

**City of Lafayette Safety Element CEQA Document:
Addendum to the
Lafayette Housing Element Environmental Impact Report**

City of Lafayette
SCH No. 2021080038

Prepared for:

City of Lafayette

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1. Executive Summary

This is an Environmental Impact Report (EIR) Addendum, prepared in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168. This EIR Addendum reviews the proposed goals, policies, and programs in the Draft Lafayette Safety Element and finds that the proposed Safety Element is consistent with the Housing Element of the General Plan and that its potential environmental impacts are within the scope of those addressed in the Housing Element EIR, which was certified by the Lafayette City Council in January 2023.

1. Executive Summary

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2. Introduction

2.1 PURPOSE AND SCOPE

The City of Lafayette (City) certified the Lafayette Housing Element Environmental Impact Report (Housing Element EIR), State Clearinghouse (SCH) Number 2021080038, in January 2023. The Housing Element Update (HEU) included adoption of General Plan amendments adding and or modifying goals, objectives, policies, and implementation programs related to housing applicable citywide, and address the maintenance, preservation, improvement, and development of housing in the city.

California Government Code Section 65302(g) requires local jurisdictions to update their Safety Element upon each revision of the Housing Element or Local Hazard Mitigation Plan. The Safety Element is a State-mandated General Plan element that must identify potential natural and human-caused hazards that could affect the city's residents, businesses, and services. To be consistent with State law, the proposed 2023 Safety Element (proposed project) would be an update to the 2009 Safety Element and would include updated information on natural and human-cause hazards, an expanded set of policies and programs, and the addition of climate change resiliency and adaptation. It covers a variety of natural and human-caused hazards, including drought, wildfires, extreme heat, and seismic activity. This includes a discussion of climate change hazards and how climate change may affect the frequency and severity of hazards in and around Lafayette. The purpose of the Safety Element is to establish a framework to anticipate these hazards and increase the community's resilience to these risks by identifying the natural and human-caused hazards that affect existing and future development, describing present and expected future conditions, and setting a policy and program framework for improved public health and safety. This framework includes strategies to minimize physical harm to the people, buildings, and infrastructure in and around Lafayette to reduce damage to local economic systems, community services, and ecosystems.

This Addendum has been prepared to document that the proposed project is consistent with the Housing Element of the General Plan and that its potential environmental impacts are within the scope of those addressed in the Housing Element EIR, pursuant to CEQA Guidelines Section 15168. This Addendum also documents that none of the conditions have occurred, as described in CEQA Section 21166 or CEQA Guidelines Sections 15162 and 15163, that would call for preparation of a subsequent or supplemental EIR. Pursuant to the provisions of CEQA and the CEQA Guidelines, the City, acting as the lead agency, is charged with the responsibility of deciding whether to approve the proposed project.

2. Introduction

2.2 ENVIRONMENTAL PROCEDURES

According to the CEQA Statutes, Section 21166, and CEQA Guidelines, Section 15162, when an EIR has been certified for a project, no subsequent EIR shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

- Substantial project changes are proposed that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; 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, or the negative declaration was adopted shows any of the following:
 - a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration.
 - b) Significant effects previously examined will be substantially more severe than identified in the previous EIR.
 - 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 proponent declines to adopt the mitigation measures or alternatives.
 - d) Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

Where none of the conditions specified in CEQA Guidelines Section 15162 are present,¹ the lead agency must determine whether to prepare an Addendum or whether no further CEQA documentation is required (CEQA Guidelines Section 15162[b]). An Addendum is appropriate where some changes or additions to the previously certified EIR are necessary, but there are not any new or substantially more severe significant impacts (CEQA Guidelines Section 15164).

In accordance with the CEQA Guidelines, as demonstrated in Section 3, *Project Description*, and Section 4, *Environmental Analysis*, of this Addendum, the City has determined that an Addendum to the Housing Element EIR is appropriate for the proposed project.

¹ See also Section 15163 of the CEQA Guidelines, which applies the requirements of Section 15162 to supplemental EIRs.

3. Project Description

3.1 REGIONAL LOCATION

The City of Lafayette is in the East Bay Region of the San Francisco Bay Area. The city is approximately 22 miles east of San Francisco in Contra Costa County, bordered by Briones Regional Park and Pleasant Hill to the north, Walnut Creek to the east, Walnut Creek and Moraga to the south, and Orinda to the west. Regional access to Lafayette is provided by State Route 24 (SR-24) and by Bay Area Rapid Transit District (BART) commuter train service. The city encompasses approximately 15 square miles.

3.2 STUDY AREA

The City's Sphere of Influence is almost identical to the city limit, except 130 acres of land west of Taylor Boulevard near the northeast corner of the city and the acres south of SR-24 and east of Pleasant Hill Road. The Study Area for this Addendum is consistent with the Housing Element EIR, which confines the Study Area to the city limit.

3.3 BACKGROUND

3.3.1 General Plan and Housing Element EIR

The Housing Element includes policies that relate to the Safety Element or include direct construction impacts similar to policies and programs in the Safety Element, and these are shown in Table 1, *Housing Element Policies Related to the Safety Element*. Those related to Safety Element goals are the policies that support climate change resiliency and require retrofitting and weatherizing housing to protect from hazards. Policies that require construction were also included because they have the potential to cause environmental impacts thus creating a baseline which the Safety Element will be evaluated against. Using the policies in Table 1, which were evaluated in the Housing Element EIR, as a baseline is needed to show that the proposed project is consistent with the Housing Element of the General Plan and that its potential environmental impacts are within the scope of those addressed in the Housing Element EIR. All other Housing Element policies do not directly or indirectly relate to what is being evaluated in this EIR Addendum and therefore were not included in Table 1.

TABLE 1 HOUSING ELEMENT POLICIES RELATED TO THE SAFETY ELEMENT

No.	Policy/Action
Policy H-2.3	Encourage housing rehabilitation in commercial zoning districts.
Policy H-3.1	Promote existing and develop new energy conservation programs.

3. Project Description

TABLE 1 HOUSING ELEMENT POLICIES RELATED TO THE SAFETY ELEMENT

No.	Policy/Action
Policy H-3.2	Provide information to the public on programs for energy conservation.
Policy H-6.1	Facilitate and support the production of new affordable housing units.
Policy H-6.3	Promote and incentivize the construction of accessory dwelling units.
Policy H-6.12	Promote development of a range of housing types.
Policy H-8.1	Encourage infill housing development.
Policy H-10.1	Pursue available funding for the preservation and rehabilitation of older housing.
Policy H-10.2	Encourage new multifamily housing.

3.3.2 2023 Safety Element (Proposed Project)

As previously described in Section 2.1, *Purpose and Scope*, the Lafayette 2009 Safety Element is being updated due to the update of the Housing Element to be consistent with California Government Code Section 65302(g) requirements. City staff developed the proposed project in three phases: (1) conduct Vulnerability Assessment; (2) prepare background report; and (3) update information, goal, policies, and actions. Each phase integrates community and stakeholder engagement. The proposed project is one of seven State-mandated General Plan elements, which discusses potential risks from natural and human-caused hazards and presents the City’s approach to minimizing harm to residents, visitors, buildings, infrastructure, economic drivers, services, and natural systems. This includes Emergency Preparedness Response, Flooding and Inundation Hazards, Seismic and Geologic Hazards, Fire Hazards, Hazardous Materials and Waste, and Climate Change Resiliency.

The Safety Element update process provided multiple opportunities for community members to provide stories of lived experiences, review materials, and provide feedback that was integrated into the Safety Element narrative, goals, policies, and programs. Accordingly, the policies in the proposed project reflect the community priorities and recommendations expressed through the community outreach process. This process was also used as a tool by City staff to build new and maintain existing relationships with community partner agencies and organizations needed to help implement the proposed project. Table 2, *2023 Safety Element Policies and Programs*, provides a list of the policies included in the Safety Element.

3. Project Description

TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Emergency Preparedness and Response	
Policy S-1.1	<u>Emergency Operations Plan</u> : Maintain an Emergency Operations Plan that meets current and anticipated community needs in the event of a major disaster and conforms with the California Standardized Emergency Management System (SEMS).
Program S-1.1.1	Conduct regular training programs for personnel involved in implementing the Emergency Operations Plan and operating the City’s Emergency Operations Center (EOC). Personnel expected to be involved in the operation of the EOC shall receive training on the EOC operations and management within 1 year of being hired, and existing staff shall receive refresher training every 5 years. This training should take the form of multiday intensive training and be responsive to current emergency issues and conditions
Program S-1.1.2	Review periodically and revise, as appropriate, the City's Emergency Operations Plan.
Program S-1.1.3	Coordinate with Contra Costa County’s Emergency Services Division when revising the City's Emergency Operations Plan to ensure that it is consistent and in compliance with Contra Costa County's Emergency Preparedness Plan.
Program S-1.1.4	Provide clear and current information to the public through emergency notification systems, as prescribed in the Emergency Operations Plan.
Policy S-1.2	<u>Emergency Operations Center</u> : Ensure that Lafayette has adequate and well-equipped critical facilities.
Program S-1.2.1	Identify specific facilities, such as City offices, schools, fire stations, and police buildings, and lifelines such as telephone, electric, water, and sewer service, that are critical to effective emergency and disaster response. Evaluate their abilities to operate efficiently immediately after a disaster. Designate alternate facilities for post-disaster assistance in the event that the primary facilities become unusable.
Program S-1.2.2	Upgrade the existing EOC and alternate EOC sites so they are resilient to potential hazards and are outside of mapped hazard-prone areas.
Policy S-1.3	<u>Public Education</u> : Conduct public education campaigns to increase awareness of and preparation for hazards in the community, such as geologic and seismic risks, flooding, wildfire, drought, and extreme heat. Educational campaigns should offer residents information on ways to protect their property and preserve personal health and safety from various hazards, and on available incentives and other financial resources. Educational and informational materials should be available in multiple languages commonly used in the City based on Census data and in formats appropriate for people with access and functional needs, such as low-income households or seniors.
Policy S-1.4	<u>Equitable Emergency Preparation and Response Communication</u> : Ensure that communication, education and information materials, assistance in preparedness activities, and evacuation and short-term recovery activities are available to all residents. Educational and informational materials should be available in multiple languages and in formats appropriate for people with access and functional needs, such as low-income households, persons with disabilities, and seniors. They should focus on methods to reduce the dangers from natural and human-caused hazards, ways to prepare for emergency situations, such as Public Safety Power Shutoff (PSPS) events, and promote neighborhood prevention and emergency response programs.
Program S-1.4.1	Promote registration with the Contra Costa County Community Warning System (CWS).
Program S-1.4.2	Encourage coordination between neighborhoods to share information and support emergency preparations.
Policy S-1.5	<u>CERT Training</u> : Support and encourage Community Emergency Response Team (CERT) training to residents and members of the business community to increase disaster awareness and emergency response capability.
Program S-1.5.1	Coordinate with the Moraga-Orinda Fire District and Lafayette Emergency Preparedness Committee to conduct emergency services training in support of appropriate goals and standards for training efforts.
Policy S-1.6	<u>Hazard Mitigation Plan Incorporation</u> : Incorporate the Contra Costa County Hazard Mitigation Plan and the City of Lafayette Annex, as approved by the Federal Emergency Management Agency, into this Safety Element by reference, as permitted by California Government Code Section 65302.6, to ensure that emergency response and evacuation routes are accessible throughout the city.

3. Project Description

TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Policy S-1.7	<u>Agency Cooperation</u> : Continue to cooperate with other public agencies to ensure adequate medical and other emergency services, including assessing and projecting future emergency service needs.
Program S-1.7.1	Coordinate with local and State emergency management agencies using the Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS) to facilitate multiagency emergency response.
Program S-1.7.2	Maintain inter-jurisdictional cooperation and coordination, including automatic aid agreements with fire protection and suppression agencies in Contra Costa County.
Program S-1.7.3	Continue to maintain agreements with other local, state, and federal agencies to ensure coordinated disaster response.
Policy S-1.8	<u>Emergency Power Supplies</u> : Install emergency power supplies at City-owned and -operated critical facilities and encourage the installation of emergency power supplies for residential properties in partnership with regional partners. Emergency power supplies can include power generators and battery storage and should prioritize renewable energy systems where feasible.
Policy S-1.9	<u>Renewable Energy Generation Systems</u> : Renovate existing City-owned facilities and design future City facilities to incorporate renewable energy generation systems, battery energy storage systems, and energy-efficient design and features, as feasible.
Policy S-1.10	<u>Large-Scale Disaster Preparation and Response</u> : Prepare for and respond to large-scale disasters by coordinating and sharing data, experience, and strategies with other emergency management agencies in state or regional efforts on disaster planning.
Program S-1.10.1	Ensure that communication systems used by emergency responders and key City staff have sufficient redundancy and resiliency to meet City needs during and after an emergency or hazard event. The City will work with utility and communication providers to ensure that systems are in place to maintain communication services for community members, City staff, and emergency responders, especially during power outages.
Program S-1.10.2	Coordinate with emergency management staff in neighboring cities, special districts, Contra Costa County, and fire districts on an annual basis to review disaster planning strategies, resources, and available funding.
Program S-1.10.3	Cooperate with communities in Contra Costa County to establish a network of equitably located resilience hubs that would offer local or regional refuge for community members in the event of a large-scale disaster or extreme heat event. Participating communities should strive to make these locations known to the public through outreach as well as posting informational resources and educational materials on city websites.
Policy S-1.11	<u>Increased Community Resilience to Climate-Related Hazards</u> : Increase community resilience to climate-related hazards projected to impact Lafayette. Use the reported data and findings of applicable local, regional, or state climate change studies, models, reports, or plans pertaining to climate-related hazards that could impact the City of Lafayette, including the California Climate Change Assessment, the California Adaptation Planning Guide, and the California Climate Adaptation Strategy.
Program S-1.11.1	Integrate the results of the Climate Change Vulnerability Assessment into other City planning documents where feasible, including the Hazard Mitigation Plan, Capital Improvement Program, zoning code, building code, and other applicable plans and codes.
Policy S-1.12	<u>Shelter for Households with Large Animals and Pets</u> : Ensure that evacuation shelters and resources are available for households with large animals, such as horses and livestock, and pets in the event of a community-wide emergency or disaster.
Policy S-1.13	<u>Evacuation Assistance</u> : Develop and implement an evacuation assistance program, in coordination with Contra Costa County Transportation Authority, paratransit, and dial-a-ride agencies, to help those with limited mobility, lack of access to a vehicle, and other at-risk populations evacuate safely.
Policy S-1.14	<u>Evacuation Routes</u> : Coordinate with emergency responders and CalTrans to maintain potential evacuation routes to ensure adequate capacity, safety, and viability of those routes in the event of an emergency, including making improvements to existing roads to support safe evacuations as needed.

3. Project Description

TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Program S-1.14.1	Maintain an emergency evacuation routes system.
Program S-1.14.2	Encourage the use of trails as evacuation routes in the Emergency Operations Plan, in coordination with emergency responders.
Program S-1.14.3	Maintain designated evacuation routes in a passable condition at all times, and, as feasible, improve function of these routes for emergency evacuations.
Program S-1.14.4	Publicize the City’s evacuation routes and other aspects of its Emergency Operations Plan.
Program S-1.14.5	Review recommendations of the General Plan Emergency Evacuation Analysis (Appendix A1 of the Housing Element Final EIR) and, as feasible, conduct further analyses regarding:
Program S-1.14.6	Ensure road and intersection improvements consider potential impacts on evacuation routes and are designed in coordination with emergency responders.
Program S-1.14.7	Coordinate with Lamorinda Village to encourage them to provide evacuation assistance for senior citizens.
Policy S-1.15	<u>Emergency Service Response</u> : Work to improve emergency medical, fire, and police responses service in Lafayette.
Program S-1.15.1	Periodically monitor the response times for emergency medical, fire, and police response services in Lafayette and coordinate with providers to maintain adequate service.
Program S-1.15.2	In coordination with emergency service providers, identify barriers to improving emergency response times on an ongoing basis.
Policy S-1.16	<u>Police Services</u> : Work with the Contra Costa County Sheriff’s Department and neighboring jurisdictions to improve police service in Lafayette.
Program S-1.16.1	Police Response: Continue to have the Lafayette Police Department serve as local first responders to all emergency incidents, where they will work to make the scene safe, with priority on human life, and will establish a safe perimeter and coordinate with appropriate agencies for additional response actions and resources.
Policy S-1.17	<u>New Essential Facilities</u> : To the greatest extent possible, locate new essential public facilities, such as police stations, schools, and community centers, outside of mapped hazard zones. If essential facilities must be located in these zones, site and design them to minimize the risk of damage and maintain their operational capacity during and after a hazard.
Policy S-1.18	<u>Red Flag Parking</u> : Explore establishing parking restrictions during red flag days or other periods of high wildfire risk utilizing best practices from neighboring jurisdictions.
Policy S-1.19	<u>Property Disclosure</u> : Explore requiring property owners to disclose the presence of hazardous conditions and mapped hazard zones on or near the property at time of sale.
Policy S-1.20	<u>Cybersecurity Training</u> : Require all City employees to complete annual cyber security awareness training to ensure that proper cybersecurity procedures are followed on a regular basis.
Policy S-1.21	<u>Cybersecurity Assessment</u> : Periodically review and evaluate the defenses of the City’s network through a comprehensive assessment that identifies vulnerabilities, weaknesses, and areas for improvement to enhance the City’s overall cybersecurity posture.
Program S-1.21.1	Conduct regular cybersecurity audits, following procedures to evaluate the cybersecurity of government organizations, to provide an informed assessment of the City’s security measures.
Policy S-1.22	<u>Redundancy Against Cyber-Attacks</u> : Establish and maintain redundancies in the City’s critical infrastructure and communication systems to ensure continuity of operations and minimize the impact of cyber-attacks.
Program S-1.22.1	Implement regular data backups and offsite storage to ensure data integrity and availability even in the event of a cyber-attack.
Policy S-1.23	<u>Cybersecurity Collaboration</u> : Collaborate with neighboring cities, Contra Costa County, utility companies, and government agencies to maintain strong cybersecurity for critical infrastructure and coordinate response efforts in the event of a cyber-attack.

3. Project Description

TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Flood and Inundation Hazards	
Policy S-2.1	<u>Reduce Flood Hazards:</u> Reduce flood risk by maintaining effective stormwater drainage systems, regulating construction, and updating stormwater infrastructure design requirements, and retrofit storm drainage systems as needed. These efforts are subject to funding availability and are intended to maintain consistency with federal, state, and local regulatory requirements and to convey runoff from more intense storms resulting from climate change.
Program S-2.1.1	Update the municipal code as necessary to comply with State requirements and future flood projections.
Program S-2.1.2	Develop and implement minor repairs and replacement of City-maintained drainage facilities as problems are identified through the ongoing storm drain planning and inventory work during the storm season or through ongoing inspections.
Program S-2.1.3	Maintain current inundation maps and drainage plans for existing and new water storage tanks in the city.
Program S-2.1.4	Develop an Adopt-a-Drain program for community members to contribute towards the maintenance of storm drains to prevent drain backups and flooding during wet-weather events.
Program S-2.1.5	Consult with the Contra Costa County Flood Control District as well as upstream and downstream jurisdictions regarding regional approaches to the planning, construction, operation, and maintenance of drainage and flood-control facilities. Include these entities in the referral of project applications, as appropriate.
Program S-2.1.6	Develop a creek maintenance program that seeks to reduce flooding by removing debris from creeks, implementing erosion-control practices along creek beds, and restoring natural creek flow.
Program S-2.1.7	Provide information to creekside property owners on their responsibilities and best practices associated with creek maintenance.
Policy S-2.2	<u>Flood Protection Standard:</u> Review development applications to mitigate flood recurrence intervals for 100-year floods to match the Contra Costa County Flood Control District standards. (Reso. 2009-021, 2009)
Program S-2.2.1	Use the Federal Emergency Management Agency’s Flood Insurance Rate Map and California Department of Water Resources Best Available Mapping to reduce risk of flooding, to identify 100-year and 500-year floods, to calculate flow rates within identified stream channels, and to review development proposals.
Program S-2.2.2	Maintain participation in the National Flood Insurance program.
Policy S-2.3	<u>Storm Drainage System:</u> Maintain unobstructed water flow in the storm drainage system.
Program S-2.3.1	Enforce measures to minimize the volume and velocity of surface runoff, soil erosion, and sedimentation both during and after construction through implementation of the grading ordinance.
Program S-2.3.2	As feasible, carry out annual inspection of the drainage systems in Lafayette.
Program S-2.3.3	Require siltation/detention ponds to be incorporated into the design and construction of development projects where deemed necessary.
Program S-2.3.4	Refer to Program S-2.1.1 for other measures, including detention ponds, aimed at reducing peak runoff. All work done within creeks must be done under applicable permits from the appropriate agencies, such as the City, Department of Fish and Wildlife, US Army Corps of Engineers, and the Regional Water Quality Control Board.
Program S-2.3.5	Conduct regular cleaning and maintenance of storm drains along key roadways, especially in advance of the rainy season. The City shall address potential ponding and the need for storm drain improvements on major roadways, subject to funding availability.
Policy S-2.4	<u>Finance the Storm Drain System:</u> Cooperate with the Contra Costa County Flood Control and Water Conservation District and other jurisdictions to pursue all available sources of funding to finance improvements to storm drainage facilities.
Program S-2.4.1	Enforce the storm drainage impact fee ordinance requiring development to cover the costs of drainage facilities needed as a result of new development.

