IMPACT SCIENCES

505 14th Street, Suite 900
Oakland, CA 94612
(213) 935-1901
www.impactsciences.com

MEMORANDUM

To:	Greg Wolff City of Lafayette, Department of Planning and Building	**Job No.**	658.002
From:	Impact Sciences, Inc.		
Subject:	Peer Review of the Addendum to the Terraces of Lafayette Project Environmental Impact Report Prepared by First Carbon dated December 18, 2018		
Date:	April 5, 2019		

This memorandum summarizes the findings of Impact Sciences' review of the draft Addendum to the Terraces of Lafayette Environmental Impact Report (EIR) prepared by First Carbon on December 18, 2018. Our findings are presented in the following three sections:

I. Level of CEQA Analysis
II. Adequacy of the Analysis in the Draft Addendum; and
III. Recommended Revisions to the Draft Addendum

I. LEVEL OF CEQA ANALYSIS

As stated in the CEQA document prepared by First Carbon for the Terraces of Lafayette project (Draft Addendum), an Addendum to a previously certified EIR can be prepared pursuant to *CEQA Guidelines* Section 15164 if the analysis has included substantial evidence supporting the conclusion that a Supplemental EIR or Subsequent EIR is not required.

Therefore, concurrent with the Draft Addendum findings, no subsequent or supplemental EIR or Negative Declaration (ND) may be required if additional analysis can demonstrate that none of the conditions listed below and described in *CEQA Guidelines* Section 15162 calling for the preparation of a subsequent or supplemental EIR or ND have occurred. Specifically, an addendum would be sufficient in the event that:

- There were no substantial changes to the project requiring major revisions to the EIR because of new or substantially increased significant environmental effects.

- There were no substantial changes in circumstances requiring major revisions to the EIR because of new or substantially increased significant environmental effects; and there was no new, previously unknown or unknowable, information of substantial importance showing: (a) the project will have new significant effects; (b) the project will have substantially more severe significant effects than shown in the EIR; (c) previously infeasible mitigation measures and project alternatives are now feasible and would substantially reduce significant environment effects; or (d) considerably different mitigation measures than analyzed in the EIR would substantially reduce significant environmental effects.

Review of the components of the Terraces of Lafayette project (Resumed Project) as proposed in the Draft Addendum did not identify any land use changes as compared to the Terraces of Lafayette Project Environmental Impact Review (2013 EIR), certified on August 13, 2013. It should be noted that design plans were not made available to Impact Sciences, therefore, our analysis and review of the Addendum was limited to information provided in the Addendum itself.

In addition, it does not appear that substantial changes in the project circumstances or substantial changes in circumstances requiring major revisions to the 2013 EIR have occurred, thereby making an addendum appropriate under CEQA.

However, as outlined in this memorandum, because we recommend changes to some of the methodologies used and assumptions made in the technical analysis of the Resumed Project, some additional technical studies are necessary, and the results of those studies would confirm the appropriate level of CEQA analysis.

II. ADEQUACY OF THE ANALYSIS IN THE DRAFT ADDENDUM

This section presents Impact Sciences' findings regarding the adequacy of the Draft Addendum and the assessment of information presented to substantiate the reasons for determining why implementation of the Resumed Project does not necessitate further environmental review:

Draft Addendum Section 1.2.1. Findings: Components considered in the Addendum as refinements to the existing conditions

The Addendum considers the following as part of the refinements to the existing conditions:

- Ridgeline Evaluation, prepared by ENGEO in 2011:[1] This report, submitted with the original application, concludes that the nearest Class I ridgeline terminates 650 feet west of the Project site. As part of the 2013

---

1 ENGEO Incorporated, 2011. Geotechnical Evaluation of Ridge Ordinance. AMD Trust Property Lafayette, California. Submitted to O'Brien Land Company, LLC. August 3. Revised August 30.

