records, Native American Heritage Commission (NAHC) sacred lands file, and pedestrian surveys, failed to identify any listed Tribal Cultural Resources that may be adversely affected by the Project. Potential impacts to inadvertently discovered Tribal Cultural Resources would be minimized with the implementation of MM CULT-1 and MM CULT-3 that require proscriptive treatment procedures in the unlikely circumstance that sensitive artifacts or human remains are found. Thus, with incorporation of the recommended mitigation measures, associated impacts would be less than significant.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM CULT-1 In the event that archaeological materials are discovered during Project construction activities, the applicant shall inform its contractor(s) of the archaeological sensitivity of the Project site by including the following italicized measures in contract documents. The City shall verify that the following language is included in the appropriate contract documents:

> *If prehistoric or historical archaeological deposits are discovered during Project activities, all work within 25 feet of the discovery must stop and the City shall be notified. A qualified archaeologist shall inspect the findings within 24 hours of discovery, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Project personnel should not collect or move any archaeological materials or human remains and associated materials. Archaeological resources can include flaked-stone tools (e.g. projectile points, knives, choppers) or obsidian, chert, basalt, or quartzite toolmaking debris; bone tools; culturally darkened soil (i.e. midden soil often containing heat-affected rock, ash and charcoal, shellfish remains, faunal bones, and cultural materials); and stone-milling equipment (e.g. mortars, pestles, handstones). Prehistoric archaeological sites often contain human remains. Historical*

materials can include wood, stone, concrete, or adobe footings, walls, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, metal, and other refuse. Cultural resources shall be recorded on California Department of Parks and Recreation (DPR) Form 523 (Historic Resource Recordation form). If it is determined that the proposed Project could damage unique archaeological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. If preservation in place is not feasible, the Project applicant shall pay in lieu fees to mitigate significant effects. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by the Project. Possible mitigation under CEQA emphasizes preservation in place measures, including planning construction avoid archaeological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement.

MM CULT-2 In the event that fossils are discovered during project activities, the applicant shall inform its contractor(s) of the paleontological sensitivity of the Project site by including the following italicized language in contract documents. The City shall verify that the following language is included in the appropriate contract documents:

The subsurface at the construction site may be sensitive for paleontological resources. If paleontological resources are encountered during project subsurface construction, all ground-disturbing activities within 25 feet must stop and the City shall be notified. A qualified paleontologist shall inspect the findings within 24 hours of discovery, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Paleontological resources include fossil plants and animals, and such trace fossil evidence of past life as tracks. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Paleontological resources also include plant imprints, petrified wood, and animal tracks. If it is determined that the project could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public

Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. If preservation in place is not feasible, the project applicant shall pay in lieu fees to mitigate significant effects. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by the project. Possible mitigation under CEQA emphasizes preservation in place measures, including planning construction avoid archaeological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement.

MM CULT-3 Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Contra Costa County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendent (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reintern the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

Revised Mitigation Measures for the Resumed Project

MM CULT-2 In the event that unique paleontological resources are discovered during project activities, the applicant shall inform its contractor(s) of the paleontological sensitivity of the Project site by including the following italicized language in contract documents. The City shall verify that the following language is included in the appropriate contract documents:

The subsurface at the construction site may be sensitive for paleontological resources. If paleontological resources are encountered during project subsurface construction, all ground-disturbing activities within 25 feet must stop and the City shall be notified. A qualified paleontologist shall inspect the findings within 24 hours of discovery, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Project personnel shall not collect or move any paleontological materials.

Paleontological resources include fossil plants and animals, and such trace fossil evidence of past life as tracks. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Paleontological resources also include plant imprints, petrified wood, and animal tracks. If it is determined that the project could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. If preservation in place is not feasible, the project applicant shall pay in lieu fees to mitigate significant effects. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by the project. Possible mitigation under CEQA emphasizes preservation in place measures, including planning construction avoid archaeological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement.

Conclusion

MM CULT-2 is revised to clarify the types of resources included in this mitigation and to reflect language from the Appendix G Checklist Question as well as Public Resources Code 21803.2. There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to cultural resources. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR assessment of cultural resources.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
VI. Geology, Seismicity, and Soils							
Would the project:							
a) Expose people or structures to potential substantial adverse effects, including 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	No	No	No	Less than Significant	None	None
ii) Strong seismic ground shaking?	Less than Significant	No	No	No	Less than Significant	None	None
iii) Seismic-related ground failure, including liquefaction?	Less than Significant	No	No	No	Less than Significant	None	None
iv) Landslides?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM GEO-1	MM GEO-1 **[revised]**
b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	No	No	Less than Significant	None	None
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,	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM GEO-1	MM GEO-1 **[revised]**

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
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 risks to life or property?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM GEO-1	MM GEO-1 **[revised]**
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	No Impact	No	No	No	No Impact	None	None

Discussion

Geologic, seismic, and soil impacts associated with the Project would be consistent with those identified in the 2013 FEIR. The 2013 FEIR identified less than significant impacts with respect to seismic hazards, soil erosion, or loss of topsoil. The 2013 FEIR concluded that there were potential impacts related to landslides, unstable geologic or soil units, and expansive soils that could be reduced to a less than significant level with incorporation of mitigation. The 2013 FEIR determined that there would no impacts related to septic tanks of alternative waste systems. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

The Geotechnical Report prepared for the Project by ENGEO Incorporated and used for the analysis in the 2013 FEIR was revised on April 3, 2014, after the 2013 FEIR was certified, to reevaluate geotechnical considerations in light of the single-family Project Alternative and pursuant to the 2013 CBC. The 2014 Updated Geotechnical Report confirmed the analysis and conclusions of the Geotechnical Report that was initially prepared for the Project on August 18, 2011, and subsequently updated on September 2, 2011. The 2014 Updated Geotechnical Report is provided in Appendix E.

This Addendum includes a revision to MM GEO-1 to make note that the Geotechnical Exploration was updated in April 3, 2014, after the 2013 FEIR was certified. This updated Geotechnical

Exploration was conducted in order to determine if conditions on the site have changed since they were evaluated in the 2011 Geotechnical Evaluation. The update reflects similar impacts to slope stability, existing fill, expansive soils, and groundwater and does not result in substantial changes to the conclusions of the Geotechnical Exploration. The revisions to MM GEO-1 are appropriately discussed in this addendum and incorporated into the MMRP because the revision does not itself involve new significant effects or substantially increase the severity of previously analyzed significant effects.

a) Summary of 2013 FEIR

The 2013 FEIR found that the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. Additionally, the closest fault to the Project site, the Calaveras Fault, is located 1.4 miles to the south and is not considered a potential source of fault rupture. As a result, the 2013 FEIR concluded that impacts related to fault rupture are less than significant.

Because the City of Lafayette is within a seismically active area, the Project site could experience moderate to strong seismic ground shaking. The 2013 FEIR identified that the Project site's northeast corner was the epicenter of a magnitude 4.2 earthquake on March 2, 2007. Additionally, this earthquake resulted in moderate ground shaking and was not attributed to any specific fault. Project development would be compliant with the then-current California Building Code (CBC) requirements that are based on the maximum magnitude earthquake considered possible in the Bay Area region, 6.7 and greater. The 2013 FEIR concluded that compliance with these requirements would ensure that major damage is avoided during major earthquakes. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Test pit drilling on the Project site determined that Project site soils are composed of stiff to very stiff clays. The 2013 FEIR concluded that these types of soils were determined to have a low potential for liquefaction and, as a result, impacts would be less than significant.

The 2013 FEIR determined that there is a low potential for an earthquake-induced landslide to occur on the Project site because there is no evidence of past landslides or slope instability. However, soils on steeper slopes on the Project site could be susceptible to instability due to heavy rains or excavation. As a result, slope instability could result in landslides creating a potentially significant impact. With implementation of MM GEO-1, to ensure the City geotechnical engineer reviews all grading plans in order to improve the stability of the site and that all grading operations meet the requirements of the Geotechnical Exploration, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site does not contain any Alquist-Priolo Earthquake Fault Zones, and there are no faults near the Project site with the potential for fault rupture. In addition, compliance with seismic design standards of the current CBC would ensure proposed buildings would not experience major damage during strong seismic ground shaking. The Project site contains the same soils as previously analyzed in the 2013 FEIR. As a result, the potential for liquefaction to occur remains low. The Project site has a low potential for an

earthquake-induced landslide, but steeper slopes could be susceptible to instability during heavy rain and excavation. Consistent with the 2013 FEIR, the Project would implement MM GEO-1 that would reduce impacts related to slope instability. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR determined that the Project could result in substantial erosion of soils during grading. In addition, construction activity could further erode soils on slopes and increase soil erosion, which would affect drainage and stormwater systems. As a result, the Project would be required to submit a SWPPP to the State Water Resource Control Board (SWRCB) and the City. Implementation of a SWPPP would ensure that BMPs controlling for erosion and sedimentation from construction would reduce impacts to a less than significant level.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, construction activity associated with the Project could result in soil erosion. The Project would be required to prepare a SWPPP in compliance with the SWRCB and the City of Lafayette. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

As discussed in Impact VI(a), the 2013 FEIR determined the Project site would have a low potential for liquefaction, lateral spreading, and landslides. However, the 2013 FEIR concluded that locations on the Project site with existing soil fill from previous grading activity have the potential for moderate settlement to occur. In addition, groundwater is known to occur as shallow as 4 feet below existing grade. As a result, potentially significant soil instability impacts could occur. Therefore, the Project would implement MM GEO-1, which is described in more detail in Impact VI(a), to ensure these impacts would be reduced to a less than significant level.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, in order to improve overall stability of the Project site, the Project would implement MM GEO-1, which is described in more detail in Impact VI(a). Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project site contains moderately expansive soils, which could damage structures in shallow foundations resulting in a significant impact. However, implementation of MM GEO-1, which is described in more detail in Impact VI(a), would reduce impacts and would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project could result in significant impacts due to expansive soils and would implement MM GEO-1, which is described in more detail in Impact VI(a). Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project would be served by the Contra Costa County Sanitary District and that no septic tanks or alternative wastewater disposal systems would be required. As a result, no impact would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would be served by the Contra Costa County Sanitary District and no septic tanks or alternative wastewater disposal systems are proposed. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM GEO-1 Prior to issuance of the grading permits, development of the final grading plans shall be coordinated with a City approved Geotechnical Engineer and Engineering Geologist in order to tailor the plans to accommodate known soil and geologic hazards and to improve the overall stability of the site. The final 40-scale grading plans for the Project shall be reviewed by the City-approved Geotechnical Engineer. Grading operations shall meet the requirements of the Guide Contract Specifications included in Appendix D of the *Geotechnical Exploration: The Terraces of Lafayette*, prepared by ENGEO Incorporated on August 18, 2011 and revised on September 2, 2011 and shall be observed and tested by the City-approved Geotechnical Engineer.

Revised Mitigation Measures for the Resumed Project

MM GEO-1 Prior to issuance of the grading permits, development of the final grading plans shall be coordinated with a City approved Geotechnical Engineer and Engineering Geologist in order to tailor the plans to accommodate known soil and geologic hazards and to improve the overall stability of the site. The final 40-scale grading plans for the Project shall be reviewed by the City-approved Geotechnical Engineer. Grading operations shall meet the requirements of the Guide Contract Specifications included in Appendix D of the *Geotechnical Exploration: The Terraces of Lafayette*, prepared by ENGEO Incorporated on August 18, 2011, and revised on September 2,

2011, and April 3, 2014, and shall be observed and tested by the City-approved Geotechnical Engineer.

Conclusion

There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to geology, seismicity, and soils. The revision to MM GEO-1 is appropriately discussed in this addendum and incorporated into the MMRP because the revision does not itself involve new significant effects or substantially increase the severity of previously analyzed significant effects. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR with respect to geology, seismicity, and soils.

Environmental Issue Area	Conclusion in 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
VII. Greenhouse Gas Emissions							
Would the project:							
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM GHG-1 (MM GHG-1a and MM GHG-1b)	MM GHG-1 (MM GHG-1a and MM GHG-1b)
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No	No	No	Less than Significant	None	None

Discussion

Greenhouse Gas (GHG) impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR concluded that the GHG emissions associated with construction of the Project would be less than significant. Operational GHG emissions would be less than significant after the incorporation of mitigation. Specifically, MM GHG-1a and MM GHG-1b were required to reduce impacts to a less-than-significant level. The 2013 FEIR found that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions; the impact was found to be less than significant. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

The Greenhouse Gas Emissions supporting information is provided in Appendix B.

a) Summary of 2013 FEIR

Construction-Related GHG Emissions

The 2013 FEIR found that short-term construction activities would generate a total of 4,013 metric tons (MT) of carbon dioxide equivalents (CO_2e) per year over the entire duration of the construction period. BAAQMD does not identify a significance threshold for Project-related construction emissions. Consequently, GHG emissions generated by project-related construction activities were determined to be less than significant.

Operational GHG Emissions

The 2013 FEIR concluded that the Project would have a buildout service population of 658 (658 residents based on 2.09 persons per household). Total operational GHG emissions were estimated at 3,261 MT CO_2e per year. Therefore, the per capita emission rate from unmitigated operational GHG emissions would be 5.0 MT CO_2e per service population per year (MT CO_2e/service population/year), which would exceed the BAAQMD threshold of 4.6 MT CO_2e/service population/year. The Project would be required to implement MM GHG-1a, which would provide options to limit wood-burning or gas-burning fireplaces and/or improve energy efficiency of the buildings, and MM GHG-1b, which would implement MM TRAF-14 to provide shuttle service between the Project site and the Lafayette BART station or transit vouchers in lieu of a shuttle. These mitigation measures would reduce the per capita emission rate to 4.6 MT CO_2e/service population/year. Therefore, the mitigated operational emissions would not exceed the BAAQMD threshold of 4.6 MT CO_2e/service population/year. Consequently, the 2013 FEIR found that GHG emissions from long-term operations of the Project would be less than significant with mitigation incorporated.

Resumed Project Analysis and Conclusion

Since the adoption of the 2013 FEIR, the BAAQMD released the 2017 BAAQMD CEQA Guidelines. The GHG emission thresholds used to evaluate the Project's potential impacts in the 2013 FEIR are consistent with the recommendations in the 2017 BAAQMD CEQA Guidelines, as discussed below.

BAAQMD provides multiple options in its 2017 CEQA Air Quality Guidelines for analysis of project-level GHG emissions. BAAQMD does not provide a construction-related GHG generation threshold, but recommends that construction-generated GHGs be quantified and disclosed. BAAQMD also recommends that lead agencies such as the City of Lafayette make a determination of the level of significance of construction-generated GHG emissions in relation to meeting Assembly Bill (AB) 32 GHG reduction goals. To make this determination, construction emissions were amortized over the life of the Project (30 years) and added to operational emissions. The combined annual GHG emissions that would occur at the buildout of the Project were analyzed against the applicable BAAQMD significance threshold standard to determine significance for the Project's total generation of GHG emissions.

BAAQMD's project-level significance threshold for operational GHG generation was deemed appropriate to use when determining the Project's potential GHG impacts. The thresholds suggested by BAAQMD for project-level operational GHG generation are as follows:

- Compliance with a qualified GHG Reduction Strategy, or
- 1,100 MT CO_2e/year, or
- 4.6 MT CO_2e/service population/year

BAAQMD's 2017 CEQA Guidelines state that if annual GHG emissions exceed the thresholds, the Project would result in a cumulatively considerable significant impact to global climate change. If the Project is less than any one of the thresholds identified above, however, then

the Project would result in a less than significant cumulative impact to global climate change. Therefore, a significant impact would occur if combined annual operational emissions and amortized construction emissions exceed the BAAQMD's threshold of 4.6 MT CO_2e/service population/year.

Construction-Related GHG Emissions

The Project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any hauling that may occur. As indicated in Appendix H of the 2013 FEIR, construction was assumed to begin in January 2013 and conclude in July 2014. The Project would be constructed at a later date than what was assumed in the 2013 FEIR, however, in light of the Project history briefly discussed herein. In general, improvements in technology and more stringent regulatory requirements result in lower emission factors for construction equipment as the analysis year increases. Therefore, construction emissions would decrease as a result of a later construction analysis year if all other factors are held constant.

The recommended model for estimating GHG emissions has been updated since the 2013 FEIR. To provide an updated estimate based on the most recent Project information, regulations, and recommended guidance, GHG construction emissions were estimated using CalEEMod, Version 2016.3.2. Construction phases, duration, and equipment assumptions used to estimate GHG emissions are consistent with those used to estimate emissions in the 2013 FEIR with modifications to the start and end dates (see Section III of this Addendum and Appendix B).

GHG emissions from Project construction equipment and on-road vehicles are shown in Table 11. The emissions are from all phases of construction. Construction of the Project is estimated to generate approximately 4,772 MT CO_2e over the entire construction duration.

Table 11: Annual Construction GHG Emissions

Construction Year	Total Emissions (MT CO_2e/year)
2020	2,501
2021	2,271
Total Construction Emissions	4,772
Amortized over 30 years	159

Note:
MT CO_2e = metric tons of carbon dioxide equivalent
Due to rounding, total MT CO_2e may be marginally different from CalEEMod, Version 2016.3.2, output.
Source: CalEEMod output (Appendix B).

Operational GHG Emissions

Operational or long-term emissions occur over the life of a project. Typical sources for operational emissions from residential development projects include:

- **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.
- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site. Natural gas uses could include heating water, space heating, dryers, stoves, or other uses.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

The Project would consist of the same maximum 315 residential units within the same Project site as previously analyzed in the 2013 FEIR. As such, the Project would not have the potential to add more residents to the City of Lafayette than what was analyzed in the 2013 FEIR. For this reason, the service population of 658 residents would still apply to the Project. Operational GHG emissions by source are shown in Table 12 below.

Table 12: Annual Operational GHG Emissions

Emission Source	Project Total MT CO_2e per year
Area	43
Energy	573
Mobile	2,020
Waste	73
Water	74
Amortized Construction Emissions	159
Total Project Emissions	2,942
Unit	**Value**
Service Population (Employees + Residents)	658
Project Emission Generation	**4.5**
BAAQMD Threshold	**4.6**
Exceeds Thresholds?	**No**
Notes: MT CO_2e = metric tons of carbon dioxide equivalent. Unrounded results used to calculate totals. Source of Emissions: CalEEMod Output (Appendix B) Source of Threshold: BAAQMD 2017	

As shown in Table 12, the Project would not exceed the BAAQMD's threshold of 4.6 MT CO_2e/service population/year for GHG emissions. Impacts associated with the generation of GHG emissions from construction and long-term operations of the Project would be less than significant. Although the Project-related emissions do not exceed the thresholds of significance, the Project would continue to implement MM GHG-1a and MM GHG-1b consistent with the 2013 FEIR, which would further reduce GHG emissions. Therefore, the Project would not introduce new environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

No qualified GHG reduction plan was adopted by the City of Lafayette at the time of the 2013 FEIR. Therefore, the 2013 FEIR assessed the Project's consistency with Statewide strategies measures that were adopted to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32. The 2013 FEIR concluded that because the Project would be consistent with the existing regulations adopted for the purpose of reducing GHG emissions, impacts associated with conflicting with any applicable plan, policy, or regulation of an agency adopted for reducing the emissions of GHGs would be less than significant.

Resumed Project Analysis and Conclusion

Although the City of Lafayette has developed certain environmental policies and programs, such as the Environmental Action Plan, the City has not yet adopted a qualified GHG reduction plan at the time of this analysis. In addition, the City has not completed the GHG inventory, benchmarking, and goal-setting process required to identify a reduction target and to take advantage of the streamlining provisions contained in the CEQA Guidelines amendments adopted for Senate Bill (SB) 97. Since no other local or regional climate action plan is in place, the Project is assessed for its consistency with ARB's adopted Scoping Plans. This would be achieved with an assessment of the Project's compliance with Scoping Plan measures.

AB 32 Scoping Plan

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHG emissions (CO_2, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, the ARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008 and an update to the Scoping Plan in 2014, which outline actions recommended to obtain that goal. The Scoping Plan contains a variety of strategies to reduce the State's emissions. As shown in Table 13, the Project is consistent with most of the strategies, while others are not applicable to the Project.

Table 13: Scoping Plan Measures Consistency Analysis

Scoping Plan Reduction Measure	Project Consistency
1. **California Cap-and-Trade Program Linked to Western Climate Initiative.** Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	**Not applicable.** Although the cap-and-trade system has begun, the Project is not one targeted by the cap-and-trade system regulations and therefore this measure does not apply to the Project.
2. **California Light-Duty Vehicle GHG Standards.** Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, the standards would be applicable to the light-duty vehicles that access the Project site.
3. **Energy Efficiency.** Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent.** This is a measure for the State to increase its energy efficiency standards in new buildings. The Project is required to build to the new standards and would increase its energy efficiency through compliance.
4. **Renewable Portfolio Standard.** Achieve 33 percent renewable energy mix Statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency. PG&E is required to increase its percent of power supply from renewable sources to 33 percent by the year 2020 pursuant to various regulations. The Project would purchase power that comprises a greater amount of renewable sources and could install renewable solar power systems that will assist the utility in achieving the mandate.
5. **Low Carbon Fuel Standard.** Develop and adopt the Low Carbon Fuel Standard.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency. All fuel consumption associated with the Project's construction and operational activities would use fuel that meets these standards.
6. **Regional Transportation-Related GHG Targets.** Develop regional GHG emissions reduction targets for passenger vehicles. This measure refers to SB 375.	**Not applicable.** The Project is not required to develop GHG emission reduction targets.
7. **Vehicle Efficiency Measures.** Implement light-duty vehicle efficiency measures.	**Not applicable.** The standards would be applicable to the light-duty vehicles that would access the Project site.

Table 13 (cont.): Scoping Plan Measures Consistency Analysis

Scoping Plan Reduction Measure	Project Consistency
8. **Goods Movement.** Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not applicable.** The Project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
9. **Million Solar Roofs Program.** Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent.** This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The Project would not preclude the implementation of this strategy.
10. **Medium/Heavy-Duty Vehicles.** Adopt medium and heavy-duty vehicle efficiency measures.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency.
11. **Industrial Emissions.** Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive CH_4 emissions and reduce flaring at refineries.	**Not applicable.** This measure would apply to the direct GHG emissions at major industrial facilities emitting more than 500,000 $MTCO_2e$ per year. **The Project is not an industrial land use.**
12. **High Speed Rail.** Support implementation of a high-speed rail system.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency. The Project would not preclude the implementation of this strategy.
13. **Green Building Strategy.** Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The Project would comply with the most recent requirements of the California Energy Code and thus incorporate applicable energy efficiency features designed to reduce project energy consumption.
14. **High Global Warming Potential Gases.** Adopt measures to reduce high global warming potential gases.	**Consistent.** This measure is applicable to the high global warming potential gases that would be used by sources with large equipment (such as in air conditioning and commercial refrigerators) that are typically not found in residential land uses. It is not anticipated that the Project, which is residential in nature, would include refrigeration subject to refrigerant management regulations adopted by ARB.
15. **Recycling and Waste.** Reduce CH_4 emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero waste.	**Consistent**. The Project would not conflict with implementation of this measure. The Project complies with the CALGreen code and would utilize City of Lafayette recycling services.
16. **Sustainable Forests.** Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Consistent.** Approximately 85 percent of the Project site has either been graded or disturbed. The majority of the site is currently grass-

Table 13 (cont.): Scoping Plan Measures Consistency Analysis

Scoping Plan Reduction Measure	Project Consistency
	covered. Although the Project would remove 91 of 116 existing trees on the Project site, the Project would also add 700 additional trees on the entire site, including existing areas with bare soil, for a total of 725 trees planted at Project buildout.
17. **Water.** Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** The Project would comply with the California Energy Code and the California Updated Model Landscape Ordinance. With adherence to these regulations, the Project will consume energy and water in an efficient manner.
18. **Agriculture.** In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not applicable.** The Project site is not designated or in use for agriculture purposes. No grazing, feedlot, or other agricultural activities that generate manure occur on-site or are proposed to be implemented by the Project**.**
Source of ARB Scoping Plan Reduction Measure: ARB 2008.	

