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February 23, 2026

Contra Costa County
Department of Conservation and Development
Attn: Syd Sotoodeh, Senior Planner
30 Muir Road
Martinez, CA 94553

RE: Proposed Mitigated Negative Declaration for the East County Service Center Project (CP #25-39, Project No. WH429A)

Dear Ms. Sotoodeh:

Thank you for the opportunity to review the proposed Initial Study/Mitigated Negative Declaration (IS/MND) for the East County Service Center Project (Project), located south of Technology Way and west of Brentwood Boulevard. The City's comments are as follows:

1. On **page 2 of the Notice of Public Review** and repeated throughout the IS/MND, the proposed building will have a maximum height of 58 feet, "including the mechanical penthouse and mechanical roof equipment." It is not clear; however, how much of the penthouse and/or equipment extends to 58 feet. It is also not clear what the height of the building is, as measured to the top of the parapet. This information is essential for the purpose of adequately assessing any aesthetic impacts.
2. On **page 1-2**, there is a reference to a rooftop photovoltaic system, but there is no reference to any such system within the parking lot. This should be clarified, as it was mentioned during the January 27, 2026 presentation from County staff to the City Council, and it has the potential to significantly impact the proposed landscape plan (e.g., a reduction in the number of trees that could be planted).
3. On **Figure 2** (Conceptual Site Plan), there appears to be a portion of the site plan missing along the south boundary, near Brentwood Boulevard.
4. On **page 1-11**, under "Environmental Factors Potentially Affected," all boxes should be checked for factors that include at least one potentially significant impact (i.e., any that include mitigation measures).
5. On **page 2-1** under the discussion for Impact (a) related to Aesthetics, it is noted that the building would be of a height similar to many of the trees surrounding the project site, but the statement is general and not substantiated. For reference, the City's applicable development standards for the project site

(both within the PD-42 zoning district and the Brentwood Boulevard Specific Plan) provide for a maximum building height of 40 feet. The Silvergate apartment complex, located directly west of the project site, includes three-story buildings with a maximum height of 36 feet. While three-story buildings typically range in height from 36 feet to 45 feet, the proposed building is substantially higher (at 58 feet). Given this, as well as the context of existing development in the surrounding area, public views along both Technology Way and Brentwood Boulevard could be significantly impacted.

6. On **page 2-3**, under the discussion of Impact (d) related to Aesthetics, there should be a precise foot candle requirement included in Mitigation Measure AES-1 to ensure that light does not spill onto adjacent properties.
7. On **page 2-4**, under the discussion of Impact (a) related to Agriculture and Forestry Resources, while the County is not required to pay development impact fees for the project, it should at least be noted that the City has an adopted Agricultural Preservation Program to offset the loss of prime farmland. The City's General Plan has specific goals, policies, and actions related to this effort, and the Agricultural Preservation Program is codified in Chapter 17.730 of the Brentwood Municipal Code.
8. On **page 2-28**, under the discussion for Cultural Resources, there is a reference to a cultural resources assessment that was prepared for the project by Cogstone Resource Management. The assessment is not; however, attached to the IS/MND. It should be attached in order to conduct a proper review and to ensure that the impacts are adequately analyzed.
9. On **page 2-44**, the IS/MND states that most of the project's annual GHG emissions, approximately 71 percent, would be from mobile sources, including County workers and visitors. No data is provided regarding where the majority of workers and customers would be traveling from. Without this information, it is possible that the GHG analysis is underestimating the impacts of mobile sources.
10. On **page 2-63**, under Mineral Resources, both Impact (a) and Impact (b) are checked as "less than significant," but the conclusion is "no impact." These should be consistent.
11. On **page 2-64**, under Noise, Impact (a) is checked as "less than significant with mitigation incorporated," but the conclusion is "less than significant." These should be consistent.
12. On **page 2-65**, there is a reference to one of the local roads as Business *Circle* Drive. This should be changed to Business *Center* Drive here and throughout the IS/MND.
13. On **page 2-79**, under the heading "Play-Area Noise," there is a reference to Linda Vista Elementary School in San Diego. There is no explanation as to why measurements taken at that particular school are relevant to this project.
14. On **page 2-83**, under the discussion of Impact (a) related to Public Services (fire protection), there is no reference to Fire Station #94. This station, which will be owned and operated by the Contra Costa County Fire Protection District (District), is currently under construction. It is located in the Downtown approximately $\frac{3}{4}$ -mile south of the project site. The analysis also does not reference whether the District has adequate equipment, such as a ladder truck, to serve the 58-foot high building. This information is necessary to determine whether the project would impact response times.