EIR analysis, the ENGEO report was reviewed by an independent technical consultant. The findings of this review were documented in a letter report that was included in Appendix M.3 of the 2013 EIR.[2] Although the letter report notes that the project site configuration differs from that shown on the U.S. Geological Survey topographic (USGS) quadrangle maps, it states that the reason is because the data for the USGS maps were developed before construction of Deer Hill Road and quarry operations at the project site. However, the letter report notes that cut and fill at the project site "lowered and widened the crest of the ridge and steepened the side slopes, however the ridge was not removed." The letter report confirms that the Lafayette Ridge landform extends between the Russell Peak area to the west and the valley floor near the southeast corner of the project site and encompasses all of the project site. It notes that the portion of the ridge between elevation 759 and the project site is consistent with other Class I and II ridge/ridges shown on the Lafayette Ridge Map. The findings of this review are part of the certified EIR. Therefore, the conclusions of the ENGEO report cannot be considered refinements to the existing conditions.

- Removal of asbestos and lead-based paint: While the structures at the project site have been demolished and removed since the preparation of the 2013 EIR, documentation of completion of removal should be included within the Addendum documents. These documents should include the abatement completion report and completion confirmation by relevant authorities.
- Bridges' coast range shoulderband snail survey: As stated in Mitigation Measure BIO-4 of the EIR, the survey shall be conducted in advance of construction in the late winter and early spring (February through May). While the survey was conducted during the required season, it was done in 2013. In compliance with Mitigation Measure BIO-4, the shoulderband snail survey should be conducted during the early spring, but right before construction is planned to begin. Therefore, the results of the 2013 survey cannot be considered as part of the refinements to the existing conditions, and as described under Biological Resources below, this mitigation measure still applies to the Resumed Project.
- Pre-construction survey for bats: This survey was conducted in 2016 before the demolition of the structures. The Addendum adequately notes that the City of Lafayette has provided approval for the survey. However, the Addendum should include supporting evidence of the proper completion of the survey.
- Pre-construction survey nesting birds: Although no bird nests may have been observed on the site during the 2016 survey, there remains a possibility that nests or roosts could have been established later on and

[2] Cal Engineering and Geology, 2012. Geotechnical and Geologic Review. Geotechnical Evaluation of the Ridge Ordinance. AMD Trust Property. February 3.

before construction proceeds. Therefore, the results of the 2013 survey cannot be considered as part of the refinements to the existing conditions. As the Draft Addendum adequately indicates under Section 3.IV – Biological Resources, Mitigation Measure BIO-2 still applies to the Resumed Project and a focused survey for nesting migratory birds would be required to be conducted 14 days prior to the onset of vegetation removal or construction.

The Draft Addendum considers the following as "environmentally beneficial" refinements to the site that would be implemented:

- Grassland mitigation: The Draft Addendum notes that the repropagation of 2.1 acres of native blue wildrye on site would be an "environmentally beneficial" refinement. The Draft Addendum notes that the Applicant has salvaged the existing native blue wildrye from the site in 2016 and holding the plants at a local nursery in preparation of repropagation activities. The CEQA document should describe and clearly document the handling and current status of the native blue wildrye during the salvage activities and at the nursery. Documentation of these activities should include the oversight of the City of Lafayette Planning & Building Services Division that was identified in the Mitigation Measure BIO-5 of the 2013 EIR for the native blue wildrye.

Draft Addendum Section 2.3. Project Characteristics

The project description section should include a comparison noting the components that are similar to those analyzed in the 2013 EIR and provide detailed description of the refinements or changes included in the Resumed Project. The project description should include figures showing any project refinements.