As shown in Table 13, while many of the measures are not applicable to the Project, the Project is consistent with the applicable measures and would not conflict with the recommendations of AB 32 in achieving a Statewide reduction in GHG emissions. Considering this information, the Project would not hinder or delay the State's ability to meet the reduction targets contained in AB 32 or conflict with implementation of the Scoping Plan.

SB 32 2017 Scoping Plan Update

On April 29, 2015, Governor Edmund G. Brown Jr. issued an Executive Order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor signed SB 32 in September of 2016, giving ARB the statutory responsibility to address the 2030 GHG emissions reduction target previously contained in Executive Order B-30-15. SB 32 states that "In adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions authorized by this division, the state [air resources] board shall ensure that statewide greenhouse gas emissions are reduced to at least 40 percent below the statewide greenhouse gas emissions limit no later than December 31, 2030."

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017. Table 14 provides an analysis of the Project's consistency with the 2017 Scoping Plan Update measures. As shown in Table 14, while many of the measures are not applicable to the Project, the Project is consistent with strategies that are applicable.

Table 14: Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 350 50 Percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	**Not applicable.** This measure would apply to utilities and not to individual development projects. The Project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	**Not applicable**. This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The Project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	**Not applicable.** This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles that would access the future residences at the Project site would be benefit from the standards.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million Zero Emission Vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.	**Not applicable.** This measure is not applicable to the Project; however, vehicles accessing the residences at the Project site would be benefit from the increased availability of cleaner technology and fuels. Delivery trucks and buses that would serve future residents will be made by increasing numbers of ZEV delivery trucks.
Sustainable Freight Action Plan. The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	**Not applicable.** This measure applies to owners and operators of trucks and freight operations. The Project is residential in nature and would not support truck and freight operations. However, it is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including infrequent trips that could be made to and from the Project site.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	**Not applicable.** The Project would not include major sources of black carbon.
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	**Not applicable.** The Project does not include the development of a Regional Transportation Plan.

Table 14 (cont.): Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	**Not applicable.** The Project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the Project. However, the post-2020 Cap-and-Trade Program indirectly affects people and entities who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, state, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	**Not applicable**. The Project is in a built-up urban area and the Project site would not be considered natural or working lands.
Source of ARB 2017 Scoping Plan Update Reduction Measures: ARB 2017.	

Summary

As presented in Table 13, the Project is consistent with the applicable strategies and would not conflict with the recommendations of AB 32 in achieving a Statewide reduction in GHG emissions. Considering this information, the Project would not significantly hinder or delay the State's ability to meet the reduction targets contained in AB 32 or conflict with implementation of the Scoping Plan. As shown in Table 14, implementation of the Project would not conflict with the reduction measures proposed in SB 32. Considering this information, the Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce the emissions of GHGs. Therefore, the Project would not introduce new environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM GHG-1a Residential units shall be prohibited from having wood-burning or gas-burning fireplaces. The City shall verify that residential units/buildings comply with one of the following:

1. Ensure that 157 residential units are constructed without fireplaces (fireplaces are acceptable in the other 158 residential units).

2. Build the residential units to achieve a 25 percent reduction in building energy efficiency compared to the 2008 Building and Energy Efficiency Standards, which is equivalent to the new 2013 Building and Energy Efficiency Standards.
3. Build the residential units to achieve a 15 percent reduction in building energy efficiency compared to the 2008 Building and Energy Efficiency Standards AND ensure that 78 residential units are constructed without fireplaces (fireplaces are acceptable in the other 237 residential units).

MM GHG-1b Implement MM TRAF-14. The Project applicant shall provide subsidized, frequent shuttle service between the Project site and the Lafayette BART station during the AM and PM peak commute periods, until such time that a bus route on Pleasant Hill Road serving the BART station is implemented (as called for in the Lamorinda Action Plan), at which point the Project applicant may provide transit vouchers in lieu of a shuttle.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to GHG emissions. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR with respect to GHG emissions.

Environmental Issue Area	Conclusion in 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
VIII. 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?	Less than Significant	No	No	No	Less than Significant	None	None
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant	MM HAZ-1a MM HAZ-1b	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	No	No	No	Less than Significant	None	None
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	No	No	No	Less than Significant	None	None
e) For a project located within an airport land use plan or, where	No Impact	No	No	No	No Impact	None	None

Environmental Issue Area	Conclusion in 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
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 for people residing or working in the project area?							
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	No Impact	No	No	No	No Impact	None	None
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	No	No	Less than Significant	None	None
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Less than Significant	No	No	No	Less than Significant	None	None

Discussion

Hazards and Hazardous Materials impacts associated with the Project would not be more severe with those identified in the 2013 FEIR analysis. The 2013 FEIR identified less than significant impacts with respect to routine transport, use, or disposal of hazardous materials, hazardous materials within 0.25 mile of an existing or proposed school, sites listed on a list of hazardous materials sites

compiled pursuant to Government Code Section 65962.5, emergency response plan, wildland fire, and a less than significant impact with mitigation incorporated with respect to accidental release of hazardous materials. The 2013 FEIR concluded that there would be no impacts in relation to airports. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

The 2013 FEIR determined that the Project would not involve the routine transport of significant hazardous materials. Although construction and operation of the Project would include the routine use and handling of small amounts of hazardous materials during construction and operation, such as gasoline and fertilizers, these potentially hazardous materials would not be used in sufficient enough quantities on the site to pose a significant health risk. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would involve the same routine use and transport of hazardous materials during construction and operation as previously analyzed in the 2013 FEIR. Therefore, the Project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the 2013 FEIR. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded that demolition of existing buildings on the Project site could release Asbestos Containing Materials (ACMs) and Lead Based Paint (LBP) resulting in significant impacts. However, MM HAZ-1a and HAZ-1b would ensure a certified asbestos and lead based paint abatement consultant either provide a letter to the City verifying no ACMs or LBP are present or properly remove and dispose of ACMs and LBP pursuant to applicable federal, State, and local regulations. Furthermore, the 2013 FEIR determined that during Project operation all pesticides, herbicides and fertilizer used for landscaping would be used and stored by professional maintenance personnel and would not produce significant environmental hazards to residents on-site. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

The previously existing buildings on-site were removed in 2016, in accordance with State and federal regulations. Therefore, implementation of MM HAZ-1a and HAZ-1b, which require removal of potential lead-based paint and asbestos-containing materials by a State-licensed contractor, would no longer be necessary. The demolition of the buildings in 2016 included removal of any lead-based paint and/or asbestos materials by a State-licensed contractor, and therefore the Project would not result in new environmental effects in relation to asbestos and lead-based paint identified in the 2013 FEIR. In addition, operational use of pesticides,

herbicides, and fertilizers for landscaping would not produce significant environmental hazards because they would be used and stored by professional maintenance personnel. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

Acalanes High School is located within 0.25 mile of the Project site at 1200 Pleasant Hill Road. The 2013 FEIR determined that construction and operation of the Project would not generate hazardous emissions or result in the handling or material storage that could result in harmful or accidental upsets of hazardous materials within 0.25 mile of a school. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would be located on the same site as previously analyzed in the 2013 FEIR and would be located within 0.25 mile of Acalanes High School. The Project is composed of the same residential land uses as the 2013 FEIR and, consistent with the 2013 FEIR would not generate or handle large quantities of hazardous materials that could result in harmful or accidental upset. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Hazardous materials sites located near the Project site would be monitored by appropriate government agencies that would enforce and require implementation of regulations pertaining to hazardous wastes. As a result, the 2013 FEIR concluded that no impacts would occur.

Resumed Project Analysis and Conclusion

The Project would be located on the same Project site as previously analyzed in the 2013 FEIR and would not be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Consistent with the 2013 FEIR, hazardous materials sites located near the Project site would be monitored by appropriate government agencies, which would enforce and implement regulations pertaining to hazardous wastes. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project site is not within 2 miles of a public airport or airport land use plan and as a result no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site would not be within 2 miles of a public airport or airport land use plan. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

f) Summary of 2013 FEIR

The 2013 FEIR concluded that there are no private airstrips near the Project site and as a result no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, no private airstrips would be located near the Project site. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

g) Summary of 2013 FEIR

The 2013 FEIR determined that the Project would provide adequate emergency and residential access with implementation of MM TRAF-7 that would ensure turning radii are provided on-site for fire protection services. As a result, the 2013 FEIR concluded that the Project would not interfere with implementation of the City Emergency Operations Plan and impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would not change the circulation analyzed in the 2013 FEIR. Consistent with the 2013 FEIR, implementation of MM TRAF-7 would ensure the Project would not interfere with the City Emergency Operations Plan. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

h) Summary of 2013 FEIR

The 2013 FEIR determined that the Project site is not located in a California Department of Forestry and Fire Protection (CAL FIRE) designated Very High Fire Hazard Severity Zone but is located in an area designated as a “High” risk zone. Implementation of a City approved Vegetation Management Plan, CBC requirements, and plan review by the Contra Costa County Fire Protection District (CCCFPD) would ensure impacts associated with wildland fire risk would be less than significant.

Resumed Project Analysis and Conclusion

The Project would be located within an area designed as a "High" risk zone. Consistent with the 2013 FEIR, the Project would implement the City's approved Vegetation Management Plan, comply with CBC requirements, and undergo plan review by the CCCFPD. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measure Summary from the 2013 FEIR

MM HAZ-1a Hire the services of a Cal OSHA certified qualified asbestos abatement consultant to conduct a pre-construction assessment for asbestos-containing materials. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the City Planning and Building Services Division from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, the hazardous materials shall be properly removed and disposed prior to demolition of buildings on the Project site in compliance with applicable federal, State, and local regulations, such as the Environmental Protection Agency (EPA) National Emission Standards for Hazardous Pollutants (NESHAP) regulation, Bay Area Air Quality Management District (BAAQMD) Regulation 11, Title 8 of the California Codes of Regulations (CCR), the Unified Program, and the City's General Plan Policies, as described in Section A.

MM HAZ-1b Hire the services of a qualified lead paint abatement consultant to conduct a pre-construction assessment of lead-based paints. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the City Planning and Building Services Division from a qualified lead paint abatement consultant that no lead paint is present in on-site buildings. If lead paint is found to be present on buildings to be demolished or renovated, the hazardous materials shall be properly removed and disposed in compliance with applicable federal, State, and local regulations, including the US EPA's NESHAP regulation, Title 40 of the Code of Federal Regulations (CFR), Title 8 of the CCR, the Unified Program, and the City's General Plan Policies, as described in Section A.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised. MM HAZ-1a and MM HAZ-1b are not applicable to the Project.

Conclusion

The previously existing buildings on-site were removed in 2016; thus, implementation of MM HAZ-1a and HAZ-1b, which require removal of potential lead-based paint and asbestos-containing materials by a State-licensed contractor, would no longer be necessary and therefore the Project would not result in new environmental effects in relation to asbestos and lead-based paint identified in the 2013 FEIR. These factually accurate revisions are appropriately discussed in this

Addendum because the revisions do not themselves involve new significant effects or substantially increase the severity of previously analyzed significant effects. There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to hazards and hazardous materials. Further, no new mitigation measures or alternatives are required.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
IX. Hydrology and Water Quality							
Would the project:							
a) Violate any water quality standards or waste discharge requirements?	Less than Significant	No	No	No	Less than Significant	None	None
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less than Significant	No	No	No	Less than Significant	None	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM HYDRO-1a and MM HYDRO-1b	MM HYDRO-1a and MM HYDRO-1b

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM HYDRO-1a and MM HYDRO-1b	MM HYDRO-1a and MM HYDRO-1b
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM HYDRO-2	MM HYDRO-2
f) Otherwise substantially degrade water quality?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM HYDRO-1a, MM HYDRO-1b, and MM HYDRO-2	MM HYDRO-1a, MM HYDRO-1b, and MM HYDRO-2
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Less than Significant	No	No	No	Less than Significant	None	None

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
h) Place within a 100-year flood hazard structures which would impede or redirect flood flows?	Less than Significant	No	No	No	Less than Significant	None	None
i) Expose people or structures to significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	No Impact	No	No	No	No Impact	None	None
j) Inundation of by seiche, tsunami, or mudflow?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM GEO-1	MM GEO-1

Discussion

Hydrology and Water Quality impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified potential impacts related to alteration of existing drainage, stormwater runoff, and water quality that would be reduced to less than significant with the incorporation of mitigation measures. The 2013 FEIR concluded there would be less than significant impacts with respect to violating water or waste discharge standards, depleting groundwater supplies or interfering with groundwater recharge, exceeding the capacity of existing or planned stormwater drainage systems, placing housing or structures within a 100-year flood hazard area or impeding or redirecting flood flows. In addition, the 2013 FEIR determined that there would be a less then significant impact with mitigation incorporated with respect to levee or dam failure, or inundation by seiche, tsunami, or mudflow. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

The 2013 FEIR determined that Project construction and operation could potentially impact water quality. In order to address construction impacts, the Project would prepare and implement a SWPPP with BMPs pursuant to the applicable National Pollution Discharge Elimination System (NPDES) requirements. In addition, the 2013 FEIR concluded that submission of a Project specific hydrology/hydraulic report, grading plan, erosion plan, and Storm Water Control Operation and Maintenance Plan to the City would reduce operational

water quality impacts. Further, site specific BMPs that carry out these reports requirements would be incorporated through the Project's Homeowner's Association fees. As a result, impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would prepare and implement a SWPPP with BMPs in order to mitigate Project construction water quality impacts. In addition, the Project would submit a Project specific hydrology/hydraulic report, grading plan, erosion plan, and Storm Water Control Operation and Maintenance Plan to the City in order to reduce operational water quality impacts. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR determined the Project would not utilize groundwater, and would be served by the EBMUD. Although the Project would result in an increase in impervious surfaces that would prevent groundwater infiltration, the Project is not located over any significant groundwater basin. Further, the 2013 FEIR concluded that if groundwater dewatering is required, a site-specific NPDES dewatering permit and a Waste Discharge Authorization would be obtained from the RWQCB. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would result in the same amount of impervious surfaces in the same location as analyzed in the 2013 FEIR. The increase in impervious surfaces would interfere with groundwater infiltration but, consistent with the 2013 FEIR, the Project site is not located over a significant groundwater basin. In addition, the Project would be served by EBMUD and would not use groundwater. Consistent with the 2013 FEIR, if groundwater dewatering is required, a site-specific NPDES dewatering permit and a Waste Discharge Authorization would be obtained from RWQCB. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR determined that Project grading and construction could result in substantial erosion and sedimentation creating significant impacts. The Project would submit a Notice of Intent, SWPPP, and erosion control plan with BMPs to minimize construction related erosion impacts. As described in the 2013 FEIR, the Project would include 18 bioretention areas in accordance with the Contra Costa Clean Water Program (CCCWP) Hydromodification Management Plan Low Impact Site Design procedures in order to reduce runoff. Furthermore, implementation of MM HYDRO-1a and MM HYDRO-1b would require the City review a Final

Stormwater Control Plan and the applicant implement that plan, thereby reducing impacts to a less than significant level.

Resumed Project Analysis and Conclusion

The Project's grading and construction impacts would be consistent with the 2013 FEIR and result in similar alterations to existing drainage, which would create potentially significant impacts. Consistent with the 2013 FEIR, the Project would implement MM HYDRO-1a and MM HYDRO-1b. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

The 2013 FEIR concluded the Project would increase impervious surfaces and increase peak runoff potentially resulting in significant flooding off-site. Although the Project would include 18 bioretention areas that would be designed to treat and contain runoff on-site, the existing off-site drainage system may not safely convey site runoff. Implementation of MM HYDRO-1a and MM HYDRO-1b would ensure that the existing off-site drainage systems are sufficient to handle Project related runoff. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would result in the same amount of impervious surfaces as previously analyzed in the 2013 FEIR. Similarly, the Project would include 18 bioretention areas that would be designed to treat and contain runoff. However, those bioretention areas may not safely convey site run-off. Consistent with the 2013 FEIR, MM HYDRO-1a and MM HYDRO-1b would be implemented in order to ensure off-site drainage systems contain sufficient capacity to treat Project related runoff. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR concluded the Project would increase impervious surfaces and increase peak runoff resulting in significant impacts. Although the Project would include 18 bioretention areas that would be designed to treat polluted runoff, the existing off-site drainage system may not safely convey site runoff. Implementation of MM HYDRO-2 would require the applicant provide the City analysis that shows discharge from the Project site for the 10-year and 100-year storm event, and demonstrates that this discharge can be safely conveyed through the existing off-site storm drain system. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Similar to the 2013 FEIR, the Project would increase impervious surfaces and peak runoff resulting in potentially substantial sources of polluted runoff. Consistent with the 2013 FEIR, the Project would implement MM HYDRO-2 in order to ensure off-site drainage systems contain capacity to handle Project related runoff. As a result, impacts would be less than significant. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

f) Summary of 2013 FEIR

The 2013 FEIR considered the potential of the Project to substantially degrade water quality. As described in Impacts IX(a)-(e), the Project would implement MM HYDRO-1a, MM HYDRO-1b, and MM HYDRO-2, which would ensure preparation of a Final Stormwater Control Plan and an Operation and Maintenance Plan. Implementation of MM HYDRO-1a, MM-1b, and MM-2 would ensure the Project would not significantly degrade water quality. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would implement MM HYDRO-1a, MM HYDRO-1b, and MM HYDRO-2, which would ensure the Project would not significantly degrade water quality. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

g) Summary of 2013 FEIR

The 2013 FEIR determined that the Project site would not place housing within a Federal Emergency Management Agency (FEMA) designated 100-year or 500-year flood hazard zone. As a result, no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site would not be within a FEMA designated 100-year or 500-year flood hazard zone. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

h) Summary of 2013 FEIR

The 2013 FEIR determined that the Project would not place structures within a FEMA designated 100-year or 500-year flood hazard zone. As a result, no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site would not be within a FEMA designated 100-year or 500-year flood hazard zone. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

i) Summary of 2013 FEIR

The 2013 FEIR determined the Project site is not located within a dam inundation hazard zone. In addition, the Project site is elevated and, in the event of a dam failure, would not be affected. As such, no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site would not be within a dam inundation hazard zone. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

j) Summary of 2013 FEIR

The 2013 FEIR determined the Project site is not located near the ocean and would not be exposed to tsunamis. In addition, the Project site is outside the dam inundation hazard zone area and would not be susceptible to seiches. The 2013 FEIR concluded that because the Project site is located on steep slopes, the Project could be exposed to mudflows resulting in potentially significant impacts. However, as described in Section VI Impact(a), MM GEO-1 would ensure a geotechnical study is prepared that would detail areas susceptible to landslides and would make construction recommendations that would avoid or take measures to prevent significant loss of life or property. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site would not be exposed to tsunamis or susceptible to seiches. As noted in the 2013 FEIR, the Project site could be exposed to mudflows resulting in potentially significant impacts. Consistent with the 2013 FEIR, the Project would implement MM GEO-1 to address potential impacts from mudflows. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

Implement MM GEO-1 and the following:

MM HYDRO-1a Prior to the issuance of grading permits, additional hydrologic analyses and detailed drainage design drawings for the bioretention basins shall be submitted in a Final Stormwater Control Plan to the City for review and approval. The analyses shall include:

- 10-year peak flows
- Comparison of post-development peak flow rates to pre-development conditions
- Final calculation providing size, capacity, location, and infiltration rates for the 18 proposed bioretention basins
- On-site storm drain system piping layout and pipe size calculations

MM HYDRO-1b An Operation and Maintenance (O&M) Plan and Schedule shall be prepared as part of the Final Stormwater Control Plan and submitted to the City of Lafayette. The property owner (or Homeowners Association) shall enter into a standard stormwater O&M agreement with the City, codifying their responsibility for O&M performance and reporting. An O&M Manual shall be prepared and submitted to the City prior to the issuance of grading permits. The O&M Manual shall specify that the design storage capacity of the basins will be maintained and that accumulated residual sediment and other material will be cleaned out. The detention basins shall be inspected at least once per year prior to the start of the rainy season and debris removal shall occur on an as needed basis.

MM HYDRO-2 As part of the Final Stormwater Control Plan, the Project applicant shall provide to the City an analysis that shows the peak discharge from the Project site for the 10-year and 100-year storm event and demonstrate that this discharge can be safely conveyed through the existing off-site storm drain system.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects nor is there a substantial increase in the severity of previously identified significant effects related to hydrology and water quality. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR hydrology and water quality assessment.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
X. Land Use							
Would the project:							
a) Physically divide an established community?	No Impact	No	No	No	No Impact	None	None
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Significant and Unavoidable	No	No	No	Less than Significant with Mitigation Incorporated	MM LU-1, MM LU-2, and MM LU-3	MM BIO-5 **[revised]**, MM BIO-7 **[revised]**, MM HYDRO-1a, MM HYDRO-1b, and MM HYDRO-2
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	No Impact	No	No	No	No Impact	None	None

Discussion

The 2013 FEIR identified a significant and unavoidable impact related to conflicts with applicable land use plans, policies, and regulations and concluded that there would be no impact with respect to physically dividing a community or conflicting with HCPs or NCCPS. MM LU-1, MM LU-2, and MM LU-3 are listed, but the text of these measures simply states that mitigation is not feasible; they do not identify any action. As described below, land use impacts associated with the Project would be reduced when compared to the conclusions of the 2013 FEIR. As also described in more detail below, the Project does not result in new or more severe impacts than disclosed and analyzed in the 2013 FEIR.

a) Summary of 2013 FEIR

The 2013 FEIR determined that the Project site contains minimal development and surrounding development is limited to residential land uses and a high school. In addition, the Project site does not contain an existing community and would not eliminate roadways or reduce connectivity of the surrounding community. As such, development of the Project would not physically divide the community and no impact would occur.