3. Project Description

TABLE 2 **2023 SAFETY ELEMENT POLICIES AND PROGRAMS**

No.	Strategy
Program S-2.4.2	Periodically assess the need to establish improvement districts and other financing mechanisms to fund necessary storm drainage and watercourse improvements to minimize flood hazards and creek erosion.
Policy S-2.5	<u>Green Infrastructure</u> : Promote the use of green infrastructure and permeable paving materials to reduce flood risk on public and private property.
Program S-2.5.1	Where appropriate, promote the use of stormwater retention basins rather than standard engineering modifications to natural channels.
Program S-2.5.2	Encourage use of meandering drainage channels in all new developments and wherever channels are replaced.
Program S-2.5.3	Condition new development to maintain or minimize post-development peak runoff rate and average volume similar to predevelopment conditions, to the maximum extent feasible. Consider use of green infrastructure and low impact development that use on site infiltration to slow runoff during peak periods. Where this is not feasible, mitigate the increase in peak stormwater runoff. Include clear and comprehensive mitigation measures as part of the project approvals with financial and other measures to ensure their implementation.
Program S-2.5.4	Require runoff from all new impervious surfacing to be directed either to landscaping at least 50 percent the size of the contributing impervious surfacing, or to bioretention treatment facilities.
Program S-2.5.5	Require all development projects where impervious coverage of a lot exceeds 50 percent to treat the runoff from all impervious surfacing on the lot with bio retention facilities.
Policy S-2.6	<u>Dam and Pipeline Inundation Risk</u> : Coordinate with the East Bay Municipal Utilities District to assess the dam and pipeline inundation risk in Lafayette and upgrade facilities and infrastructure at risk.
Program S-2.6.1	Coordinate with the State Division of Safety of Dams to ensure that the City is aware of the timeline for the maintenance and inspection of dams whose failure would impact the city.
Policy S-2.7	<u>Water Supply Infrastructure Maintenance</u> : Coordinate with the East Bay Municipal Utilities District to support maintenance of water pipelines and aqueducts.

3. Project Description

TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Seismic and Geologic Hazards	
Policy S-3.1	<u>Seismic and Geologic Safety</u> : Consider potential seismic or geologic hazards when reviewing future projects and determining building density and siting dwellings. Development proposals in areas with seismic or geologic hazards shall be reviewed by an engineering geologist to determine whether the proposed development is feasible, and to define the required construction standards and mitigation measures. Intensity of development shall be minimal in areas of high risk.
Program S-3.1.1	Require submittal and review of a site-specific geotechnical report for proposed development in areas with liquefaction potential as illustrated on Figure S-6: <i>Liquefaction Areas</i> , or in areas with landslide susceptibility, as illustrated on Figure S-7: <i>Landslide Susceptibility Areas</i> . Development shall be supervised and certified by a geotechnical engineer, and where necessary, by an engineering geologist.
Program S-3.1.2	Require financial protection for public agencies and individuals as a condition of development approval where geological conditions indicate a potential for ongoing maintenance costs related to the geological conditions. Financial protection would ensure that developers will have the resources to carry out such maintenance on properties where geological analysis identifies a risk of high ongoing maintenance costs. This program would also serve to limit the City’s liability. Examples include bonds, liens, or other suitable security to ensure that landscaped slopes in areas with unstable soils are maintained to prevent hazardous soil movement. A soils report prepared by a qualified soils engineer would be required to establish standards for City protection.
Program S-3.1.3	As a condition of project approval, require new development to repair or stabilize areas of soil creep or possible debris flow, or to avoid construction on or directly below such areas.
Program S-3.1.4	Require professional inspection of foundation and excavation, earthwork and other geotechnical aspects of site development during construction on those sites identified as being prone to slope instability.
Program S-3.1.5	Carefully review applications for development in areas with liquefaction potential, as shown on Figure S-6, Liquefaction Areas, or in areas with very high landslide susceptibility, as shown on Figure S-7, Landslide Susceptibility.
Policy S-3.2	<u>Drainage Requirements</u> : Require new development in hillside areas to prepare drainage plans to direct runoff and drainage away from potentially unstable slopes.
Policy S-3.3	<u>Roadways and Roadway Improvements</u> : New roadways or modifications to roadways where a licensed geotechnical engineer has identified ancient, mapped, or otherwise identified landslides may only be permitted if a licensed geotechnical engineer certifies that the proposed construction poses no likelihood of a hazard to persons or property resulting from the proposed construction.
Policy S-3.4	<u>Creebank Protection</u> : Except where required by State law, prohibit structures of any kind that might be impacted by or exacerbate creebank slippage and erosion through enforcement of the creek setback ordinance.
Policy S-3.5	<u>Seismic and Geologic Hazards</u> : Minimize exposure to seismic and geologic hazards through site planning and building design for all new development, including subdivisions, new construction, and remodels or expansions of existing structures as well as critical high-occupancy or essential services buildings. A geotechnical investigation and report shall be required for all new development in landslide and liquefaction zones. Any other facility that could create a geologic hazard, such as a road on hillside terrain, must also conduct such an investigation. Evidence of probable geologic hazard shall require a geotechnical study by a registered soil engineer or registered geologist that shall be reviewed by geotechnical consultants selected by the City.
Program S-3.5.1	The City will require a geotechnical evaluation prior to construction of buildings intended for public occupancy in areas with potential risk related to geologic conditions or soil limitations, as identified on maps maintained by the City. The geotechnical evaluation shall evaluate all relevant risks, which may include but are not limited to erosion, landslide, expansive soils, subsidence, and seismic activity. Recommendations from the geotechnical evaluation shall be incorporated into the subject project or

3. Project Description

TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
	plan in order to reduce risk to levels acceptable to the City. The City will also incorporate geotechnical evaluations and recommendations into its own public investments, as appropriate.
Program S-3.5.2	Comply with the provisions of the State Alquist-Priolo Act, as appropriate.
Program S-3.5.3	Strengthen existing City-owned structures against seismic events to applicable, nationally recognized standards, and work with external agencies and private property owners to support seismic retrofits for non-City facilities. Give priority to emergency buildings, schools, theaters, meeting halls, apartment complexes, and major transportation facilities.
Program S-3.5.4	Provide information to the public on ways to reinforce buildings to reduce damage from earthquakes, particularly for soft-story buildings and other potentially seismically vulnerable buildings.
Program S-3.5.5	Provide information to the public on how to respond to an earthquake.
Policy S-3.6	<u>Minimize Risk Potential</u> : Minimize exposure to seismic and geologic hazards through site planning and building design for all new development, including subdivisions, new construction, and remodels or expansions of existing structures as well as critical, high-occupancy, or essential services buildings.
Policy S-3.7	<u>Seismic Retrofits</u> : Identify City infrastructure with seismic vulnerabilities and pursue funding to conduct appropriate seismic retrofits.
Fire Hazards	
Policy S-4.1	<u>Adequate Fire Protection</u> : Enforce regulations and standards that contribute to adequate fire protection.
Program S-4.1.1	Improve access for emergency response vehicles and response times of emergency personnel.
Program S-4.1.2	Retrofit existing traffic signals, as necessary, and ensure that new traffic signals include an EMTRAC system that allows emergency vehicles to change the signal.
Program S-4.1.3	Coordinate with the Contra Costa County Fire Protection District, including paramedic services, to improve and maintain response times in Lafayette to five minutes, particularly in the Very High Fire Hazard Severity Zones. (Reso. 2009-021, 2009)
Program S-4.1.4	Establish and enforce no parking zones on narrow roads to allow access by emergency vehicles and to facilitate evacuation.
Program S-4.1.5	Require development that includes private access roads or fire roads to provide access rights and keys to all gates to the Contra Costa County Fire Protection District.
Program S-4.1.6	Conduct fire response drills on an ongoing basis to ensure that the Contra Costa County Fire Protection District is prepared for emergencies impacting the community.
Program S-4.1.7	Require that new development be located where fire and emergency services have sufficient capacity to meet project needs or require that they be upgraded to provide necessary capacity as part of the proposed development activities to ensure new development has adequate fire protection.
Program S-4.1.8	Work with the Contra Costa County Fire Protection District to evaluate development proposals, enforce the fire code, and improve fire prevention measures and protection services.
Program S-4.1.9	Continue supporting involvement and collaboration with Contra Costa County Fire Protection District, CAL FIRE, public utilities, and universities engaged in the effort to improve early detection of wildfires through the use of technology.
Program S-4.1.10	Work with the Contra Costa County Fire Protection District and other regional fire protection agencies to expand the rapid fire suppression response capability in the Lamorinda area.
Policy S-4.2	<u>Development and Mitigation Fees</u> : Maintain development and mitigation fees at a level to adequately finance fire protection costs.
Program S-4.2.1	Periodically assess fees for fire protection to ensure that existing and new development pay its fair share of the cost of fire protection facilities, personnel, and maintenance.
Policy S-4.3	<u>Mutual Aid Agreements</u> : Participate in mutual aid agreements with the County and State fire-fighting agencies.
Policy S-4.4	<u>Vegetation Management</u> : Require new and existing development and infrastructure in areas of elevated wildfire risk to establish and maintain vegetation management practices to reduce the risk of wildfire

3. Project Description

TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
	ignition and spread. This shall include responsible site planning, vegetation management, the use of native drought-tolerant and fire-resistant species, and defensible space consistent with State, local, and Contra Costa County Fire Protection District regulations.
Program S-4.4.1	All new development within mapped high and very-high fire hazard severity zones established by the Contra Costa County Fire Protection District shall be required to develop and implement a Vegetation Management Plan in compliance with Chapter 49 of the California Fire Code. The plan shall be part of the development application and approved by the Contra Costa County Fire District and the City. The plan shall be developed by an arborist or vegetation management specialist. The City shall ensure that the actions recommended in the plan are implemented in the future and should amend the municipal code to allow the City the right to conduct actions recommended in the plan at the property owner’s expense, if those actions are not performed in a timely fashion by the property owner. The Contra Costa County Fire Protection District shall have the right to review properties to judge whether actions recommended in the Vegetation Management Plan are being properly implemented in a timely fashion.
Program S-4.4.2	Establish buffer areas for new and existing buildings in Very High Fire Hazard Severity Zones.
Program S-4.4.3	Evolve the Tree Protection Ordinance to address fire risks created by dead, dying, or non-native trees.
Program S-4.4.4	<p>All new development must comply with fire-resistant landscaping and defensible space requirements. These standards shall meet or exceed Title 14 of the California Code of Regulations (CCR). This specifically includes Division 1.5, Chapter 7, Subchapter 2, Articles 1-5 (commencing with section 1270, SRA Fire Safe Regulations); and Division 1.5, Chapter 7, Subchapter 3, Article 3 (commencing with section 1299.01, Fire Hazard Reduction Around Buildings and Structures Regulations). New development shall also comply with the California Public Resource Code Section 4291 (State Defensible Space Requirements) which requires the following:</p> <ul style="list-style-type: none"> • Create a defensible space of at least 100 feet around the structure. • Remove all dead plants, grass, weeds, and other flammable vegetation from the defensible space. • Remove tree limbs that are within 10 feet of the chimney or stovepipe of the structure. • Trim tree limbs that are within 6 feet of the ground or within 10 feet of the structure. • Remove all dead branches, leaves, and other debris from roofs and rain gutters. • Create horizontal and vertical spacing between trees and shrubs to prevent the spread of fire. • Space trees at least 10 feet apart from each other. • Maintain the defensible space throughout the year, not just during fire season. • Obtain any necessary permits from local fire agencies before conducting any vegetation management activities. • Provide and maintain access to the property for emergency vehicles.
Program S-4.4.5	Provide or connect elderly residents, low-income residents, and persons with access and functional needs assistance with information on maintaining defensible space around their homes.
Program S-4.4.6	Coordinate with Contra Costa County Fire Protection District, fire safe councils, other agencies, community organizations, and landowners to develop and maintain fuel breaks in dedicated open space and fire-access easements, including through prescribed burns or the use of goats. Consult with these external agencies on the best way to create a collaborative relationship for ongoing shared concerns.
Program S-4.4.7	Work with CAL FIRE, Contra Costa County Fire Protection District, fire safe councils, other agencies, community organizations, and landowners to ensure maintenance of existing fuel breaks, vegetation clearance, and emergency access routes for effective fire suppression on public and private roads.
Program S-4.4.8	Coordinate with East Bay Regional Parks District, CalTrans, Pacific Gas and Electric Company, and the East Bay Municipal Utilities District to undertake vegetation management programs to reduce fire hazards on their properties.
Policy S-4.5	<u>Avoid Development in Fire-Prone Areas:</u> Encourage new development to occur outside of Very High Fire Hazard Severity Zones. Any development that does occur in the Very High Fire Hazard Severity Zones should demonstrate compliance with applicable state and local building and fire code regulations as well as appropriate mitigation measures and design considerations.

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TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Policy S-4.6	<p><u>New Development:</u> Require review by the Planning Department and Contra Costa County Fire Protection District prior to the issuance of development permits for proposed construction projects and conceptual landscaping plans in Very Fire Hazard Severity Zones identified by CAL FIRE (see Figure 8: <i>Wildfire Hazard Severity Zone</i>). Plans for proposed development in such areas shall include, at a minimum:</p> <ul style="list-style-type: none"> • Site plan, planting plan, planting palette, and irrigation plan to reduce the risk of fire hazards and with consideration to site conditions, including slope, structures, and adjacencies. • Development and maintenance of defensible space. • Multiple points of ingress and egress to improve evacuation, emergency response, and fire equipment access and adequate water infrastructure for water supply and fire flow that meets or exceeds the standards in the California Fire Safe Regulations (California Code of Regulations, Title 24, Division 1.5, Chapter 7, Articles 2 and 3, Sections 1273 and 1274). • Class A roof materials for new and replacement roofs. • Location and source of anticipated water supply.
Program S-4.6.1	Continue to implement the City’s most currently adopted fire code to ensure that development is constructed in a structurally safe manner. To the extent feasible, conduct periodic fire safety inspections to ensure compliance with adopted codes.
Program S-4.6.2	Permit new development where there is adequate fire flow (fire hydrant or water main water pressure) and adequate emergency vehicular access. Where these are not present, allow new development to utilize alternative fire prevention methods approved by ConFire, such as sprinkler systems.
Program S-4.6.3	For structures within Very High Fire Hazard Severity Zones, require a greater degree of fire resistance in roof coverings and exterior building materials than what is specified in the Unified Facility Criteria, as determined by the Chief Building Official and upon making findings specified in Health and Safety Code Section 13143.4.
Program S-4.6.4	<p>Require fire protection plans for all new development projects located in the Very High Fire Hazard Severity Zone, including plans for long-term, comprehensive, fuel reduction and management. The main components</p> <ol style="list-style-type: none"> 1. Risk Analysis 2. Fire Response Capabilities 3. Fire Safety Requirements – Defensible Space, Infrastructure, and Building Ignition Resistance 4. Mitigation Measures and Design Considerations for Non-Conforming Fuel Modification 5. Wildfire Education Maintenance and Limitations of a fire protection plan include:
Policy S-4.7	<u>Recovery and Redevelopment After a Large Fire:</u> Develop programs and provide updates, as appropriate, that ensure recovery and redevelopment after a large fire and reduce future vulnerabilities to fire hazard risks through site preparation, redevelopment layout design, fire resistant landscape planning, and fire retarding building design and materials.
Policy S-4.8	<u>Educational and Outreach Materials:</u> Make available and share relevant educational and outreach materials, including the Wildfire Preparedness and Evacuation Guide, with the public to help residents understand appropriate fire mitigation activities, such as vegetation management, defensible space, evacuation routes, and emergency evacuation procedures during a fire hazard.
Policy S-4.9	<u>Long-Term Water Supply:</u> Coordinate with the East Bay Municipal Utilities District to maintain an adequate, long-term water supply for fire suppression needs for the community.
Program S-4.9.1	Identify and improve areas lacking adequate water service for firefighting, including capacity for peak load under a reasonable worst-case wildland fire scenario determined by the Contra Costa County Fire Protection District. The City shall identify areas lacking adequate water service, including areas where future development may occur.
Program S-4.9.2	Work with the East Bay Municipal Utility District and Contra Costa County Fire Protection District to ensure that fire hydrants throughout Lafayette have sufficient water flow.

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TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Policy S-4.10	<u>Fire Hazards Response Support</u> : Support measures that help firefighting crews and emergency response teams respond to fire hazards or work under low-visibility conditions, such as high-visibility signage for streets and building addresses that meet or exceed the standards in the California Fire Safe Regulations (Title 14 of the CCR, Division 1.5, Chapter 7, Articles 2 and 3, Sections 1273 and 1274).
Policy S-4.11	<u>Access for Fire and Emergency Vehicles and Equipment</u> : Require proposed development to provide adequate access for fire and emergency vehicles and equipment that meets or exceeds the standards in the California Fire Safe Regulations (California Code of Regulations, Title 24, Division 1.5, Chapter 7, Articles 2 and 3, Sections 1273 and 1274).
Policy S-4.12	<u>Retrofitting City-Owned Roadways</u> : Identify existing public and private roadways in fire hazard severity zones that are not in compliance with current fire safety regulations, including road standards for evacuation and emergency vehicle access, vegetation clearance, and other requirements of the California Fire Safe Regulations (California Code of Regulations, Title 24, Division 1.5, Chapter 7, Articles 2 and 3, Sections 1273 and 1274), to the extent resources are available. Work at retrofitting City-owned roadways as needed to meet current standards and require private property owners to do the same, to the extent feasible and given the absence of other site constraints.
Policy S-4.13	<u>Power and Natural Gas Lines</u> : Coordinate with PG&E to regularly review their safety maintenance schedule and fire risk mitigation plans for both electricity and natural gas transmission and distribution systems in the Lafayette service area.
Program S-4.13.1	Coordinate with the Pacific Gas and Electric Company (PG&E) to support focused efforts in mapped wildfire risk areas, including work to underground power lines, manage vegetation near energy infrastructure, and other fire risk reduction activities throughout the community, especially in Very High Fire Hazard Severity Zones.
Program S-4.13.2	Continue to consult and coordinate with PG&E to acquire underground utility funding for Lafayette.
Program S-4.13.3	Coordinate with the California Public Utilities Commission (CPUC) as necessary to ensure that the City is aware of standards and timelines for maintenance and inspection of utilities whose failure would impact the City.
Policy S-1.14	<u>Roadside Fuels Reduction</u> : Collaborate with Contra Costa County Fire Protection District to provide roadside fuel reduction, defensible space, and vegetation management, particularly along evacuation routes.
Policy S-4.15	<u>Poor Air Quality Event Assistance</u> : Work with local agencies and community-based organizations to provide resources to help residents respond to poor air quality events (e.g., transportation to resilience centers and supply free N95 masks).
Policy S-4.16	<u>Firewise Communities</u> : Publicize the Firewise USA program to neighborhoods in areas with high fire risks and support neighborhoods in Very High Fire Hazard Severity Zones and the Wildland-Urban Interface in pursuing designation as Firewise Communities.
Hazardous Materials and Waste	
Policy S-5.1	<u>Storage of Hazardous Materials</u> : Coordinate with Contra Costa County Health Services, the Certified Unified Program Agency (CUPA) to enforce the regulations governing the storage of chemical, biological, and other hazardous materials as set forth in California Code of Regulations, Title 22, Division 4.5.
Policy S-5.2	<u>Transport of Hazardous Materials</u> : Develop, in cooperation with Contra Costa County Health Services and neighboring cities, regulations prohibiting, as permitted by State law, through-transport by truck of hazardous materials on the local street systems and require that this activity be limited to State highways.
Program S-5.2.1	Provide measures to protect the public from the hazards associated with the transportation, storage and disposal of hazardous wastes.
Program S-5.2.2	Refer land use and transportation decisions and other programs involving hazardous materials regulations to the appropriate agencies.
Program S-5.2.3	Maintain the Hazardous Materials and Waste Ordinance.