Draft Addendum Section 3. I Aesthetics

- **Change in the CEQA determination related to project impacts on scenic vista.** The Draft Addendum concludes that project impacts on scenic vista would be less than significant, while the 2013 EIR concluded that these impacts would be significant and unavoidable and no mitigation measure would be feasible because of the proposed building height and grading. For the CEQA determination to be modified from significant and unavoidable to less than significant, the analysis in the Addendum should provide supporting evidence that leads to this conclusion. In particular, in the discussion of project impact on scenic vista the following clarifications should be considered:

  Analysis in the Draft Addendum states that the Resumed Project would comply with General Plan LU-2 by incorporating a native landscape in an unmanicured and natural way. To demonstrate compliance with General Plan LU-2, the analysis in the Addendum should demonstrate how the Resumed Project would comply with General Plan LU-2 by preserving the Scenic Corridor Views. The 2013 EIR noted the

following: "*Scenic Corridor Views would be obstructed by the proposed buildings from Viewpoints 3, 4, 5 and 6 with varying degrees of impact. From Viewpoints 5 and 6, all of the ridgeline views are blocked. From Viewpoints 3 and 4, the proposed Project buildings obstruct views of the existing undeveloped Project site, while maintaining views of Lafayette Ridge*." The analysis should show whether the project complies or not by providing a detailed analysis prepared after the certification of the EIR to demonstrate any changes to the views as a result of the Resumed Project. The analysis should be reviewed and approved by the lead agency to be used in the Addendum. The Addendum should also provide an analysis of the temporary impacts to the scenic view while the new landscape is growing, as conditions would change over time.

In addition, the analysis should describe how the Resumed Project, as we understand it, would have the same building height and design as the project analyzed in the 2013 EIR would comply with General Plan Goal LU-5. Specifically, the 2013 EIR notes the following: "*the buildings shown in Viewpoint 2 and 3 do not reflect the semi-rural character called for in the Goal*."

- **Change in the CEQA determination related to damaging scenic resources.** The 2013 EIR notes the following before concluding that project impacts related to damaging scenic resources would be significant and unavoidable: "*The Project site is visible from State Highway 24, in the westbound direction, and partially visible in the eastbound direction. As is evident from Viewpoint 6, the buildings along the edge of the upper terrace would be visible from the highway, representing a change from current views of the hillside and terraced edges.*" In order to change the CEQA determination from significant unavoidable to less than significant, the analysis should demonstrate that the Resumed Project would not substantially damage scenic resources from State Highway 24.

  The Draft Addendum concludes based on the Ridgeline Evaluation prepared by ENGEO that the Class I ridgeline terminates 650 feet west of the project site, well outside the 400 feet setback required in Lafayette City Code. As noted above under the comments for the Draft Addendum Section 1.2.1, the ENGEO report was reviewed by an independent technical consultant, and the findings of this review were documented in a letter report that was included in Appendix M.3 of the 2013 Final EIR. This review concludes that although cut and fill at the project site lowered and widened the ridge crest and steepened the side slopes, the ridge was not removed. The letter states that the Lafayette Ridge landform extends between the Russell Peak area to the west and the valley floor near the southeast corner of the project site and encompasses all of the project site. The study notes that the portion of the ridge between elevation 759 and the project site is consistent with other Class I and II ridge/ridges shown on the Lafayette Ridge Map. The findings of this review are part of the certified EIR. If the Draft Addendum is presenting different conclusions to those

stated in the certified 2013 EIR, it should rely on supporting analysis that occurred after the certification of the EIR and that has been validated by the lead agency.

- **Change in the CEQA determination of the impacts on the degradation of the existing visual character**. The 2013 EIR found that the project would alter the visual character of open space and concluded that the impact with respect to the existing visual character would be significant. The Addendum describes the project area as heavily disturbed and further states it would not qualify as important visual open space. The supporting documentation to the change in the CEQA determination should be based on analysis prepared after the certification of the EIR that was reviewed and approved by the lead agency.