Resumed Project Analysis and Conclusion

The Project is the same proposed uses, and on the same site, as that evaluated in the 2013 FEIR. Thus, consistent with the 2013 FEIR, the Project would not divide an established community. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR determined that the Project would be inconsistent with the following General Plan goals and policies: Goal LU-2, Goal LU-13, Policy LU-2.1, 2.2, 2.3, and Policy LU-20.1 In addition, the 2013 FEIR concluded that the Project would be inconsistent with the Hillside Development Permit (Sections 6-2015, 6-2031 through 6-2034, 6-2067, and 6-2070) and Ridgeline Setback Exception (Sections 6-2028, 6-2029, 6-2067, and 6-2071), resulting in significant impacts. Furthermore, the 2013 FEIR determined that no mitigation measures would be feasible and impacts would be significant and unavoidable.

Resumed Project Analysis and Conclusion

As presented in the Introduction and Project Description of this Addendum, the Project application reflects several refinements that are material to the evaluation of consistency with Land Use policies. Refinements include the following:

- A precise on-site measurement of ridgelines, prepared by ENGEO (Appendix A), pursuant to Municipal Code Section 6-2006 Modification of Lafayette Area Ridge Map, which concludes that the nearest Class I ridgeline terminates 650 feet west of the Project site, well outside the 400-foot setback required in the Lafayette City Code. Pursuant to Municipal Code Section 6-2006 Modification of Lafayette Area Ridge Map, "If a precise onsite measurement shows that the area within which development is prohibited varies from that shown on the City's map, the area shown by the on-site measurement controls."
- Proposed repropagation of 2.1 acres of native blue wildrye on-site. The applicant salvaged the existing native blue wildrye from the site in 2016 and has been holding the plants at a local nursery in preparation for re-establishment on-site.
- Emphasis on the installation of native tree species indigenous to the site and vicinity.

A consistency analysis of the policies the Project found to be inconsistent with Land Use policies in the 2013 FEIR are provided below in Table 15.

Table 15: Lafayette General Plan and Municipal Code Consistency Analysis

General Plan/Municipal Code Section	Summary of Requirement	Consistency Discussion
General Plan		
Goal LU-2	Ensure that development respects the natural environmental of Lafayette. Preserve the scenic quality of ridgelines, hills, creek areas, and trees.	**Consistent.** The Project would involve the removal of trees and filling of a creek channel on the site. Construction of the Project could result in the creation of impervious surfaces (roads, buildings) and slight changes of local topography with the potential to alter surface runoff rates and drainage patterns from the site and increase surface runoff rates, peak flows, and sediment transport downstream. MM HYDRO-1a, MM HYDRO-1b, and MM HYDRO-2 would ensure that impacts to water quality would be less than significant with implementation of the required Stormwater Control Plan. As noted above, the Project would not affect a Class I ridgeline, which does not exist on the Project site. Furthermore, in contrast to the 2013 FEIR, the Project would also repropagate 2.1 acres of native blue wildrye on-site and would emphasize the installation of native tree species indigenous to the site and vicinity. These refinements are reflected in the updated analysis in Section I Aesthetics and Section IV Biological Resources, as well as in the revised MM BIO-5 and MM BIO-7. While the General Plan does require site planning, construction, and maintenance of new development to preserve existing healthy trees and native vegetation to the maximum extent feasible, this Open Space and Conservation Element program (Program OS-4.4.1) is not a threshold of significance under CEQA Guidelines and has not been adopted as such by the City as required by CEQA

Table 15 (cont.): Lafayette General Plan and Municipal Code Consistency Analysis

General Plan/Municipal Code Section	Summary of Requirement	Consistency Discussion
		Guidelines Section 15064.7. In addition, other applicable General Plan provisions call for the replacement of native trees when a project results in the loss of woodland habitat (Program OS-4.3), and while the Project would remove 91 of 116 existing trees on the Project site, the Project would also add 700 additional trees on the entire site, including existing areas with bare soil, for a total of 725 trees planted at Project buildout. Moreover, the Project is preserving existing healthy trees and native vegetation to the maximum extent feasible under the proposed site plan.
Policy LU-2.1	Density of Hillside Development: Land use densities should not adversely affect the significant natural features of hill areas.	**Consistent.** The construction of 315 units on the 22.27-acre site as proposed would result in a residential density of 14 du/acre. The proposed residential density would not exceed the maximum of 35 du/acre allowed under the APO zoning regulations that apply to the Project site pursuant to the Housing Accountability Act. In addition, the Project would incorporate landscaping that would partially screen the Project and present a natural appearance.
Policy LU-2.2	Cluster Development: Preserve important visual and functional open space by requiring development to be clustered on the most buildable portions of lots, minimizing grading for building sites and roads.	**Consistent.** The Project site has been previously extensively disturbed through grading and contouring associated with the prior use of the site as a quarry, as well as the construction of Deer Hill Road. The Project site is surrounded on three sides by development and, as such, does not qualify as important visual open space. In addition, as a privately owned property, it does not provide publicly-accessible functional open space.

Table 15 (cont.): Lafayette General Plan and Municipal Code Consistency Analysis

General Plan/Municipal Code Section	Summary of Requirement	Consistency Discussion
Policy LU-2.2 (cont.)		Clustering is the grouping of residential buildings on a parcel in a way that creates substantial open space separate from development on the parcel. The Project proposes to utilize the existing man-made terraces to minimize grading required for the establishment of building pads and roadways. As shown in Exhibit 5 (refer to Section IV Biological Resources for further discussion), over 2 acres would be left as open space, and the apartment buildings would be clustered on the remaining acreage, in compliance with Policy LU-2.2.
Policy LU-2.3	Preservation of Views: Structures in the hillside overlay area shall be sited and designed to be substantially concealed when viewed from below from publicly owned property. The hillsides and ridgelines should appear essentially undeveloped, to the maximum extent feasible.	**Consistent.** As described in Section I Aesthetics in Impact I(a), the Project would include native vegetation that would partially screen the Project when viewed from lower elevations.
Policy LU-20.1	Traffic Service Standards: Consider the level of service (LOS) goals and standards set forth in the Circulation Chapter when evaluating development proposals.	**Consistent.** As described in Section XVI Transportation in Impact XVI(a) of this Addendum evaluates the Project against the LOS standards set forth by the City's General Plan. As described in that section, the Project would not conflict with the LOS goals and standards set forth in the Circulation Chapter.
Ridgeline Setback Exception (Sections 6-2028, 6-2029, 6-2067, and 6-2071)	The Project is within the City's Hillside Overlay District (HOD), and formerly contained a Class I Ridgeline, which is considered the most sensitive of the HOD's three classifications.	**Not applicable.** As described in the Project Description and in Section I Aesthetics in Impact I(b), the Project site is not within a Class I Ridgeline, and these policies are not applicable to the Project.
Hillside Development Permit (Sections 6-2015, 6-2031 through 6-2034, 6-2067, and 6-2070)	Building and grading permits would be required for construction of the proposed Project, and therefore, a Hillside Development Permit for an existing lot of record would also be required for construction within the HOD, pursuant to Sections 6-2015,	

Table 15 (cont.): Lafayette General Plan and Municipal Code Consistency Analysis

General Plan/Municipal Code Section	Summary of Requirement	Consistency Discussion
	6-2031 through 6-2034, 6-2067, and 6-2070 of the Hillside Development Requirements. Upon issuance of this permit, the Project would be consistent with the Hillside Development Requirements. The following findings must be made for a Hillside Development Permit:	
	• The development is consistent with the applicable goals and policies of the General Plan and is in conformance with applicable zoning regulations.	**Consistent.** See above.
	• The development will preserve open space and physical features, including rock outcroppings and other prominent geological features, streams, streambeds and ponds, native vegetation, native riparian vegetation, animal habitats and other natural features.	**Consistent.** As described in Section I Aesthetics in Impact I(a) and in Section IV Biological Resources in Impact IV(b) and IV(e), the Project would incorporate native landscaping, would repropagate native blue wildrye on-site and preserve existing trees to the maximum extent feasible under the proposed site plan, and provide replacement trees that are indigenous to the site and vicinity. Please refer to Goal LU-2 for further discussion.
	• The development and each associated improvement is located and designed to complement the natural terrain and landscape of the site and surrounding properties, and relates to the development pattern, including density and distribution, of the surrounding neighborhood.	**Consistent.** The Project site has been extensively disturbed through grading and contouring associated with the prior use of the site as a quarry, as well as the construction of Deer Hill Road. The Project would not cause additional grading that would prohibit the Project from complementing the surrounding properties to the north.
	• Structures in a Hillside Overlay District will, to the extent feasible, be located away from prominent locations such as ridgelines, hilltops, knolls and open slopes.	**Consistent.** Proposed building heights were designed to use the existing terraces and to comply with the height limits required under the Hillside Overlay District. Heights would be limited to 2 or 3 stories, depending upon location within the Project site.

Table 15 (cont.): Lafayette General Plan and Municipal Code Consistency Analysis

General Plan/Municipal Code Section	Summary of Requirement	Consistency Discussion
	• Development grading will be minimized to reduce cut and fill, preserve existing geologic features, topographic conditions and existing vegetation, reduce short and long-term erosion, slides, and flooding, and abate visual impacts.	**Consistent.** As discussed above, the Project site has been substantially disturbed and graded and development of the Project would not cause additional grading such that development of the Project would result in visual impacts. Geologic and hydrologic impacts would be mitigated to less than significant levels. In addition, the Project would provide landscaping that would include native species that would abate visual impacts as discussed in Section I Aesthetics.
	• Each structure proposed complies with the City's residential design guidelines, and development landscaping will ensure visual relief and complement each proposed structure to provide an attractive environment.	**Consistent.** The Project would be required to meet design review findings.
	• The development will not create a nuisance, hazard, or enforcement problem within the neighborhood or the City, nor require the City to provide an unusual or disproportionate level of public services.	**Consistent.** The Project would contain residential uses that would not cause any unusual nuisances, hazards, or enforcement problems.
	• The new or replacement vegetation for the development is native to the surrounding area in areas abutting open space and natural areas, such as oak woodland, chaparral, grassland and riparian areas, excluding planting for erosion control or land stabilization.	**Consistent.** The Project would provide native replacement vegetation.
	For projects on existing lots of record within the Hillside Overlay District, the additional findings must be made:	
	• When within a L-R-10 or L-R-5 district, within 100 feet of a restricted ridgeline area, or when an exception to a ridgeline setback has been granted, the development will result in each	**Not applicable.** As discussed in Section I Aesthetics Impact I(a), there are no ridgelines on the Project site.

Table 15 (cont.): Lafayette General Plan and Municipal Code Consistency Analysis

General Plan/Municipal Code Section	Summary of Requirement	Consistency Discussion
	structure being substantially concealed when viewed from lower elevations from publicly owned property (including freeways, roadways, open space, parks and trails), using the viewing evaluation map as a guide to establish locations from which views are considered.	
	• The development uses site planning techniques to the extent feasible to preserve hillsides, knolls, and ridgelines and open space, minimize grading and impacts to habitat, and preserve on-site open space and vegetation, terrain, scenic vistas, streams or other courses, or other areas of ecological significance.	**Consistent.** As discussed in Section IV Biological Resources in Impact IV(b) and Impact IV(e), the Project would repropagate native blue wildrye on-site, would provide replacement trees that are indigenous to the site and vicinity, and would conserve open space, physical features, and trees to the maximum extent feasible under the proposed site plan. Furthermore, as discussed in Section I Aesthetics in Impact I(a), the Project would not have a significant impact on scenic vistas.
	• The development provides adequate emergency vehicle access, including turn-around space, to the building site and surrounding on-site undeveloped or isolated areas while protecting trees, minimizing grading, and preserving to the extent feasible the natural hillside character of the site.	**Consistent.** The Project would provide adequate emergency vehicle access. Although the Project includes extensive grading, the redevelopment of the Project site would not degrade the natural hillside character because the site has been extensively disturbed through previous grading and benching. In addition, new trees, shrubs, and groundcovers proposed by the Project would be predominately native and the Project would repropagate native blue wildrye on-site and preserve the existing trees to the maximum extent feasible under the proposed site plan.
	• The development, including site design and the location and massing of all structures and improvements will, to the extent feasible: - Preserve the open space and uncluttered topography of the city;	**Consistent.** As described in Section I Aesthetics in Impact I(a), I(b), and I(c) and throughout this table, the Project would not have any significant visual impacts. In regards to the privacy to surrounding residents, the project would incorporate landscaping that

Table 15 (cont.): Lafayette General Plan and Municipal Code Consistency Analysis

General Plan/Municipal Code Section	Summary of Requirement	Consistency Discussion
	- Minimize the loss of privacy to surrounding residents; - Not have significant visual impact when viewed from lower elevations from publicly owned properties (including freeways, roadways, open space, parks and trails), using the viewing evaluation map as a guide; and - Not interfere with a ridgeline corridor or compromise the open space of scenic character of the corridor.	would partially screen the project and provide privacy for surrounding residents.

The Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR concluded that no HCPs or NCCPs are applicable to the Project and no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project is not within an area covered by an HCP or NCCP. Therefore, the 2018 proposed Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measure Summary from the 2013 FEIR

MM LU-1 No feasible mitigation measure would maintain the natural, undeveloped appearance of the hillside on the Project site.

MM LU-2 No feasible mitigation measure would achieve the definition of clustering set forth by the Lafayette Municipal Code.

MM LU-3 No feasible mitigation measure would achieve consistency with the Hillside Development Permit requirements.

Revised Mitigation Measures for the Resumed Project

Implement MM BIO-5, MM BIO-7, MM HYDRO-1a, MM HYDRO-1b, and MM HYDRO-2.

MM LU-1, MM LU-2, and MM LU-3 are not applicable to the Project.

Conclusion

Because of corrections and refinements to existing conditions and environmentally beneficial site plan refinements, land use impacts would be reduced when compared to those identified in the 2013 FEIR, and MM LU-1, MM LU-2, and MM LU-3 are not applicable to the Project. There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to land use. Further, no new mitigation measures or alternatives are required.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
XI. 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?	No Impact	No	No	No	No Impact	None	None
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact	No	No	No	No Impact	None	None

Discussion

Mineral Resource impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified no potential impacts related to mineral resources, which, as described below, would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

The 2013 FEIR noted that the Project site does not support any mineral extraction activities, and no known mineral deposits exist on-site. Therefore, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State. As a result, the 2013 FEIR concluded that no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site does not support any mineral extraction activities, and no known mineral deposits exist on-site. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR noted that the Project site does not contain any mineral resources. Therefore, implementation of the Project would not result in the loss of availability of a locally important mineral resource. As a result, no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site does not support any known mineral deposits or locally important mineral resources. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measure Summary from the 2013 FEIR

None.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to mineral resources. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR mineral resources assessment.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
XII. Noise							
Would the project:							
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM NOISE-1	MM NOISE-1
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	No	No	No	Less than Significant	None	None
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than Significant	No	No	No	Less than Significant	None	None
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM NOISE-2	MM NOISE-2
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	No Impact	No	No	No	No Impact	None	None

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
project expose people residing or working in the project area to excessive noise levels?							
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No Impact	None	None

Discussion

Noise impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified potential Project impacts related to excessive noise levels, or generating noise levels in excess of standards established in the General Plan Noise Element and noise ordinance or applicable standards of other agencies, and substantial temporary or periodic increase in ambient noise levels. The 2013 FEIR concluded that these potential impacts would be reduced to less than significant with the incorporation of mitigation measures. The 2013 FEIR concluded there would be less than significant impacts with respect to groundborne vibration or groundborne noise levels and substantial permanent increase in ambient noise levels. In addition, the 2013 FEIR determined that there would be no impact with respect to public airports and public use airports as well as private airstrips. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

The Noise supporting information is provided in Appendix D.

a) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project would comply with the land use compatibility standards of the Noise Element for outdoor spaces, resulting in a less than significant impact. Noise exposure levels in all open areas behind proposed structures would be less than 60 dBA L_{dn} because of the barrier effect of the edges of the graded terraces and the proposed apartment buildings. However, the study also concluded that interior noise levels would exceed the standard with windows open. Implementation of special noise control treatments, detailed in the 2013 FEIR MM NOISE-1, would be required to reduce interior noise levels to below the 45 dBA L_{dn} interior noise level threshold. The 2013 FEIR concluded that this

mitigation measure, including sound-rated windows and doors, and a suitable form of ventilation (to allow the option of closing windows while still having a source of fresh air), would reduce interior noise levels to less than significant with mitigation.

Resumed Project Analysis and Conclusion

In order to verify the existing ambient noise conditions and to determine if any substantial changes have occurred since the time of the adoption of the 2013 FEIR, additional ambient noise measurements were taken and traffic noise modeling was performed based on the Updated Traffic and Circulation Impact Analysis (2018 Traffic Report).

The existing ambient noise environment was documented through a long-term ambient noise measurement conducted from 12:18 p.m., August 28, 2018, to 12:38 p.m., August 30, 2018. The long-term measurement was taken on the Project site northeastern boundary, approximately 75-feet west of Pleasant Hill Road. This location corresponds with the noise measurement LT-N of the previous noise study prepared for the 2013 FEIR (Figure 4.10-1 of the 2013 FEIR). The results show that current weekday 24-hour average day/night noise levels at this location ranged up to 68.5 dBA L_{dn}. The documented daytime hourly average noise level was 65.1 L_{eq} with a nighttime hourly average noise level of 61.3 L_{eq}. The noise measurement data and survey sheets are provided in Appendix D of this Addendum. The noise measurements captured all noise sources in the Project vicinity, including noise levels from traffic sources. The noise levels documented by the LT-N noise measurement conducted for the 2013 FEIR show that ambient noise levels were documented to range from 71 dBA to 74 dBA L_{dn} at this location. Thus, the current ambient noise conditions on the Project site have not changed substantially since the analysis performed for the 2013 FEIR.

The Federal Highway Administration (FHWA) highway traffic noise prediction model (FHWA RD-77-108) was also used to evaluate existing and future project-related traffic noise conditions along modeled roadway segments in the vicinity of the Project site. The projected future traffic noise levels on roadways adjacent to the site were analyzed to determine compliance with the City's noise and land use compatibility standards. Traffic modeling was performed using the data obtained from the updated Project-specific traffic impact study conducted by TJKM (Appendix F). This 2018 Traffic Report provides data for existing (2018) and cumulative year conditions. The resultant noise levels were weighed and summed over a 24-hour period to determine the L_{dn} values. The traffic noise modeling input and output files—including the 60 dBA, 65 dBA, and 70 dBA L_{dn} noise contour distances—are included in Appendix D. Table 16 shows a summary of the modeled traffic noise level results for existing and cumulative year conditions, with and without the Project, as measured at 50 feet from the centerline of the outermost travel lane for each modeled roadway segment.

Table 16: Traffic Noise Model Results Summary

Roadway Segment	Existing (dBA) L_{dn}	Existing + Plus Project (dBA) L_{dn}	Increase over Existing (dBA)	Cumulative No Project (dBA) L_{dn}	Cumulative + Project (dBA) L_{dn}	Increase over Cumulative No Project (dBA)
Deer Hill Road—Pleasant Hill Road to East Project Driveway	66.8	66.9	0.1	68.2	68.3	0.1
Deer Hill Road—East Project Driveway to West Project Driveway	67.4	67.4	0.0	68.8	68.8	0.0
Deer Hill Road—West Project Driveway to Brown Avenue	67.4	67.5	0.1	68.8	68.9	0.1
Pleasant Hill Road—Quant Road to Stanley Boulevard	64.5	64.5	0.0	66.0	66.0	0.0
Pleasant Hill Road—Stanley Boulevard to Project Driveway	66.8	66.9	0.1	68.3	68.3	0.0
Pleasant Hill Road—Project Driveway to Acalanes Avenue	67.1	67.2	0.1	68.5	68.6	0.1
Pleasant Hill Road—Acalanes Avenue to SR-24 WB Direct Ramps	67.1	67.3	0.2	68.6	68.7	0.1
SR-4—1st Street ramps to Pleasant Hill Road ramps	79.3	79.3	0.0	79.3	79.3	0.0

Note:
Noise levels as measured at 50 feet from the centerline of the outermost travel lane.
Source: FirstCarbon Solutions, 2018.

The nearest façade of the proposed multi-family residential structures to SR-24 would be located approximately 260 feet from the centerline. Due to distance attenuation and a minimum reduction of 3 dBA for shielding due to terrain conditions, the nearest façade would be exposed to traffic noise levels ranging up to approximately 70 dBA L_{dn}. This corresponds with the calculated results of the 2013 FEIR, which showed that the nearest façade would be exposed to traffic noise levels ranging up to 69 dBA L_{dn}. Therefore, Project site traffic noise conditions have not changed substantially since the time of the analysis for the 2013 FEIR.

Since the proposed building layouts would remain the same, the conclusions of the 2013 FEIR noise analysis would also remain the same regarding traffic noise impacts to the Project site. The 2013 FEIR analysis concluded that with the Project in place, that noise exposure level in all open areas behind the proposed structures would be less than 60 dBA L_{dn} because of the barrier effect on the edges of the graded terraces and the buildings. Similar to the 2013 FEIR, the Project would comply with the land use compatibility standards of the Noise Element for outdoor spaces, but the interior noise levels of the Project would exceed the standard for open exterior windows. Therefore, implementation of special noise control treatments, including

sound-rated windows and doors, plus a suitable form of ventilation that would allow windows to remain closed for extended periods, would still be required to reduce interior noise levels to below the 45 dBA L_{dn} threshold. Consistent with the 2013 FEIR, the Project would implement MM NOISE-1. Therefore, the Project would not introduce new significant noise impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded that potential construction-related vibration associated with the Project would be well below the Federal Transit Administration (FTA) 0.2 peak particle velocity (PPV) inches/second criteria for construction-related groundborne vibration impacts on surrounding structures. Therefore, construction-related groundborne vibration impacts would be less than significant. Additionally, average vibration levels for mobile sources in the Project vicinity would not exceed 60 VdB at receiving land uses, which would not exceed the FTA criterion for vibration annoyance of 75 VdB. Therefore, the 2013 FEIR concluded that impacts from mobile source vibration levels in the Project vicinity are less than significant.

Resumed Project Analysis and Conclusion

The Project would be located on the same site as was analyzed in the 2013 FEIR, with the same maximum construction footprint. In addition, there are no new sources of groundborne vibration in the Project vicinity. Accordingly, similar to the conclusions from the 2013 FEIR, the Project would have no impact related to groundborne vibration or groundborne noise and would not be exposed to vibration impacts from any existing sources of groundborne vibration in the Project vicinity. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project would not involve any major stationary sources of noise. Minor stationary-related noise from the operation of air conditioning units and noise from parking lots would be masked by traffic noise on Deer Hill Road and Pleasant Hill Road. Further, the Project would be required to comply with the noise ordinance standards of the Noise Element and noise ordinance. Consequently, the Project's long-term, stationary-related noise impacts to off-site uses would be less than significant. The 2013 FEIR also recognized that project-related traffic could cause potential long-term noise increases, particularly for the largest traffic flow area on Pleasant Hill Road between SR-24 and Stanley Road/Deer Hill Road. However, the Traffic Impact Study in the 2013 FEIR calculated a noise level increase due to Project-related traffic of less than 0.2 dB, which is well below the most restrictive criterion of a 2 dB increase. The 2013 FEIR thus concluded that the long-term traffic noise impacts of the Project to off-site uses would be less than significant.