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TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Program S-5.2.4	Require, as a condition of City development project approvals, that the Contra Costa County Fire Protection District be notified of all hazardous substances that are transported, stored, treated, or could be released accidentally into the environment.
Program S-5.2.5	Support thorough environmental review for hazardous waste transportation, storage and disposal facilities proposed in the Lafayette planning area and throughout Contra Costa County, since the potentially significant, widespread, and long-term impacts on public health and safety of these facilities do not respect jurisdictional boundaries.
Policy S-5.3	<u>Hazardous Materials Risk Reduction:</u> Coordinate with the Contra Costa County Emergency Services Division, Contra Costa County Health Services, and Contra Costa County Fire Protection District to support efforts to reduce the level of risk from toxic and hazardous materials in Lafayette by regulating the transportation and storage of these materials in the community, and through an education program on the proper disposal methods for hazardous, toxic, and polluting materials.
Policy S-5.4	<u>Hazardous Materials and Wastes Public Disclosure:</u> Require public disclosure of all companies, facilities, buildings, and properties that use, store, produce, and/or import/export any hazardous materials and wastes in the city. The City will maintain and share its inventory with the Contra Costa County Environmental Health Department.
Policy S-5.5	<u>On-Site Green Infrastructure:</u> Encourage use of on-site green infrastructure to protect and enhance community water quality, and use of landscape design (e.g., berms, grasslands, plantings) to either contain released hazardous materials or to process and/or absorb pollutants to prevent them from infiltrating the soil or watershed.
Policy S-5.6	<u>Grading and Trenching Safety:</u> Continue to require project applicants to call 811 or consult the California 811 Center’s website (https://www.usanorth811.org/) prior to conducting any grading, trenching, or similar activities.
Climate Change Resiliency	
Policy S-6.1	<u>Equitably Located Resilience Centers:</u> Establish one or more equitably located resilience centers in Lafayette. Ensure that resilience centers are not in areas at risk from hazard impacts, to the extent possible; offer refuge from extreme heat and extreme weather events as well as poor air quality and disasters; and are equipped with renewable energy generation and backup power supplies. Such facilities should be in easily accessible locations and available to all community members. Resilience centers consist of new, well-used, existing, community-serving facilities that are upgraded to provide local communities with shelter, water, and electricity during these events or disasters.
Program S-6.1.1	Work with owners and operators of local schools and community centers to allow these facilities to serve as resilience centers during emergencies and interruptions in essential services, offering water, electricity, and other necessary services.
Policy S-6.2	<u>Resilience Center Transit Services:</u> Work with transit, dial-a-ride, and paratransit services to provide transit services to and from resilience centers for seniors and people with disabilities in the community.
Policy S-6.3	<u>Sustainable Water Supplies:</u> Prepare for a reduced long-term water supply resulting from more frequent and severe droughts, including working with regional water providers to implement extensive water conservation measures and ensure sustainable water supplies, including for fire suppression needs.
Policy S-6.4	<u>Energy Storage Capacity and Generation Efficiency:</u> Coordinate with PG&E to explore ways to improve and increase energy storage capacity and generation efficiency for public facilities.
Policy S-6.5	<u>Shading and Heat-Mitigating Materials:</u> Coordinate with the Contra Costa County Transportation Authority and BART to increase shading and heat-mitigating materials on pedestrian walkways and at transit stops.
Program S-6.5.1	Evaluate, and revise as needed, City requirements for vegetative landscaping and tree planting to provide increased shade for sidewalks, parking lots, plazas, and other open space.

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TABLE 2 2023 SAFETY ELEMENT POLICIES AND PROGRAMS

No.	Strategy
Policy S-6.6	<u>Sustainable, Energy-Efficient, and Environmentally Regenerative Features</u> : Encourage new developments and existing property owners to incorporate sustainable, energy-efficient, and environmentally regenerative features into their facilities, landscapes, and structures to reduce energy demands and improve on-site resilience. Support financing efforts to increase community access to these features. Environmentally regenerative features refer to design or operational features of buildings, infrastructure, and systems that help to restore, renew, or regenerate the natural environment. Examples include green roofs and living walls, permeable pavement, on-site renewable energy generation, rainwater harvesting and reuse, or use of low-impact materials and construction techniques.
Policy S-6.7	<u>Drought-Tolerant Green Infrastructure</u> : Promote the use of drought-tolerant green infrastructure, including landscaped areas, as part of cooling strategies in public and private spaces.
Policy S-6.8	<u>Water Conservation</u> : Promote water conservation measures in all public and private development.
Program S-6.8.1	Replace irrigated landscaping with drought-resistant vegetation to the extent feasible and consider use of graywater or rainwater harvesting for irrigation in City-owned facilities.
Program S-6.8.2	Develop a landscape improvement program for residential properties that prioritizes water conservation through water-efficient landscaping practices and design strategies.
Program S-6.8.3	Provide information about native and drought-resistant species to community members and applicants who seek to install new or replacement landscaping, including resources prepared by the East Bay Municipal Utilities District.
Program S-6.8.4	Promote graywater and rainwater harvesting for residential properties.
Policy S-6.9	<u>Natural Resources and Infrastructure</u> : Use natural resources and infrastructure to absorb the impacts of climate-related hazards and associated natural hazards, as feasible.
Program S-6.9.1	Where feasible, the City shall encourage the use of existing natural features and ecosystem processes, or their restoration, when considering alternatives and adaptation projects through the conservation, preservation, or sustainable management of open space.
Policy S-6.10	<u>Extreme Heat Response Plan</u> : Coordinate with neighboring communities to develop an extreme heat response plan that designates cooling centers and establishes a temperature threshold to trigger citywide notification and coordination for opening designated cooling centers to the public.
Policy S-6.11	<u>Minimized Disruption of Medical-Supply Chain</u> : Collaborate with the Contra Costa County Department of Public Health and health-care providers to minimize disruptions of the medical-supply chain for facilities in Lafayette.
Policy S-6.12	<u>Severe Weather Resiliency</u> : Increase the resiliency of City-owned structures to severe weather events, including high wind events, and support homeowners and business owners to increase the resilience of their buildings and properties through retrofits, weatherization, and other improvements.
Policy S-6.13	<u>Collaboration with Utility Providers</u> : Collaborate with utility and communication providers to mitigate effects of service disruptions, such as Public Safety Power Shutoff events.
Policy S-6.14	<u>Property Insurance</u> : Educate both property owners and renters on the benefits of property or renters' insurance policies that provide sufficient protection against all applicable hazards, including wildfires, floods, landslides, and seismic events.

Source: 2023 Safety Element, PlaceWorks, 2023.

In summary, in combination with existing and ongoing local and State programs, implementation of the policies and programs in the proposed project would provide a resilience framework for existing and potential new development in the city. Some policies can be initiated immediately and may yield significant results in the near term; other policies require long-term and sustained community investment. These required updates provide the flexibility for the proposed project to be modified, refined, and improved over time.

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4. Environmental Analysis

As previously described in Section 2.2, *Environmental Procedures*, this Addendum has been prepared pursuant to the CEQA Statutes, Section 21166, and CEQA Guidelines Sections 15162 and 15164 to determine whether implementation of the proposed project would result in any new impacts compared to the Housing Element EIR. This Addendum only considers the extent to which the proposed project (2023 Safety Element) could result in new or more severe impacts than previously evaluated in the Housing Element EIR; it does not reevaluate impacts that would remain consistent with the analysis in the Housing Element EIR.

The proposed project is a program-level policy document focused on natural and human-caused hazards, with hazard reduction and adaptation policies and program and does not involve any land use or zoning changes that would result in direct or indirect growth or changes in building density and intensity. As shown in the supporting environmental checklist, no provisions implemented under the proposed project would result in population growth and thus would not place additional demands on natural resources, public services, or infrastructure. In addition, the proposed project does not include any site-specific designs or proposals to develop specific projects, nor does it grant any entitlements for development projects. Any future construction-level projects occurring from implementation of the proposed 2023 Safety Element would be subject to applicable federal, State, regional, and/or City regulations, including compliance with General Plan policies and Municipal Code requirements, and undergo an appropriate level of environmental review under CEQA, including incorporating mitigation measures from the Housing Element EIR, as required.

4.1 POLICY CHECKLIST

As demonstrated in the supporting environmental checklist, most of the proposed project's policies and programs would not have the potential to result in new or additional physical impacts on the environment because they focus on regulatory, municipal, education and outreach, and supportive programs; most of the proposed project's policies would result in beneficial programs that promote community resilience. The proposed policies and programs that could potentially result in a physical impact to the environment through direct or indirect construction impacts are shown with a "✓" in Table 3, *2023 Safety Element Policies and Programs Impact Potential by Environmental Topic*. A "+" is shown where the policy would have a positive impact on the environmental topic. Environmental topics that would not be affected, in a positive nor negative way, by implementation of the proposed project's policies and programs (no "✓" or "+"es) were not included in Table 3; however, these topics are discussed with the other environmental topics in Section 4.2, *Environmental Checklist and Discussion*. The environmental topics that are not

3. Environmental Analysis

impacted include Land Use and Planning, Population and Housing, Public Services, and Recreation. Additionally, proposed policies and programs that do not have the potential to result in physical impacts are not included in Table 3.

Table 3 includes the following abbreviations of relevant environmental topics addressed in this Addendum: AES = Aesthetics; AIR = Air Quality; BIO = Biological Resources; CUL = Cultural Resources; ENE = Energy; GEO = Geology and Soils; GHG = Greenhouse Gas; HAZ = Hazards and Hazardous Materials; HYD = Hydrology and Water Quality; NOI = Noise; TRA = Transportation; TCR = Tribal Cultural Resources; USS = Utilities and Service Systems; WF = Wildfire.

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Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
Emergency Preparedness and Response														
Policy S-1.2 Emergency Operations Center: Ensure that Lafayette has adequate and well-equipped critical facilities.	✓	✓			✓		✓		✓	✓	✓		✓	✓
Program S-1.2.2 Upgrade the existing EOC and alternate EOC sites so they are resilient to potential hazards and are outside of mapped hazard-prone areas.	✓	✓			✓		✓		✓	✓	✓		✓	✓
Policy S-1.8 Emergency Power Supplies: Install emergency power supplies at City-owned and -operated critical facilities and encourage the installation of emergency power supplies for residential properties in partnership with regional partners. Emergency power supplies can include power generators and battery storage and should prioritize renewable energy systems where feasible.	✓	✓	✓		+		✓		✓	✓	✓		✓	✓
Policy S-1.9 Renewable Energy Generation Systems: Renovate existing City-owned facilities and design future City facilities to incorporate renewable energy generation systems, battery energy storage systems, and energy-efficient design and features, as feasible.	✓	✓			+		+		✓	✓	✓		✓	✓
Program S-1.10.3 Cooperate with communities in Contra Costa County to establish a network of equitably located resilience hubs that would offer local or regional refuge for community members in the event of a large-scale disaster or extreme heat event. Participating communities should strive to make these locations known to the public through outreach as well as posting informational resources and educational materials on city websites.					✓		✓			✓	✓		✓	
Program S-1.14.3 Maintain designated evacuation routes in a passable condition at all times, and, as feasible, improve function of these routes for emergency evacuations.	✓	✓	✓	✓			✓	✓	✓	✓	+	✓	✓	+

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TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
Flood and Inundation Hazards														
Policy S-2.1 Reduce Flood Hazards: Reduce flood risk by maintaining effective stormwater drainage systems, regulating construction, and updating stormwater infrastructure design requirements, and retrofit storm drainage systems as needed. These efforts are subject to funding availability and are intended to maintain consistency with federal, state, and local regulatory requirements and to convey runoff from more intense storms resulting from climate change.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Program S-2.1.2 Develop and implement minor repairs and replacement of City-maintained drainage facilities as problems are identified through the ongoing storm drain planning and inventory work during the storm season or through ongoing inspections.					✓	✓	✓		+	✓	✓		✓	✓
Program S-2.1.3 Develop a creek maintenance program that seeks to reduce flooding by removing debris from creeks, implementing erosion-control practices along creek beds, and restoring natural creek flow.	✓	✓	+	✓	✓	+	✓		+	✓	✓	✓	✓	✓
Policy S-2.3 Storm Drainage System: Maintain unobstructed water flow in the storm drainage system.		✓			✓		✓		+	✓	✓		✓	✓
Program S-2.3.5 Conduct regular cleaning and maintenance of storm drains along key roadways, especially in advance of the rainy season. The City shall address potential ponding and the need for storm drain improvements on major roadways, subject to funding availability.		✓	✓		✓		✓		+	✓	+		✓	✓
Policy S-2.6 Green Infrastructure: Promote the use of green infrastructure and permeable paving materials to reduce flood risk on public and private property.	✓		+			+			+				✓	
Program S-2.6.3 Condition new development to maintain or minimize post-development peak runoff rate and average volume similar to predevelopment conditions, to the maximum extent feasible. Consider use of green infrastructure and low impact development that use on-site infiltration to slow runoff during peak periods. Where								✓	+				✓	

4. Environmental Analysis

TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
this is not feasible, mitigate the increase in peak stormwater runoff. Include clear and comprehensive mitigation measures as part of the project approvals with financial and other measures to ensure their implementation.														
Program S-2.5.4 Require runoff from all new impervious surfacing to be directed either to landscaping at least 50 percent the size of the contributing impervious surfacing, or to bioretention treatment facilities.	✓								+				✓	
Program S-2.6.5 Require all development projects where impervious coverage of a lot exceeds 50 percent to treat the runoff from all impervious surfacing on the lot with bio-retention facilities.	✓								+				✓	
Seismic and Geologic Hazards														
Policy S-3.1 Seismic and Geologic Safety: Consider potential seismic or geologic hazards when reviewing future projects and determining building density and siting dwellings. Development proposals in areas with seismic or geologic hazards shall be reviewed by an engineering geologist to determine whether the proposed development is feasible, and to define the required construction standards and mitigation measures. Intensity of development shall be minimal in areas of high risk.									+					
Program S-3.1.1 Require submittal and review of a site-specific geotechnical report for proposed development in areas with liquefaction potential as illustrated on Figure S-6: Liquefaction Areas, or in areas with landslide susceptibility, as illustrated on Figure S-7: Landslide Susceptibility Areas. Development shall be supervised and certified by a geotechnical engineer, and where necessary, by an engineering geologist.									+					
Program S-3.1.3 As a condition of project approval, require new development to repair or stabilize areas of soil creep or possible debris flow, or to avoid construction on or directly below such areas.			✓	✓			+		✓	✓			✓	

4. Environmental Analysis

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
Program S-3.1.4 Require professional inspection of foundation and excavation, earthwork and other geotechnical aspects of site development during construction on those sites identified as being prone to slope instability.						+								
Policy S-3.2 Drainage Requirements: Require new development in hillside areas to prepare drainage plans to direct runoff and drainage away from potentially unstable slopes.						+			+				✓	+
Policy S-3.5 Seismic and Geologic Hazards: Minimize exposure to seismic and geologic hazards through site planning and building design for all new development, including subdivisions, new construction, and remodels or expansions of existing structures as well as critical high-occupancy or essential services buildings. A geotechnical investigation and report shall be required for all new development in landslide and liquefaction zones. Any other facility that could create a geologic hazard, such as a road on hillside terrain, must also conduct such an investigation. Evidence of probable geologic hazard shall require a geotechnical study by a registered soil engineer or registered geologist that shall be reviewed by geotechnical consultants selected by the City.	✓	✓		✓	✓	+	✓			✓	✓	✓	✓	+
Program S-3.5.3 Strengthen existing City-owned structures against seismic events to applicable, nationally recognized standards, and work with external agencies and private property owners to support seismic retrofits for non-City facilities. Give priority to emergency buildings, schools, theaters, meeting halls, apartment complexes, and major transportation facilities.	✓	✓		✓	✓	+	✓		✓	✓	✓	✓		✓
Policy S-3.6 Minimize Risk Potential: Minimize exposure to seismic and geologic hazards through site planning and building design for all new development, including subdivisions, new construction, and remodels or expansions of existing structures as well as critical, high-occupancy, or essential services buildings.	✓	✓		✓	✓	+	✓			✓	✓	✓	✓	✓

4. Environmental Analysis

TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
Policy S-3.7 Seismic Retrofits: Identify City infrastructure with seismic vulnerabilities and pursue funding to conduct appropriate seismic retrofits.	✓	✓		✓	✓	+	✓			✓	✓	✓	✓	✓
Fire Hazards														
Program S-4.1.2 Retrofit existing traffic signals, as necessary, and ensure that new traffic signals include an EMTRAC system that allows emergency vehicles to change the signal.		✓			✓		✓			✓	+			+
Policy S-4.4 Vegetation Management: Require new and existing development and infrastructure in areas of elevated wildfire risk to establish and maintain vegetation management practices to reduce the risk of wildfire ignition and spread. This shall include responsible site planning, vegetation management, the use of native drought-tolerant and fire-resistant species, and defensible space consistent with State, local, and Contra Costa County Fire Protection District regulations.	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	+
Program S-4.4.1 All new development within mapped high and very-high fire hazard severity zones established by the Contra Costa County Fire Protection District shall be required to develop and implement a Vegetation Management Plan in compliance with Chapter 49 of the California Fire Code. The plan shall be part of the development application and approved by the Contra Costa County Fire District and the City. The plan shall be developed by an arborist or vegetation management specialist. The City shall ensure that the actions recommended in the plan are implemented in the future and should amend the municipal code to allow the City the right to conduct actions recommended in the plan at the property owner’s expense, if those actions are not performed in a timely fashion by the property owner. The Contra Costa County Fire Protection District shall have the right to review properties to judge whether actions recommended in the Vegetation Management Plan are being properly implemented in a timely fashion.	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	+

4. Environmental Analysis

TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic											WF		
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA		TCR	USS
Program S-4.4.2 Establish buffer areas for new and existing buildings in Very High Fire Hazard Severity Zones.	✓	✓			✓		✓				✓	✓	✓	+
Program S-4.4.4 All new development must comply with fire-resistant landscaping and defensible space requirements. These standards shall meet or exceed Title 14 of the California Code of Regulations (CCR). This specifically includes Division 1.5, Chapter 7, Subchapter 2, Articles 1-5 (commencing with section 1270, SRA Fire Safe Regulations); and Division 1.5, Chapter 7, Subchapter 3, Article 3 (commencing with section 1299.01, Fire Hazard Reduction Around Buildings and Structures Regulations). New development shall also comply with the California Public Resource Code Section 4291 (State Defensible Space Requirements) which requires the following:														
<ul style="list-style-type: none"> Create a defensible space of at least 100 feet around the structure. Remove all dead plants, grass, weeds, and other flammable vegetation from the defensible space. Remove tree limbs that are within 10 feet of the chimney or stovepipe of the structure. Trim tree limbs that are within 6 feet of the ground or within 10 feet of the structure. Remove all dead branches, leaves, and other debris from roofs and rain gutters. Create horizontal and vertical spacing between trees and shrubs to prevent the spread of fire. Space trees at least 10 feet apart from each other. Maintain the defensible space throughout the year, not just during fire season. Obtain any necessary permits from local fire agencies before conducting any vegetation management activities. Provide and maintain access to the property for emergency vehicles. 	✓		✓	✓		✓				✓		✓	✓	+

4. Environmental Analysis

TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
Program S-4.4.6 Coordinate with Contra Costa County Fire Protection District, fire safe councils, other agencies, community organizations, and landowners to develop and maintain fuel breaks in dedicated open space and fire-access easements, including through prescribed burns or the use of goats. Consult with these external agencies on the best way to create a collaborative relationship for ongoing shared concerns.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	+
Policy S-4.5 Avoid Development in Fire-Prone Areas: Encourage new development to occur outside of Very High Fire Hazard Severity Zones. Any development that does occur in the Very High Fire Hazard Severity Zones should demonstrate compliance with applicable state and local building and fire code regulations as well as appropriate mitigation measures and design considerations.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	+
Policy S-4.6 New Development: Require review by the Planning Department and Contra Costa County Fire Protection District prior to the issuance of development permits for proposed construction projects and conceptual landscaping plans in Very Fire Hazard Severity Zones identified by CAL FIRE (see Figure 8: Wildfire Hazard Severity Zone). Plans for proposed development in such areas shall include, at a minimum:														
<ul style="list-style-type: none"> • Site plan, planting plan, planting palette, and irrigation plan to reduce the risk of fire hazards and with consideration to site conditions, including slope, structures, and adjacencies. 	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	+
<ul style="list-style-type: none"> • Development and maintenance of defensible space. • Multiple points of ingress and egress to improve evacuation, emergency response, and fire equipment access and adequate water infrastructure for water supply and fire flow that meets or exceeds the standards in the California Fire Safe Regulations (California Code of Regulations, Title 24, Division 1.5, Chapter 7, Articles 2 and 3, Sections 1273 and 1274). 														