Draft Addendum Section 3. III-Air Quality

- **Change in the CEQA determination with respect to violation of air quality standards or contribution to an existing or projected air quality violation**. The Draft Addendum shows that the NOx emissions under unmitigated conditions would be 111.86 pounds per day, which would exceed the BAAQMD threshold of significance of 54 pounds per day. The Draft Addendum shows that by using Tier IV engines and vehicle class HHDT 2020 running emissions for off-site emissions, NOx emissions would be reduced to 53.8 pounds per day (under the BAAQMD threshold). The analysis in the 2013 EIR found NOx emissions to be significant and unavoidable using Tier III engines. Based on the review of the on-road vehicle emission factors model (EMFAC) data in Appendix B of the Draft Addendum, emissions calculations do not appear to include idle emissions, and assume usage of a mixture of diesel and gasoline powered construction equipment. An EMFAC run using the same parameters as provided in the appendix, but with aggregated model years, vehicle speeds, and diesel fuel only provides a running exhaust emission rate of 4.44 grams per mile rather than 3.88 grams per miles provided in the appendix. Using vehicle model years 2007 through 2021, such as that provided in the appendix, yields an emission rate of 4.17 grams per mile. Therefore, it is recommended to run the emission calculations using the CalEEMod default assumptions of haul trucks types or explain the assumptions of the mix of diesel and powered haul trucks.

  Further, the Draft Addendum concludes that levels of NOx would be below significance thresholds with implementation of Mitigation Measure AQ-2a which requires the use of Tier IV engines. However, Mitigation Measure AQ-2a allows for the substitution of these engines in case they are not available. If there is a possibility that Interim Tier IV, Tier III, or other engines that would not result in the same or greater emissions reductions as Tier IV engines would be used, emissions calculation need to be revised to conservatively reflect that possibility, or the mitigation measure should be revised to require the use of Tier IV engines for all construction equipment, without exception.

- **Impacts related to the exposure of sensitive receptors to substantial pollutants concentration**. The Draft Addendum found that cancer risk associated with the Resumed Project would be at 37.3 per million before mitigation – above the BAAQMD significance threshold of 10 per million. After mitigation, the Draft Addendum found that cancer risk of the Resumed Project would be at 4.6 per million.

  Based on the review of calculations of cancer risk in Appendix B of the Draft Addendum, only infants 0-2 years old appear to be included. Although including additional age groups may not increase cancer risk above significant levels, it would increase cancer risk by approximately 15 percent. Based on a communication with BAAQMD, limiting analysis to only the 0-2 year age group is considered a Tier 2 assessment, which would not be acceptable to BAAQMD and would require approval from the California EPA Office of Environmental Health Hazard (OEHHA). In addition, it appears that First Carbon's own model was used to calculate cancer risk. BAAQMD recommends utilizing a software application such as HARP2 for all health risk assessments involving toxic air contaminants. It is recommended using HARP2 model to complete health risk assessment for all age groups.

Draft Addendum Section 3. IV-Biological Resources

- **Changes in the scope of Mitigation Measure BIO-1**. Mitigation Measure BIO-1 of the 2013 EIR requires implementation of offsite surveys to reduce impacts to special-status plant species. The Draft Addendum makes the determination that Mitigation Measure BIO-1 is infeasible and broadens its scope. Modification to the mitigation measure from the certified EIR should be supported by documentation of infeasibility.
- **Change in the CEQA determination of impacts on riparian habitat or sensitive natural community.** The Draft Addendum notes that the Resumed Project would mitigate for the removal of native blue wildrye by repropagating 2.1 acres on a 1:1 compensatory replacement ratio. Mitigation Measure BIO-5 has been revised in the Draft Addendum, which concludes that environmental impacts identified in the 2013 EIR would be reduced.