Resumed Project Analysis and Conclusion

The Project contemplates the same uses, building heights, and maximum amount of residential units as previously analyzed in the 2013 FEIR. In addition, the Project footprint, landscaping, and design features would remain the same as those analyzed in the 2013 FEIR. As such, similar to the findings of the 2013 FEIR, the Project's long-term, stationary-related noise impacts to off-site uses would be less than significant. The calculated 2018 traffic noise modeling results summarized in Table 16 above, show that project-related traffic noise level increases would range up to 0.2 dBA compared to conditions that would exist without the Project, which is well below the most restrictive criterion of a 2 dBA increase. This is consistent with the findings of the 2013 FEIR. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

d) Summary of 2013 FEIR

The 2013 FEIR concluded that the levels of haul truck and worker vehicle traffic flows would be negligible compared to the volumes of traffic currently generated along the segment of roadway expected to be the primary construction traffic access (Pleasant Hill Road between SR-24 and Deer Hill Road). Therefore, these impacts are less than significant at noise receptors along the construction routes. Construction activities would be required to comply with the City of Lafayette Municipal Code, which limits the hours of construction equipment and restricts construction activities to the least noise-sensitive portions of the day. Furthermore, MM NOISE-2 details the selection of appropriate construction equipment and operating techniques to reduce construction noise to the extent reasonably feasible. The 2013 FEIR concluded that with adherence to the City's time-of-day restrictions and implementation of MM NOISE-2, construction noise levels would be reduced to a less than significant level.

Resumed Project Analysis and Conclusion

There are no new noise sensitive receptors in the Project vicinity that are located closer to the Project site than those analyzed in the 2013 FEIR noise analysis. The Project contemplates the same footprint, landscaping, and design features as those analyzed in the 2013 FEIR. Since the maximum Project construction footprint would remain the same, the conclusions of the 2013 FEIR noise analysis would also remain the same regarding construction noise impacts. Construction activities would still be required to comply with the City of Lafayette Municipal Code, which limits the hours of construction equipment and restricts construction activities to the least noise-sensitive portions of the day. Furthermore, consistent with the 2013 FEIR, the Project would implement MM NOISE-2 that would further ensure that noise levels from construction activities would not impact nearby sensitive receptors. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR did not identify any public airports within 2 miles of the Project site. Therefore, given the distance of the Project site from the nearest airport, people residing or working in the Project area would not be exposed to excessive noise levels. As such, the 2013 FEIR determined that the Project would result in no noise impact.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would develop the same site, which would be located at a distance greater than 2 miles from the nearest public airport. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

f) Summary of 2013 FEIR

The Project site is not located within the vicinity of a private airstrip. Therefore, given the distance of the Project site from the nearest private airstrip, people residing or working in the Project area would not be exposed to excessive noise levels. As such, the 2013 FEIR determined that the Project would result in no noise impact.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would not be located near any private airstrips. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM NOISE-1 The exterior glazing, entry doors, exterior wall, and supplemental ventilation design features shall be designed to achieve a 45 dBA L_{dn} interior noise standard. These features are summarized below and additional details are provided in the Wilson Ihrig & Associates (WIA) report prepared for the 2013 FEIR.

- Two classes of exterior glazing are indicated for windows, sliding glass doors, and entry doors:
  - Class I elements shall have a minimum OITC 24/STC 28 rating
  - Class II elements shall have a minimum OITC 21/STC 25 rating

  (Note: The different classes are based on the location of proposed buildings on the Project site, per Figures 12 and 13 of the WIA report.[33] Also note that the recommended OITC/STC ratings are for full window assemblies (glass and frame), rather than just for the glass itself.)

[33] Wilson Ihrig & Associates. 2011. CCR Title 24 Noise Study, The Terraces of Lafayette Multifamily Project, Lafayette, California. June 16.

- If hard floor surfaces (such as hardwood or ceramic tile) are used, then the minimum recommended glazing rating (above) shall be increased by two OITC/STC points for windows serving those rooms.
- Entrance doors, together with their perimeter seals, shall have STC ratings not less than 26. Such tested doors shall operate normally with commercially available seals. Solid-core wood-slab doors 1-3/8 inches (35 mm) thick minimum or 18 gage insulated steel-slab doors with compression seals all around, including the threshold, may be considered adequate without other substantiating information.
- Acceptable acoustical caulking, applied per the manufacturer's directions, shall be used to properly seal windows, doorways, electrical outlets (in exterior walls), and the indicated intersections of interior gypsum wall board (GWB) installations throughout the affected buildings.
- Potential architectural element suppliers shall verify the acoustical performance ratings by providing laboratory test data for the specific assembly type submitted for the Project.
- Exterior wall assemblies shall have a minimum OITC 38 (comparable to STC 50) rating. This can be achieved with 'typical' assembly designs for this type of multi-family development, which were assumed to consist of 7/8-inch stucco over plywood shear sheathing, 4- to 6-inch deep studs, fiberglass batt insulation in the stud cavity, and at least one layer of 5/8-inch gypsum board on the interior face of the wall.
- Supplemental ventilation shall be provided in the architectural design so as to allow for closed windows as well as the adequate supply of fresh air per applicable building codes.

MM NOISE-2 The construction contractor shall adhere to the following measures during construction activities:

- Use of construction equipment shall be restricted to the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday.
- Material deliveries and haul-off truck trips shall be restricted to the hours of 7:00 a.m. to 10:00 p.m. Monday through Friday. Further, all such construction trips shall avoid, to the extent reasonably feasible, peak traffic periods along Pleasant Hill Road and Deer Hill Road (i.e. morning rush hour, mid-afternoon school pick-up time, and afternoon rush hour).
- Prior to the start of and for the duration of construction, the contractor shall properly maintain and tune all construction equipment in accordance with the manufacturer's recommendations to minimize noise emissions.
- Prior to use of any construction equipment, the contractor shall fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer.
- During construction, the construction contractor shall place stationary construction equipment and material delivery (loading/unloading) areas so as to maintain the greatest distance from the nearest residences.

- The construction contractor shall post a sign at the work site that is clearly visible to the public, providing a contact name and telephone number for lodging a noise complaint.

These measures shall be listed on the grading plan and monitored by the City during construction.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to noise. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR noise assessment.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
XIII. Population and Housing							
Would the project:							
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	Less than Significant	No	No	No	Less than Significant	None	None
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	No	No Impact	None	None
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	No	No Impact	None	None

Discussion

Population and Housing impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified a less than significant impact with respect to inducing substantial population growth and no impact in relation to displacing substantial numbers of people or existing housing. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

The 2013 FEIR determined that the Project would not directly induce growth because the Project's maximum 315 residential units are less than planned for in the General Plan and are consistent with regional growth projections. As noted in the 2013 FEIR, the Project would result in 658 residents, which would represent approximately 60 percent of the 1,100 new

residents forecast for Lafayette by 2020 in the Association of Bay Area Government's 2009 projections. The Project's maximum 315 residential units would represent 59 percent fewer residential units than allowed under the City's APO zoning classification and would result in 30 percent of the 1,026 new residential units forecast by 2020 in the City's General Plan EIR.

The 2013 FEIR concluded that the Project would be served by current urban infrastructure and utilities. In addition, all roads and infrastructure would be designed to serve only the Project site and would not facilitate additional development or remove a physical barrier to growth. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would consist of the same maximum 315 residential units within the same Project site as previously analyzed in the 2013 FEIR. As such, the Project would not have the potential to add more residents to the City of Lafayette than what was analyzed in the 2013 FEIR. In addition, consistent with the 2013 FEIR, all roads and infrastructure would be designed to serve only the Project site and would not facilitate additional development or remove a physical barrier to growth. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded that the former housing unit on the Project represented 0.01 percent of the total number of housing in the City of Lafayette. As a result, no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, removal of the former housing unit in 2016 would not displace significant numbers of existing housing because it represented 0.01 percent of the housing in the City. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR determined that the former housing unit on the Project site was vacant and no impacts would occur.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project site formerly contained one housing unit, which was removed in 2016. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

None.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to population and housing. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR population and housing assessment.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigations Measures for the Resumed Project
XIV. 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?	Less than Significant	No	No	No	Less than Significant	None	None
b) Police protection?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM PS-1a, MM PS-1b, MM PS-1c, and MM PS-1d	MM PS-1a, MM PS-1b, MM PS-1c, and MM PS-1d
c) Schools?	Less than Significant	No	No	No	Less than Significant	None	None
d) Parks?	Less than Significant	No	No	No	Less than Significant	None	None
e) Other public facilities?	Less than Significant	No	No	No	Less than Significant	None	None

Discussion

Public Services impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified less than significant impacts with mitigation incorporated with respect to police protection and less than significant impacts with respect to fire protection, schools, parks, and other public facilities. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

The 2013 FEIR determined the Project would increase demand for fire protection services and is within the CCCFPD service area. The 2013 FEIR noted that the Project would incorporate CBC and City fire safety features as well as ensuring adequate emergency vehicle access. In addition, the CCCFPD would review all plans in order to ensure adequate access would be provided and all fire safety features are included.

At the time of preparation of the 2013 FEIR, the CCCFPD did not meet the standard response time of five minutes. However, the CCCFPD determined that construction of the Project would not require the construction or expansion of CCCFPD facilities.[34] The 2013 FEIR concluded that

[34] Leach, Ted, Fire Inspector, Contra Costa County Fire Protection District. Personal communication with The Planning Center|DC&E. October 31, 2011.

payment of development impact fees would help maintain the CCCFPD facilities, and impacts would be less than significant.

Resumed Project Analysis and Conclusion

According to the CCCFPD, response times are well within the emergency medical service agency's 90 percent requirements.[35] Consistent with 2013 FEIR, the Project would pay development impact fees, incorporate current CBC and City fire safety features, and provide adequate emergency vehicle access. In addition, the CCCFPD would review all plans in order to ensure adequate access is provided and all fire safety features are included. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded that the Project's 658 new residents would increase the need for police services in the Lafayette Police Service District (LPSD) service area by three percent. However, the 2013 FEIR determined the Project would adversely affect the LPSD's ability to respond to calls for service and would require additional personnel resulting in a potentially significant impact. As noted in the 2013 FEIR, the Project would incorporate MM PS-1a, MM-1b, and MM-1c that would include safety features such as outdoor lighting, security gates, video surveillance, and contracting with a private security company to routinely patrol the premises upon construction of the Project. Furthermore, the Project would incorporate MM-1d, which includes the payment of police impact fees. The 2013 FEIR concluded that implementation of MM PS-1a, MM PS-1b, MM PS-1c, and MM PS-1d would reduce impacts to less than significant.

Resumed Project Analysis and Conclusion

The Project would result in the same three percent increase in police service demand, resulting in the same potentially significant impacts identified in the 2013 FEIR. Consistent with the 2013 FEIR, the Project would implement MM PS-1a, MM PS-1b, MM PS-1c, and MM PS-1d, which would reduce impacts to less than significant. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR indicated that the Project would result in 658 new residents, which would create an estimated increase in enrollment in K-12 schools. Specifically, the 2013 FEIR found that the Project would generate 53 to 78 high school students and 63 K-5 students. The 2013 FEIR determined that the Project's expected student generation would not exceed the capacity of the schools that children living in the Project would attend (i.e., Acalanes High School, Stanley

[35] CCCFPD. 2018. Fire Chief's Messages-authored by Jeff Carman. Website: https://www.cccfpd.org/chiefs-message.php. Last accessed October 15, 2018.

Middle School, and Springhill Elementary). In addition, the Project would be required to pay school development fees in accordance with the latest adopted fee schedule. As a result, the 2013 FEIR determined impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would develop the same maximum amount of residential units and would generate the same number of students. Table 17 presents the past, current, and projected enrollment at the three schools that would serve the Project site.

Table 17: Capacity of Local Schools Serving the Project Site

School	Past/Current Enrollment[1]				Projected Enrollment		
	2013–2014	2014–2015	2015–2016	2016–2017	2017–2018	2018–2019	2019–2020
Acalanes High School[2]	1,342	1,396	1,423	1,360	1,377	1,347	1,371
Stanley Middle School[3]	1,163	1,178	1,220	1,235	1,227	1,328	1,336
Springhill Elementary[4]	501	487	486	481	469	473	488

Notes
(1) EdData. 2018. Acalanes High. Website: http://www.ed-data.org/school/Contra-Costa/. Last accessed October 15, 2018.
(2) Alcalanes Union High School District. 2017. 2017-2018 Budget Adoption. Website: https://www.acalanes.k12.ca.us/cms/lib/CA01001364/Centricity/Domain/609/2017-2018_Budget_Adoption.pdf. Last accessed October 15, 2018.
(3) Lafayette Elementary School District. 2015. Demographic Study: Long-Range Enrollment Projections. March.
(4) Lafayette Elementary School District. 2014. Demographic Study: Revised Enrollment Projections. November.

The Acalanes Union High School District anticipates that the Project would generate an additional 53 to 78 high school students, based on the student yield rates for residential units ranging from 0.17 to 0.25. High school enrollment for the 2016–2017 school year was 1,360 students. The addition of 53 or more students would slightly exceed Acalanes High School's capacity of 1,400 students.[36] Currently the Lafayette School District does not have an elementary (grades K-5) or middle school (grades 6-8) student yield rate but, assuming a general yield rate of 0.2 students per residential unit,[37] the Project would generate approximately 42 K-5 Grade students. The capacity of Springhill Elementary School is 530 students[38] and enrollment for the 2016–2017 school year was 481 students. The addition of 42 K-5 Grade students would not exceed the capacity at Springhill Elementary. The enrollment at Stanley Middle School for the 2016–2017 school year was 1,235 students, and the school can

[36] The Planning Center | DC&E. 2012. The Terraces of Lafayette DEIR, Section 4.12-Public Services pages 4.12-25 to 4.12-26.
[37] The State Allocation Board calculates projected enrollment rates for Elementary School, High School, and Unified School District based on the methods outlined in California Code of Regulations Section 1859.42, 1859.42.1, and 1859.43. Districts are allowed to use their own Student Yield Factor provided they offer a justification for that Student Yield Factor. Because the LAFSD does not currently have a student yield rate, the general yield rate of 0.2 (used in the adjacent Walnut Creek School District) was applied to provide a more accurate, local projected enrollment than the statewide project enrollment provided by the State Allocation Board. Using the 0.2 yield rate, the Project would yield approximately 63 K-8 students.
[38] The Planning Center | DC&E. 2012. The Terraces of Lafayette DEIR, Section 4.12-Public Services pages 4.12-25 to 4.12-26.

accommodate up to 1,320 students.[39] Assuming a general yield rate of 0.2,[40] the Project would generate approximately 21 6-8 Grade students. The additional 21 students would not exceed the maximum capacity of Stanley Middle School. Consistent with the 2013 FEIR, the Project would pay school development fees in accordance with the latest adopted fee schedule. Therefore, the Project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the 2013 FEIR. No additional analysis is required.

d) Summary of 2013 FEIR

The 2013 FEIR determined that the Project would increase demand for parks. The 2013 FEIR concluded that because the Project includes a recreation center, open space, turf play areas, and would pay park development fees in accordance with the most recent fee schedule, impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project's 658 new residents would result in the same demand for parks and would develop the same recreational facilities as previously analyzed in the 2013 FEIR. Consistent with the 2013 FEIR, the Project would pay development impact fees in accordance with the most recent fee schedule. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR determined that the Project's 658 new residents would increase the use of library services but the closest library, the Lafayette Library and Learning Center. The Lafayette Library and Learning Center opened in 2010, replacing the County-owned Lafayette Library facility that was not adequately meeting the needs of the community. The Lafayette Library and Learning Center is in excellent condition and currently does not experience deficiencies.[41] As result, the 2013 FEIR concluded impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would result in the same number of additional residents resulting in the same increase in demand for library services as analyzed in the 2013 FEIR. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

[39] The Planning Center | DC&E. 2012. The Terraces of Lafayette DEIR, Section 4.12-Public Services pages 4.12-25 to 4.12-26.
[40] The general yield rate of 0.2 is used in the adjacent Walnut Creek School District.
[41] Contra Costa Local Agency Formation Commission. 2013. Municipal Service Review: Library Services, page 18. February.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM PS-1a The Project's outdoor lighting plan shall be reviewed and approved by the Lafayette Police Services Department prior to the issuance of building permits by Contra Costa County.

MM PS-1b The Project shall include a video surveillance system. The location and position of the video surveillance system shall be reviewed and approved by the by the Lafayette Police Services Department prior to the issuance of building permits by Contra Costa County.

MM PS-1c The Project shall include the services of a private security company to routinely patrol the premises upon construction of the proposed Project. A draft contract between a private security company and the apartment management company shall be reviewed and approved by the Lafayette Police Services Department prior to the issuance of building permits by Contra Costa County.

MM PS-1d The Project shall pay a police impact fee to the City prior to the issuance of building permits by Contra Costa County. The City would prepare a nexus study to determine the appropriate fee that could support the LPSD's additional personnel and associated equipment. If the impact fee assessment by the City is not in place at the time of building permit issuance for the Project, the Project applicant would be required to pay the fees after the building permit issuance when the City finishes the nexus study.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to public services. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR public services assessment.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
XV. Recreation							
Would the project:							
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	No	No	No	Less than Significant	None	None
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?	Less than Significant	No	No	No	Less than Significant	None	None

Discussion

Recreation impacts associated with the Project would be consistent with those identified in the 2013 FEIR. The 2013 FEIR identified less than significant impacts related to recreational facilities, which, as described below, would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

The 2013 FEIR determined that the Project's 658 new residents would increase demand for recreational facilities and local parks. The Project would include a 13,300 square foot clubhouse that includes recreational areas such as fitness facilities, a pool, and other amenities. The 2013 FEIR concluded that the inclusion of recreational facilities in the Project design and payment of park development fees in accordance with the most recent fee schedule would reduce impacts to a less than significant level.

Resumed Project Analysis and Conclusion

The Project would result in the same amount of new residents and increase in demand for parks and recreational facilities as previously analyzed in the 2013 FEIR. Consistent with the 2013 FEIR, the Project applicant would pay park development fees in accordance with the most recent fee schedule. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR determined that given the vast size of the three regional parks surrounding the Project area (i.e., Lafayette Reservoir, Briones Regional Park, and Las Trampas Regional Wilderness) and the relatively infrequent use of the regional parks by the future residents, the Project would not significantly affect the three regional park facilities near the Project site. The 2013 FEIR concluded that park facilities would not significantly deteriorate, and impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project would result in the same amount of new residents as previously analyzed in the 2013 FEIR. As a result, the Project would not result in substantial deterioration of the three regional park facilities surrounding the Project area. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

None.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to recreation. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR recreation assessment.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project[1]
XVI. Transportation							
Would the project:							
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Significant and Unavoidable	No	No	No	Less than Significant with Mitigation Incorporated	MM TRAF-1, MM TRAF-2, MM TRAF-9, MM TRAF-10, MM TRAF-11, MM TRAF-12	MM TRAF-2 **[revised]**, MM TRAF-9 **[revised]**, and MM TRAF-10 **[revised]**
b) Conflict with an applicable congestion management program, including but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for the designated roads or highways?	Significant and Unavoidable	No	No	No	Less than Significant	MM TRAF-13	None

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project[1]
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	No Impact	No	No	No	No Impact	None	None
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant	MM TRAF-3, MM TRAF-4, and MM TRAF-8	None
e) Result in inadequate emergency access?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM TRAF-5 and MM TRAF-6	MM TRAF-5
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Less than Significant with Mitigation Incorporated	No	No	No	Less than Significant with Mitigation Incorporated	MM TRAF-7, MM TRAF-14, MM TRAF-15, MM TRAF-16a, MM TRAF-16b, MM TRAF-17, MM TRAF-18, MM TRAF-19, MM TRAF-20, MM TRAF-21	MM TRAF-7 and MM TRAF-14
Note: The numbering matches the numbering from the 2013 FEIR. The Addendum concludes that some of the mitigation measures are not applicable, but, to maintain consistency with the 2013 FEIR, the numbering was not revised.							

Discussion

The 2012 Traffic and Circulation Impact Analysis (2012 Traffic Report, dated April 18, 2012) was updated in November 2018 to reflect current traffic conditions as well as environmentally beneficial site refinements proposed as part of the Project.

In addition, TJKM reviewed the Project site plan dated December 13, 2018 with regard to on-site circulation, including pedestrians. The refined site plan, as shown in Exhibit 4, incorporates numerous refinements to the site plan initially submitted in 2012 (dated September 21, 2011) that address design features that could otherwise generate impacts An annotated copy of the 2011 site plan, showing all environmentally beneficial refinements, has been included in Appendix F.

For purposes of the following description of refinements, the term "upper loop" refers to the on-site driveway closest to Deer Hill Road that serves Buildings A, B, C, and D, and connects the west project driveway on Deer Hill Road to the Pleasant Hill Road driveway. The "lower loop" refers to the on-site driveway closer to the southerly property boundary that serves Buildings E through L and the Clubhouse, terminating at the east project driveway on Deer Hill Road.

Refinements include all of the following measures:

a) To maintain adequate sight-distance, all landscaping within 15 feet of on-site driveway intersections shall be limited to plants with foliage no more than 30 inches at fully mature height above the closest adjacent curb elevation, or trees with canopy foliage no less than 7 feet above the closest adjacent curb elevation, or other dimensions as specified by the City Engineer. Ensure that landscaping and signage, monuments, etc., do not obstruct sight lines at driveways and along the Project frontage.

b) At the on-site four-way intersection of the upper loop and lower loop driveways, which connect to Pleasant Hill Road and the east driveway on Deer Hill Road respectively, install two-way stop sign control on one of the two driveways.

c) Refine the site plan to include construction of pedestrian facilities, which may include stairs and walkways on alignments as needed, to provide more direct pedestrian connections for the following routes:
   - Between Deer Hill Road and Building A, along the west project driveway
   - Between Building D and Pleasant Hill Road near Building M, along the upper loop driveway
   - Between Building G and Deer Hill Road, along the lower loop driveway
   - Between Building L and the Leasing Office, along the lower loop driveway
   - Between Building M and the recommended facility, along the upper loop driveway
   - Between Building N and the upper loop driveway, with a potential crosswalk to connect with the recommended Building M connection

d) Relocate the west driveway on Deer Hill Road at least 100 feet to the west of the location shown on the 2011 Project plans and add signage and a raised island prohibiting left turns into the driveway from westbound Deer Hill Road.

e) Position the east driveway on Deer Hill Road to allow at least 250 feet of left turn storage for westbound vehicles.

f) At Project driveways, include special design treatments, such as paving to be specified by the City Engineer, to alert drivers exiting the Project site that they are crossing pedestrian and bicycle facilities.

g) Revise the Project site plans such that corner radii and medians at on-site driveway intersections provide a minimum inside turning radius of 25 feet and a minimum outside turning radius of 45 feet, per CCCFPD requirements. Project driveways and internal intersections shall provide adequate width and turning radii to allow adequate truck access.

h) Further review parking stall depth and vehicle overhang.

i) Ensure that all sidewalks satisfy City guidelines for minimum width and buffer strips.

j) School bus stops should be added to the Project frontages on southbound Pleasant Hill Road with the design and location determined in consultation with the Lamorinda School Bus Program.