15. **Attachment E** (Traffic Impact Study) shows that the project will increase traffic volumes and degrade the level of service at several intersections. The discussion of Public Services impacts on **page 2-84**; however, focuses only on whether the increased daytime population from the project is likely to attract crime or be a source of crime. The section should analyze whether the increased traffic volumes from the project would impact Police service ratios or response times, either due to increased accidents or increased traffic delays on adjacent streets.
16. As noted above, the Public Services discussion does not include a thorough analysis of the project's impact on response times of Fire and Police emergency services. The discussion also does not specify whether there will be Contra Costa County Office of the Sheriff resources on-site to provide law enforcement and emergency services, which could impact service ratios and response times. The analysis in this section should be updated with this information.
17. On **page 2-85** under discussion of Public Services, the Sources of Information list only the 2014 Brentwood General Plan Environmental Impact Report (EIR). The EIR was prepared in 2014 and the County did not contact Parks and Recreation Department or Police Department staff directly to obtain the latest information regarding police protection and parks in Brentwood. Therefore, it is not evident that the conclusions of less than significant impacts in Public Services are supported by the analysis in the IS/MND.
18. On **page 2-88**, under the discussion of Impact (a) related to Transportation (parking), it is noted that the project will provide 424 parking spaces. This contradicts other information within the IS/MND, including **page 2 of the Notice of Public Review**, which indicates that 409 parking spaces will be provided. In addition, while the discussion includes a reference to the sixth edition of the ITE *Parking Generation Manual* and concludes that the parking "would be above minimum parking demand requirements," there is nothing to substantiate that 424 parking spaces will be adequate. By way of example, the City standard for office uses is one parking space for every 250 square feet of gross floor area, which would result in 480 parking spaces for a project of this size. This analysis should be expanded, including an indication of what the typical County parking standard is for office uses, where the majority of the customers and employees would be traveling from, and what the typical work shifts for County employees are. The analysis should substantiate that the project is supplying enough parking on-site to prevent parking overflow onto adjacent streets.
19. **Attachment E** (Traffic Impact Study) references updated signal timing at three intersections; however, the Project Description does not mention these improvements. The County should clarify whether signal timing modifications are included as project components and provide the updated timing plans for City review.
20. On **page 27 of Attachment E** (Traffic Impact Study), the Tri Delta Transit bus routes and stops that serve the project are referenced, and they are attached in Appendix B to the Traffic Impact Study. Tri Delta Transit updated these bus routes and schedules; however, effective August 10, 2025. The analysis should be updated to reflect the correct routes and schedules.
21. During the January 27, 2026 presentation to the City Council, the County indicated that solar-covered parking may be incorporated throughout the proposed parking lot. The

project visuals and conceptual plans; however, depict substantial tree planting within the parking areas. The presentation referenced both screening the site with trees and potentially installing solar panels over parking spaces. Please clarify the intended design approach and whether solar carports (photovoltaic parking canopies) are being proposed. If so, the IS/MND should be updated to reflect and analyze these features, as they are not currently discussed.

22. Engineering-related comments:

- a. Proposed Geothermal System. The County should confirm that the system is a closed-loop system rather than an open-loop system, given that 60 geothermal wells are proposed and described as being up to 400 feet deep. The properties along Technology Way had previously relinquished water rights below 300 feet to the City. Assuming the system includes wells on those properties, then it should not be an open-loop system, which may require extracting water below the 300-foot threshold.
- b. The Traffic Impact Study evaluates Level of Service (LOS) and identifies mitigation measures. The **Notice of Public Review** also references LOS mitigation measures as part of the project. Please clarify when the mitigation measure designs will be submitted to the City for review and approval, and when construction of these improvements will occur (e.g., prior to building occupancy).
- c. Nancy Street, designated as a collector street in the Brentwood Boulevard Specific Plan (BBSP), is planned to be extended along the south side of the project site. The BBSP also discourages driveways onto Brentwood Boulevard in order to maintain roadway capacity and acceptable levels of service at existing and planned intersections. Accordingly, the project should extend Nancy Street along its southern boundary with driveway access and eliminate the proposed driveway on Brentwood Boulevard.

In addition to the above comments on the IS/MND, Brentwood City Council Members have the following general comments on the project:

1. The County should conduct more community engagement regarding the project in Brentwood to demonstrate that the County and City are partners. Community engagement should include an in-person meeting with Brentwood residents and County staff so residents can learn more about the project and have their questions answered directly by County staff.
2. The County should notify nearby residents, property owners, and the Goddard School of Brentwood of potential noise impacts, construction impacts, and air quality impacts, including the project's potential to generate emissions of ROG, NO_x, PM₁₀, and PM_{2.5} that could result in both construction-related impacts and long-term air quality impacts during operations.
3. Most of the project is designated Commercial/Office/Industrial/Residential (COIR) in the BBSP. Page 26 of the BBSP states that "the primary land use in this district should be high density residential, with a density range from 11 to 20 dwelling units per acre, while

commercial, office, and light industrial development is also allowed.” Development of this site with non-residential uses could have a negative impact on the City’s ability to meet its Regional Housing Needs Allocation (RHNA) obligation.

4. The project has the potential to increase property values in the surrounding area, which could lead to the displacement of local businesses, low-income residents, and people of color. The County should analyze the economic impacts of the project on the surrounding neighborhood.
5. The distance of the project from State Route 4 may increase the overall VMT in the region compared to other locations in Brentwood zoned for office uses, such as parcels within the City’s Priority Area One Specific Plan that are adjacent to State Route 4. This increase in VMT could impact air quality and increase greenhouse gas emissions in the region.

Sincerely,



G. Harold Duffey
City Manager

cc: Monica Nino, County Administrator
John Gioia, District 1 Supervisor
Candace Andersen, District 2 Supervisor
Diane Burgis, District 3 Supervisor
Ken Carlson, District 4 Supervisor
Shanelle Scales-Preston, District 5 Supervisor