  As noted above under comments for Draft Addendum Section 1.2.1 Findings, the CEQA document should describe and clearly document the handling of native blue wildrye during the salvage activities that already occurred and the current conditions at the nursery. Documentation of these activities consistent with the biologist recommended methods should include the oversight or relevant permits from the City of Lafayette Planning & Building Services Division that was identified in the Mitigation Measure BIO-5 of the 2013 EIR for native blue wildrye.
- **Change in the CEQA determination of impacts related to conflicts with local policies and ordinances protecting biological resources.** The Draft Addendum notes that the Open Space and Conservation Element program is not a threshold of significance under CEQA. This analysis should be revised to clarify

that the significance of the impact under CEQA relates to conflicts with local policies to protect biological resources, consistent with Appendix G of the CEQA Guidelines.

- **Mitigation Measure BIO-4**. As described under comments for Draft Addendum Section 1.2.1 Findings above, preconstruction surveys for shoulderband snail survey should be conducted as outlined in Mitigation Measure BIO-4, which would still be applicable to the Resumed Project

Draft Addendum Section 3. V-Cultural and Tribal Cultural Resources

Tribal Cultural Resources. In compliance with the CEQA Checklist updated after certification of the 2013 EIR, the Draft Addendum analyzes impacts associated with Tribal Cultural Resources. However, the Addendum should indicate the source of the record search used to make the conclusion that no listed Tribal Cultural Resources have been identified that may be adversely affected by the project.

Draft Addendum Section 3. VII-Greenhouse Gas Emissions

- **Impacts related to generation of greenhouse gas emissions.** As presented in Table 12, on page 89 of the Draft Addendum, GHG emissions associated with the Resumed Project would be very close to the BAAQMD threshold of significance Based on the review of calculations in Appendix B of the Draft Addendum, the vehicle emission factors were modified in the CalEEMod by assuming zero use of light duty trucks, motorcycles. It is recommended to either change the assumptions in the CalEEMod or provide a substantial justification of how these assumptions would be implemented.

Draft Addendum Section 3. VIII-Hazards and Hazardous Materials

- **Change in the CEQA determination of impacts with respect to incidental release of hazardous materials into the environment**. The Draft Addendum states that the previously existing buildings on site were removed in accordance with state and federal regulations. The analysis then concludes that Mitigation Measures HAZ-1a and HAZ-1b which require removal of asbestos-containing materials (ACMs) and lead-based paint (LBP) are no longer applicable.

  For the Addendum to determine that the mitigation measures are no longer applicable, it should reference documentation confirming that ACMs and LBPs have been properly removed and disposed in compliance with applicable federal, state, and local regulations.

Draft Addendum Section 3. X-Land Use

- **Change in CEQA determination of impacts with respect to conflict with applicable land use regulations and policies**. The analysis of the Draft Addendum relies on the findings of the Ridgeline Evaluation, prepared by ENGEO, to conclude that the project would not conflict with Goal LU-2. As noted above, this

study was previously submitted to the City and was reviewed by an independent technical consultant who concluded that the Lafayette Ridge landform extends between the Russell Peak area to the west and the valley floor near the southeast corner of the project site and encompasses all of the project site. The findings of this review are part of the certified 2013 EIR. If the Draft Addendum is presenting different conclusions to those stated in the certified 2013 EIR, it should rely on supporting analysis that occurred after the certification of the EIR and that has been approved by the lead agency.

In addition, the Draft Addendum notes that the Open Space and Conservation Element program is not a threshold of significance under CEQA. As noted above, this analysis should be revised to clarify that the threshold of significance relates to conflicts with local policies adopted to protect biological resources, consistent with Appendix G of the CEQA Guidelines.

- **Land use mitigation measures that were found non-applicable.** The Draft Addendum found that the project site was substantially disturbed and is surrounded on three sides by development, and therefore does not qualify as important visual open space. Based on this conclusion and the findings of the Ridgeline Evaluation, prepared by ENGEO, the Draft Addendum concluded that land use mitigation measures identified in the EIR are not applicable to the Resumed Project.

  The Addendum would provide CEQA clearance for the Resumed Project based on a certified EIR. Therefore, mitigation measures identified in the EIR remain applicable. If a change in findings is presented, the Addendum should provide substantial evidence to confirm the modified finding.