With respect to the Project frontage along southbound Pleasant Hill Road, the proposed widening of Pleasant Hill Road shall include the following:

k) Construction of a new Class I shared path for bicycles and pedestrians, consistent with City plans to construct a bike path in this location. The pavement width and buffer area shall be adequate to allow pedestrians to access loading spaces, and the intersection with the Project driveway shall include adequate sight distance and appropriate surface treatments to prevent hazards to pedestrians and bicyclists. The Project applicant should work with the City to develop an appropriate alignment.

l) On-street bike lanes shall be located to the left of dedicated right turn lanes. This would also apply to the proposed “trap lane” for the southbound SR-24 on-ramp.

m) The dedication of right-of-way for widening shall include adequate width to relocate the passenger loading spaces that would otherwise be eliminated.

The Project shall also include the following environmentally beneficial changes from the 2011 site plan:

n) Remove the previously proposed median break on Pleasant Hill Road opposite the Project driveway to prevent northbound left turns into the Project site. Extend the existing northbound left turn lane to Acalanes Avenue, to accommodate existing and Project-related traffic.

o) Widen Pleasant Hill Road to add a third lane for southbound traffic between Deer Hill Road and SR-24. The lane would start approximately 150 feet north of Deer Hill Road and extend south along the entire Project frontage on Pleasant Hill Road to become a right-turn-only lane for the on-ramp to westbound SR-24 (i.e., a “trap” lane).

With these environmentally beneficial site plan refinements and updated traffic conditions, the Addendum concludes that impacts associated with the Project would be reduced when compared to those identified in the 2013 FEIR. The 2018 Traffic Report is provided in Appendix F.

a) Summary of 2013 FEIR

Existing Plus Project Conditions

Intersection Level of Service

Deer Hill Road—Stanley Boulevard/Pleasant Hill Road: Because the Project would increase delay by more than 5 seconds, the result would be a significant impact. The 2013 FEIR concluded that a proposed roadway widening to add a third lane for southbound through traffic on Pleasant Hill Road (MM TRAF-1, also referred to as Mitigation Alternative 1) would reduce Project impact delays at the Deer Hill Road—Stanley Boulevard intersection; however, it would result in secondary impacts involving a "weaving" movement between the Project driveway and SR-24 westbound on-ramp that would be considered significant that would result in a significant secondary impact. Therefore, the 2013 FEIR concluded that this impact was significant and unavoidable.

Deer Hill Road/State Highway 24 Westbound Ramps—Laurel Drive: Because the Project would increase delay by less than 5 seconds, impacts would be less than significant.

Brown Avenue at Deer Hill Road: At this unsignalized study intersection, the northbound and southbound stop-controlled minor approaches on Brown Avenue would continue operating at an unacceptable level of service (LOS) F during the AM and PM peak-hours. The 2013 FEIR concluded that the Project would increase delay by more than 5 seconds at this intersection operating below the acceptable standards, resulting in a significant impact. The 2013 FEIR concluded that with the implementation of MM TRAF-2, the payment of a fair share of the cost (including an in-lieu payment) to install a traffic signal at the Brown Avenue and Deer Hill Road intersection, impacts at the Brown Avenue at Deer Hill Road intersection would be considered less than significant.

Cumulative 2030 Plus Project

Intersection Level of Service

Springhill Road—Quandt Road/Pleasant Hill Road: LOS E during the AM peak-hour, with delay increasing by 0.5 seconds. Because the Project would increase delay by less than 5 seconds, impacts were considered less than significant.

Deer Hill Road—Stanley Boulevard/Pleasant Hill Road: LOS F during the AM and PM peak-hours, with delay increasing by 1.9 seconds and 2.2 seconds respectively; poor LOS D during the school PM peak-hour, with delay increasing by 1.4 seconds. Because the Project would increase delay by less than 5 seconds, impacts were considered less than significant.

Deer Hill Road/State Highway 24 Westbound Ramps—Laurel Drive: LOS E during the AM and PM peak-hours, with delay increasing by 1.6 seconds and 0.2 seconds respectively. Because the Project would increase delay by less than 5 seconds, impacts were considered less than significant.

West Project driveway on Deer Hill Road: The 2013 FEIR concluded that the unsignalized Project driveway on Deer Hill Road would experience an LOS E delay during the AM peak-hour.

Although LOS E is acceptable at a one-way stop control intersection such as the driveway, the amount of delay suggests that drivers turning left out of the driveway would have some difficulty finding an acceptable gap in traffic flow on Deer Hill Road, at a location where prevailing speeds are relatively high, and this would result in a significant impact. With implementation of MM TRAF-10, which requires widening Deer Hill Road at the west Project driveway as needed to add a striped westbound median refuge lane, providing appropriate taper lengths, and maintaining appropriate widths for bike lanes, traffic lanes, and proposed sidewalks, impacts would be reduced to less than significant.

Brown Avenue at Deer Hill Road: The unsignalized Brown Avenue at Deer Hill Road intersection would continue to operate at an unacceptable LOS F during the AM and PM peak-hours, with delay increases substantially higher than 5 seconds. Since the Project would increase delay by more than 5 seconds at an intersection operating below the acceptable standard, the 2013 FEIR concluded that this would be a significant impact. The 2013 FEIR concluded that with implementation of MM TRAF-9 (the same as MM TRAF-2), payment of a fair share of the cost (including an in-lieu payment) to install a traffic signal at the Brown Avenue and Deer Hill Road intersection, impacts at the Brown Avenue at Deer Hill Road intersection would be considered less than significant.

Left-Turn Queue at Project Driveways

Northbound Pleasant Hill Road at Deer Hill Road: The peak estimated 95th-percentile left-turn queue length of 306 feet, which would occur during the AM peak-hour, would exceed the capacity of the existing 250-foot storage lane. The left-turn queue would occasionally extend back far enough to obstruct the northbound through lane on Pleasant Hill Road during the AM peak-hour, at a location and period of time in which various traffic conditions, including those related to the nearby high school, would make this obstruction a substantial hazard. Immediately south of this left-turn storage lane, Project plans propose construction of a northbound left-turn lane for access to the Project driveway, which would preclude extending the length of the existing left-turn storage lane to mitigate the queue and its resulting hazard. The 2013 FEIR concluded that the Project design would substantially increase hazards by precluding a potential mitigation of the traffic obstruction caused by the excess queue length, resulting in a significant cumulative impact. MM TRAF-11 states that mitigation is not feasible, and, according to the 2013 FEIR, this would remain a significant impact.

Northbound Pleasant Hill Road at the Project Driveway: The peak estimated 95th-percentile left-turn queue lengths of 124 feet and 177 feet, which would occur during the school PM and commute PM peak-hours, respectively, would exceed the capacity of the 100-foot storage lane proposed in the Project plans. The left-turn queue would occasionally extend back far enough to obstruct the northbound through lane on Pleasant Hill Road during the school PM and commute PM peak-hours, at a location and period of time in which various traffic conditions, including those related to the nearby high school, would make this obstruction a substantial hazard. The Project design would substantially increase hazards by causing the excess queue length and traffic obstruction, resulting in a significant cumulative impact. The 2013 FEIR concluded that MM TRAF-12, extending the left-turn storage lane and entrance to the left-

turn, would have secondary impacts and therefore this mitigation measure was not considered feasible. Therefore, impacts were found to be significant and unavoidable.

Resumed Project Analysis and Conclusion

The 2018 Traffic Report evaluated the same traffic scenarios as the 2012 report, but updated those scenarios to account for changed traffic conditions. For the Existing Conditions, the peak-hour turning movement volumes are projected from 2011 conditions, and have increased by a conservative annual growth rate of 2 percent per year. This growth factor was based on more recent 2016 counts performed at five of the Project intersections, and compared to the most recent Contra Costa Transportation Authority (CCTA) model and CCTA Central County Action Plan for 2014. The City used the same 2 percent growth factor in the certified Final Supplemental EIR for The Homes At Deer Hill in 2015. The CCTA model includes future land use and transportation network assumptions for the entire County, including Lafayette, Pleasant Hill, Martinez, Walnut Creek, Moraga, and unincorporated areas. The CCTA model assumes no development of the Project site. For the Cumulative Year Conditions, the 2018 Traffic Report projected 2011 Conditions traffic volumes into the future using the same conservative 2 percent annual growth factor described above.

Existing Plus Project Conditions

Intersection Level of Service

Exhibit 6 shows the Project trip distribution and assignments, Exhibit 7 shows the Existing traffic volumes, lane geometry, and controls, and Exhibit 8 shows the Existing Plus Project traffic volumes, lane geometry, and controls.

The Existing Conditions and Existing Plus Project Conditions are presented in Table 18. Detailed LOS calculations are contained in Appendix F.

Table 18: Peak Hour Intersection Levels of Service—Existing Conditions and Existing Plus Project Conditions

ID	Intersection	Existing Conditions						Existing Plus Project Conditions					
		AM Peak Hour		School PM Peak Hour		PM Peak Hour		AM Peak Hour		School PM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1	Rancho View Drive/Pleasant Hill Road	22.3	C	11.2	B	11.0	B	23.8	C	11.2	B	11.0	B
2	Green Valley Drive/Pleasant Hill Road	3.1	A	6.8	A	5.1	A	2.8	A	6.8	A	5.1	A
3	Reliez Valley Road/Pleasant Hill Road	13.0	B	9.9	A	6.5	A	12.4	B	9.9	A	6.5	A
4	Springhill Road—Quandt Road/Pleasant Hill Road	40.9	D	8.7	A	9.7	A	42.1	D	8.7	A	9.7	A
5	Deer Hill Road—Stanley Boulevard/Pleasant Hill Road	**184.4**	**F**	**49.3**	**D**	**77.4**	**E**	**127.9**	**F**	**49.6**	**D**	**77.8**	**E**
6	Mount Diablo Boulevard—SR-24 EB On-ramp/Pleasant Hill Road	16.4	B	21.0	C	31.8	C	15.9	B	21.0	C	31.6	C
7	SR-24 EB Off-Ramp—Old Tunnel Road/Pleasant Hill Road	8.5	A	9.6	A	10.7	B	8.5	A	9.6	A	10.8	B
8	Deer Hill Road/Brown Avenue	**386.5**	**F**	N/A	N/A	**761.3**	**F**	**421.6**	**F**	N/A	N/A	**853.4**	**F**
	Mitigation—Signalize Intersection	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	*6.8*	*A*	*N/A*	*N/A*	*7.5*	*A*
	Mitigation—Roundabout	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	*19.3*	*C*	*N/A*	*N/A*	*27.6*	*D*
9	Deer Hill Road/First Street—Sierra Vista Way	18.3	B	17.7	B	19.3	B	18.8	B	18.1	B	20.1	C
10	Deer Hill Road/SR-24 WB Ramps—Laurel Drive	**71.8**	**E**	38.7	D	**67.6**	**E**	**71.5**	**E**	39.1	D	**69.1**	**E**
11	Pleasant Hill Road/Project Driveway	N/A	N/A	N/A	N/A	N/A	N/A	11.5	B	11.9	A	9.0	A
12	Deer Hill Road/East Project Driveway	N/A	N/A	N/A	N/A	N/A	N/A	10.6	B	12.3	B	17.8	C

Table 18 (cont.): Peak Hour Intersection Levels of Service—Existing Conditions and Existing Plus Project Conditions

		Existing Conditions						Existing Plus Project Conditions					
		AM Peak Hour		School PM Peak Hour		PM Peak Hour		AM Peak Hour		School PM Peak Hour		PM Peak Hour	
ID	Intersection	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
13	Deer Hill Road/ West Project Driveway	N/A	N/A	N/A	N/A	N/A	N/A	31.4	D	20.9	C	29.0	D

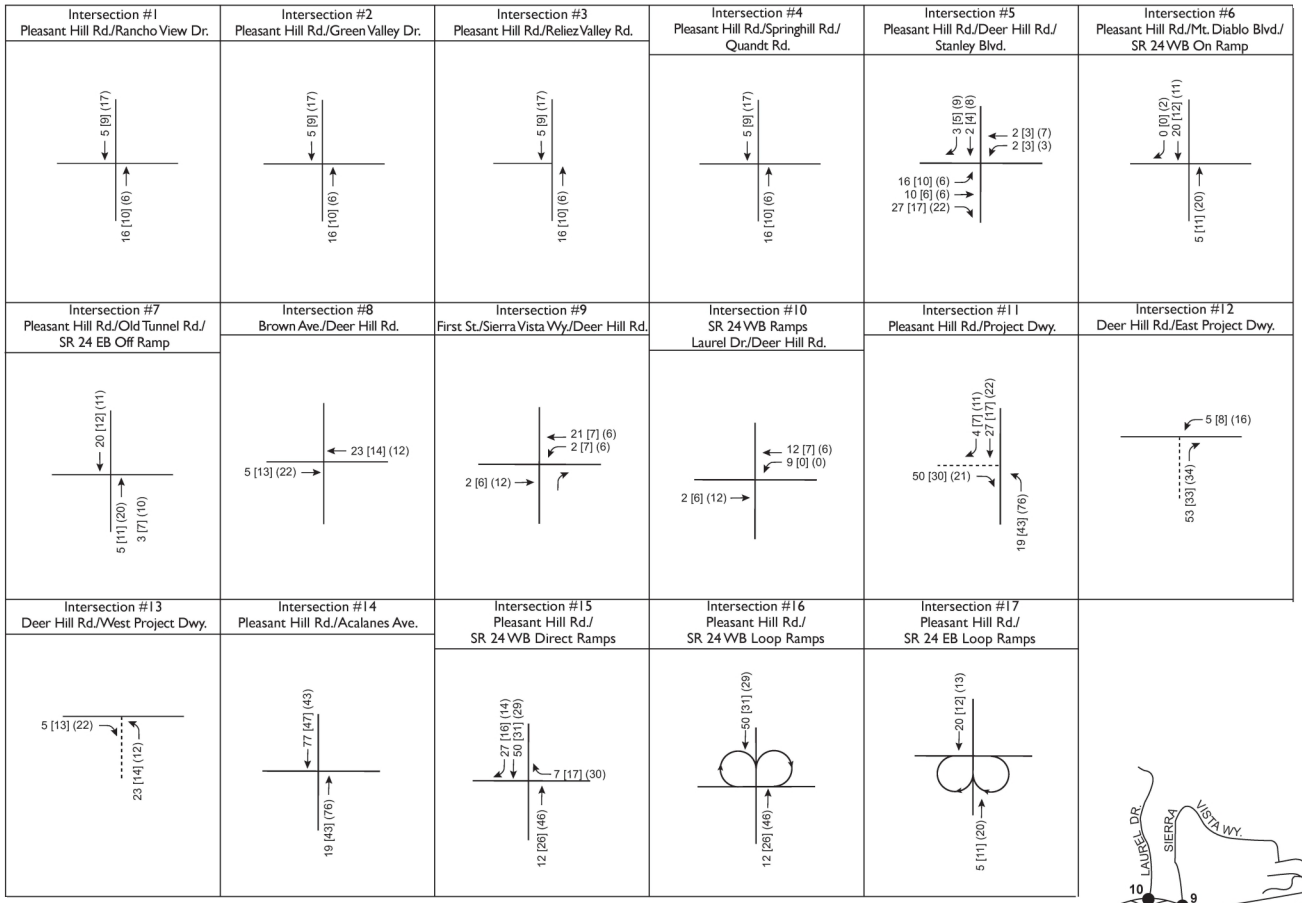
Notes:
[1] LOS=Level of Service, Delay = Average control delay per vehicle in seconds
[2] Signalized and all-way stop controlled intersections—Delay/LOS is for overall intersection
[3] Unsignalized one- and two-way stop controlled intersections—Delay/LOS is for critical minor stop-controlled approach.
[4] **Bold** indicates unacceptable operational conditions based on applicable City standards.
[5] "Good" LOS D is defined as 35 to 45 seconds of average control delay per vehicle. "Poor" LOS D is defined as 45 to 55 seconds of average delay.
[6] N/A=Not analyzed. At intersection No. 8, AM and PM commute peaks provide worst-case results.

Consistent with the 2013 FEIR, the 2018 Traffic Report concluded that under Existing Plus Project Conditions all signalized intersections are expected to continue operating under acceptable City LOS standards, with the exception of the following intersections that already operate at an unacceptable LOS under the Existing Conditions scenario:

Deer Hill Road—Stanley Boulevard/Pleasant Hill Road: LOS F during the AM peak-hour, with delay decreasing by 56.5 seconds as a result of the Project; poor LOS D during the school PM peak-hour with delay increasing by 0.3 seconds; and LOS E during the PM peak-hour with delay increasing by 0.4 seconds. The 2018 Traffic Report found that under updated Existing Conditions, the signal coordination now in place has improved southbound traffic progression substantially and, with the addition of a third southbound lane, the Project would not increase delay by more than 5 seconds at an intersection operating below the acceptable standard, and would not therefore result in a significant impact. To improve the Deer Hill Road—Stanley Boulevard/Pleasant Hill Road intersection, refined Project plans propose roadway widening to add a third lane for southbound through traffic on Pleasant Hill Road between Deer Hill Road—Stanley Boulevard and SR-24. The additional southbound lane would start approximately 150 feet north of Deer Hill Road and extend south along the entire Project frontage on Pleasant Hill Road to become a right-turn-only lane for the on-ramp to westbound SR-24. Traffic engineers often refer to this type of configuration with a through lane leading into a required turn lane as a "trap lane." The proposed lane configuration would also eliminate existing curb parking and loading zones along the west curb. As discussed in more detail in the 2018 Traffic Report, the addition of a third southbound lane would not result in any significant secondary impacts. Therefore, MM TRAF-1 would no longer be applicable to the Project.

Deer Hill Road/State Highway 24 Westbound Ramps—Laurel Drive: LOS E during the AM and PM peak-hours, with delay decreasing by 0.3 seconds in the AM peak-hour and increasing by 1.5 seconds in the PM peak-hour. Because the Project would increase delay by less than 5 seconds, impacts are considered less than significant.

Brown Avenue at Deer Hill Road: The only existing unsignalized study intersection, the northbound and southbound stop-controlled minor approaches on Brown Avenue at Deer Hill Road, would continue operating at an unacceptable LOS F during the AM and PM peak-hours. The Project would increase delay by more than 5 seconds at an intersection operating below the acceptable standards, resulting in a significant impact. Consistent with the 2013 FEIR, and as shown in Table 18, the Project would implement MM TRAF-2. MM TRAF-2 has been revised to include the construction of a roundabout as an alternative to signalization. Under the signalization alternative, the intersection would operate at LOS A during both the AM and PM peak periods. Under the roundabout alternative, the intersection would operate at LOS C during the AM peak-hour and LOS D during the PM peak-hour. Therefore, with implementation of MM TRAF-2, the impact at the Brown Avenue at Deer Hill Road intersection would be less than significant. As such, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

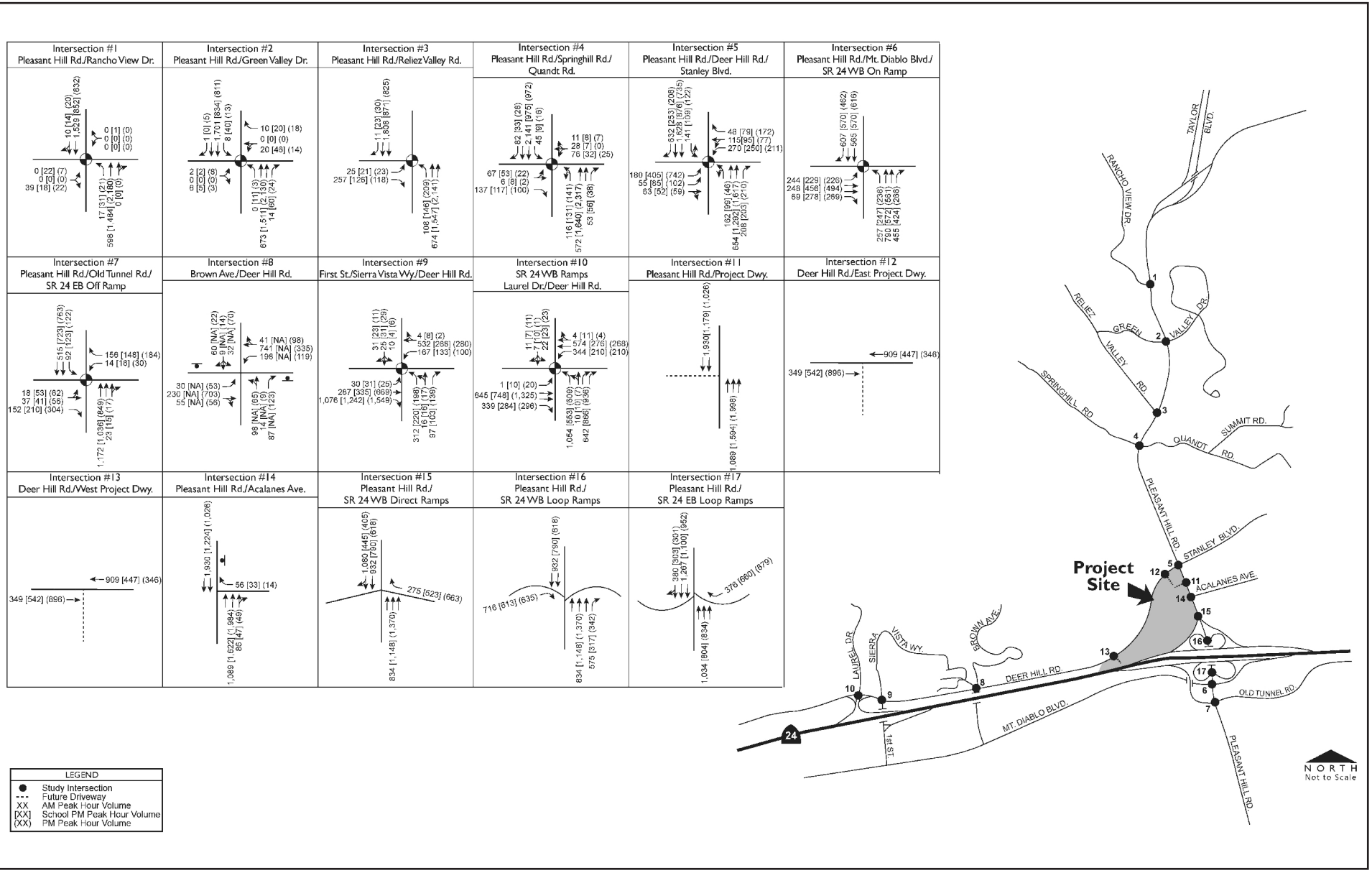


Source: TJKM, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 6
Project Trip Distribution and Assignment