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TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
Policy S-4.11 Access for Fire and Emergency Vehicles and Equipment: Require proposed development to provide adequate access for fire and emergency vehicles and equipment that meets or exceeds the standards in the California Fire Safe Regulations (California Code of Regulations, Title 24, Division 1.5, Chapter 7, Articles 2 and 3, Sections 1273 and 1274).	✓	✓	✓	✓	✓	✓	✓		✓	✓	+	✓		+
Policy S-4.12 Retrofitting City-Owned Roadways: Identify existing public and private roadways in fire hazard severity zones that are not in compliance with current fire safety regulations, including road standards for evacuation and emergency vehicle access, vegetation clearance, and other requirements of the California Fire Safe Regulations (California Code of Regulations, Title 24, Division 1.5, Chapter 7, Articles 2 and 3, Sections 1273 and 1274), to the extent resources are available. Work at retrofitting City-owned roadways as needed to meet current standards and require private property owners to do the same, to the extent feasible and given the absence of other site constraints.	✓	✓	✓	✓	✓	✓	✓		✓	✓	+	✓		+
Program S-4.13.1 Coordinate with the Pacific Gas and Electric Company (PG&E) to support focused efforts in mapped wildfire risk areas, including work to underground power lines, manage vegetation near energy infrastructure, and other fire risk reduction activities throughout the community, especially in Very High Fire Hazard Severity Zones.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	+
Policy S-4.14 Roadside Fuels Reduction: Collaborate with Contra Costa County Fire Protection District to provide roadside fuel reduction, defensible space, and vegetation management, particularly along evacuation routes.	✓	✓	✓		✓	✓	✓		✓	✓	+			+
Climate Change Resiliency														
Policy S-6.1 Equitably Located Resilience Centers: Establish one or more equitably located resilience centers in Lafayette. Ensure that resilience centers are not in areas at risk from hazard impacts, to the extent possible; offer	✓	✓			✓		✓			✓	✓		✓	

4. Environmental Analysis

TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
refuge from extreme heat and extreme weather events as well as poor air quality and disasters; and are equipped with renewable energy generation and backup power supplies. Such facilities should be in easily accessible locations and available to all community members. Resilience centers consist of new, well-used, existing, community-serving facilities that are upgraded to provide local communities with shelter, water, and electricity during these events or disasters.														
Policy S-6.4 Energy Storage Capacity and Generation Efficiency: Coordinate with PG&E to explore ways to improve and increase energy storage capacity and generation efficiency for public facilities.	✓		✓	✓	+		+			✓	✓	✓	✓	✓
Policy S-6.5 Shading and Heat-Mitigating Materials: Coordinate with the Contra Costa County Transportation Authority and BART to increase shading and heat-mitigating materials on pedestrian walkways and at transit stops.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Policy S-6.6 Sustainable, Energy-Efficient, and Environmentally Regenerative Features: Encourage new developments and existing property owners to incorporate sustainable, energy-efficient, and environmentally regenerative features into their facilities, landscapes, and structures to reduce energy demands and improve on-site resilience. Support financing efforts to increase community access to these features. Environmentally regenerative features refer to design or operational features of buildings, infrastructure, and systems that help to restore, renew, or regenerate the natural environment. Examples include green roofs and living walls, permeable pavement, on-site renewable energy generation, rainwater harvesting and reuse, or use of low-impact materials and construction techniques.	✓	+	+	✓	+	✓	+	✓	+	✓	✓	✓	✓	✓
Policy S-6.7 Drought-Tolerant Green Infrastructure: Promote the use of drought-tolerant green infrastructure,	✓		+	+					+			✓	✓	✓

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TABLE 3 2023 SAFETY ELEMENT POLICIES AND PROGRAMS IMPACT POTENTIAL BY ENVIRONMENTAL TOPIC

Policies and Programs	Environmental Topic													
	AES	AIR	BIO	CUL	ENE	GEO	GHG	HAZ	HYD	NOI	TRA	TCR	USS	WF
including landscaped areas, as part of cooling strategies in public and private spaces.														
Program S-6.8.1 Replace irrigated landscaping with drought-resistant vegetation to the extent feasible and consider use of graywater or rainwater harvesting for irrigation in City-owned facilities.	✓		+	✓					+			✓	✓	✓
Policy S-6.12 Severe Weather Resiliency: Increase the resiliency of City-owned structures to severe weather events, including high wind events, and support homeowners and business owners to increase the resilience of their buildings and properties through retrofits, weatherization, and other improvements.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

4. Environmental Analysis

As shown in Table 3, these proposed policies and programs promote more resilient public facilities and evacuation routes and roads, improve drainage systems, encourage green infrastructure and landscaping, promote increased reviews for new developments, stabilize slopes, and promote vegetation management plans. As shown in Table 3, the implementation of these proposed policies and programs could result in potential impacts related to the environmental topic areas of aesthetics, air quality, biological resources, cultural and tribal cultural resources, energy, geology and soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, and utilities and services systems. As described in the environmental checklist, most of the potential impacts associated with the implementation of the proposed policies and programs would only occur during the construction and installation of the infrastructure or improvement. The ongoing operation of the proposed policies and programs would have beneficial impacts such as conserving energy and water, reducing geologic and seismic hazards, flooding, wildfire impacts, and public service demands.

4.2 ENVIRONMENTAL CHECKLIST AND DISCUSSION

Sections 4.2.1 through 4.2.19 provide an evaluation of the environmental impacts of the proposed project and are organized to correspond with the standards of significance consistent with Appendix G, *Environmental Checklist Form*, of the CEQA Guidelines, as evaluated in the Housing Element EIR. Each section contains a summary of the findings of the evaluation, organized into the following columns:

- **Level of Impact for the Housing Element in the Housing Element EIR** presents the level of significance identified for the Housing Element in the Housing Element EIR, using the following acronyms:
 - **NI = no impact.** For these topics, there is no adverse effect on the environment.
 - **LTS = less than significant.** These effects are noticeable but do not exceed established or defined thresholds, and no mitigation is required.
 - **LTS/M = less than significant with mitigation.** For these circumstances, an established or defined threshold would be exceeded, and a significant impact would occur; mitigation is required and would reduce the impact to a less-than-significant level.
 - **SU = significant and unavoidable.** For these topics, a significant impact would occur, and Housing Element policies and/or feasible mitigation measures would not diminish these effects to less-than-significant levels.
- **Environmental Effects of the Proposed Project** presents a yes or no response to these questions:
 - Would the proposed project have the same or reduced impact when compared to the Housing Element EIR?
 - Would the proposed project have new or more severe impacts when compared to the Housing Element EIR?
 - Are there new circumstances involving new or more severe impacts when compared to the Housing Element EIR?
 - Is there new information requiring new analysis or verification when compared to Housing Element EIR?

4. Environmental Analysis

CEQA identifies and analyzes the significant effects on the environment, where “significant effect on the environment” means a substantial or potentially substantial adverse change in any of the physical condition (CEQA Guidelines Section 15382). The proposed project, which does not increase the development potential, introduce new types of development, or expand the boundaries of the Study Area evaluated under the Housing Element EIR, are analyzed herein.

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4.2.1 Aesthetics

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Have a substantial adverse effect on a scenic vista?	SU	Yes	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LTS	Yes	No	No	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings, or in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?	SU	Yes	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	Yes	No	No	No
e) Result in a cumulatively considerable impact to aesthetic resources?	SU	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs could result in construction and operational impacts that may adversely affect scenic vistas. These include ensuring public facilities are well equipped for future safety events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4, 6.5, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); creating a creek maintenance program (Program 2.1.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.5.4 and 2.6.5); developing new buildings with increased reviews (Policies 3.5 and 3.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1); and public transit shading (Policy 6.5). All of these, depending on the size and location, could have a substantial adverse effect to scenic resources in Lafayette.

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Impacts on scenic vistas from implementation of the Lafayette Housing Element were evaluated in the Housing Element EIR and impacts were found to be significant and unavoidable. While abundant views of these scenic and visual resources would remain with new development, the extent of physical change that could occur and the associated alteration and potential blockage of views is considered substantial. Given that the Housing Element with Distributed Sites plans for higher-density development than currently exists in the area, no feasible mitigation measures are available to reduce this impact. The proposed project would not result in construction of new buildings or intensifying of development that would change the scale of overall ground-disturbing activities, such as those that could occur from implementation of the Housing Element, and as such would not result in new or more severe direct or indirect impacts to scenic vistas beyond what was evaluated in the Housing Element EIR.

The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to scenic vistas through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to scenic views are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include height limits, setback requirements, maximum lot coverage, and similar standards. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts identified in the Housing Element EIR with respect to scenic vistas.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3 and mentioned in (a) above, implementation of proposed policies and programs could result in construction and operational impacts to a scenic highway, like SR-24 that runs through Lafayette. These include ensuring public facilities are well equipped for future safety events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4, 6.5, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); creating a creek maintenance program (Program 2.1.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.5.4

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and 2.6.5); developing new buildings with increased review requirements (Policies 3.5 and 3.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1); and public transit shading (Policy 6.5). All of these, depending on the size and location, could have a substantial adverse effect to State scenic highways in and around Lafayette.

Impacts to scenic resources and scenic highways from implementation of the Lafayette Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities, such as those that could occur from implementation of the Housing Element, and as such would not result in new or more severe impacts to scenic resources or scenic highways beyond what was evaluated in the Housing Element EIR. Additionally, all potential future development from implementation of the proposed project would be required to be consistent with applicable zoning and other regulations governing scenic highways.

The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to scenic highways through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to scenic highways are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include height limits, setback requirements, maximum lot coverage, and similar standards. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts identified in the Housing Element EIR with respect to scenic highways.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) Would the proposed project conflict with applicable zoning and other regulations governing scenic quality?

As shown in Table 3, implementation of proposed policies and programs could result in construction impacts that may impact scenic quality. These include ensuring public facilities are well equipped for future safety

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events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4, 6.5, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); creating a creek maintenance program (Program 2.1.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.5.4 and 2.6.5); and developing new buildings with increased reviews (Policies 3.5 and 3.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1); and public transit shading (Policy 6.5). All of these, depending on the size and location, could have a substantial adverse effect to scenic resources in Lafayette, but would not conflict with applicable zoning regulations governing scenic resources.

Visual quality and character impacts from implementation of the Lafayette Housing Element were evaluated in the Housing Element EIR and impacts were found to be significant and unavoidable. Notwithstanding the adoption of General Plan and zoning amendments, the development of new housing under the Housing Element EIR of increased density, greater scale, and higher height than currently exists in many areas could result in potentially adverse effects to visual character and the quality of public views. Some of the housing could be denser and taller than most or all the existing adjacent residential development. Some areas currently appreciated as open space could be developed with new housing. Given the Housing Element plan for higher density development than currently exists in the area, it was determined that no feasible mitigation was available. The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities, such as those that could occur from implementation of the Housing Element, and as such would not result in new or more severe impacts to scenic quality beyond what was evaluated in the Housing Element EIR. Additionally, all potential future development from implementation of the proposed project would be required to be consistent with applicable zoning and other regulations governing scenic quality.

Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to scenic quality through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to scenic quality are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include height limits, setback requirements, maximum lot coverage, and similar standards. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the impacts identified in the Housing Element EIR with respect to regulations governing scenic quality.

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There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs could result in new sources of light and glare during construction and operation. These include ensuring public facilities are well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4, 6.5, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); creating a creek maintenance program (Program 2.1.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.5.4 and 2.6.5); developing new buildings with increased reviews (Policies 3.5 and 3.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, 6.8.1); and public transit shading (Policy 6.5). All of these, depending on the size and location, could create a new source of light and glare in Lafayette.

Creation of new light and glare from implementation of the Lafayette Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities, such as those that could occur from implementation of the Housing Element, and as such would not result in new or more severe impacts to aesthetics beyond what was evaluated in the Housing Element EIR. Additionally, all potential future development from implementation of the proposed project would be required to be consistent with applicable zoning and other regulations governing sources of light and glare.

Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to scenic quality through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to scenic quality are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include height limits, setback requirements, maximum lot coverage, and similar standards. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not

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result in a new impact or a substantial increase in magnitude of the existing impacts identified in the Housing Element EIR with respect to new sources of light and glare.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

e) Would the proposed project result in a cumulatively considerable impact to aesthetic resources?

The Safety Element in combination with other past, present, and reasonably foreseeable future projects could cause cumulatively considerable impacts as or less severe than evaluated in the Housing Element EIR related to aesthetic resources. New development could occur with the implementation of the Safety Element that could block or limit views of scenic resources and be inconsistent with visual character. The extent of physical change that could occur and the associated alteration and potential blockage of views and impacts related to visual character is considered to be a substantial cumulative impact. Given the Housing Element's plan for higher density development than currently exists in the area, no feasible mitigation measures are available to reduce this impact, therefore this impact is a cumulative impact and is considered significant and unavoidable, as it was concluded in the Housing Element EIR.

Implementation of the proposed Safety Element policies and programs could also block views of historic buildings in Lafayette. However, due to the speed of travel, these changes would be experienced for relatively short durations, and abundant views of these scenic and visual resources would remain for travelers on SR-24 with new development of these sites. For this reason, the cumulative impact on scenic highways would be less than significant.

Development that could occur with implementation of Safety Element programs and policies, and cumulative development would still be required to comply with applicable State and local plans, policies, and standards. Additionally, all future development projects that would implement the proposed project or cumulative projects would undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.2 Air Quality

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Conflict with or obstruct implementation of the applicable air quality plan?	LTS	Yes	No	No	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	SU	Yes	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	NI	Yes	No	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	Yes	No	No	No
e) Cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin?	SU	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in a short-term air quality impact related to the construction of infrastructure and improvements that supports the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policy 6.6); developing new buildings with increased reviews (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5). These policies and programs could create short-term air quality impacts, but not obstruct the implementation of applicable air quality plans.

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Air quality plan conflicts from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect conflicts to air quality plans through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that conflicts to air quality plans are minimized. Examples include following the Clean Air Plan that includes Transportation Control Measures, Energy Control Measures, Buildings Control Measures, Waste Management Control Measures, and Water Conservation Control Measures. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, air quality impacts from construction are temporary and deemed to be less than significant through compliance with Bay Area Air Quality Management District (BAAQMD) best management practices and/or site-specific construction health risk assessments. Therefore, the proposed project would not result in a new impact in conflict or obstruct implementation of an air quality plan compared to the existing impacts identified in the Housing Element EIR.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in a construction related cumulatively considerable impacts to criteria pollutants. These include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policy 6.6); developing new buildings with increased reviews (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5). These policies and programs would not spur additional growth in the city that would increase vehicle miles traveled (VMT), and therefore would not result in a cumulatively considerable net increase in criteria pollutants.

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Increase in cumulatively considerable criteria pollutants from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant for the Housing Element Update, but significant and unavoidable for construction and operation of individual development projects following the adoption of the Housing Element Update. The Housing Element EIR provides two mitigation measures that all construction of potential projects under implementation of the proposed project would be required to comply with:

- **Housing Element EIR Mitigation Measure 4.2-3a:** Best Management Practices
- **Housing Element EIR Mitigation Measure 4.2-3b:** Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Criteria Pollutants.

Implementation of Housing Element EIR Mitigation Measure 4.2-3a was determined to reduce construction dust impacts of subsequent project to less than significant by incorporating best management practices provided by BAAQMD. With implementation of Housing Element EIR Mitigation Measure 4.2-3b, it cannot be stated with certainty that construction and operational criteria air pollutant impacts associated with all subsequent projects would be reduced to less-than-significant levels. However, only large construction projects that exceed the screening sizes in Table 3-1 of the Air Quality CEQA Guidelines would be expected to exceed emissions significant thresholds. However, implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project or beyond what was evaluated in the Housing Element EIR, and it does not include specific development proposals. The implementation of the proposed project could cause indirect conflicts to air quality plans through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that conflicts to air quality plans are minimized. Examples include following the Clean Air Plan that includes Transportation Control Measures, Energy Control Measures, Buildings Control Measures, Waste Management Control Measures, and Water Conservation Control Measures. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, including incorporating mitigation measures from the Housing Element EIR as required. Therefore, the proposed project would not result in a more severe impact compared to the existing impacts identified in the Housing Element EIR with respect to cumulatively considerable criteria pollutants.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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c) Would the proposed project expose sensitive receptors to substantial pollutant concentrations?

As shown in Table 3, implementation of proposed policies and programs do not have the potential to expose sensitive receptors to substantial pollutant concentrations during the construction of infrastructure and improvements that support the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policy 6.6); developing new buildings with increased reviews (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5). These policies and programs could expose sensitive receptors to substantial pollutant concentrations; however, the proposed project would not create new sensitive receptors near SR-24, the largest existing source of toxic air contaminants (TACs) and would not create new sources of TACs.

Sensitive receptors exposure to substantial pollutant concentrations from implementation of the Housing Element were evaluated in the Housing Element EIR and no impact was found. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts. Therefore, the proposed project would not result in exposure of sensitive receptors to substantial pollutant concentrations compared to the existing impacts identified in the Housing Element EIR.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in the release of other emissions, such as odors that could affect a substantial number of people, related to the construction of infrastructure and improvements that supports the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policy 6.6); developing new buildings with increased reviews (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and

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4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5).

The release of other air emissions, such as odors, that would adversely affect a substantial number of people from implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. Housing Element EIR Mitigation 4.2-5a, *Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks associated with TAC Emissions*, requires development projects within 1,000 feet of a sensitive receptor to conduct a project-level health risk assessment and if the assessment finds that the project could result in health risks that exceed the significance thresholds, to implement Housing Element EIR Mitigation Measure 4.2-3b, described above, to reduce the impacts to less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project beyond what was evaluated in the Housing Element EIR, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect release of other air emissions through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts from the release of other air emissions are minimized. Examples include the Clean Air Plan that includes Transportation Control Measures, Energy Control Measures, Buildings Control Measures, Waste Management Control Measures, and Water Conservation Control Measures. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, including incorporating mitigation measures from the Housing Element EIR as required. Therefore, the proposed project would not result in a more severe impacts compared to the impacts identified in the Housing Element EIR with respect to air quality.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

e) *Would the proposed project cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin?*

The San Francisco Bay Area Air Basin is a nonattainment area for both the federal and State ozone standards; therefore, a cumulative air quality impact already exists. Additional emissions of ozone precursors NO_x or reactive organic gas (ROG) over threshold amounts would further degrade air quality related to ozone. Criterion (b), above, evaluates whether the implementation of the Safety Element policies and programs would contribute to this significant impact and would be considerable, and concludes that the impact would

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be as or less severe than the Housing Element’s EIR conclusion of significant and unavoidable after mitigation. For this reason, no further analysis of cumulative criteria pollutants is necessary.