Draft Addendum Section 3. XII-Noise

- **Impacts related to generation of noise in excess of established standards**. The Draft Addendum notes that the Federal Highway Administration (FHWA) RD-77-108 model (108 model) was used to evaluate existing and future project-related traffic noise. According to the FHWA, the 108 model was comprised of acoustic algorithms, computer architecture, and source code that dated back to the 1970s.[3] The FHWA has been requiring the use of traffic noise model (TNM) for environmental analysis of all its projects beginning after January 15, 2006.[4] Although the Resumed Project is not a federal project, it is recommended that noise impacts associated with project traffic be evaluated using the recommended FHWA traffic noise model or other models that include the FHWA TNM, such as CadnaA or SoundPlan.[5] In addition, as

---

3 FHWA. *Traffic Noise Model*. Page last updated June 2017. Available at: https://www.fhwa.dot.gov/environment/noise/traffic_noise_model/

4 FHWA. Technical Noise Supplement to the Traffic Noise Analysis Protocol. September 2013.

5 DataKustik. 2008. CadnaA Reference Manual. Available at: http://download.datakustik.com/download/CadnaA_Englisch_3_8_TEST.pdf

recommended below for the transportation analysis, traffic data should be based on actual current traffic counts instead of forecasted traffic volumes

- **Impacts related to temporary increase in ambient noise levels**. The Draft Addendum provides a discussion of ambient noise levels at the project site. However, it appears that off-site noise measurements at nearby sensitive receptors were not conducted or updated. The analysis of ambient noise at the project site should account for the existing ambient noise levels at nearby sensitive receptors.
- **Noise Associated with Construction activities**. The 2013 EIR notes the following in reference to Lafayette Municipal Code[6] "The Municipal Code limits the hours of permitted construction to the hours of 8:00 a.m. to 8:00 p.m.…provided that such construction activities do not exceed 80 A-weighted decibels (dBA) at the nearest affected property or individual equipment items do not exceed 83 dBA at 50 feet."

  A rough calculation of the FHWA Roadway Construction Noise Model (RCNM) run using equipment estimates from the Draft Addendum's CalEEMod outputs shows that during grading, noise levels could reach 80 dBA Leq at the residences to the east of the project site along Pleasant Hill Road. Therefore, given that construction noise may not exceed but may be close to the noise limit criteria stated in the 2013 EIR and Lafayette Municipal Code, it is recommended to quantify construction noise and provide an analysis that compares the results to the limits listed in the 2013 EIR and Municipal Code. The analysis would need to examine whether mitigation measures identified in the 2013 EIR would be appropriate and sufficient to reduce noise to less than significant levels.

Draft Addendum Section 3.XIII – Population and Housing

- **Population Projections**. The Draft Addendum concurs with the 2013 EIR analysis regarding population growth which compared the project's increase in population to the 2009 forecast of the Association of Bay Area Government (ABAG). It is recommended that the analysis in the addendum consider the updated ABAG forecast, although the new information may not change the conclusion that is already made in the Draft Addendum

Draft Addendum Section 3. XVI-Transportation

- **Change in CEQA determination with respect to conflict with plans associated with all modes of transportation.** To examine the changes in traffic conditions and associated traffic impacts of the Resumed

---

[6] Lafayette Municipal Code. Chapter 5-2 Noise. Available at : https://library.municode.com/ca/lafayette/codes/code_of_ordinances?nodeId=TIT5HESA_CH5-2NO_5-208SPPR. Accessed on April 2, 2019.