THIS PAGE INTENTIONALLY LEFT BLANK

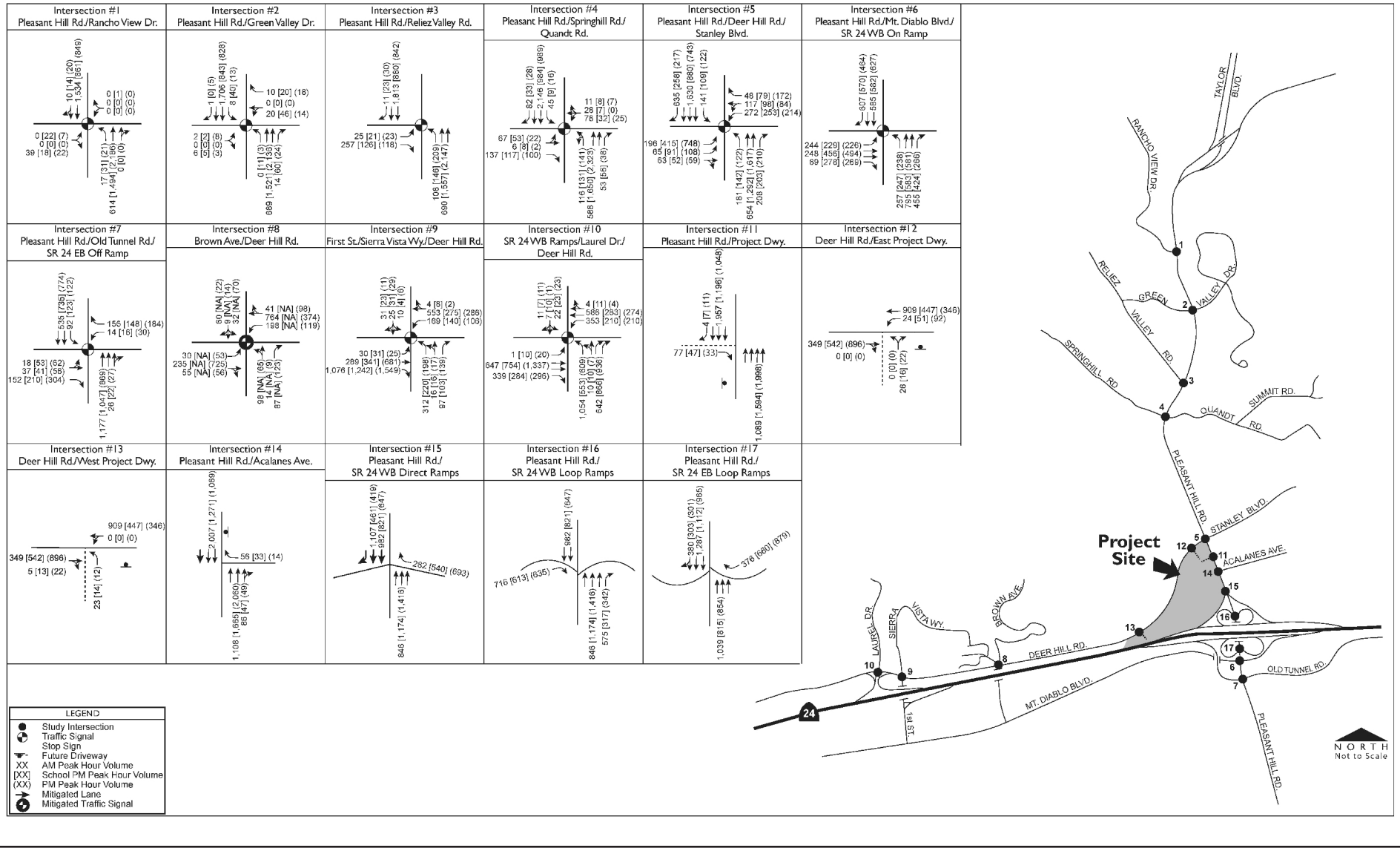


Source: TJKM, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 7
Existing Traffic Volumes, Lane Geometry, and Controls

THIS PAGE INTENTIONALLY LEFT BLANK



Source: TJKM, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 8
Existing plus Project Traffic Volumes, Lane Geometry, and Controls

THIS PAGE INTENTIONALLY LEFT BLANK

Left-Turn Queue at Project Driveways

Left-turn queue lengths at the westbound Deer Hill Road at two project driveways (east and west) was analyzed using SimTraffic results for Existing plus Project conditions in the AM, school PM, and commute PM peak-hours. The resulting 95th-percentile queue lengths were compared with the left-turn storage lane lengths that would be provided at these intersections to determine if that queue storage capacity would be adequate to avoid spillback into other lanes. The estimated 95th-percentile left-turn queue lengths during the AM peak-hour would be no more than one car length at either driveway. Results for the east and west Project driveways are summarized as follows:

- **East Project Driveway:** During the school PM and PM peak periods, eastbound queuing backing up from the Deer Hill Road–Stanley Boulevard/Pleasant Hill Road intersection would occasionally prevent westbound vehicles from turning left into the eastern project driveway, generating minor queues that would be fully accommodated in the proposed left turn lane. Therefore, the impact at the east driveway would be less than significant.
- **West project driveway:** Where a minimal number of left turns into the Project are expected, no storage lane is proposed in the project plans; the safety aspects of this condition are addressed the 2018 Traffic Report. TJKM recommends restricting left turns into the project driveway by westbound traffic.

Because the Project would prohibit left turns into and out of the site from Pleasant Hill Road, there would be no left-turn queue lengths on northbound Pleasant Hill Road at the Project driveways. As such, contrary to the 2013 FEIR, this condition does not exist, and this impact was not analyzed. In addition, because of this refinement, the left-turn lane storage at northbound Pleasant Hill Road at Deer Hill Road could be extended and would fully accommodate the left-turn lane queues at this intersection.

Cumulative 2035 Plus Project

Intersection Level of Service

Exhibit 9 shows the Cumulative Year 2035 No Project traffic volumes, lane geometry, and controls, and Exhibit 10 shows the Cumulative Year 2035 Plus Project traffic volumes, lane geometry, and controls.

Table 19 presents the results of the LOS analysis for study intersection under the Cumulative Year 2035 No Project and Cumulative Year 2035 Plus Project. Detailed LOS calculations are contained in Appendix F.

Table 19: Peak Hour Intersection Levels of Service—Cumulative Year 2035 No Project Conditions and Cumulative Year 2035 Plus Project Conditions

ID	Intersection	Cumulative Year 2035 No Project Conditions						Cumulative Year 2035 Plus Project Conditions					
		AM Peak Hour		School PM Peak Hour		PM Peak Hour		AM Peak Hour		School PM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1	Rancho View Drive/Pleasant Hill Road	35.3	D	12.5	B	25.1	C	35.7	D	12.6	B	25.2	C
2	Green Valley Drive/Pleasant Hill Road	4.5	A	11.5	B	15.9	B	4.5	A	11.5	B	16.2	B
3	Reliez Valley Road/Pleasant Hill Road	25.4	C	8.5	A	7.9	A	25.5	C	8.5	A	12.2	B
4	Springhill Road—Quandt Road/ Pleasant Hill Road	**166.7**	**F**	14.7	B	**52.1**	**D**	**166.9**	**F**	14.8	B	**52.6**	**D**
5	Deer Hill Road—Stanley Boulevard/Pleasant Hill Road	**239.2**	**F**	**113.0**	**F**	**208.6**	**F**	**162.4**	**F**	**104.4**	**F**	**205.6**	**F**
6	Mt. Diablo Boulevard—SR-24 EB On-ramp/Pleasant Hill Road	21.9	C	34.0	C	38.0	D	22.0	C	34.3	C	38.2	D
7	SR-24 EB Off-Ramp—Old Tunnel Road/Pleasant Hill Road	12.6	B	15.0	B	17.8	B	12.6	B	15.2	B	18.6	B
8	Deer Hill Road/Brown Avenue	**4,181.6**	**F**	N/A	N/A	**12,813.2**	**F**	**4,672.0**	**F**	N/A	N/A	**19,432.0**	**F**
	Mitigation—Signalize Intersection	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	*22.7*	*C*	*N/A*	*N/A*	*20.8*	*C*
	Mitigation-Roundabout	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*	***91.4***	***F***	*N/A*	*N/A*	***114.3***	***F***
9	Deer Hill Road/First Street—Sierra Vista Way	30.7	C	22.4	C	37.4	D	32.1	C	23.0	C	38.6	D
10	Deer Hill Road/SR-24 WB Ramps—Laurel Drive	**143.3**	**F**	**64.5**	**E**	**165.6**	**F**	**144.7**	**F**	**64.7**	**E**	**167.1**	**F**
11	Pleasant Hill Road/Project Driveway	N/A	N/A	N/A	N/A	N/A	N/A	11.7	B	9.9	A	9.5	A

Table 19 (cont.): Peak Hour Intersection Levels of Service—Cumulative Year 2035 No Project Conditions and Cumulative Year 2035 Plus Project Conditions

		Cumulative Year 2035 No Project Conditions						Cumulative Year 2035 Plus Project Conditions					
		AM Peak Hour		School PM Peak Hour		PM Peak Hour		AM Peak Hour		School PM Peak Hour		PM Peak Hour	
ID	Intersection	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
12	Deer Hill Road/East Project Driveway	N/A	N/A	N/A	N/A	N/A	N/A	11.9	B	15.2	C	27.9	D
13	Deer Hill Road/ West Project Driveway	N/A	N/A	N/A	N/A	N/A	N/A	**76.7**	**F**	19.1	C	**61.9**	**F**

Notes:
[1] LOS=Level of Service, Delay = Average control delay per vehicle in seconds
[2] Signalized and all-way stop controlled intersections—Delay/LOS is for overall intersection
[3] Unsignalized one- and two-way stop controlled intersections—Delay/LOS is for critical minor stop-controlled approach.
[4] **Bold** indicates unacceptable operational conditions based on applicable City standards.
5 "Good" LOS D is defined as 35 to 45 seconds of average control delay per vehicle. "Poor" LOS D is defined as 45 to 55 seconds of average delay.
6 N/A=Not analyzed.

Under Cumulative Year 2035 Plus Project Conditions the following intersections would operate at an unacceptable LOS:

Springhill Road—Quandt Road/Pleasant Hill Road: LOS F during the AM peak-hour, with delays increasing by 0.2 seconds, and poor LOS D during the PM peak-hour, with delays increasing by 0.5 seconds. Because the Project would increase delays by less than 5 seconds, impacts are considered less than significant.

Deer Hill Road—Stanley Blvd./Pleasant Hill Road: LOS F during all 3 peak-hours, with delay decreasing by 76.8 seconds in the AM peak-hour, decreasing by 8.6 seconds in the school PM peak-hour, and decreasing by 3.0 seconds in the PM peak-hour. Because the Project would not increase delays by more than 5 seconds, impacts are considered less than significant.

Deer Hill Road/SR-24 Westbound Ramps—Laurel Drive: LOS F during the AM and PM peak-hours, with delays increasing by 1.4 seconds and 1.5 seconds respectively, and LOS E during the school PM peak-hour, with delay increasing by 0.2 seconds. Because the Project would increase delays by less than 5 seconds, impacts are considered less than significant.

West Project driveway on Deer Hill Road: The unsignalized Project driveway on Deer Hill Road would experience an LOS F delay during the AM and PM peak-hour. This amount of delay suggests that drivers turning left out of the driveway would have some difficulty finding an acceptable gap in traffic flow on Deer Hill Road, at a location where prevailing speeds are relatively high, and this would result in a significant impact. The Project would implement MM TRAF-10, and impacts would be reduced to less than significant. MM TRAF-10 has been revised to acknowledge that MM TRAF-3 is no longer applicable to the Project.

Brown Avenue at Deer Hill Road: The unsignalized Brown Avenue at Deer Hill Road intersection would continue to operate at an unacceptable LOS F during the AM and PM peak-hours, with delay increases substantially higher than 5 seconds, consistent with the 2013 FEIR. MM TRAF-9 (same as MM TRAF-2) has been revised to include the construction of a roundabout as an alternative to signalization. Under the signalization alternative, the intersection would operate at LOS C during both the AM and PM peak periods. Under the roundabout alternative, the intersection would operate at LOS F during the AM and PM peak-hours, but the delay would be a substantial improvement in average delay over Existing Conditions. Therefore, with implementation of MM TRAF-9 (same as MM TRAF-2), the impact at the Brown Avenue at Deer Hill Road intersection would be less than significant.

Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

Left-Turn Queue at Project Driveways

Left-turn queue lengths on westbound Deer Hill Road at two project driveways were analyzed using SimTraffic results for Cumulative Year 2035 plus Project conditions in the AM, school PM, and commute PM peak-hours. The resulting 95th-percentile queue lengths were compared with the left-turn storage lane lengths that would be provided at these intersections to determine if that queue storage capacity would be adequate to avoid spillback into other

lanes. The estimated 95th-percentile left-turn queue lengths during the AM peak-hour would be no more than one car length at either driveway. Results for the east and west Project driveways are summarized as follows:

- **East Project Driveway:** During the school PM and PM peak periods, eastbound queuing backing up from the Deer Hill Road–Stanley Boulevard/Pleasant Hill Road intersection would occasionally prevent westbound vehicles from turning left into the eastern project driveway, generating peak estimated 95th percentile queues between 150 and 230 feet. TJKM recommends ensuring that the eastern driveway includes at least 250 feet of left turn storage for westbound vehicles.
- **West Project Driveway:** Where a minimal number of left turns into the Project are expected, no storage lane is proposed in the project plans; the safety aspects of this condition are addressed in the 2018 Traffic Report. TJKM recommends that no left turns into the Project be allowed from westbound Deer Hill Road into the west driveway.

Because the Project would prohibit left turns into and out of the site from Pleasant Hill Road, there would be no left-turn queue lengths on northbound Pleasant Hill Road at the Project driveways. As such, contrary to the 2013 FEIR, this condition does not exist, and this impact was not analyzed. In addition, because of this refinement, the left-turn lane storage at northbound Pleasant Hill Road at Deer Hill Road could be extended and would accommodate the left-turn lane queues at this intersection.

As such, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

b) Summary of 2013 FEIR

The 2013 FEIR concluded that under Cumulative Year 2030 Plus Project Conditions, the addition of Project trips to Pleasant Hill Road would increase the peak-hour peak direction Delay Index (DI) by approximately 0.41 for southbound traffic in the AM peak-hour and northbound traffic in the PM peak-hour. Because the DI would increase by more than 0.05 for peak-hour peak direction traffic where the DI exceeds 2.0 on Pleasant Hill Road, the result would be a significant cumulative impact. MM TRAF-13 states that measures to address this impact include the provision of transit service in the Pleasant Hill Road/Taylor Boulevard corridor, measures to meter traffic flow on Pleasant Hill Road to discourage its use to bypass the Interstate 680/SR-24 interchange, or the construction of additional capacity on Pleasant Hill Road north of SR-24. However, MM TRAF-13 concluded that these measures would either fail to reduce the cumulative Project impact to less than significant or are not considered to be feasible. As such, according to the 2013 FEIR, this impact would remain significant and unavoidable.

Resumed Project Analysis and Conclusion

The 2013 FEIR presented calculations for the DI that were based on overly conservative and, ultimately, inaccurate assumptions. The more recent 2040 DI contained in the 2017 Lamorinda

Action Plan shows no DI deficiencies along Pleasant Hill Road.[42] Therefore, the condition that resulted in a significant and unavoidable impact as analyzed in the 2013 FEIR would not exist. MM TRAF-13 would no longer apply to the Project. As such, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR did not identify any airports within 2 miles of the Project site. Therefore, given the distance of the Project site from the nearest airport, the Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. As such, the 2013 FEIR determined that the Project would result in no impact to air traffic patterns.

Resumed Project Analysis and Conclusion

The Project is on the same site as analyzed in the 2013 FEIR. Therefore, consistent with the 2013 FEIR, the Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. As a result, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

d) Summary of 2013 FEIR

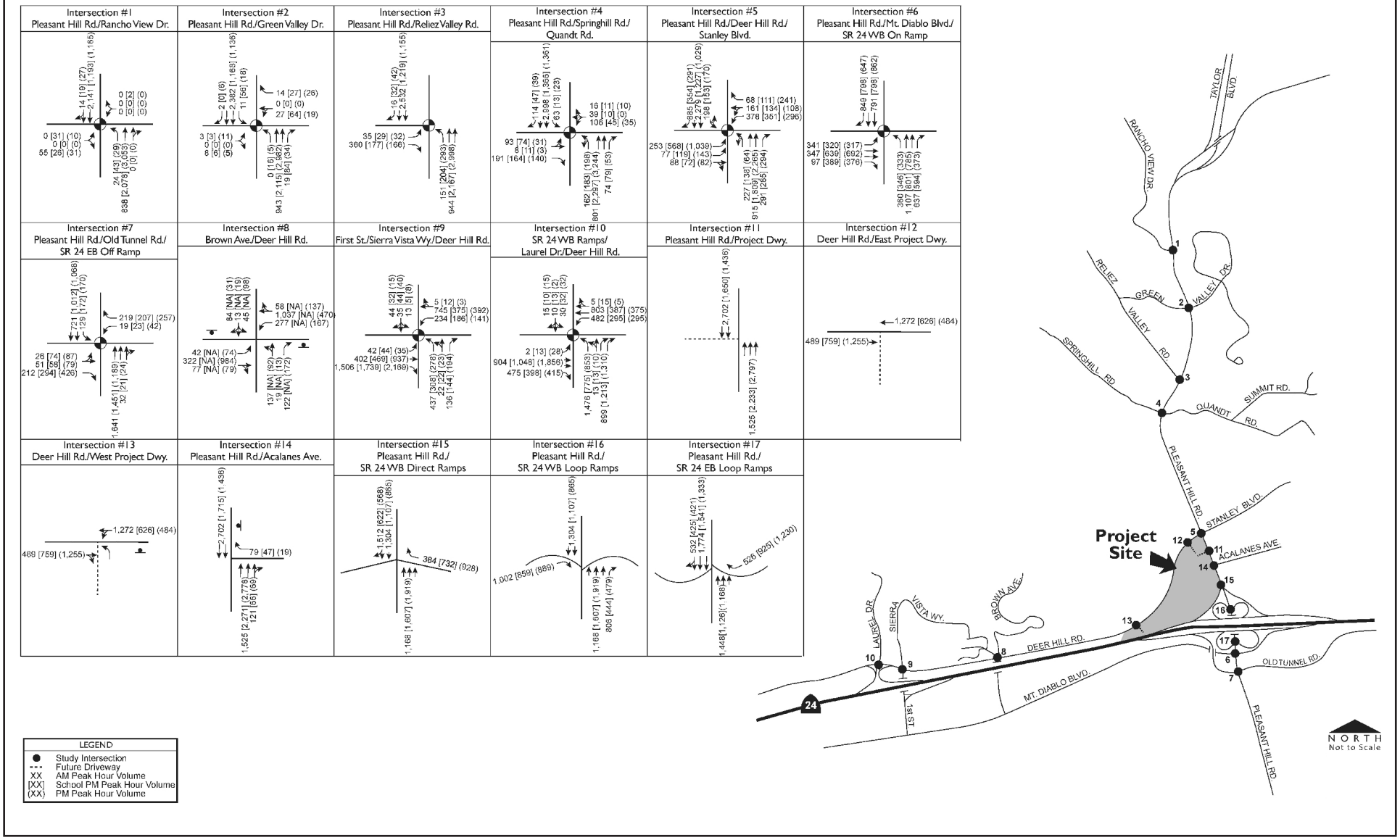
On-Site Circulation and Parking

The 2013 FEIR concluded that the Project would have adequate circulation for passenger cars and light-duty trucks. However, large moving vans would have inadequate truck turning radii at the Project entry driveways, which would result in a significant impact. With implementation of MM TRAF-8, which would require revising the Project plans to ensure adequate truck turning radii are provided, impacts would be less than significant.

Site-Distance and Safety

Deer Hill Road at the Project Driveways: The 2013 FEIR concluded that Project design features would increase traffic hazards because of the potential for inadequate site-distance that would exist at all of the Project driveways, and at the proposed location of the west Project driveway on Deer Hill Road that would provide inadequate sight-distance for westbound traffic. This would result in a significant impact. The Project would implement MM TRAF-3, which requires implementation of specifications for Project landscaping to ensure adequate line of sight. It also provides specifications for all entryway features. Finally, it stipulates that the west Project driveway on Deer Hill Road shall be relocated at least 100 feet to the west of the location shown on the Project plans. MM TRAF-4 requires either provision of a westbound left-turn lane, or posting of signs and construction of a raised island to prevent westbound left-turns into the west Project driveway. With implementation of MM TRAF-3 and MM TRAF-4, the 2013 FEIR concluded that impacts were considered less than significant.

[42] DKS, prepared for Contra Costa Transportation Authority. 2017. Lamorinda Action Plan. Website: http://www.ccta.net/uploads/59cd5bd512c34.pdf. Last Accessed November 9, 2018.