All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

4.2.3 Biological Resources

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	LTS/M	Yes	No	No	No
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 Game or U.S. Fish and Wildlife Service?	LTS/M	Yes	No	No	No
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTS/M	Yes	No	No	No

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Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
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?	LTS	Yes	No	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS	Yes	No	No	No
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?	NI	Yes	No	No	No
g) Result in a cumulatively considerable impact to biological resources?	LTS/M	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in short-term impacts to a candidate, sensitive, or special-status species due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 6.4, and 6.12 and Program 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2 and 6.8.1); and public transit shading (Policy 6.5). Depending on the scope and location, these policies and programs have the potential to impact the sensitive species.

Short-term and permanent impacts to listed species from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation.

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The Housing Element EIR provides mitigation measures that all construction of potential projects, that would create short-term impacts, under implementation of the proposed project would be required to comply with:

- **Mitigation Measure 4.3-1a:** Avoid and Minimize Impacts on Special-Status Plant Species.
- **Mitigation Measure 4.3-1b:** Avoid and Minimize Impacts on Nesting Birds.
- **Mitigation Measure 4.3-1c:** Avoid and Minimize Impact on Roosting Bats.

Implementation of Housing Element EIR Mitigation Measure 4.3-1a was determined to reduce impacts to special status plants to less than significant by conducting surveys to determine if special-status plants are present in the project area and, if so, demarcating their location so that they can be avoided; establishing a plan for minimizing direct impacts that cannot be avoided, including replanting at the project area to compensate for temporary impacts, or requiring off-site relocation or compensatory mitigation for permanent impacts; establishing success criteria; and, monitoring replanting or relocation sites to assure success criteria are met. Implementation of Housing Element EIR Mitigation Measure 4.3-1b was determined to reduce impacts to nesting birds to less than significant by limiting construction to the non-nesting season when feasible or, if avoiding the nesting season is not feasible, conducting pre-construction surveys for nesting birds and establishing no-disturbance buffers around any active nests until birds have fledged and are able to leave the construction area; and reporting findings to the City prior to initiation of construction. Mitigation Measure 4.3-1c would reduce construction-related impacts to roosting bats to less than significant by requiring pre-construction surveys to identify active bat roosts; establishment of protective buffers until roosts are no longer in use; and, limiting the removal of trees or structures with potential bat roosting habitat to the time of year when bats are active to avoid disturbing bats during the maternity roosting season or months of winter torpor.

Additionally, implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to listed species through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to listed species are minimized as well as following the mitigation measures mentioned above. Future potential implementation projects under the proposed projects would also be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to any species identified as a candidate, sensitive, or special-status species in local or regional plan, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

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There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

b) Would the proposed project 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?

As shown in Table 3, implementation of proposed policies and programs have the potential to result in short-term impacts to riparian habitat due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 6.4 and 6.12 and Program 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3, and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); creating a vegetation management plan (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 6.8.1 and 4.4.2); and public transit shading (Policy 6.1). Depending on the scope and location, these policies and programs may impact the riparian habitat.

Impacts to riparian habitats from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. The Housing Element EIR provides mitigation measures that all construction of potential projects under implementation of the proposed project would be required to comply with:

- **Mitigation Measure 4.3-2a:** Avoidance of Impacts on Riparian Habitat and Sensitive Natural Communities.
- **Mitigation Measure 4.3-2b:** Riparian Habitat and Sensitive Natural Community Mitigation and Monitoring Plan.

Implementation of Housing Element EIR Mitigation Measure 4.3-2a and Mitigation Measure 4.3-2b, combined with Mitigation Measure 4.3-1a, were determined to reduce construction-related impacts to less than significant by requiring pre-construction surveys to demarcate and avoid of riparian habitat and sensitive natural communities, if present; where avoidance is not possible, development of a Riparian and Sensitive Natural Community Revegetation Plan to guide restoration of temporarily impacted riparian habitat and sensitive natural communities to pre-construction conditions; restoration monitoring to ensure that success criteria are met; and mitigation for permanent impacts to riparian habitat or sensitive natural communities. Construction activities occurring within 20 feet of riparian habitat or sensitive natural communities will be clearly delineated with flagging by a qualified biologist. Riparian habitat and sensitive natural communities will be separated and protected from the work area through silt fencing, amphibian-

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friendly fiber rolls (i.e., no monofilament), or other appropriate erosion control material. Material staging, and all other development-related activities will be located as far possible from riparian habitat and sensitive natural communities. If these areas cannot be avoided, any temporarily impacted areas will be restored to pre-construction conditions or better at the end of construction.

Additionally, implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to riparian habitat through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to riparian habitat are minimized as well as following the mitigation measures mentioned above. Preparation of a Stormwater Pollution Prevention Plan (SWPPP), along with implementation during construction, is required to comply with the National Pollution Discharge Elimination System (NDPES) Construction General Permit. Title 5, Chapter 5-4 of the Lafayette Municipal Code contains established measures to prevent and reduce stormwater pollution such as development runoff requirements including performance standards to address construction and post-construction impacts to water quality. Consistent with General Plan Policy OS-6.1, these standards are needed to minimize pollutants in storm water runoff and protect water courses. Future potential implementation projects under the proposed projects would also be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to riparian habitat resources.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in short-term impacts to wetlands due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 6.4 and 6.12 and Program 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3, and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies

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4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 6.8.1 and 4.4.2); and public transit shading (Policy 6.5). Depending on the scope and location, these policies and programs may impact the wetland habitat and mitigation may be necessary.

Impacts to wetlands from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant, with mitigation. Future potential construction projects under the proposed project would be required to comply with Mitigation Measure 4.3-2a and Mitigation Measure 4.3-2b from the Housing Element EIR, described above. Furthermore, implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to wetlands through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities.

Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to wetlands are minimized as well as following the mitigation measures mentioned above. Wetlands, streams, reservoirs, sloughs, and ponds are typically under federal jurisdiction under Section 404 of the Clean Water Act and state jurisdiction under the Porter-Cologne Water Quality Control Act. Streams and ponds typically fall under state jurisdiction under Section 1602 of the California Fish and Game Code. Future potential implementation projects under the proposed projects would also be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to State or federally protected wetlands.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

d) Would the proposed project 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?

As shown in Table 3, implementation of proposed policies and programs have the potential to result in short-term impacts to native or migratory fish or wildlife species due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 6.4 and 6.12 and Program 4.13.1); creating safer evacuation

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routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 4.5, and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 6.8.1 and 4.4.2); and public transit shading (Policy 6.5). Depending on the scope and location, these policies and programs may impact native or migratory fish and wildlife species.

Impacts to migratory wildlife from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it would not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to migratory wildlife through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to migratory wildlife are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include increases in artificial night lighting and noise or a change in adjacent uses could impact wildlife in the riparian corridor by disrupting their circadian rhythms, increasing stress, or masking natural sounds. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to interfering 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.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in impacts to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 6.4 and 6.12 and Program 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing

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better drainage systems (Policy 2.1 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 6.8.1 and 4.4.2); and public transit shading (Policy 6.5).

Conflicts with local policies and ordinances protecting biological resources from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect conflicts with policies protecting biological resources through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced including mitigation measures mentioned above to ensure that conflicts with policies protecting biological resources are minimized only to the extent that such policies and standards are quantitative and objective. The local policies relevant to the biological resources present, or with potential to occur, in the study area include the City of Lafayette General Plan, Lafayette Downtown Specific Plan, and the City of Lafayette Tree Protection Ordinance. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not conflict with local policies or ordinances protecting biological resources that were not addressed in the Housing Element EIR.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As described in the Housing Element EIR, the EIR Study Area is not in any local, regional, or State habitat conservation plan areas and as such, no impact regarding this standard would occur under either plan.

g) Would the proposed project result in a cumulatively considerable impact to biological resources?

Significant cumulative impacts related to biological resources could occur if the incremental impacts of the implementation of Safety Element policies and programs combined with the incremental impacts of cumulative development of the past, present, and reasonably foreseeable future. Construction activities

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associated with the implementation of the Safety Element policies and programs could result in direct temporary or permanent impacts to special-status plant species or sensitive natural communities, if present, and if clearing, ground disturbance, site access, or construction staging were to remove or otherwise damage individuals of these special-status plant species or the sensitive natural community. However, with implementation of Mitigation Measure 4.3-1a, Avoid and Minimize Impacts on Special-Status Plants, implementation of the Safety Element policies and programs would not result in a considerable contribution to cumulative impacts; therefore, the cumulative impact would be less than significant.

Construction activities associated with the implementation of the Housing Element policies and programs could result in direct impacts on nesting birds and special-status roosting bats due to tree removal or trimming. Indirect construction-related impacts on nesting birds and roosting bats could include construction noise, vibration, and human activity near active bird nests and bat roosts during construction of multi-family residences. However, with implementation of Mitigation Measures 4.3-1b, Avoid and Minimize Impacts on Nesting Birds and 4.3-1c, Avoid and Minimize Impacts on Roosting Bats, implementation of the Safety Element would not result in a considerable contribution to cumulative impacts; therefore, the cumulative impact would be less than significant.

Construction activities associated with the implementation of the Safety Element policies and programs could result in direct impacts on wetlands and riparian habitat (a category of jurisdictional waters) due to vegetation removal or trimming. Indirect construction-related impacts on wetlands and riparian habitat could include equipment leaks, refueling, or improper storage or containment caused harmful material (e.g., concrete truck washout, sediment) to enter Lafayette Creek or Happy Valley creek, especially during the rainy season. However, with implementation of Mitigation Measures 4.3-2a, Avoidance of Impacts on Riparian Habitat and Sensitive Natural Communities and 4.3-2b, Riparian Habitat and Sensitive Natural Community Mitigation and Monitoring Plan, the proposed project would not result in a considerable contribution to cumulative impacts; therefore, the cumulative impact would be less than significant.

As previously discussed, the project would have no impact on an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Accordingly, the project could not contribute to cumulative impacts related to this topic.

All future development projects that would implement the proposed project would be subject to applicable federal, State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.4 Cultural Resources

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	SU	Yes	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	LTS/M	Yes	No	No	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	LTS/M	Yes	No	No	No
d) Cause impacts that are cumulatively considerable when viewed in connection with the effects of past, present, and reasonably foreseeable projects?	SU	N/A	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

a) *Would the proposed project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

As shown in Table 3, implementation of proposed policies and programs have the potential to result in an adverse change in significance of a historical resource due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 3.7, 6.4, and 6.12 and Programs 3.5.3 and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2 and 6.8.1); and public transit shading (Policy 6.5). Depending on the scope and location, these policies and programs may impact a historical resource.

Impacts to historical resources from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be significant and unavoidable with mitigation. The Housing Element EIR provides three mitigation measures that all construction of potential projects under implementation of the proposed project would be required to comply with:

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- **Mitigation Measure 4.4-1a:** Identify Architectural Historic Resources.
- **Mitigation Measure 4.4-1b:** Identify Character-Defining Features.
- **Mitigation Measure 4.4-1c:** Document Architectural Historic Resources Prior to Demolition or Alteration.

Implementation of Housing Element EIR Mitigation Measure 4.4-1a requires that prior to any demolition work or significant alterations to any building or structure that is 45 years old or older, the City will require a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards evaluate the building or structure for eligibility for listing on the National Register, California Register, and as a City Historic Landmark. Implementation of Housing Element EIR Mitigation Measure 4.4-1b requires that prior to any work to a known historical resource the City will confirm that a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards identifies character-defining features of each historical resource.

Implementation of Housing Element EIR Mitigation Measure 4.4-1c requires that prior to any demolition work or significant alterations initiated on a known historical resource, the City will confirm that a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards thoroughly documents each building and associated landscaping and setting.

The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities that could cause damage to historical resources, such as those that could occur from implementation of the Housing Element and would not result in adverse impacts beyond what was evaluated in the Housing Element EIR.

The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to historic resources through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to historical resources are minimized. CEQA requires lead agencies to determine, prior to approval, if a project would have a significant adverse effect on historical resources and requires the lead agency to prescribe any feasible mitigation measures that would reduce significant impacts, and those measures are mentioned above. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to historical resources.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed

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in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

b) Would the proposed project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

As shown in Table 3, implementation of proposed policies and programs have the potential to result in an adverse change in significance of an archaeological resource due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 3.7, 6.4, and 6.12 and Programs 3.5.3 and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Program 4.4.1); promoting drought tolerant (Program 6.8.1) and landscaping buffer (Program 4.4.2); and public transit shading (Policy 6.5). Depending on the scope and location, these policies and programs may impact an archaeological resource and mitigation may be necessary. The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities that could cause damage to archaeological resources, such as those that could occur from implementation of the Housing Element and would not result in adverse impacts beyond what was evaluated in the Housing Element EIR.

Impacts to archaeological resources from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. The Housing Element EIR provides a mitigation measure that all construction of potential projects under implementation of the proposed project would be required to comply with:

- **Mitigation Measure 4.4-2a:** Cultural Resources Review Requirements.

Implementation of Housing Element EIR Mitigation Measure 4.4-2a requires all discretionary projects that include ground disturbance (e.g., excavation, trenching, grading, etc.), within a mapped archaeological sensitivity area or within 200 feet of a stream, pursuant to General Plan Program LU 22.1.5, have a cultural resources records search performed at the Northwest Information Center of the California Historical Resources Information System for the project area. An archaeologist meeting the U.S. Secretary of the Interior's Standards (SOIS) for Archaeology, must review the results and identify if the project would potentially impact cultural resources. If the archaeologist determines that known cultural resources or potential archaeological sensitivity areas may be impacted by the project, a pedestrian survey must be conducted under the supervision of SOIS-qualified archaeologist of all accessible portions of the project area, if one has not been completed within the previous five years.

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The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to archeological resources through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to archeological resources are minimized. All projects with ground-disturbance would be reviewed by a qualified archaeologist and any potential archaeological resources identified, that may also be considered tribal cultural resources, would be evaluated, and treated appropriately, including consulting with Native American representatives. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to the significance of archaeological resources.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) Would the proposed project disturb any human remains, including those interred outside of dedicated cemeteries?

As shown in Table 3, implementation of proposed policies and programs have the potential to result in new construction of infrastructure and improvements that could disturb human remains. The construction would include ensuring public facilities are well equipped for future emergency events (Policies 3.7, 6.4, and 6.12 and Programs 3.5.3 and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new developments (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2 and 6.8.1); and public transit shading (Policy 6.5). Depending on the scope and location, these policies and programs may disturb human remains and mitigation may be necessary. The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities that could disturb any human remains, such as those activities that could occur from implementation of the Housing Element and would not result in adverse impacts beyond what was evaluated in the Housing Element EIR.

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Impacts to human remains from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. The Housing Element EIR provides a mitigation measure that all construction of potential projects under implementation of the proposed project would be required to comply with:

- **Mitigation Measure 4.4-2B:** Inadvertent Discovery of Cultural Resources and/or Human Remains.

Implementation of Housing Element EIR Mitigation Measure 4.4-2b was determined to protect cultural resources and human remains by requiring that if human remains are encountered during project construction and implementation, all construction activities within 100 feet of the find shall cease until the Contra Costa County Coroner has been contacted to determine that no investigation of the cause of death is required. The Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours if the Coroner determines the remains to be Native American in origin. The NAHC will then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the City for the appropriate means of treating the human remains and any associated funerary objects.

The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to historic resources through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to historical impacts are minimized. CEQA requires lead agencies to determine, prior to approval, if a project would have a significant adverse effect on historical resources and requires the lead agency to prescribe any feasible mitigation measures that would reduce significant impacts, and those measures are mentioned above. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to cultural resources.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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d) Would the proposed project cause impacts that are cumulatively considerable when viewed in connection with the effects of past, present, and reasonably foreseeable projects?

Significant cumulative impacts related to cultural resources could occur if the incremental impacts of the implementation of Safety Element policies and programs combined with the incremental impacts of cumulative development of the past, present, and reasonably foreseeable future cause significant impacts to cultural resources.

Future development under the Housing Element as well as other residential projects within the City of Lafayette could potentially impact architectural historic resources that may be present. The cumulative effect of this future development is the continued loss of significant architectural historic resources. Potential future development increases the likelihood that additional architectural historic resources could be lost. It is therefore possible that cumulative development could result in the demolition or destruction of significant architectural historic resources. The loss of these resources would result in a significant impact, and impacts associated with the Housing Element would be considered cumulatively considerable, resulting in a significant impact. Because demolition or significant alteration of potential historical resources could result in a substantial adverse change in the significance of historical resources, no measures would fully mitigate these actions to a less-than-significant level. Therefore, even with implementation of Measures 4.4-1A, 4.4-1B, and 4.4-1C, as described above, the impact would be significant and unavoidable. Impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

Future development under the Safety Element, as well as other residential projects within the City of Lafayette, could potentially impact human remains. Future development has the potential to increase ground disturbance that could increase the likelihood that additional human remains could be discovered and harmed, cumulatively impacting human remains. Though human remains can be preserved when discovered during excavation, there is no guarantee that these resources can be protected and preserved. However, the implementation of the proposed project policies and programs would be required to comply with Mitigation Measures 4.4-2A and 4.4-2B, and therefore would be as or less severe than those evaluated in the Housing Element EIR.

All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.5 Energy

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	Yes	No	No	No
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	Yes	No	No	No
c) Result in a cumulatively considerable impact to energy conservation and renewable energy?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in an energy impact related to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, and 6.12 and Programs 1.2.2, 1.10.3, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3 and 2.3.5); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5). These policies and programs could create short-term energy impacts but would not be wasteful or inefficient to an extent more severe than analyzed in the Housing Element EIR.

Impacts due to energy consumption from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. In addition, implementation of the proposed policies and programs would ultimately lead to energy resilience and reduced energy demand through policies that increase opportunities for more efficient uses of energy (Policy S-5.6), planting more vegetation and trees for shade and to manage air pollution and high temperatures (Policy S-5.5), conducting building weatherization (Policy S-5.12), and increasing energy storage capacity and generation efficiency

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(Policy S-5.4). Additionally, the proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities, such as those that could occur from implementation of the Housing Element and would not result in potential future development impacts beyond what was identified in the Housing Element EIR.

The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to energy consumption through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that unnecessary consumption of energy resources are minimized. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Construction activities would not be unusual as compared to overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state. Future development would be required to meet Title 24 requirements. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to energy resources.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

b) Would the proposed project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

As shown in Table 3, implementation of proposed policies and programs have the potential to result in a short-term energy impact but would be consistent with State and local plans for renewable energy or energy efficiency. Construction related impacts are due to infrastructure and improvements that implement the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, and 6.12 and Programs 1.2.2, 1.10.3, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3 and 2.3.5); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5). These policies and programs would comply with local and State plans for renewable energy and energy efficiency. In fact, the implementation of the proposed policies

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and programs would ultimately lead to energy resilience and reduced energy demand through policies that increase opportunities for more efficient uses of energy (Policy S-5.6), planting more vegetation and trees for shade and to manage air pollution and high temperatures (Policy S-5.5), conducting building weatherization (Policy S-5.12), and increasing energy storage capacity and generation efficiency (Policy S-5.4).

Conflicts with State or local plans for renewable energy or energy efficiency from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to energy efficiency through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced including mitigation measures mentioned above to ensure that conflicts with energy plans are minimized only to the extent that such policies and standards are quantitative and objective. The local policies relevant to energy efficiency include the California Energy Code Building Energy Efficiency Standards (CCR Title 24, Part 6), the CALGreen Code (CCR Title 24, Part 11), and SB 743. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) Would the proposed project result in a cumulatively considerable impact to energy conservation and renewable energy?