Project, a traffic impact study was prepared as part of the Draft Addendum. The traffic impact study projected the 2011 peak-hour turning movement volume. To improve traffic conditions, the traffic study recommended street improvement measures that were incorporated in the Draft Addendum as mitigation measures. These measures included adding a third lane for southbound through traffic on Pleasant Hill Road between Deer Hill Road— Stanley Boulevard and SR-24. Traffic improvement measures also included the construction of a roundabout as an alternative to signalization at the intersection of Brown Avenue and Deer Hill Road. Other improvements identified in the traffic study to reduce cumulative traffic impacts are adding 250 feet of left turn storage for westbound vehicles at the east project driveway.

For the proposed street improvements to be used as mitigation measures in the CEQA analysis, they should be evaluated for their feasibility by the City of Lafayette and Cal Trans. To better determine the adequacy of these measures and to substantiate their findings, traffic counts should be conducted instead of forecasted traffic volumes. The traffic impact study should be revised and traffic impacts should be analyzed based on the collected traffic counts.

If the revised technical analysis identifies similar or other measures that the lead agency finds feasible and effective, the analysis in the Addendum should be revised to clearly explain how the measures would mitigate the traffic impacts and how mitigation measures previously identified in the 2013 EIR are no longer applicable.

- **Trip Generation based on the 8th Edition.** The Addendum should provide supporting evidence for using the Institute of Transportation Engineers' publication Trip Generation, 8th Edition instead of the most recent 10th Edition. or the analysis should be revised to use the 10th Edition.

Draft Addendum Section 3. Modification to the 2013 EIR Mitigation Measures

If modifications to the mitigation measures of the certified EIR are warranted, the Addendum should clearly show the changes that could be done by referencing the 2013 EIR by Chapter, Section, and underlining new text and showing deleted text with strikethrough. In addition, the analysis should discuss those changes, include new facts, and describe in detail and clearly how they would reduce the impacts.

The Draft Addendum justifies how with the incorporation of the mitigation measures into the project description some mitigation measures, such as MM HAZ-1a and MM HAZ-1b, would not be applicable. However, it should provide explanation of why some mitigation measures became non-applicable to the Resumed Project. These mitigation measures are: MM AES-1; MM AES-2; MM AES-3; MM BIO-4; MM LU-1; MM LU-2; MM LU-3 ; 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.

III. RECOMMENDED REVISIONS TO THE DRAFT ADDENDUM

To complete an adequate CEQA analysis of the Resumed Project based on the review of the Draft Addendum, we recommend the following:

- Calculate air quality emissions using the BAAQMD recommended HARP2
- Review/Revise the calculations and assumptions of the air quality and GHG emissions for criteria pollutant emissions
- Quantify construction noise impacts
- Use the noise model that is currently recommended by FHWA or equivalent models
- Analyze traffic impact using traffic counts of existing conditions
- Review and validate the results of the technical studies by relevant agencies before incorporating the findings and recommendations into the Addendum
- Revise the Addendum to provide a concise description of the background conditions of the project, clear comparison of the project analyzed in the Draft Addendum and the one analyzed in the 2013 EIR, and revisions to the analysis following the completion of the technical studies.
- In general, the analysis should be revised to make sure it is based on substantial evidence and it provides an objective and impartial description of the project impacts.
- Recommend including a brief analysis of the added CEQA Checklist questions in the 2018 updated *CEQA Guidelines*. In particular, it is recommended that the Addendum includes a brief analysis of the following:
    - **Energy:**
        1) Would the project result in a potential impact due to wasteful, inefficient, or unnecessary consumption of energy?
        2) Would the project conflict with a state/local plan for renewable energy or energy efficiency?
    - **Transportation:**
        1) Would the project conflict with *CEQA Guidelines* section 15064.3?
    - **Wildfire:**
        1) Would the project substantially impair an adopted emergency response plan or evacuation plan?

2) Would the project exacerbate wildfire risks, and thereby expose project occupants to pollutants concentrations from a wildfire or uncontrolled spread of fire?
3) Would the project require the installation of infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
4) Would the project expose people or structure to significant risks, including downslope or downstream flooding or landslides as a result of runoff post-fire slope instability, or drainage changes?