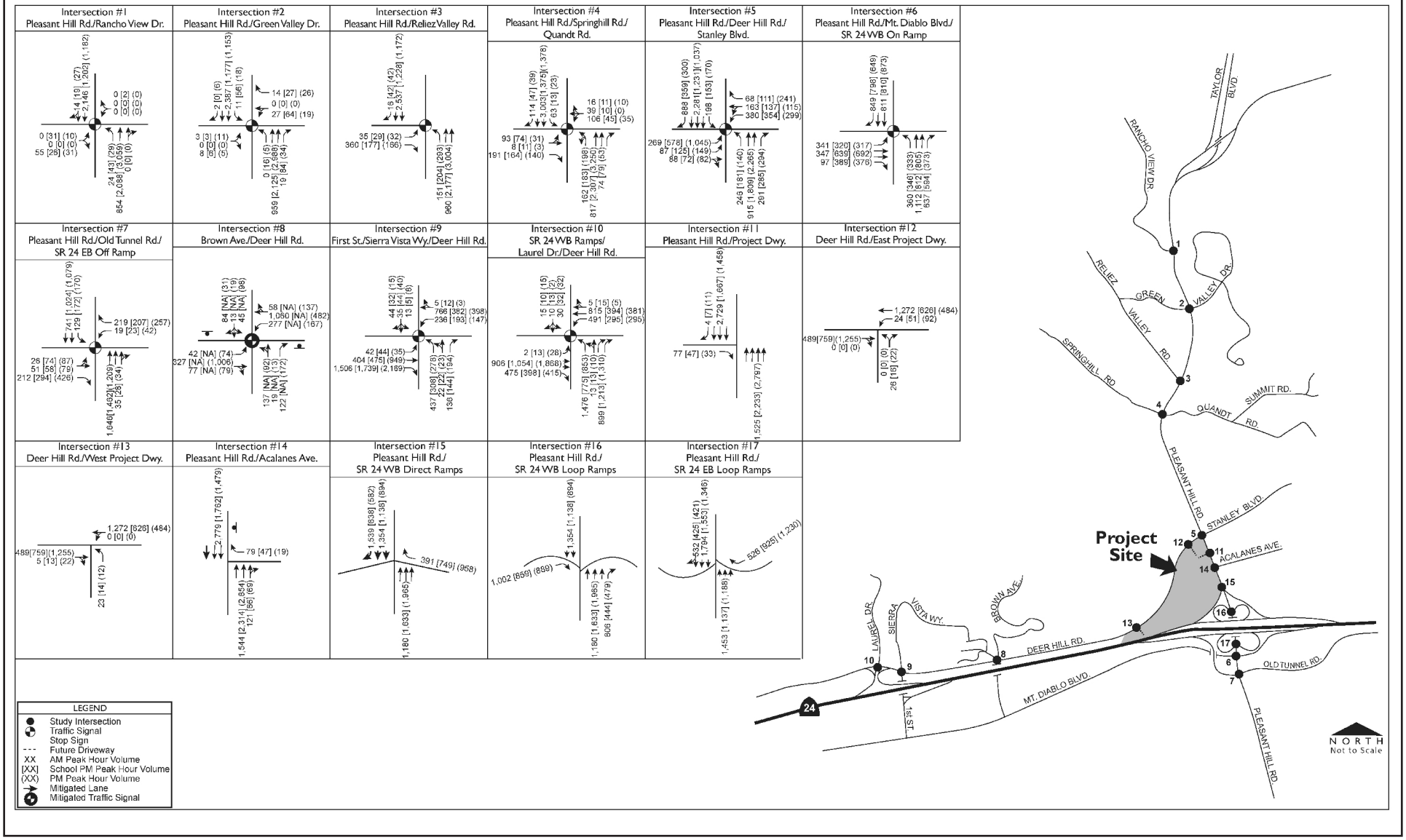


Source: TJKM, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 9
Cumulative No Project Traffic Volumes, Lane Geometry, and Controls

THIS PAGE INTENTIONALLY LEFT BLANK



Source: TJKM, 2018.

FIRSTCARBON SOLUTIONS™

Exhibit 10
Cumulative plus Project Traffic Volumes, Lane Geometry, and Controls

THIS PAGE INTENTIONALLY LEFT BLANK

Resumed Project Analysis and Conclusion

On-Site Circulation and Parking

As shown in Exhibit 4, the site refinements include corner radii and medians at on-site driveway intersections that would provide a minimum inside turning radius of 25 feet and a minimum outside turning radius of 45 feet, per CCCFPD requirements. Project driveways and internal intersections would provide adequate width and turning radii to allow adequate truck access. With these environmentally beneficial refinements to the site plan, impacts would be less than significant and MM TRAF-8 would no longer be applicable to the Project. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

Project Driveway Site-Distance and Safety

Deer Hill Road at the Project Driveways: With the site plan refinements, the Project would include modifications to circulation to improve design and operation including landscaping and entryway specifications as described above. In addition, the west Project driveway on Deer Hill Road would be relocated approximately 100 feet to the west of the location shown on the Project plans and signage and a raised island would be added that would prohibit left turns into the driveway from westbound Deer Hill Road. With these environmentally beneficial refinements to the site plan, impacts would be less than significant and MM TRAF-3 and MM TRAF-4 would no longer be applicable to the Project. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR concluded that under both Existing Plus Project and Cumulative Year 2030 Plus Project conditions, the Project's significant impact on PM peak-hour traffic speeds for northbound Pleasant Hill Road between the off-ramp from westbound SR-24 and the Project driveway would result in inadequate emergency access to other areas of Lafayette served by Pleasant Hill Road between SR-24 and Rancho View Drive. The result would be a significant impact. The Project would implement MM TRAF-5 that would require the Project applicant to install advance detection equipment to ensure effective traffic signal preemption for responding emergency vehicles. The 2013 FEIR also determined that the emergency vehicle access shown on the Project site plans would not comply with minimum turning radii requirements at several on-site driveway locations, which would result in inadequate emergency access to the Project site, which would be a significant impact. The Project would be required to implement MM TRAF-6 to revise the Project site plans so that corner radii and medians at on-site driveway intersections provide a minimum inside turning radius of 25 feet and a minimum outside turning radius of 45 feet, per CCCFPD requirements. With implementation of MM TRAF-5 and MM TRAF-6, impacts would be considered less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would implement MM TRAF-5 that to require the Project applicant to install advance detection equipment to ensure effective traffic signal preemption for responding emergency vehicles. Following the recommendations of TJKM's 2018 Traffic Report, corner radii and medians at on-site driveway intersections would provide a minimum inside turning radius of 25 feet and a minimum outside turning radius of 45 feet, per CCCFPD requirements. Project driveways and internal intersections would thus provide adequate width and turning radii to allow adequate emergency vehicle access. Therefore, MM TRAF-6 would no longer be applicable to the Project. Therefore, the Project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the 2013 FEIR. No additional analysis is required.

f) Summary of 2013 FEIR

Bay Area Rapid Transit

The 2013 FEIR concluded that the Project would generate an additional weekday parking demand for up to 50 spaces at the Lafayette BART station, which represents approximately 3 percent of the 1,529 spaces in the lot. Because the parking lot demand already exceeds capacity on weekdays, this would be a significant impact. MM TRAF-14 requires the Project applicant to provide subsidized, frequent shuttle service between the Project site and the Lafayette BART station during the AM and PM peak commute periods until a bus route is implemented on Pleasant Hill Road. With implementation of MM TRAF-14, impacts would be considered less than significant.

Buses

The 2013 FEIR determined that the Project site plan does not include a loading and unloading area for school bus service, and peak-hour traffic congestion on Pleasant Hill Road and Deer Hill Road would be exacerbated if traffic is required to stop for a school bus in the traffic lane, resulting in a significant impact. MM TRAF-15 requires the Project applicant to coordinate with the Lamorinda School Bus Program to determine the appropriate locations and designs for bus stop pullouts along the Project frontage, and the Project applicant would construct those bus stop pullouts. With implementation of MM TRAF-15, impacts would be considered less than significant.

Pedestrians and Bicycles

The 2013 FEIR concluded that during the grading phase of construction on the Project site, large truck traffic on Pleasant Hill Road and Deer Hill Road and elimination of the existing passenger loading zone along the Project frontage on Pleasant Hill Road would result in a temporary significant impact. MM TRAF-7 would require the Project applicant to prepare and submit a Construction Staging Plan for review and approval by the City Engineer. In addition, Project plans propose widening southbound Pleasant Hill Road between Deer Hill and the on-ramp to westbound SR-24 to add a vehicle traffic lane and a bike lane along the west curb, where the plans show elimination of the existing curb parking and passenger loading zone.

The proposed elimination of the existing designated spaces on the west curb of Pleasant Hill Road that are currently used for school passenger loading would result in additional hazardous passenger loading activity at unsuitable locations. The 2013 FEIR concluded that the loss of these designated curb spaces used for passenger loading would substantially increase hazards for school pedestrians and vehicle traffic in the immediate area, resulting in a significant impact. MM TRAF-21 would require the entire curb segment between Deer Hill Road and the recommended right-turn lane to be designated as a passenger loading zone, which would accommodate eight cars in approximately the same location as the existing curb spaces used for passenger loading.

In addition, the 5-foot sidewalks proposed by the Project plans would be narrower than those existing in the immediate vicinity or recently approved by the City on arterial roadways. Therefore, the 2013 FEIR concluded that the Project would be inconsistent with City guidelines for pedestrian facilities, and this would be a significant impact. MM TRAF-16a would require the applicant to construct a new sidewalk and curb at least 6.5 feet wide (or as specified by the City Engineer) on the south side of Deer Hill Road along the Project site frontage. MM TRAF-16b would require the applicant to construct a new shared path for bicycles and pedestrians on the west side of Pleasant Hill Road along the Project site frontage as well as a path to accommodate pedestrians and bicyclists at the southwest corner of Pleasant Hill Road and Deer Hill Road.

The Project driveways on Deer Hill Road and Pleasant Hill Road would interrupt the new sidewalks and would cross existing and proposed Class II bicycles lanes that would present conflicting vehicle traffic for pedestrians and bicycles and, according to the 2013 FEIR, would result in a significant impact. The Project would implement MM TRAF-4 (described above) and MM TRAF-17 that would require the applicant to install stop signs for traffic exiting Project driveways and other paving treatments to alert drivers exiting the Project site that they are crossing pedestrian and bicycle facilities.

The proposed widening of southbound Pleasant Hill Road includes adding a 5-foot wide Class II bike lane along the west curb north of the Project driveway. South of the Project driveway, this bike lane would be forced to shift to the left side of the additional southbound traffic lane that would become a right-turn-only lane for the on-ramp to westbound SR-24. The 2013 FEIR concluded that this configuration would cause unacceptable weaving conflicts with vehicle traffic for the planned 5-foot wide Class II bike southbound bike lane, resulting in a significant impact. MM TRAF-18 requires the applicant to implement an alternative configuration for widening southbound Pleasant Hill Road.

Project plans could preclude accommodation of a planned bike path along the Project boundary, and the plans propose a narrower facility on the west side of Pleasant Hill Road than those recently constructed by the City for shared bicycle and pedestrian use. Therefore, the 2013 FEIR concluded that the Project would interfere with planned bicycle facilities, resulting in a significant impact. In addition to implementing MM TRAF-16b (as described above), the Project applicant would coordinate with the City and Caltrans to ensure that Project site

improvements do not preclude construction of a Class I bicycle path as described in greater detail in MM TRAF-19, below.

Traffic entering and exiting the Project driveway on Pleasant Hill Road would interfere with the shared bicycle and pedestrian path that is planned along the west side of the roadway, causing hazards to bicyclists at the driveway intersection. The 2013 FEIR concluded that this would be a significant impact. As required by MM TRAF-20, the Project applicant would coordinate with the City to develop an appropriate route and provide necessary grading and structure support on-site.

Therefore, with implementation of MM TRAF-4, MM TRAF-7, MM TRAF-16a, MM TRAF-16b, MM TRAF-17, MM TRAF-18, MM TRAF-19, MM TRAF-20, and MM TRAF-21, impacts to pedestrians and bicycles would be considered less than significant.

Resumed Project Analysis and Conclusion

Bay Area Rapid Transit

Consistent with the 2013 FEIR, the Project would implement MM TRAF-14 and provide subsidized, frequent shuttle service between the Project site and the Lafayette BART station during the AM and PM peak commute periods until a bus route is implemented on Pleasant Hill Road. With implementation of MM TRAF-14, impacts would be less than significant.

Buses

As discussed above, the Project would include modifications to site circulation, and the Project frontage would include a designated school bus stop, with the design and location determined in consultation with the Lamorinda School Bus Program. With this refinement to the site plan, impacts would be less than significant and MM TRAF-15 would no longer be applicable to the Project.

Pedestrians and Bicycles

Consistent with the 2013 FEIR, the Project would implement TRAF-7 and prepare and submit a Construction Staging Plan for review and approval by the City Engineer. Following the recommendations of TJKM's 2018 Traffic Report, the Project would include design modifications to the site plan described above and shown in Exhibit 4. These design modifications would improve pedestrian and bicycle safety and MM TRAF-16a and MM TRAF-16b, MM TRAF-17, MM TRAF-18, MM TRAF-19, MM TRAF-20, and MM TRAF-21 would no longer be applicable to the Project.

Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

MM TRAF-1 No feasible mitigation measures are available to reduce this impact to a less than significant level.

MM TRAF-2 The Project applicant shall coordinate with the City to contribute a fair share of the cost, including an in-lieu payment, to install a traffic signal at the Brown Avenue/Deer Hill Road intersection, which will be added to the City's Capital Improvement Projects (CIP) program. The traffic signal equipment shall include an emergency vehicle preemption system (Opticom), which would allow emergency response vehicles approaching the signalized intersection to activate a green signal for their travel direction. SR-24 freeway overpass structures on Brown Avenue could obstruct the Opticom activation device on responding emergency vehicles headed northbound on Brown Avenue from Mount Diablo Boulevard toward Deer Hill Road, which could substantially reduce the effectiveness of the traffic signal preemption. To avoid this problem, the traffic signal equipment shall include advance detection devices for the Opticom system as needed to ensure effective traffic signal preemption for responding emergency vehicles on northbound Brown Avenue.

MM TRAF-3 The Project applicant shall implement the following measures:

- **West of the East Driveway on Deer Hill Road:** All landscaping along the south side of Deer Hill Road that is located in the line of sight for eastbound traffic within 360 feet west of the east Project driveway shall be limited to plants with foliage no more than 30 inches fully mature height above the closest adjacent curb elevation, or trees with canopy foliage no less than 7 feet above the closest adjacent curb elevation, or other dimensions as specified by the City Engineer. The line of sight is defined as the area between the south curb on Deer Hill Road and a straight line connecting a point 10 feet behind the back of the sidewalk on the centerline of the east driveway, and a point 360 feet to the west where it intersects the south curb line, or as otherwise specified by the City Engineer.
- **All other Project Driveways:** All landscaping along the Project street frontage that is located in the line of sight of traffic approaching Project driveways in either direction shall be limited to plants with foliage no more than 30 inches fully mature height above the closest adjacent curb elevation, or trees with canopy foliage no less than 7 feet above the closest adjacent curb elevation, or other dimensions as specified by the City Engineer. The line of sight is defined as an area within 10 feet behind the back of the sidewalk or shared-use path, and within 50 feet of the driveway edge, or as otherwise specified by the City Engineer.
- **Entryway Features:** All monument signs, walls, slopes and other vertical features that could otherwise block visibility shall be no more than 3 feet higher than the adjacent driveway elevation in the area within 15 feet behind the back of the

sidewalk or shared-use path and within 50 feet of the driveway edge, or as otherwise specified by the City Engineer.

- **The west Project driveway on Deer Hill Road**: the west Project driveway on Deer Hill Road shall be relocated at least 100 feet to the west of the location shown on the Project plans.

MM TRAF-4 The Project applicant shall implement the following measures:

- Widen Deer Hill Road as needed to add a striped westbound left-turn lane and appropriate taper lengths approaching the west Project driveway, and maintain appropriate widths for bike lanes, traffic lanes, and proposed sidewalks, as well as legal left-turn access at the adjacent driveway on the north side of the roadway; or
- Post signs prohibiting left turns from westbound Deer Hill Road into the west driveway. In the mouth of the driveway on the south side of Deer Hill Road, a raised island designed to physically obstruct left turns into the driveway shall be constructed, if emergency access can be maintained to the satisfaction of the CCCFPD and the eastbound bike lane is not obstructed. Raised centerline or median features to obstruct the westbound left-turn are not recommended on Deer Hill Road at this location because of prevailing speeds, as well as potential obstruction of left turns out of the Project driveway and access at the adjacent driveway on the north side of the roadway.

Selection between these two alternative mitigation measures should be coordinated with the potential prohibition of left turns at the east Project driveway, which is not required as mitigation, but is recommended to address design and operational concerns.

MM TRAF-5 The Project applicant shall contribute a fair share to the cost of installing advance detection equipment for the existing Opticom system as needed to assure effective traffic signal preemption for responding emergency vehicles on northbound Pleasant Hill Road approaching the Deer Hill Road intersection and the other four signalized study intersections to the north. The advance detection system shall be designed to activate a green signal for northbound Pleasant Hill Road at Deer Hill Road with enough time before the emergency vehicle arrives to allow traffic congestion between SR-24 and the intersection to clear sufficiently to facilitate passage of the emergency vehicle. At a minimum, the advance detection system shall allow emergency vehicles responding from CCCFPD Station 15 (located at 3338 Mount Diablo Boulevard) to activate traffic signal preemption for northbound Pleasant Hill Road at Deer Hill Road as soon as they turn north from eastbound Mount Diablo Boulevard.

MM TRAF-6 The Project site plans shall be revised such that corner radii and medians at on-site driveway intersections provide a minimum inside turning radius of 25 feet and a minimum outside turning radius of 45 feet, per CCCFPD requirements.

MM TRAF-7 The Project applicant shall prepare and submit a Construction Staging Plan for review and approval by the City Engineer. The Construction Staging Plan shall include elements such as flaggers for trucks entering and exiting the site, and a designated liaison to coordinate with the City, schools, and the public as needed, and shall implement the following required measures:

- Large trucks involved in the grading phase of construction shall be prohibited from arriving at or departing from the Project site during the hours of 7:00 to 9:00 a.m. and 3:00 to 7:00 p.m. on any school day, and 7:00 to 9:00 a.m. and 4:00 to 7:00 p.m. on any non-school weekday.
- Large trucks shall be prohibited from making U-turn movements from northbound to southbound Pleasant Hill Road at the Deer Hill Road intersection during construction. The Construction Staging Plan shall specify for each construction phase whether access to the Project site from northbound Pleasant Hill Road will be allowed by providing a median opening for left turns directly into the site south of Deer Hill Road, or will require a left-turn onto Deer Hill Road and a subsequent left-turn into the site.
- If the Construction Staging Plan allows large trucks to turn left from northbound Pleasant Hill Road to Deer Hill Road, accommodation of their turning radius may require the following temporary measures: modifications to the south median within up to 15 feet from the nose; relocation of the limit line for eastbound Deer Hill Road traffic lanes by up to 15 feet behind the existing crosswalk marking; adjustments to vehicle detectors, any other affected traffic signal equipment, and traffic signal timing as required to maintain safe and effective operations; and, measures as otherwise specified by the City Engineer.
- The proposed locations and configuration of access points on Pleasant Hill Road and Deer Hill Road where large trucks would turn into or out of the Project site during construction shall be subject to approval by the City Engineer, to ensure consideration of sight-distance constraints and implementation of appropriate safety precautions.
- During any construction phase when access to the existing passenger loading zone on the west curb of Pleasant Hill Road along the Project frontage would be unavailable on school days, one of the following measures shall be taken:
  - Provide a safe, temporary alternative loading zone in the immediate area, subject to approval by the City Engineer. Potential alternatives may include temporary use of the property on the northwest corner of Pleasant Hill Road and Deer Hill Road, which would require surface improvements to facilitate safe vehicle and pedestrian access.
  - Stage construction on the subject portion of the site such that during the school break for summer, the existing passenger loading zone would be demolished and replaced by construction of the recommended roadway configuration and passenger loading zone on the Pleasant Hill Road Project frontage.

- The Construction Staging Plan shall require restriping of bike lanes and other pavement markings at the discretion of the City Engineer to address wear from construction traffic.
- Special school events, such as swim meets, shall be addressed by the designated liaison required in the Construction Staging Plan, or any additional measures that the City Engineer may require in that Plan.
- The Construction Staging Plan shall include an engineering analysis to estimate the percentage of the pavement service life that will be used by Project construction truck trips on Pleasant Hill Road and Deer Hill Road. Based on this analysis, appropriate mitigation of the resulting damage shall be required from the Project sponsor, which may include construction of pavement improvements to restore the lost service life, or an in-lieu contribution of equivalent value, at the discretion of the City Engineer.

MM TRAF-8 The Project site plan shall be revised at the three Project driveways such that adequate truck turning radii are provided, by widening the portion of the entry roadway near each intersection, modifying the median configuration, and/or increasing the corner radius.

MM TRAF-9 Implement MM TRAF-2.

MM TRAF-10 Widen Deer Hill Road at the west Project driveway as needed to add a striped westbound median refuge lane to receive left turns from the driveway, provide appropriate taper lengths west of the refuge lane, and maintain appropriate widths for bike lanes, traffic lanes, and proposed sidewalks; or

Implement Mitigation Measure TRAF-3 and install a side road symbol (California MUTCH No. W2-2) warning sign facing westbound Deer Hill Road traffic in advance of the relocated driveway.

MM TRAF-11 No feasible mitigation measures are available to reduce this impact to a less than significant level.

MM TRAF-12 The Project applicant shall extend the proposed left-turn storage lane an additional 75 through 100 feet to the south by widening Pleasant Hill Road on the Project frontage to accommodate the peak left-turn queue length. Extending the entrance to the left-turn further south toward the off-ramp from westbound SR-24 would shorten the available weaving distance on northbound Pleasant Hill Road for left turns at the Project driveway, but this would not be considered a significant secondary impact, and therefore the mitigation is considered feasible.

MM TRAF-13 No feasible mitigation measures are available to reduce this impact to a less than significant level.

MM TRAF-14 The Project applicant shall provide subsidized, frequent shuttle service between the Project site and the Lafayette BART station during the AM and PM peak commute periods, until such time that a bus route on Pleasant Hill Road serving the BART station is implemented (as called for in the Lamorinda Action Plan), at which point the Project applicant may provide transit vouchers in lieu of a shuttle.

MM TRAF-15 The Project applicant shall coordinate with the Lamorinda School Bus Program to determine the appropriate locations and designs for bus stop pullouts along the Project frontage, which the Project applicant shall construct as part of the Project site frontage improvements. A bus stop on the southbound Pleasant Hill Road frontage may need to be located south of the Project driveway to avoid driveway sight-distance issues as well as conflicts with passenger loading activity for Acalanes High School north of the driveway. On eastbound Deer Hill Road, a bus stop would need to be located to avoid sight–distance issues at Project driveways.

MM TRAF-16a On the south side of Deer Hill Road along the Project site frontage, construct new sidewalk and curb at a width of at least 6.5 feet, or as otherwise specified by the City Engineer.

MM TRAF-16b On the west side of Pleasant Hill Road along the Project site frontage, construct a new shared path for bicycles and pedestrians at a paved width of 10 feet with a buffer strip at least 4 feet wide between the path and the curb, or as otherwise specified by the City Engineer. The buffer strip's surface treatment shall be appropriate to accommodate pedestrians accessing vehicles at curb parking and passenger loading areas. At the southwest corner of Pleasant Hill Road and Deer Hill Road, the path shall be designed to accommodate expected volumes of pedestrians and bicyclists waiting for the traffic signal. This measure shall be implemented in addition to the Class II (on-street) bike lane on southbound Pleasant Hill Road described in MM TRAF-18, MM TRAF-19, MM TRAF-20, and MM TRAF-21 described below.)

MM TRAF-17 Implement MM TRAF-4. In addition, the Project applicant shall install stop signs for traffic exiting Project driveways, and special design treatments such as paving to be specified by the City Engineer to alert drivers exiting the Project site that they are crossing pedestrian and bicycle facilities.