Cumulative impacts to energy conservation and renewable energy from implementation of Safety Element policies and programs were evaluated in the Housing Element EIR and impacts were found to be less than significant. The Housing Element and Safety Element, in conjunction with cumulative development in the City, would increase housing in an already developed area and result in increased energy consumption. Potential impacts to energy resources from future housing development facilitated by the Housing Element and Safety Element would be site-specific and would require applications for development permits that would be evaluated on a case-by-case basis. Each cumulative project would require separate discretionary approval and evaluation under CEQA, which would address potential energy consumption impacts, if any,

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and identify necessary mitigation measures, where appropriate. Additionally, any development facilitated by the Housing Element or Safety Element would be subject to compliance with all federal, State, and local requirements for energy efficiency. Therefore, impacts under implementation of Safety Element policies and programs would be as or less severe than those evaluated in the Housing Element EIR.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

4.2.6 Geology and Soils

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	LTS	Yes	No	No	No
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.	NI	Yes	No	No	No
ii) Strong seismic ground shaking?	LTS	Yes	No	No	No
iii) Seismic-related ground failure, including liquefaction?	LTS	Yes	No	No	No
iv) Landslides?	LTS	Yes	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	LTS	Yes	No	No	No

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Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LTS	Yes	No	No	No
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?	LTS	Yes	No	No	No
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	LTS	N/A	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS/M	Yes	No	No	No
g) Result in a cumulatively considerable impact to geological resources?	LTS/M	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

a) *Would the proposed project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) Strong seismic ground shaking; (iii) Seismic-related ground failure, including liquefaction; (iv) Landslides, mudslides, or other similar hazards?*

(i) According to Housing Element EIR Section 4.6.2, *Environmental Setting*, there are no known active faults or earthquake fault zones within the planning area. Given the absence of any known active fault or earthquake fault zones, there would be no impact under this criterion, and this issue is not discussed further.

(ii-iv) As shown in Table 3, implementation of proposed policies and programs could directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death related to the construction and operation of infrastructure and improvements that support the proposed project, such as ensuring public

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facilities are prepared and well equipped for future emergency events (Policies 3.7 and 6.12 and Programs 3.5.3 and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policies 2.1 and 3.2 and Programs 2.1.2 and 2.1.3); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.1, 3.5, 3.6, 4.5, and 4.6 and Programs 3.1.1 and 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.4); and public transit shading (Policy 6.5). These policies and programs could create short-term adverse impacts to geologic and seismic hazards.

Risk of loss, injury or death involving: (ii) Strong seismic ground shaking; (iii) Seismic-related ground failure, including liquefaction; (iv) Landslides, mudslides, or other similar hazards from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause risk of loss, injury or death involving: (ii) Strong seismic ground shaking; (iii) Seismic-related ground failure, including liquefaction; (iv) Landslides, mudslides, or other similar hazards from the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that risk of loss, injury, or death is minimized, including the California Building Code (CBC). The CBC standards require all new developments to be designed consistent with a site-specific, design-level geotechnical report, which would be fully compliant with the seismic recommendations of a California-registered professional geotechnical engineer. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element policies and programs would further minimize geologic and seismic hazards in Lafayette through construction requirements, structural retrofits, and drainage requirements (Policies 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7). Therefore, proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to risk of loss, injury or death involving: (ii) Strong seismic ground shaking; (iii) Seismic-related ground failure, including liquefaction; (iv) Landslides, mudslides, or other similar hazards.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in substantial soil erosion and loss of top soil related to the construction and operation of infrastructure and improvements that support the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 3.7 and 6.12 and Programs 3.5.3 and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policies 2.1 and 3.2 and Programs 2.1.2 and 2.1.3); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.1, 3.5, 3.6, 4.5, and 4.6 and Programs 3.1.1 and 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.4); and public transit shading (Policy 6.5). These policies and programs could create adverse impacts on soil loss and erosion.

Impacts to soil erosion from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause soil erosion from the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that soils erosion is minimized.

Any new development that would require the disturbance of one or more acres during construction would be subject to the requirements of the NPDES General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities (Construction General Permit). The NPDES permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would include Best Management Practices (BMPs) designed to control and reduce soil erosion. The BMPs may include dewatering procedures, storm water runoff quality control measures, watering for dust control, and the construction of silt fences, as needed. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes policies to minimize soil erosion, including Policy 3.1 and Policy 3.5. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to soil erosion and loss of topsoil.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to be located on a geologic unit or soil that is unstable or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse related to the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 3.7 and 6.12 and Programs 3.5.3 and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policies 2.1 and 3.2 and Programs 2.1.2 and 2.1.3); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.1, 3.5, 3.6, 4.5, and 4.6 and Programs 3.1.1 and 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.4); and public transit shading (Policy 6.5). These policies and programs could create short-term adverse impacts on unstable soil.

Impacts to soil stability from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause risk on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse from the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that risk of on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse is minimized, including the California Building Code (CBC). The CBC standards require all new developments to be designed consistent with a site-specific, design-level geotechnical report, which would be fully compliant with the recommendations of a California-registered professional geotechnical engineer. Geotechnical investigations include the analysis of potential unstable soil conditions at a site. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element policies and programs would further minimize hazards created by new development located on unstable soils in Lafayette through construction requirements, structural retrofits, and drainage requirements (Policies 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7). Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe

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impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to be located on expansive soils and create risk to life or property related to the construction and operation of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 3.7 and 6.12 and Programs 3.5.3 and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policies 2.1 and 3.2 and Programs 2.1.2 and 2.1.3); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.1, 3.5, 3.6, 4.5, and 4.6 and Programs 3.1.1 and 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.4); and public transit shading (Policy 6.5). These policies and programs could create short-term adverse impacts regarding expansive soils.

Impacts due to expansive soil from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause risks to life or property from expansive soils during the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that risk to life and property is minimized, including the California Building Code (CBC). Analysis of expansive and soils is standard during geotechnical investigations, as the CBC outlines specific soil engineering parameters to identify and mitigate for expansive soils. If expansive soils are detected during the geotechnical investigation process further laboratory testing is warranted to determine the exact nature of the affected soils, which will inform the specific soil engineering requirements. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element policies and programs would further minimize hazards created by new development located on unstable soils in Lafayette through construction requirements, structural retrofits, and drainage requirements (Policies 3.1, 3.3, 3.5, and 3.6). Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to expansive soil, creating substantial direct or indirect risks to life or property.

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There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

e) Would the proposed project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

As shown in Table 3, implementation of proposed policies and programs have the potential to result wastewater; however, most new development would connect to existing sewer lines, and on-site septic tanks and alternative wastewater disposal systems would be rare, if allowed at all. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 3.7 and 6.12 and Programs 3.5.3 and 4.13.1) increased review requirements for new development (Policies 3.1, 3.5, 3.6, 4.5, and 4.6 and Programs 3.1.1 and 4.4.6); and stabilizing slopes (Program 3.1.3). These policies and programs could create short-term adverse impacts regarding soil capability to support alternative wastewater disposal systems.

Impacts on soils capability of adequately supporting the use of septic tanks or alternative wastewater disposal systems from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could lead to impacts from soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems during the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities.

Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that impacts from alternative wastewater disposal systems is minimized. A permit would be required from the Contra Costa Health Services Environmental Health Division. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Each system would be constructed within the parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems, as well as the Contra Costa County Health Officer Regulations for Sewage Collection and Disposal. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

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There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

f) Would the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As shown in Table 3, implementation of proposed policies and programs have the potential to destroy a unique paleontological resource or site due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are prepared and well equipped (Policies 3.7 and 6.12 and Programs 3.5.3 and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policies 2.1 and 3.2 and Programs 2.1.2 and 2.1.3); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.1, 3.5, 3.6, 4.5, and 4.6 and Programs 3.1.1 and 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.4); and public transit shading (Policy 6.5). These policies and programs could damage a unique paleontological resource or site or unique geologic feature.

Impacts to paleontological resources from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. The Housing Element EIR provides a mitigation measure that all construction of potential projects under implementation of the proposed project would be required to comply with

- **Mitigation Measure 4.6-1:** Determination of Paleontological Potential.

Implementation of Housing Element EIR Mitigation Measure 4.6-1 requires that prior to issuance of a grading permit for any project that requires ground disturbance, to depths of 6 or more feet in previously undisturbed deposits of Holocene-age alluvium and/or the Orinda Formation, the project will undergo a CEQA-level analysis to determine the potential for a project to encounter significant paleontological resources, based on a review of site-specific geology and the extent of ground disturbance associated with each project. Implementation of Mitigation Measure 4.6-1 would minimize impacts to a less than significant level and ensure that a thorough analysis of the potential to encounter significant paleontological resources is performed in accordance with Society of Vertebrate Paleontology standard guidelines.

Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could lead to impacts on paleontological resources during the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed

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project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that impacts on paleontological resources is minimized as well as the mitigation measure mentioned above. If it is determined that the potential exists for a project to encounter and destroy significant paleontological resources, the appropriate steps will be followed to ensure that a professional paleontologist is retained to prepare a paleontological resource management plan (or similar), which will include appropriate mitigation recommendations to avoid a potentially significant impact. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to destroying a unique paleontological resource or site or unique geologic feature.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

g) Would the proposed project result in a cumulatively considerable impact to geological resources?

Cumulative impacts to geologic resources from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. Impacts related to geology and paleontology tend to be site-specific and depend on the local geology and soil conditions. For these reasons, the geographic scope for potential cumulative impacts to geological resources consists of the planning areas and adjacent areas. The geographic scope of cumulative impacts to paleontological resources includes the planning areas and adjacent areas where deposits with a high potential to contain paleontological resources could be disturbed. If there are potential paleontological resources that extend across areas of ground disturbance of the potential Housing Element and Safety Element projects and cumulative projects, the projects could result in the loss of paleontological resources, a potentially significant impact. However, with implementation of Mitigation Measure 4.8-6, Determination of Paleontological Potential, implementation of the Housing Element and Safety Element policies and programs would effectively avoid the potential loss of paleontological resources in the event of inadvertent discovery during construction. Therefore, while implementation of cumulative projects could have a significant effect related to paleontological resources, the project's contribution to such impacts would be less than significant. Impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe

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impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

4.2.7 Greenhouse Gas Emissions

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	LTS/M	Yes	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	LTS/M	Yes	No	No	No
c) Cumulatively contribute to GHG emissions and global climate change?	LTS/M	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to generate GHG emissions related to the construction of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3, and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3 and 2.3.5); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5). These policies and programs could create short-term GHG impacts that would have an impact on the environment. The primary source of these GHGs is fossil fuel use. The use of construction equipment and waste haul vehicles could use fossil fuels.

Impact on GHG emissions from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. The Housing Element EIR

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provides a mitigation measure that all construction of potential projects under implementation of the proposed project would be required to comply with:

- **Mitigation Measure 4.7-1:** Reduce GHG emissions from building energy use and motor vehicle trips.

Implementation of Housing Element EIR Mitigation Measure 4.7-1 was determined to reduce GHG emissions to a less than significant level by requiring that all new multifamily development be 100 percent electric with no natural gas infrastructure for appliances, including water heaters, clothes washers and dryers, HVAC systems, and stove and Subsequent multifamily development projects must comply with electric vehicle (EV) requirements in the most recently adopted version of CALGreen Tier 2 at the time of project specific CEQA review. Housing Element EIR Mitigation Measure 4.7-1 would be required for development under the proposed Safety Element.

Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could generate greenhouse gas emissions during construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that impacts on the environment is minimized. Any new development that would be required to comply with the no natural gas requirement in Title 24, electric vehicle requirements in CALGreen, SB 743 VMT reduction target, and the mitigation measure mentioned above. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing environmental impacts due to GHG emissions.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to conflict with plans, policies, or regulations adopted to reduce GHG emissions during to the construction of infrastructure and improvements that supports the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3, and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3 and 2.3.5);

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increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Program 4.4.2); and public transit shading (Policy 6.5). These policies and programs could conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.

Conflict with an applicable plans, policies, or regulations of an agency adopted for the purpose of reducing GHG emissions due to GHG emissions from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. The Housing Element EIR provides a mitigation measure that all construction of potential projects under implementation of the proposed project would be required to comply with:

- **Mitigation Measure 4.7-1:** Reduce GHG emissions from building energy use and motor vehicle trips.

Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could generate greenhouse gas emissions during construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that impacts on the environment is minimized. Any new development that would be required to comply with the no natural gas requirement in Title 24, electric requirements in CALGreen, SB 743 VMT reduction target, and the mitigation measure mentioned above. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) Would the proposed project cumulatively contribute to GHG emissions and global climate change?

Cumulative impacts to GHG emissions and global climate change from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. Global GHG emissions are inherently a cumulative concern that is understood for CEQA purposes to be an existing significant and adverse condition. Accordingly, the significance of GHG emissions in this analysis is determined based on whether such emissions would have a cumulatively considerable impact

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on global climate change. Although the geographic scope of cumulative impacts related to GHG emissions is global, this analysis focuses on the implementation of Housing Element and Safety Element policies and program direct and/or indirect generation of GHG emissions on the region and the state. Implementation of the Housing Element would result in a less than significant impact with mitigation. Implementation of Mitigation Measure 4.7-1, discussed above, would ensure consistency with the State's 2030 GHG reduction goals. Implementation of the proposed Safety Element policies and programs would be required to comply with this mitigation measure. The Housing Element's incremental impact relative to GHG emissions in the cumulative context would also be less than significant with mitigation. Impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.8 Hazards and Hazardous Materials

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	Yes	No	No	No
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?	LTS	Yes	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	Yes	No	No	No
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?	LTS/M	Yes	No	No	No
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	NI	Yes	No	No	No
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LTS	Yes	No	No	No
g) Result in a cumulatively considerable impact to hazards and hazardous material?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

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

As shown in Table 3, implementation of proposed policies and programs have the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials related to the construction and operation of infrastructure and improvements that supports the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policy 6.12 and Program 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policy 6.6 and Program 2.6.3); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4); and promoting public transit shading (Policy 6.5). These policies and programs could create short-term adverse impacts to hazardous materials.

Impacts due to the routine transport, use, or disposal of hazardous materials from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts due to routine transport, use, or disposal of hazardous materials through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts due to hazardous material use, transport, and disposal are minimized only to the extent that such policies and standards are quantitative and objective. Construction permits would be required, and the transportation of hazardous materials would be regulated by the US Department of Transportation, Caltrans, and the California Highway Patrol. Additionally, future potential implementation projects under the proposed project would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes policies to minimize impacts due to the transport, use, and disposal of hazardous materials, including Policies 4.1, 4.2, 4.3, and 4.4. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to creating a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to 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 related to the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policy 6.12 and Program 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policy 6.6 and Program 2.6.3); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4); and promoting public transit shading (Policy 6.5). These policies and programs could create short-term adverse impacts to the release of hazardous materials.

Impacts due to the release of hazardous materials into the environment from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts due to the release of hazardous materials through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts due to hazardous materials release are minimized only to the extent that such policies and standards are quantitative and objective.

Construction activities would be required to comply with numerous hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and downstream receiving water bodies. Contractors would be required to prepare and implement Hazardous Materials Business Plans that would require that hazardous materials used for construction would be used properly and stored in appropriate containers with secondary containment to contain a potential release. The California Fire Code would also require measures for the safe storage and handling of hazardous materials. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes policies to minimize the potential of the release of hazardous materials, including Policies 4.1, 4.2, 4.3, 4.4, 4.5, and 4.6. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to creating a significant hazard to the public or

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the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school related to the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policy 6.12 and Program 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policy 6.6 and Program 2.6.3); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4); and promoting public transit shading (Policy 6.5). These policies and programs could create short-term adverse hazardous materials impacts within 0.25 miles from an existing or proposed school.

Impacts due to the release of hazardous materials near a school from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts due to the release of hazardous material near a school through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts from hazardous materials near a school are minimized. Construction activities would be required to comply with numerous hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and downstream receiving water bodies. Contractors would be required to prepare and implement Hazardous Materials Business Plans that would require that hazardous materials used for construction would be used properly and stored in appropriate containers with secondary containment to contain a potential release. The California Fire Code would also require measures for the safe storage and handling of hazardous

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materials. The required compliance with these regulations would ensure that nearby schools would not be exposed to hazardous materials. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes policies to minimize the potential of hazardous emissions or handling of hazardous materials, including Policies 4.1, 4.2, 4.3, 4.4, 4.5, and 4.6. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to emitting hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to create a significant hazard to the public or the environment due to being located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 related to the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policy 6.12 and Program 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policy 6.6 and Program 2.6.3); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4); and promoting public transit shading (Policy 6.5). These policies and programs could be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

Impacts due to implementation of the proposed project being located on a site which is included on a list of hazardous material sites from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation. The Housing Element EIR provides mitigation measures that all construction of potential projects under implementation of the proposed project would be required to comply with:

- **Mitigation Measure 4.8-3A:** Phase I Assessment.
- **Mitigation Measure 4.8-3B:** Health and Safety Plan.
- **Mitigation Measure 4.8-3C:** Soil and Groundwater Management Plan.

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Implementation of Housing Element EIR Mitigation Measure 4.8-3a was determined to minimize impacts to a less than significant level by requiring ground-disturbing activities on industrial and commercial properties, as well as listed active hazardous materials cleanup sites, to complete a Phase I environmental site assessment for that property in accordance with American Society for Testing and Materials Standard E1527 for those active hazardous materials sites to ascertain their current status. Any recommended follow-up sampling (i.e., Phase II activities) set forth in the Phase I assessment shall be implemented prior to construction. The results of Phase II studies, if necessary, shall be submitted to the local overseeing agency and any required remediation or further delineation of identified contamination shall be completed prior to commencement of construction.

Implementation of Housing Element EIR Mitigation Measure 4.8-3b was determined to minimize impacts to a less than significant level by requiring properties for which a Phase 1 assessment identifies hazardous materials issues, that the construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (Title 29 Code of Federal Regulations, Section 1910.120) and California Occupational Safety and Health Administration regulations (Title 8 California Code of Regulations, Section 5192).

Implementation of Housing Element EIR Mitigation Measure 4.8-3c was determined to minimize impacts to a less than significant level by requiring that project contractor(s) develop and implement a Soil and Groundwater Management Plan (SGMP) for the management of soil and groundwater before any ground-disturbing activity. The SGMP shall describe the hazardous materials that may be encountered, the roles and responsibilities of on-site workers and supervisors, training for site workers focused on the recognition of and response to encountering hazardous materials, and protocols for the materials (soil and/or dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner.

Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts create a significant hazard to the public or the environment during the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts due to hazardous materials release are minimized. There are numerous regulations covering the transportation, use, storage, and disposal of hazardous materials during construction activities. The required compliance with these regulations and the mitigation measures mentioned above would reduce the exposure to hazardous materials. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes policies to reduce the risk of hazards to the public or environment from

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hazardous materials, including Policies 4.1, 4.2, 4.3, 4.4, 4.5, and 4.6. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to project being located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

e) For a project within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the proposed project result in a safety hazard or excessive noise for people living or working in the project area?

As described in the Housing Element EIR, the EIR Study Area is not in an airport land use plan or within two miles of a public airport and, as such, no impact regarding this criterion would occur under either plan.

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

As shown in Table 3, implementation of proposed policies and programs have the potential to interfere with an adopted emergency response plan or emergency evacuation plan through the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policy 6.12 and Program 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policy 2.1); increasing green infrastructure (Policy 6.6 and Program 2.6.3); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4); and promoting public transit shading (Policy 6.5). These policies and programs could create short-term interferences with emergency response plans.

Impacts to emergency response and evacuation plans from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts emergency response plans during the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to emergency response plans are minimized. The City's Emergency

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Operations Plan/Wildland Fire Evacuation Plan identifies key routes within the City that must remain open for purposes of emergency response and evacuation. During the permit review process, the proposed project's potential impacts to those routes would be identified and addressed through compliance with Section 3-2 of the City's building regulations. In this manner, construction of residential projects that might arise would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes several policies to improve the evacuation system and processes, including Policies 1.1, 1.4, 1.7, 1.10, 1.12, 1.13, 1.14, 1.15, 1.16, 1.18, and 1.20. All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of interference with an adopted emergency response plan or emergency evacuation plan.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

g) Would the proposed project result in a cumulatively considerable impact to hazards and hazardous material?