MM TRAF-18 The Project shall implement an alternative configuration for widening southbound Pleasant Hill Road, which would not add a vehicle traffic lane. Southbound Pleasant Hill Road shall be widened along the Project frontage to provide a 6-foot wide Class II bike lane between an 8-foot wide curb loading and parking lane and the existing traffic lanes, or dimensions otherwise specified by the City Engineer. This configuration would maintain the existing curb loading and parking lane, except for a segment extending up to 100 feet north from the Project driveway, where the roadway shall be widened to accommodate an additional 12-foot wide right-turn lane along with the 6-foot wide Class II bike lane, or dimensions otherwise specified by the City Engineer.

This measure shall be implemented in addition to improvements descried in MM TRAF-16b, MM TRAF-19, MM TRAF-20, and MM TRAF-21.)

MM TRAF-19 Implement MM TRAF-16b. In addition, the Project applicant shall coordinate with the City and Caltrans to ensure that Project site improvements adjacent to the Caltrans SR-24 right-of-way, such as grading, drainage, retaining walls, or other structures, do not preclude construction of a Class I bicycle path meeting applicable vertical and horizontal alignment standards, at a paved width of 10 feet with graded shoulders at least 2 feet wide on both sides, or as otherwise specified by the City Engineer. The Project applicant shall dedicate additional right-of-ways as needed to ensure the feasibility of constructing such a path. The Project applicant shall coordinate with the City to develop an appropriate alignment of the path to connect with the shared bicycle/pedestrian path described in MM TRAF-16b while also intersecting the Project driveway on Pleasant Hill Road as described in MM TRAF-20. This measure shall be implemented in addition to the improvements described in MMs TRAF-18 and MM TRAF-21.)

MM TRAF-20 The Project applicant shall coordinate with the City to develop an appropriate route and dedicate right-of-way on the Project site for a bike path alignment that would intersect the driveway approximately 50 feet or more from Pleasant Hill Road. Additionally, the Project applicant shall provide the necessary grading and structural support on the site to allow for a Class I bike path that meets applicable width and slope standards, provides adequate sight-distance where it intersects the driveway, and connects with the shared bicycle/pedestrian path described in MM TRAF-16b and the planned bike path described in MM TRAF-19 on both ends. Where the driveway intersects the bike path, the Project applicant shall also install special design treatments, such as paving, to be specified by the City Engineer, to alert drivers that they are crossing a bike path. This measure shall be implemented in addition to the improvements described in MM TRAF-18 and MM TRAF-21.

MM TRAF-21 Implement MM TRAF-18. The entire curb segment between Deer Hill Road and the recommended right-turn lane shall be designated as a passenger loading zone, which would accommodate eight cars in approximately the same location as the existing curb spaces used for passenger loading. This measure shall be implemented in addition to the improvements described in MM TRAF-16b, MM TRAF-18, MM TRAF-19, and MM TRAF-20.

Revised Mitigation Measures for the Resumed Project

MM TRAF-2 **Signalization:** The Project applicant shall coordinate with the City to contribute a fair share of the cost, including an in-lieu payment, to install a traffic signal at the Brown Avenue/Deer Hill Road intersection, which will be added to the City's Capital Improvement Projects (CIP) program. The traffic signal equipment shall include an emergency vehicle preemption system (Opticom), which would allow emergency response vehicles approaching the signalized intersection to activate a green signal

for their travel direction. SR-24 freeway overpass structures on Brown Avenue could obstruct the Opticom activation device on responding emergency vehicles headed northbound on Brown Avenue from Mount Diablo Boulevard toward Deer Hill Road, which could substantially reduce the effectiveness of the traffic signal preemption. To avoid this problem, the traffic signal equipment shall include advance detection devices for the Opticom system as needed to ensure effective traffic signal preemption for responding emergency vehicles on northbound Brown Avenue.

Roundabout: An alternative mitigation option to installing a traffic signal would be the redesign of this intersection as a roundabout, which would improve the approach LOS for the minor approach volumes at this intersection relative to Existing Conditions, although it improves LOS to a smaller degree than signalization

MM TRAF-9 Implement MM TRAF-2.

MM TRAF-10 Widen Deer Hill Road at the west Project driveway as needed to add a striped westbound median refuge lane to receive left turns from the driveway, provide appropriate taper lengths west of the refuge lane, and maintain appropriate widths for bike lanes, traffic lanes, and proposed sidewalks.

MM TRAF-1, MM TRAF-3, MM TRAF-4, MM TRAF-6, MM TRAF-8, MM TRAF-11, MM TRAF-12, MM TRAF-13, MM TRAF-15, MM TRAF-16a, MM TRAF-16b, MM TRAF-17, MM TRAF-18, MM TRAF-19, MM TRAF-20, and MM TRAF-21 are not applicable to the Project.

Conclusion

By adding a “trap lane” for southbound traffic on Pleasant Hill Road and implementing the other environmentally beneficial site refinements and revised MM TRAF-2, MM TRAF-9, and MM TRAF-10 discussed above, transportation and traffic impacts would be reduced when compared with those identified in the 2013 FEIR. The revisions to MM TRAF-2, MM TRAF-9, and MM TRAF-10 are appropriately discussed in this addendum and incorporated into the MMRP because the revision does not itself involve new significant effects or substantially increase the severity of previously analyzed significant effects. There is no new information identifying significant new effects, nor is there a substantial increase in the severity of previously identified significant effects related to transportation and traffic. Further, no new mitigation measures or alternatives are required.

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusions for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
XVII. Utilities and Service Systems							
Would the project:							
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less than Significant	No	No	No	Less than Significant	None	None
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant	No	No	No	Less than Significant	None	None
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant	No	No	No	Less than Significant	None	None
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Less than Significant	No	No	No	Less than Significant	None	None

Environmental Issue Area	Conclusion in the 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusions for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	No	No	No	Less than Significant	None	None
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than Significant	No	No	No	Less than Significant	None	None
g) Comply with federal, state, and local statutes regulations related to solid waste?	Less than Significant	No	No	No	Less than Significant	None	None

Discussion

Utility impacts associated with the Project would be consistent with those identified in the 2013 FEIR analysis. The 2013 FEIR identified less than significant impacts with respect to water supplies and quality, wastewater treatment requirements and capacity, stormwater drainage facilities, landfill capacity, and solid waste regulations. As described below, the conclusions of the 2013 FEIR would not substantially change as a result of the Project.

a) Summary of 2013 FEIR

The 2013 FEIR concluded that the Contra Costa County Sanitary District (CCCSD) would provide sewer service to the Project site and the CCCSD complies with the RWQCB monitoring and reporting program. In addition, the Project's residential development would not involve industrial uses that would substantially increase pollutants. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

The Project contemplates the same uses with the same maximum amount of residential units as analyzed in the 2013 FEIR and would also be served by the CCCSD. As such, the Project would not include industrial land uses that would substantially increase pollutant loading levels in the sanitary sewer system. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

b) Summary of 2013 FEIR

Wastewater

The 2013 FEIR determined that the Project would connect to an existing CCCSD 8-inch sewer line on Deer Hill Road, and a 6-inch sewer line on Pleasant Hill Road. The CCCSD Collection Master Plan, which is based on General Plan projections, determines the needs for sewer improvements. The 2013 FEIR concluded that because the Project would result in 59 percent fewer residential units than permitted under the City's APO zoning classification, the CCCSD would have adequate capacity to serve the Project. In addition, the CCCSD's capacity study for the sewer system in the vicinity of the Project found that the collection system immediately downstream of the Project site has sufficient capacity to accommodate the Project and other anticipated growth. However, the CCCSD facilities further downstream do not have adequate flow carrying capacity under the CCCSD's current design criteria, and improvements to the CCCSD's existing facilities that are required as a result of new development would be funded by the developer from the applicable CCCSD fees and charges. As such, the 2013 FEIR concluded that impacts would be less than significant.

Water

The 2013 FEIR determined that new water supply lines would be need to connect the Project with existing water lines, but the Project would not require the construction of new facilities or the expansion of existing facilities over and above what is currently planned for by the Lafayette Water Treatment Plan (WTP). As such, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Wastewater

Consistent with the 2013 FEIR, the Project would connect to the existing CCCSD 8-inch sewer line on Deer Hill Road, and a 6-inch sewer line on Pleasant Hill Road. In 2017, CCCSD recorded a treatment plant flow of 33.3 with a capacity of 53.8 mgd resulting in 20.5 mgd of additional capacity. Furthermore, CCCSD confirms there is sufficient capacity district wide for several decades.[43] Consistent with the 2013 FEIR, the Project would result in 59 percent fewer residential units than permitted under the City's APO zoning classification. As a result, the Project would be expected to generate less effluent than expected under CCCSD projections.

[43] Russell Leavitt, Environmental Coordinator, CCCDS. Personal communication: phone call. September 28, 2018.

Consistent with the 2013 FEIR, improvements to the CCCSD's existing facilities that are required as a result of new development and are necessary to ensure that CCCSD facilities further downstream have adequate flow carrying capacity would be funded by the developer from the applicable CCCSD fees and charges. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

Water

The Project would not require new water supply lines beyond what was analyzed in the 2013 FEIR. Therefore, consistent with the 2013 FEIR, the Project would not require the construction of new facilities or the expansion of existing facilities over and above what is currently planned for by the Lafayette WTP. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

c) Summary of 2013 FEIR

The 2013 FEIR determined that Project stormwater would be regulated by San Francisco Bay RWQCB's NPDES permit for the City of Lafayette. Although the Project would increase impervious surfaces and stormwater, the 2013 FEIR concluded that impacts to stormwater drainage would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project's stormwater would be regulated by the San Francisco Bay RWQCB's NPDES permit. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

d) Summary of 2013 FEIR

As noted in the 2013 FEIR, the Project would receive water supplies from EBMUD during construction and at operation. The 2013 FEIR determined that EBMUD's capacity (325 million gallons per day [mgd]) exceeds the projected adjusted system demand (230 mgd) through the year 2040. Furthermore, the Project would incorporate water saving features, such as native vegetation, and comply with California water efficiency regulations as set forth in the California Model Water Efficient Landscape Ordinance (MWELO) in order to plan for water shortages in time of drought. The 2013 FEIR concluded that EBMUD has adequate water supplies to service the development and continued operation of the Project. As such, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would be served by EBMUD water supplies. According to the EBMUD 2015 Urban Water Management Plan (UWMP), EBMUD has a total

water right and capacity of 325 MGD from the Mokelumne River, which is consistent with the capacity stated in the 2013 FEIR.[44] Therefore, EBMUD would have adequate water supplies to serve the Project site. In addition, compliance with the State's current MWELO requirements would ensure water supplies would be available during water shortages. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

e) Summary of 2013 FEIR

The 2013 FEIR determined that the Project would generate 33,075 gallons of wastewater per day or 0.033 mgd. The 2013 FEIR noted that the CCCSD treatment plant's average demand was 33.5 mgd and the permitted capacity is 53.8 mgd. The CCCSD treatment plant would not exceed its permitted capacity with the addition of Project generated wastewater. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would be served by the CCCSD and the 658 new residents would generate 0.033 mgd. In 2017, CCCSD recorded a treatment plant flow of 33.3 with a capacity of 53.8 mgd resulting in 20.5 mgd of additional capacity.[45] Therefore, similar to the 2013 FEIR, the Project would not exceed the permitted capacity of the CCCSD. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

f) Summary of 2013 FEIR

As noted in the 2013 FEIR, the Project would be served by the Contra Costa Solid Waste Authority and all solid waste from the Project would be transferred to the Keller Canyon Landfill. The Keller Canyon Landfill is permitted to receive up to 3,500 tons of waste per day and had a remaining capacity of 63.408 million cubic yards. The 2013 FEIR determined that the Project would generate up to 3.9 pounds of waste per person per day, which is below the SB 1016 target of 4.7 pounds of waste per person per day. The 2013 FEIR concluded that the Project would generate approximately 0.04 percent of the permitted daily capacity of the Keller Canyon Landfill, and thus the Landfill has sufficient capacity to accommodate the Project. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would be served by Keller Canyon Landfill, which would contain sufficient capacity to serve the Project. Consistent with the analysis in the 2013 FEIR, the Keller Canyon Landfill has a remaining capacity of 63.408 million cubic yards.[46] The Project would generate approximately 3.9 pounds of waste per person per day and 0.04

[44] EBMUD, Water Resources Planning Division. 2016. UWMP, page 8. July.
[45] Russell Leavitt, Environmental Coordinator, CCCDS. Personal communication: phone call. September 28, 2018.
[46] California Department of Resources Recycling and Recovery. 2018. SWIS Facility Detail, Keller Canyon Landfill (07-AA-0032). Website: https://www2.calrecycle.ca.gov/swfacilities/Directory/07-AA-0032/. Last accessed September 28, 2018.

percent of the permitted daily capacity of the Keller Canyon Landfill. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

g) Summary of 2013 FEIR

As noted in the 2013 FEIR, the Project would comply with City of Lafayette General Plan goals and State requirements in order to reduce the volume of solid waste. Project compliance with City and State requirements would ensure the City meets the State-mandated waste diversion rate of 50 percent. The 2013 FEIR determined that the Project would prepare and implement a construction waste management plan and report that would ensure the requirements of the City's Construction Debris Ordinance are met. As a result, the 2013 FEIR concluded that impacts would be less than significant.

Resumed Project Analysis and Conclusion

Consistent with the 2013 FEIR, the Project would implement City of Lafayette General Plan goals and State solid waste requirements. The Project would implement the same construction waste management plan and report as previously analyzed in the 2013 FEIR. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effect. No additional analysis is required.

Mitigation Measures

Mitigation Measures Summary from the 2013 FEIR

None.

Revised Mitigation Measures for the Resumed Project

No mitigation measures are revised.

Conclusion

There is no new information identifying significant new effects nor is there a substantial increase in the severity of previously identified significant effects related to utilities. Further, no new mitigation measures or alternatives are required. Therefore, the Project does not change or alter any of the findings of the 2013 FEIR utilities assessment.

Environmental Issue Area	Conclusions in 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
XVIII. Mandatory Findings of Significance							
Would the project:							
a) Does the Project have the potential to 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, 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?	Significant and Unavoidable Impact	No	No	No	Less than Significant with Mitigation Incorporated	MM AES-1, MM AES-2, MM AES-3, MM AES-4, MM AQ-1, MM AQ-2a, MM AQ-2b, MM AQ-3, MM AQ-4, MM AQ-5, MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6a, MM BIO-6b, MM BIO-6c, MM BIO-7, MM BIO-8, MM GEO-1, MM GHG-1a, MM GHG-1b, MM HYDRO-1a, MM HYDRO-1b, MM HYDRO-2, MM LU-1, MM LU-2, MM LU-3, MM NOISE-1, MM NOISE-2, MM PS-1a, MM PS-1b, MM PS-1c, MM PS-1d, MM TRAF-1, MM TRAF-2, MM TRAF-3, MM TRAF-4, MM TRAF-	MM AES-4, MM AQ-1, MM AQ-2a **[revised]**, MM AQ-2b, MM AQ-3 **[revised]**, MM AQ-4, MM AQ-5, MM BIO-1 **[revised]**, MM BIO-2, MM BIO-3 **[revised]**, MM BIO-5 **[revised]**, MM BIO-6a **[revised]**, MM BIO-6b, MM BIO-6c, and MM BIO-6d **[additional subpart (d) has been included]**, MM BIO-7 **[revised]**, MM BIO-8 **[revised]**, MM CULT-1, MM CULT-2 **[revised]**, MM CULT-3, MM GEO-1 **[revised]**, MM GHG-1a, MM GHG-1b, MM HYDRO-1a, MM HYDRO-1b, MM HYDRO-2, MM NOISE-

Environmental Issue Area	Conclusions in 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
						5, MM TRAF-6, MM TRAF-7, MM TRAF-8, MM TRAF-9, MM TRAF-10, MM TRAF-11, MM TRAF-12, MM TRAF-13, MM TRAF-14, MM TRAF-15, MM TRAF-16a, MM TRAF-16b, MM TRAF-17, MM TRAF-18, MM TRAF-19, MM TRAF-20, MM TRAF-21	1, MM NOISE-2, MM PS-1a, MM PS-1b, MM PS-1c, MM PS-1d, MM TRAF-2 **[revised]**, MM TRAF-5, MM TRAF-7, MM TRAF-9 **[revised]**, MM TRAF-10 **[revised]**, and MM TRAF-14
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.)	Significant and Unavoidable Impact	No	No	No	Less than Significant with Mitigation Incorporated	MM AES-1, MM AES-2, MM AES-3, MM AES-4, MM LU-1, MM LU-2, MM LU-3, MM TRAF-1, MM TRAF-2, MM TRAF-3, MM TRAF-4, MM TRAF-5, MM TRAF-6, MM TRAF-7, MM TRAF-8, MM TRAF-9, MM TRAF-10, MM TRAF-11, MM TRAF-12,	MM AES-4, MM TRAF-2 **[revised]**, MM TRAF-5, MM TRAF-7, MM TRAF-9 [**revised]**, MM TRAF-10 **[revised]**, and MM TRAF-14

Environmental Issue Area	Conclusions in 2013 FEIR	Substantial Changes Involving New or More Severe Impacts?	Substantial Changes in Circumstances Involving New or More Severe Impacts?	New Information of Substantial Importance Requiring New Analysis or Verification?	Conclusion for Resumed Project	Mitigation Measures from the 2013 FEIR	Mitigation Measures for the Resumed Project
						MM TRAF-13, MM TRAF-14, MM TRAF-15, MM TRAF-16a, MM TRAF-16b, MM TRAF-17, MM TRAF-18, MM TRAF-19, MM TRAF-20, MM TRAF-21	
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Significant and Unavoidable Impact	No	No	No	Less than Significant with Mitigation Incorporated	MM TRAF-1, MM TRAF-2, MM TRAF-3, MM TRAF-4, MM TRAF-5, MM TRAF-6, MM TRAF-7, MM TRAF-8, MM TRAF-9, MM TRAF-10, MM TRAF-11, MM TRAF-12, MM TRAF-13, MM TRAF-14, MM TRAF-15, MM TRAF-16a, MM TRAF-16b, MM TRAF-17, MM TRAF-18, MM TRAF-19, MM TRAF-20, MM TRAF-21	MM TRAF-2 **[revised]**, MM TRAF-5, MM TRAF-7, MM TRAF-9 **[revised]**, MM TRAF-10 **[revised]**, and MM TRAF-14

Discussion

a) As discussed in Sections I, III, IV, V, VI, VII, IX, X, XII, XIV, XVI the Project would have potentially significant impacts associated with Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services and Transportation and Traffic. The Project would implement MM AES-4, MM AQ-1, MM AQ-2a, MM AQ-2b, MM AQ-3, MM AQ-4, MM AQ-5, MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-5, MM BIO-6a, MM BIO-6b, MM BIO-6c, MM BIO-6d, MM BIO-7, MM BIO-8, MM CULT-1, MM CULT-2, MM CULT-3, MM GEO-1, MM GHG-1a, MM GHG-1b, MM HYDRO-1a, MM HYDRO-1b, MM HYDRO-2, MM NOISE-1, MM NOISE-2, MM PS-1a, MM PS-1b, MM PS-1c, MM PS-1d, MM TRAF-2, MM TRAF-5, MM TRAF-7, MM TRAF-9, MM TRAF-10, and MM TRAF-14. Consistent with the 2013 FEIR, impacts to geology and soils, greenhouse gas emissions, hydrology and water quality, noise, and public services would be less than significant with mitigation incorporated. Because of corrections and refinements to the existing conditions of the Project site and environmentally beneficial refinements to the site plan as well as revised mitigations, contrary to the 2013 FEIR, the Addendum concluded that impacts to aesthetics, air quality, biological resources, land use, and transportation would be less than significant with mitigation incorporated. Therefore, the Project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the 2013 FEIR. No additional analysis is required.

b) As discussed in Sections I, X, and XVI the Project would result in potentially significant impacts to Aesthetics, Land Use, and Traffic, which could create impacts that are cumulatively significant. The Project would implement MM AES-4, MM TRAF-2, MM TRAF-5, MM TRAF-7, MM TRAF-9, MM TRAF-10, and MM TRAF-14. Because of corrections and refinements to the existing conditions of the Project site and environmentally beneficial refinements to the site plan as well as revised mitigations, contrary to the 2013 FEIR, the Addendum concluded that impacts to Aesthetics, Land Use, and Transportation would be less than significant with mitigation incorporated. Therefore, the Project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the 2013 FEIR. No additional analysis is required.

c) As discussed in Section XVI, Traffic and Transportation impacts could have adverse effects on human beings. The Project would implement MM TRAF-2, MM TRAF-5, MM TRAF-7, MM TRAF-9, MM TRAF-10, and MM TRAF-14 that would reduce impacts to a less than significant level. Therefore, the Project would not introduce new significant environmental impacts or create more severe environmental impacts than those analyzed in the 2013 FEIR. No additional analysis is required.

Mitigation Measures

Implement MM AES-4, MM AQ-1, MM AQ-2a, MM AQ-2b, MM AQ-3, MM AQ-4, MM AQ-5, MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-5, MM BIO-6a, MM BIO-6b, MM BIO-6c, MM BIO-6d, MM BIO-7, MM BIO-8, MM CULT-1, MM CULT-2, MM CULT-3, MM GEO-1, MM GHG-1a, MM GHG-1b, MM HYDRO-1a,

MM HYDRO-1b, MM HYDRO-2, MM NOISE-1, MM NOISE-2, MM PS-1a, MM PS-1b, MM PS-1c, MM PS-1d, MM TRAF-2, MM TRAF-5, MM TRAF-7, MM TRAF-9, MM TRAF-10, and MM TRAF-14.

Conclusion

There is no new information identifying significant new effects, nor is there an increase in the severity of previously identified significant effects related to mandatory findings of significance. Further, no new mitigation measures or alternatives are required. As explained throughout this Addendum, impacts to several resource categories are reduced from the conclusions in the 2013 FEIR because of corrections and refinements to existing conditions and environmentally beneficial refinements to the site plan and mitigation measures. Therefore, the Project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects. No additional analysis is required.

SECTION 4: LIST OF PREPARERS

FirstCarbon Solutions
1350 Treat Boulevard, Suite 380
Walnut Creek, CA 94597
Phone: 925.357.2562
Fax: 925.357.2572

Project Director ..... Jason Brandman
Assistant Project Manager ..... Liza Baskir
Environmental Analyst ..... Spencer Pignotti
Senior Archaeologist ..... Dana DePietro
Biological Resource Specialist ..... Brian Mayerle
Biologist ..... Robert Carroll
Senior Air Quality Project Manager ..... Jason Paukovits
Senior Noise and Air Quality Scientist ..... Phil Ault
Editor ..... Susie Harris
Word Processor ..... Ericka Rodriguez
GIS/Graphics ..... Karlee McCracken
Reprographics ..... Octavio Perez

TJKM—Traffic Subconsultant
4305 Hacienda Drive, Suite 550
Pleasanton, CA 94588
Phone: 925.264.5006

THIS PAGE INTENTIONALLY LEFT BLANK