Cumulative impacts to hazards and hazardous material from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Construction activities for the cumulative projects would be subject to the same regulatory requirements discussed for the proposed project for compliance with existing hazardous materials regulations, including the management of hazardous materials and spill response. Cumulative projects that transport, use, store, or dispose of hazardous materials would be required to comply with the same State, regional, and city regulations as the proposed project. Further, Mitigation Measures 4.8-3A, 4.8-3B, and 4.8-3C, discussed above, would be required for all projects that could arise from implementation of the Housing Element. Therefore, the implementation of the proposed project policies and programs impacts on hazards and hazardous material in the cumulatively context would be less than significant. Impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

All future development projects that would implement the proposed project would be subject to applicable federal, State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

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There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.9 Hydrology and Water Quality

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Violate any water quality standards or waste discharge requirements?	LTS	Yes	No	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	Yes	No	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or of-site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows? 	LTS	Yes	No	No	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	NI	Yes	No	No	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	Yes	No	No	No
f) Result in a cumulatively considerable impact to hydrology and water quality?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

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DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality through the construction and operation of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policies 2.1, 2.3, and 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); promoting drought tolerant landscaping (Program 6.8.1); and public transit shading (Policy 6.5). These policies and programs could create short-term degradation to surface or groundwater quality.

Impacts to surface and groundwater quality from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to surface water quality through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities.

Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to water quality are minimized. Construction projects that disturb one or more acres of ground disturbance would be required to obtain coverage under the NPDES Construction General Permit. Preparation of a SWPPP, along with implementation during construction, is required to comply with the NPDES Construction General Permit. Title 5, Chapter 5-4 of the Lafayette Municipal Code contains established measures to prevent and reduce stormwater pollution such as development runoff requirements including performance standards to address construction and post-construction impacts to water quality. Consistent with General Plan Policy OS-6.1, these standards are needed to minimize pollutants in storm water runoff and protect water courses. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes policies and programs to improve surface and groundwater water quality, including Program 2.3.3, which requires the incorporation of detention ponds into the design and construction of development projects; Policy 2.5, which promotes the use of green infrastructure and permeable paving to reduce flood risks and filter stormwater; and Policy 5.5, which encourage the use of

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green infrastructure to protect water quality. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As noted in the Housing Element EIR, the City of Lafayette is not located in a defined groundwater basin as identified by the Department of Water Resources. Lafayette is in the East Bay Municipal Utilities District (EBMUD) service area, which receives most of its water supply from surface waters imported from the Mokelumne Watershed. The potential development and infrastructure projects implemented through the proposed Safety Element would not be in a defined groundwater basin, and therefore would not substantially interfere with sustainable management of groundwater resources. For these reasons, the proposed project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) Result in substantial erosion, siltation, or flooding on- or off-site; (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?

As shown in Table 3, implementation of proposed policies and programs have the potential to alter drainage patterns through the construction and operation of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3 increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program

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3.1.3); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); and public transit shading (Policy 6.5). These policies and programs could create a short-term impact to drainage patterns.

Impacts to drainage patterns from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to drainage patterns through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to drainage patterns are minimized. Projects would be required to conform to stormwater management and control standards and would have to demonstrate that such development would not result in capacity exceedances as part of the projects' stormwater management plans, as required and subject to City review and approval. These regulatory controls along with implementation of measures described in the SWPPP would limit runoff.

Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes several policies and programs to improve drainage areas and increase pervious surfaces, including Program 2.1.6, which would develop a creek maintenance program to reduce flooding by removing debris from creeks, implementing erosion-control practices, and restoring natural creek flow; Policy 2.3 and associated programs, which would maintain unobstructed water flow in the storm drainage system; Policy 2.5 and associated programs, which promotes the use of green infrastructure and permeable surfaces to reduce flood risks; and Policy 5.5, which encourage the use of green infrastructure to protect water quality. All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, including the Construction General Permit of the NPDES program and low impact development requirements pursuant to Lafayette Municipal Code Chapter 5-405, and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) Result in substantial erosion, siltation, or flooding on- or off-site; (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed

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in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to release pollutants due to project inundation during the construction of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); and public transit shading (Policy 6.5). These policies and programs risk the release of pollutants due to project inundation.

The risk of releasing pollutants due to project inundation from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause risk release of pollutants through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that the risk release of pollutants are minimized. Construction projects that disturb one or more acres of ground disturbance would be required to obtain coverage under the NPDES Construction General Permit. Preparation of a SWPPP, along with implementation during construction, is required to comply with the NPDES Construction General Permit. Title 5, Chapter 5-4 of the Lafayette Municipal Code contains established measures to prevent and reduce stormwater pollution such as development runoff requirements including performance standards to address construction and post-construction impacts to water quality. Consistent with General Plan Policy OS-6.1, these standards are needed to minimize pollutants in storm water runoff and protect water courses.

Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes several policies and associated programs to minimize flood hazards in the city, including Policies 2.1, 2.2, 2.3, 2.4, 2.5, and 2.6. All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as

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required. Therefore, the proposed project would increase the risk the release of pollutants due to project inundation.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during the construction and operation of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policies 2.1, 2.3, and 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.5.4 and 2.6.5 increased review requirements for new development (Policies 4.5 and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); promoting drought tolerant landscaping (Program 6.8.1); and public transit shading (Policy 6.5). These policies and programs may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Conflicts with or obstructions to implementation of a water quality control plan or sustainable groundwater management plan from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect conflicts to water quality control plans through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to water quality plans are minimized. Additionally, the proposed Safety Element includes policies and programs to improve surface and groundwater water quality, including Program 2.3.3, which requires the incorporation of detention ponds into the design and construction of development projects; Policy 2.5, which promotes the use of green infrastructure and permeable paving to reduce flood risks and filter stormwater; and Policy 5.5, which encourage the use of green infrastructure to protect water quality. Therefore, the proposed

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project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

f) Would the proposed project result in a cumulatively considerable impact to hydrology and water quality?

Cumulative impacts to hydrology and water quality from implementation of the Safety Element policies and programs were evaluated in the Housing Element EIR and impacts were found to be less than significant. The geographic area for consideration of cumulative effects is defined as the Lafayette city limits. There are numerous housing developments recently constructed, proposed to be constructed, or under design review approval consideration with the City. Such development or redevelopment would be subject to regional and local stormwater management guidelines and requirements. Projects involving the creation or replacement of 10,000 square feet of impervious surface area would be subject to hydromodification management controls and low impact development design standards and would be required to demonstrate in their stormwater control management plans that run off from such disturbance is adequately controlled. Therefore, when considered in the cumulative context, hydrology and water quality impacts would not be cumulatively considerable.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.10 Land Use and Planning

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Physically divide an established community?	LTS	Yes	No	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	Yes	No	No	No
c) Result in a cumulatively considerable impact to land use and planning?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

a) *Would the proposed project physically divide an established community?*

As shown in Table 3, implementation of the proposed policies and programs would not have the potential to physically divide an established community. The physical division of an established community typically refers to the construction of a physical feature or the removal of a means of access that would impair mobility within an existing community or between a community and outlying areas. The proposed project is a regulatory document prepared for the purpose of increasing safety and resilience.

The chance of physically dividing the established community from implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. The proposed Safety Element would not alter the physical layout of the City such that movement within or across the City would be obstructed and does not propose any roadways, such as freeways, that would divide the City or isolate individual neighborhoods within it. Therefore, the proposed project would not result in a new divided community impact that was not addressed in the Housing Element EIR.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of the proposed policies and programs would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project is a regulatory document prepared for the purpose of increasing safety and resilience.

Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect from implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be required to comply with applicable State, regional, and/or City land use plans, policies, or regulations for the purpose of minimizing environmental effects, and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) Would the proposed project result in a cumulatively considerable impact to land use and planning?

Changes that would occur as a result of cumulative development would not alter the physical layout of the city such that movement within or across the City would be obstructed. Implementation of proposed Safety Element policies and programs would not contribute to a cumulative effect due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as discussed in criteria (a) and (b) above. Consequently, the cumulative impact would be less than significant.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.11 Noise

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	Yes	No	No	No
b) Result in the generation of excessive groundborne vibration or groundborne noise levels?	LTS	Yes	No	No	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	NI	Yes	No	No	No
d) Result in a cumulatively considerable impact to noise impacts?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in generation of a substantial temporary increase in ambient noise levels in the Lafayette through the construction and operation of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4, and 6.12 and Programs 1.2.2 and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.5, 3.6, 4.5 and 4.6 and Program 4.4.6);

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requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); creating buffer landscape space (Programs 4.4.2 and 4.4.4); and promoting public transit shading (Policy 6.5). Implementation of these policies and programs may increase temporary ambient noise levels in the vicinity of where the potential project would occur in excess of standards established in the local general plan or noise ordinance, or in other applicable local, State, or federal standards.

Impacts due to increased ambient noise levels from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to noise levels through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would be subject to applicable City regulations and requirements, including Lafayette Municipal Code Chapter 5-208, which regulates construction and maintenance noise in the city to ensure that adverse impacts to noise levels are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include construction equipment noise levels, time of use, and type of equipment. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, State, or federal standards.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

b) Would the proposed project result in generation of excessive groundborne vibration or groundborne noise levels?

As shown in Table 3, implementation of proposed policies and programs have the potential to result in generation of excessive groundborne vibration or groundborne noise levels through the construction and operation of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4, and 6.12 and Programs 1.2.2 and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.5, 3.6, 4.5 and 4.6 and Program 4.4.6); requiring vegetation

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management plans (Policies 4.4 and 4.14 and Program 4.4.1); creating buffer landscape space (Programs 4.4.2 and 4.4.4); and promoting public transit shading (Policy 6.5). These policies and programs may generate excessive groundborne vibration or groundborne noise levels.

Impacts due to excessive groundborne vibration or groundborne noise levels from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to vibration levels through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would be subject to applicable City regulations and requirements to ensure that adverse impacts to vibration levels are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include construction equipment noise and vibration levels, time of use, and type of equipment. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in generation of excessive groundborne vibration or groundborne noise levels.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the proposed project expose people residing or working in the project area to excessive noise levels?

As described in the Housing Element EIR, the EIR Study Area is not in an airport land use plan or within two miles of a public airport and as such, no impact regarding this standard would occur under either plan.

d) Would the proposed project result in a cumulatively considerable impact to noise impacts?

The potential exists for construction projects under implementation of proposed Safety Element policies and programs and other foreseeable developments to occur simultaneously and in proximity to one another. However, construction equipment operations would operate within the constraints of Lafayette Municipal Code and impacts associated with future construction activities conflicting with local noise standards would be less than significant.

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All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

4.2.12 Population and Housing

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	Yes	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	LTS	Yes	No	No	No
c) Result in a cumulatively considerable impact to population and housing?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

a) Would the proposed project induce substantial unplanned population growth or growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

As shown in Table 3, implementation of proposed policies and programs would not have the potential to result in an unplanned population growth related to the construction and operation of infrastructure and improvements that support the proposed project. The proposed project would not generate any new residents to Lafayette, and employees would likely be limited to those who work on the short-term construction of infrastructure and improvements that support the proposed project. The proposed project is a regulatory document prepared for the purpose of increasing safety and resilience.

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The chance of unplanned population growth from the implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not induce substantial unplanned population growth or growth for which inadequate planning has occurred, either directly (i.e., by proposing new homes and businesses) or indirectly (i.e., through extension of roads or other infrastructure).

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs would not displace substantial numbers of existing people or housing due to the construction and operation of infrastructure and improvements that support the proposed project. The proposed project would not displace any residents or housing in Lafayette. The proposed project is a regulatory document prepared for the purpose of increasing safety and resilience.

The impact of displaced people or housing from the implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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c) Would the proposed project result in a cumulatively considerable impact to population and housing?

Cumulative impacts to population and housing from implementation of implementation of proposed Safety Element policies and programs were evaluated in the Housing Element EIR and impacts were found to be less than significant. The Safety Element would not generate new residents and employees would likely be temporary positions for construction of implementation projects. Accordingly, cumulative impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.13 Public Services

Would the Proposed 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:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Fire protection services?	LTS	Yes	No	No	No
b) Police services?	LTS	Yes	No	No	No
c) Schools?	LTS	Yes	No	No	No
d) Libraries?	LTS	Yes	No	No	No
d) Parks?	LTS	Yes	No	No	No
e) Other public facilities?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

a) *Would the proposed project result in substantial adverse physical impacts associated with the provision of 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: (i) fire protection, (ii) police protection, (iii) schools, (iv) libraries, or (v) other public facilities?*

As shown in Table 3, implementation of proposed policies and programs would not have the potential to result in a public service impact related to the construction and operation of infrastructure and improvements that support the proposed project. The primary purpose of the public services impact analysis is to examine the impacts associated with physical improvements to public service facilities required to maintain acceptable service ratios, response times, or other performance objectives. Public service facilities need improvements (i.e., construction, renovation, or expansion) as demand for services increases. Increased demand is typically driven by increases in population.

The impacts on public facilities from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. Additionally, the proposed Safety Element provides policies and programs to improve public services in Lafayette, including Policy 1.7, 1.15, and 1.16. All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed

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project would not create physical impacts associated with the provision of 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: (i) fire protection, (ii) police protection, (iii) schools, (iv) libraries, or (v) other public facilities.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.14 Recreation

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) 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?	LTS	Yes	No	No	No
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	LTS	Yes	No	No	No
c) Result in a cumulatively considerable impact to recreation or parks?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

a) *Would the proposed 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?*

As shown in Table 3, implementation of proposed policies and programs would not have the potential to 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. The proposed project would not generate any new residents to Lafayette, who are the primary users of such recreational facilities, and therefore would not exceed the capacity of the recreation facilities to adequately serve residents or result in the deterioration of existing recreation facilities.

The impacts on existing neighborhood and regional parks or other recreational facilities from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not increase the use of existing neighborhood and regional

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parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The proposed project would not generate any new residents to Lafayette, who are the primary users of such recreational facilities, and therefore would not exceed the capacity of the recreation facilities to adequately serve residents or result in the deterioration of existing recreation facilities, thereby requiring construction of new facilities or modification of existing facilities.

The impacts due to constructing recreational facilities from implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

c) Would the proposed project result in a cumulatively considerable impact to recreation or parks?

Cumulative impacts to parks and recreation from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. The Housing Element, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity would increase the demand for parks and recreation. However, implementation of proposed Safety Element policies and programs would not generate new residents and employees would likely be

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temporary positions for construction of implementation projects. Therefore, cumulative impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3)

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4.2.15 Transportation

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	LTS	Yes	No	No	No
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	SU	Yes	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTS	Yes	No	No	No
d) Result in inadequate emergency access?	LTS	Yes	No	No	No
e) Result in a cumulatively considerable impact to the transportation network?	SU	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities during the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policy 6.6); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Programs 4.4.2, 4.4.4); and public transit shading (Policy 6.5). These policies and programs could conflict with a program, plan, ordinance, or policy addressing the circulation system.

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Conflicts with a program, plan, ordinance, or policy addressing the circulation system from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause conflicts with a circulation program, plan, ordinance, or policy from the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced, including General Plan Circulation Element policies to ensure that circulation system conflicts are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include VMT analysis. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element would include policies and program to improve transit, bicycle, and pedestrian facilities (Policies 6.5 and 6.7 and Program 6.5.1), as well as improve roadway facilities (Policies 1.14, 3.3, and 4.12 and Programs 1.14.1 and 1.14.3). Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs would not have the potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), pertaining to VMT during the construction and operation of infrastructure and improvements that support the proposed project. The proposed project would not promote new development, generate any new residents to Lafayette, and employees would likely be limited to those who work on the short-term construction of infrastructure and improvements that support the proposed project. The proposed project is a regulatory document prepared for the purpose of increasing safety and resilience.

Conflicts or inconsistencies with CEQA Guidelines Section 15064.3, subdivision (b) from implementation projects were evaluated in the Housing Element EIR and impacts were found to be significant and unavoidable even with mitigation for housing projects. However, the Safety Element is a policy level document and does not promote the construction of housing, and therefore does not increase VMT

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compared to what was evaluated in the Housing Element EIR. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to increase hazards due to a geometric design feature or incompatible uses during the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3, and 2.3.5); and promoting buffer landscaping (Programs 4.4.2, 4.4.4). These policies and programs could increase roadway hazards.

Increased hazards due to a geometric design feature or incompatible uses from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could increase hazards during the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced, including General Plan Circulation Element policies to ensure that traffic hazards are minimized only to the extent that such policies and standards are quantitative and objective. Examples of quantitative and objective standards include following city standards and specifications, industry design standards and best practices, and circulation analysis. Additionally, future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

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There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs may result in inadequate emergency access during the construction of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.2); installing better drainage systems (Policies 2.1 and 2.3 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policy 6.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting buffer landscaping (Programs 4.4.2, 4.4.4); and public transit shading (Policy 6.5). These policies and programs may result in inadequate emergency access in the short term.

Inadequate emergency access from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could result in inadequate emergency access during the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that inadequate emergency access is minimized. The City of Lafayette 2013 Standard Specifications ensures that the physical network would be free of obstructions to emergency responders and construction management plans are required. In addition, California law requires drivers, construction workers included, to yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicle passes to ensure the safe and timely passage of emergency vehicles. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element includes several policies that would increase the efficiency of emergency access, including Policies 1.14, 1.15, and 4.1. Therefore, the proposed project would not substantially create inadequate emergency access.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe

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impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

e) Would the proposed project result in a cumulatively considerable impact to the transportation network?

Cumulative impacts to the transportation network were evaluated in the Housing Element EIR and impacts were found to be significant and unavoidable with mitigation, due to the increased VMT from new housing projects. However, the Safety Element is a policy level document and does not promote the construction of housing, and therefore does not increase VMT compared to what was evaluated in the Housing Element EIR. Additionally, all future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.16 Tribal Cultural Resources

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) 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: <ul style="list-style-type: none"> i 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 ii A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resource Code Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance to a California Native American tribe. 	LTS/M	Yes	No	No	No
b) Cause impacts that are cumulatively considerable when viewed in connection with the effects of past, present, and reasonably foreseeable projects?	LTS/M	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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a) *Would the proposed 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:*

i) 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

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resource Code Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance to a California Native American tribe?

As shown in Table 3, implementation of proposed policies and programs have the potential to result in an adverse change in significance of a Tribal Cultural Resource due to the construction of infrastructure and improvements that support the proposed project. These include ensuring public facilities are well equipped for future emergency events (Policies 3.7, 6.4, and 6.12 and Programs 3.5.3 and 4.13.1); creating safer evacuation routes (Policies 4.11 and 4.12 and Program 1.14.3); installing better drainage systems (Policy 2.1 and Programs 2.1.3 and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); stabilizing slopes (Program 3.1.3); requiring vegetation management plans (Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2 and 6.8.1); and public transit shading (Policy 6.5). Depending on the scope and location, these policies and programs may impact tribal resources and mitigation may be necessary. The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities that could cause damage to tribal resources, such as those that could occur from implementation of the Housing Element and would not result in adverse impacts beyond what was evaluated in the Housing Element EIR.

Impacts to tribal resources from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant with mitigation:

- **Mitigation Measure 4.4-2A:** Cultural Resources Review Requirements.
- **Mitigation Measure 4.4-2B:** Inadvertent Discovery of Cultural Resources and/or Human Remains.

The proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities that could cause damage to historical resources, such as those that could occur from implementation of the Housing Element and would not result in adverse impacts beyond what was evaluated in the Housing Element EIR.

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The implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to tribal cultural resources through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements, including Lafayette Municipal Code, Assembly Bill (AB) 52, and AB 168 established and enforced to ensure that adverse impacts to tribal cultural resources are minimized as well as the mitigation measures mentioned above. All projects with ground-disturbance would be reviewed by a qualified archaeologist and any tribal cultural resources identified would be evaluated, and treated appropriately, including consulting with Native American representatives. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts with respect to tribal resources.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

b) Would the proposed project cause impacts that are cumulatively considerable when viewed in connection with the effects of past, present, and reasonably foreseeable projects?

The geographic scope for cumulative impacts to tribal cultural resources comprises the entire City of Lafayette and this analysis conservatively assumes that the land within this area contains tribal cultural resources that are not yet known. The implementation of proposed project policies and programs would be required to comply with Mitigation Measures 4.4-2a and 4.4-2b, described previously, and therefore would not result in cumulative substantial increase in magnitude of the existing impacts with respect to tribal resources.

All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3)

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4.2.17 Utilities and Service Systems

Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	LTS	Yes	No	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	Yes	No	No	No
c) Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	LTS	Yes	No	No	No
d) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	Yes	No	No	No
e) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	LTS	Yes	No	No	No
f) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LTS	Yes	No	No	No
e) Comply with federal, State, and local statutes and regulations related to solid waste?	LTS	Yes	No	No	No

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Would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
f) Result in significant cumulative impacts related to water, wastewater, stormwater, or solid waste?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

DISCUSSION

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

As shown in Table 3, implementation of proposed policies and programs have the potential to result in the construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, which could cause significant environmental effects. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, and 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policies 2.1, 2.3, and 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.6.3, 2.5.4, and 2.6.5); and increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6). These policies and programs could result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

Impacts caused by relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, including the California Building Standards Code and current General Plan policies and programs, and undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element would include policies to increase the resilience of existing utility facilities, including Policies 1.4, 1.8, 1.9, 2.3, 2.4, 2.5, 2.7, 3.7, 4.9, 4.13, 6.3, 6.4, 6.6, 6.7, and 6.8. Therefore, the proposed project would not require or result in the relocation or construction of new or expanded water,

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wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs could impact the water supplies available during the construction of infrastructure and improvements that support the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, and 4.13.1 installing better drainage systems (Policies 2.1, 2.3, and 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.6.3, 2.5.4, and 2.6.5); promoting drought tolerant landscaping and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1). These policies and programs would have sufficient water supplies available to serve the implementation projects and reasonably foreseeable future development during normal, dry, and multiple dry years.

Sufficient water supplies for implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. Additionally, the proposed Safety Element would include several policies to increase water conservation and efficiency, including Policies 6.3 and 6.8. All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

Implementation of proposed Safety Element policies and programs would not impact wastewater treatment demands or capacity. The proposed Safety Element would not promote new development, generate any new residents to Lafayette, and employees would likely be limited to those who work on the short-term construction of infrastructure and improvements that support the proposed project. Compared to the large number of residents the wastewater treatment provider serves, the added construction workers would not add substantial demand or a significant impact. The proposed project is a regulatory document prepared for the purpose of increasing safety and resilience.

Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would implement the proposed project would be subject to applicable State and/or City regulations and requirements and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would 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.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs could generate excess solid waste during the construction of infrastructure and improvements that support the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, and 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policies 2.1, 2.3, and 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.6.3, 2.5.4, and 2.6.5 increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1). These policies and programs could generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

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Solid waste generated for implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could generate solid waste through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to local infrastructure are minimized. To comply with City of Lafayette and CALGreen requirements, development projects would be required to develop a construction waste management plan and divert at least 75 percent of the solid waste generated during construction. Therefore, the proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs could conflict with solid waste regulations during the construction of infrastructure and improvements that support the proposed project, such as ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.1, 6.4 and 6.12 and Programs 1.2.2, 1.10.3, and 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policies 2.1, 2.3, and 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 2.6, 6.6, and 6.7 and Programs 2.6.3, 2.5.4, and 2.6.5); increased review requirements for new development (Policies 3.5, 3.6, 4.5, and 4.6 and Program 4.4.6); requiring vegetation management plans (Policy 4.4 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1). These policies and programs could conflict with federal, State, and local management and reduction statutes and regulations related to solid waste.

Conflicts with federal, State, and local management and reduction statutes and regulations related to solid waste due to implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could conflict with federal, State, and local management and reduction statutes and

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regulations related to solid waste through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that conflicts with solid waste plans are minimized only to the extent that such policies and standards are quantitative and objective. The local policies relevant to solid waste are the California Integrated Waste Management Act, AB 939, the CALGreen Code, AB 341 and AB 1826, Senate Bill (SB) 1383, and the City of Lafayette Municipal Code. RecycleSmart oversees the collection, transfer, and disposal of residential garbage, recycling, and organics in Lafayette and keeps the city compliant with state-mandated recycling requirements (AB 341 and AB 1826), including recycling of organics. Therefore, the proposed project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

f) Would the proposed project result in significant cumulative impacts related to water, wastewater, stormwater, or solid waste?

Cumulative impacts to water, wastewater, stormwater, or solid waste from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. The Housing Element and Safety Element, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity would incrementally increase the demand for utilities and service systems and therefore would have less than significant impacts with regard to utilities and service systems. Furthermore, cumulative development would be subject to capacity fees and other regulations that contribute to long-term utilities planning and capacity improvements. Impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.18 Wildfire

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the Proposed Project:	Level of Impact in the Housing Element EIR	Impacts of the Proposed Project Compared to Housing Element EIR:			
		Same or Reduced Impact?	New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	Yes	No	No	No
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	LTS	Yes	No	No	No
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	LTS	Yes	No	No	No
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	LTS	Yes	No	No	No
e) 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?	LTS	Yes	No	No	No
f) Result in a cumulatively considerable wildfire impact?	LTS	Yes	No	No	No

Key: NI = no impact; LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable

4.2.18.1 DISCUSSION

As shown on Figure S-10 of the proposed Safety Element, the City of Lafayette contains lands within a Local Responsibility Area, Very High Fire Hazard Severity Zone (VHFHSZ). These areas are located north of SR-24 within the City Limits and Sphere of Influence, as well as north and west of Lafayette Reservoir. Additionally, as shown on Figure S-9 of the proposed Safety Element, much of the city is within the Wildland-Urban

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Interface, where wildfires are more likely to damage homes and infrastructure. The following discussion analyzes the impacts of the proposed Safety Element on Wildfire.

a) Would the proposed project substantially impair an adopted emergency response plan or emergency evacuation plan?

As shown in Table 3, implementation of proposed policies and programs have the potential to impair an adopted emergency response plan or emergency evacuation plan during the construction of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.4, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.12); installing better drainage systems (Policies 2.1, 2.3, 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 3.5, 3.6, 4.5 and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, 6.8.1); and promoting public transit shading (Policy 6.5). These policies and programs could create less than significant construction related impacts on emergency response plans and would be beneficial in the long term.

The impacts on an adopted emergency response plan or emergency evacuation plan from implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. As described in the Housing Element EIR, the city's Emergency Operations Plan/Wildland Fire Evacuation Plan identifies key routes within Lafayette that must remain open for purposes of emergency response and evacuation. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts to emergency response or evacuation plans through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that adverse impacts to emergency response and evacuation plans are minimized only to the extent that such policies and standards are quantitative and objective. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element would contain several policies and programs to improve and maintain consistency with adopted emergency response and evacuation plans, including Policies 1.1, 1.4, 1.7, 1.10, 1.12, 1.13, 1.14, 1.15, 1.16, 1.18, and 1.20. Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed

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in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to exacerbate wildfire risk during the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.4, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.12); installing better drainage systems (Policies 2.1, 2.3, 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 3.5, 3.6, 4.5 and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1); and promoting public transit shading (Policy 6.5). These policies and programs could temporarily exacerbate wildfire risks due to slope, prevailing winds, and other factors.

The impacts on to the uncontrolled spread of wildfire due to slope, prevailing winds, or other factors from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts that exacerbate wildfire risk through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that exposure to pollutant concentrations from wildfire is minimized, such as the California Fire Code and Very High Fire Hazard Severity Zone Fire Safe Regulations. Additionally, as a condition of approval, and pursuant to the Lafayette Fire Safety Ordinance and the Contra Costa County Fire Protection District Fire Code, all development projects would be required to comply with requirements relating to emergency planning and preparedness, fire service features, building services and systems, access requirements, water supply, fire and smoke protection features, building materials, construction requirements, defensible space and vegetation management, and specific requirements for specialized uses involving flammable and hazardous materials. Future potential implementation projects under the proposed projects would also be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the Safety Element contains several policies and associated programs to minimize wildfire ignition and the spread of wildfire, including Policies 4.4, 4.5, 4.6, 4.8, 4.9, 4.10, 4.11, 4.13, 4.14, and 4.16. Therefore, the proposed project

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due to slope, prevailing winds, and other factors, would not exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to exacerbate fire risk or may result in temporary or ongoing impacts to the environment due to the construction of infrastructure and improvements that support the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.4, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.12); installing better drainage systems (Policies 2.1, 2.3, 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7 increased review requirements for new development (Policies 3.5, 3.6, 4.5 and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1); and promoting public transit shading (Policy 6.5). These policies and programs could create less than significant construction-related impacts to the environment but would not exacerbate wildfire risks.

The exacerbation of wildfire risk and temporary or ongoing impacts to the environment due to construction and operation of infrastructure was evaluated in the Housing Element EIR and impacts were found to be less than significant. However, the Housing Element EIR determined that the construction of roads, fuel breaks, emergency water sources, power lines, or other utilities would not be required to implement the Housing Element. The proposed Safety Element includes policies to maintain roadways and evacuation routes, create and maintain fuel breaks, vegetation management, underground energy transmission lines, and managing water utilities to ensure long-term water supply would be available for fire suppression. Implementation of all Safety Element policies and programs would be required to comply with the California Building Code, California Fire Code, Public Resources Code Section 4291, Very High Fire Hazard Severity Zone Fire Safe Regulations, the Lafayette Municipal Code Chapter 3-5, *Fire Safety*, Lafayette Emergency Operations Plan and Wildland Fire Evacuation Plan, City of Lafayette Encroachment Permit Requirements, and the Contra Costa County Fire Protection District Fire Code. Compliance with State, regional, and City requirements and regulations would prevent the construction of implementation projects from exacerbating wildfire risks or creating temporary or permanent impacts on the environment. Furthermore, implementation of the proposed project would result in changes at the policy level, there is no potential for

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growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. All future development projects that would undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment and impacts would be less than significant, similar to the less than significance conclusion in the Housing Element EIR.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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

As shown in Table 3, implementation of proposed policies and programs have the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes during the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, 3.7, 6.4, and 6.12 and Programs 1.2.2, 3.5.3, and 4.13.1); improving evacuation routes (Policies 4.11 and 4.12 and Programs 1.14.3 and 4.1.12); installing better drainage systems (Policies 2.1, 2.3, 3.2 and Programs 2.1.2, 2.1.3, and 2.3.5); increasing green infrastructure (Policies 6.6 and 6.7); increased review requirements for new development (Policies 3.5, 3.6, 4.5 and 4.6 and Program 4.4.6); requiring vegetation management plans (Policies 4.4 and 4.14 and Program 4.4.1); promoting drought tolerant and buffer landscaping (Programs 4.4.2, 4.4.4, and 6.8.1); and promoting public transit shading (Policy 6.5).

The impacts on downslope or downstream flooding or landslides from implementation of the Housing Element was evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause indirect impacts that expose people or structures to significant risks from the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that exposure to risks as a result of postfire slope instability is minimized. Future potential implementation projects under the proposed projects would be required to undergo an appropriate level of environmental review of project-specific impacts, as required. Additionally, the proposed Safety Element update contains several policies and associated programs to minimize landslide

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and flooding events throughout the city, including Policies 2.1, 2.2, 2.3, 2.5, 3.1, 3.2, 3.4, 3.5, and 3.6. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

e) Would the proposed project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

As shown in Table 3, implementation of proposed policies and programs have the potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires through the construction and operation of infrastructure and improvements that supports the proposed project. These policies and programs include ensuring public facilities are prepared and well equipped for future emergency events (Policies 1.2, 1.8, 1.9, and 6.12 and Programs 1.2.2 and 4.13.1); improving evacuation routes (Program 1.14.3); installing better drainage systems (Policy 2.1 and Program 2.1.2); increasing green infrastructure (Policy 6.6 and Program 2.6.3); and promoting public transit shading (Policy 6.5). These policies and programs could create short-term exposures to wildland fires.

Impacts due to wildland fires from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. Implementation of the proposed project would result in changes at the policy level, there is no potential for growth in Lafayette or the region associated with the proposed project, and it does not include specific development proposals. However, the implementation of the proposed project could cause risk of loss, injury, or death from wildfires through the construction of resilience features on existing buildings, shading projects, roadway improvement, as well as vegetation management activities. Similar to implementation actions under the Housing Element, all future development projects that would implement the proposed project would still be subject to applicable State, and/or City regulations and requirements established and enforced to ensure that risk of loss, injury, or death from wildfires is minimized, such as the California Fire Code and Very High Fire Hazard Severity Zone Fire Safe Regulations. Additionally, as a condition of approval, and pursuant to the Lafayette Fire Safety Ordinance and the Contra Costa County Fire Protection District Fire Code, all development projects would be required to comply with requirements relating to emergency planning and preparedness, fire service features, building services and systems, access requirements, water supply, fire and smoke protection features, building materials, construction requirements, defensible space and vegetation management, and specific requirements for specialized uses involving flammable and hazardous materials. Future potential implementation projects under the proposed projects would also be required to undergo an appropriate level of environmental review of project-specific impacts, as required.

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Additionally, the proposed Safety Element includes several policies to minimize risk of loss of life, injury, or death involving wildland fires, including Policies 4.1, 4.4, 4.5, 4.6, 4.8, 4.9, 4.10, 4.11, 4.12, 4.13, and 4.14. All future development projects that would implement the proposed project would be subject to applicable State, regional, and/or City regulations and requirements, and undergo an appropriate level of environmental review of project-specific impacts, as required. Therefore, the proposed project would not result in a new impact or a substantial increase in magnitude of exposure, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

f) Would the proposed project result in a cumulatively considerable wildfire impact?

Cumulatively considerable wildfire impacts from implementation of the Housing Element were evaluated in the Housing Element EIR and impacts were found to be less than significant. For cumulative projects that are within a VHFHSZ, the development of housing in those areas could increase the risk of wildfire by introducing new sources of ignition (i.e., vehicles and residents) into those areas. However, as a condition of approval, and pursuant to the Lafayette Fire Safety Ordinance and the Contra Costa County Fire Protection District Fire Code, all development projects would be required to comply with requirements relating to emergency planning and preparedness, fire service features, building services and systems, access requirements, water supply, fire and smoke protection features, building materials, construction requirements, defensible space and vegetation management, and specific requirements for specialized uses involving flammable and hazardous materials. Each of the code requirements outlined above has been developed over many decades to reduce the risks associated with wildfire. As a condition of approval for any cumulative project that may be developed in addition to those that might be developed as part of the Housing Element's adoption, the implementation of these standard requirements would reduce impacts associated with accidental ignitions emanating from project sites and would also reduce impacts associated with wildfires encroaching onto project sites from adjacent areas. Development under the implementation of proposed Safety Element policies and programs would be required to comply with all applicable regulations and standards related to wildfire. There would therefore be no cumulatively considerable effect, and the cumulative impact would therefore be less than significant. Impacts under the Safety Element would be as or less severe than those evaluated in the Housing Element EIR.

There are no changed circumstances or new information that meets the standard for requiring further environmental review under CEQA Guidelines Section 15162. No changes in land use patterns are proposed in association with the proposed project. The proposed project would not result in new or more severe impacts beyond what was addressed in the Housing Element EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3).

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4.2.19 Mandatory Findings of Significance

Would the Proposed Project:	Same or Reduced Impact?	New or More Severe Impacts?
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Yes	No
b) 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.)	Yes	No
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Yes	No

DISCUSSION

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

With respect to biological resources, cultural resources, and tribal cultural resources, implementation of the proposed project would not result in changes to the development standards or land use designations established as part of the Housing Element or to any zoning districts in the Lafayette Municipal Code. Therefore, the proposed project would not result in construction of new buildings or intensification of development that would change the scale or location of overall ground-disturbing activities, such as those that could occur from implementation of the Housing Element, and the proposed project would not generate new population growth that would generate permanent demand on service system providers is associated with the proposed project. As discussed throughout this Addendum, the proposed project would not result in a new impact or a substantial increase in magnitude of the existing impacts evaluated in the Housing Element EIR.

b) *Would the proposed 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.)*

CEQA Guidelines Section 15355, Cumulative Impacts, defines cumulative impacts as two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant

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projects taking place over a period of time. As described in Sections 4.2.1 through 4.2.18, implementation of the proposed project would not result in a new or a substantial increase in magnitude of the existing cumulatively considerable impacts of the Housing Element.

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

Implementation of the proposed project would not change from the Housing Element with respect to direct and indirect effects on human beings. The proposed project would not increase the Housing Element's development program and boundaries. Additionally, the proposed Safety Element would include the safety and resilience of the city, residents, and businesses. As discussed throughout this Addendum, implementation of the proposed project would not result in a new impact or a substantial increase in magnitude of existing impacts of those of the Housing Element EIR.

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5. Conclusion

As demonstrated in the Certified Housing Element EIR and summarized in Section 4, *Environmental Analysis*, of this Addendum, all impacts from implementation of the Housing Element were found to be less than significant or less than significant with mitigation, except for the significant and unavoidable impacts to aesthetics, air quality, cultural resources, and transportation. As shown in Section 4.2.1, *Aesthetics*, impacts to scenic vistas would remain significant and unavoidable with implementation of the proposed project, but would not be increased in severity. As shown in Section 4.2.4, *Cultural Resources*, change in significance of a historical resource would remain significant and unavoidable with implementation of the proposed project, but would not be increased in severity. As shown in Section 4.2.15, *Transportation*, implementation of the proposed project would not affect VMT and therefore would have a less severe impact in regard to CEQA Guidelines Section 15064.3(b). As described in Section 4, *Environmental Analysis*, implementation of the proposed policies and any associated programs would be subject to applicable federal, State, regional, and/or City regulations; undergo an appropriate level of environmental review; and implement mitigation measures from the Housing Element EIR, as required.

As summarized below, and for the reasons described in Section 4, *Environmental Analysis*, the City has determined that an Addendum to the Housing Element EIR is appropriate for the proposed project. None of the conditions analyzed under the Housing Element EIR have changed, nor does the proposed project, as a consistent General Plan Element to the Housing Element, meet any of the criteria for preparing a subsequent or supplemental EIR. The proposed project will not have one or more significant effects not discussed in the Housing Element EIR, nor does the proposed project create substantially more severe significant effects than previously examined in the Housing Element EIR. Implementation of the proposed project would remain consistent with the analysis in the certified Housing Element EIR.

5.1 SUBSTANTIAL CHANGES TO THE PROJECT

The proposed project is not a substantial change to the Housing Element EIR because it is within the Study Area described in the Housing Element EIR in Section 3.2, *Study Area*, and the proposed project would not result in further impacts than what was evaluated in the Housing Element EIR. Consequently, there are no substantial changes proposed that will require major revisions of the Housing Element EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

5. Conclusion

5.2 SUBSTANTIAL CHANGES IN CIRCUMSTANCES

The proposed project would not result in substantial changes in physical circumstances that would cause a new significant impact or substantially increase the severity of a previously identified significant impact, and there have been no other changes in the circumstances that meet this criterion. There have been no changes in the environmental conditions in the Study Area that were not contemplated and analyzed in the Housing Element EIR and that would result in new or substantially more severe environmental impacts in association with implementation of the proposed project.

5.3 NEW INFORMATION

There is no new information of substantial importance (which was not known or could not have been known at the time of the Housing Element certified on January 23, 2023) that identifies a new significant impact; a substantial increase in the severity of a previously identified significant impact; mitigation measures or alternatives previously found infeasible that would now be feasible and would substantially reduce one or more significant effects of the Housing Element; or mitigation measures or alternatives that are considerably different from those analyzed in the Housing Element EIR and would substantially reduce one or more significant effects on the environment.

6. References

ESA. 2023. *City of Lafayette Housing Element Environmental Impact Report*. SCH Number 2021080038.

City of Lafayette. 2023. *City of Lafayette Housing Element*.

Contra Costa County Conservation and Development Department. 2022. Demographics. <https://www.contracosta.ca.gov/5342/Demographics>, accessed May 30, 2023

6. References

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