INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
EAST COUNTY SERVICE CENTER

COUNTY FILE NO. CP#25-39
COUNTY PROJECT NO. WH429A

PREPARED FOR:

Contra Costa County Public Works Department
Environmental Services Division
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ICF. 2026. *Initial Study/Mitigated Negative Declaration, East County Service Center.* March. (ICF 104857.0.002) San Francisco, CA. Prepared for Contra Costa County Public Works Department. Martinez, CA.

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Acronyms and Abbreviations

Acronym	Definition
AB	Assembly Bill
ABAG	Association of Bay Area Governments
Air District	Bay Area Air District
Air District CEQA Guidelines	California Environmental Quality Act Air Quality Guidelines
AM	morning
ARPA	Archaeological Resources Protection Act
ATCM	Airborne Toxic Control Measure
BART	Bay Area Rapid Transit
BBSP	Brentwood Boulevard Specific Plan
BERD	Built-Environment Resource Directory
bgs	below ground surface
BMPs	best management practices
BP	Business Park
CAAP	Climate Action and Adaptation Plan
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEnviroScreen	California Communities Environmental Health Screening Tool
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCTA	Contra Costa Transportation Authority
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CH_4	methane
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System
City	City of Brentwood
City General Plan	City of Brentwood General Plan
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide

Acronym	Definition
CO_2e	carbon dioxide equivalent
County	Contra Costa County
County General Plan	Contra Costa County 2045 General Plan
CPHI	California Points of Historical Interest
CPTs	cone penetration tests
CRHR	California Register of Historical Resources
CVLN	Confederated Villages of Lisjan Nation
dB	decibel
dBA	A-weighted decibel scale
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
ESLs	Environmental Screening Levels
EV	electric vehicle
EVSE	EV supply equipment
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FTA Manual	Transit Noise and Vibration Impact Assessment Manual
GHG	greenhouse gas
GIS	Geographic information system
GSP	groundwater sustainability plan
HCP	habitat conservation plan
HFCs	hydroflourocarbons
HRA	health risk assessment
HVAC	heating, ventilation, and air-conditioning
IPaC	Information for Planning and Consultation
L_{dn}	day/night level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent sound level
L_{max}	maximum sound level
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MLD	Most Likely Descendant
MRP	San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit
MT	metric tons

Acronym	Definition
MTC	Metropolitan Transportation Commission
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
NHPA	National Historic Preservation Act
NO_2	nitrogen dioxide
NO_X	nitrogen oxide
NPDES	The National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
O_3	ozone
OCPs	organochlorine pesticides
OEHHA	Office of Environmental Health Hazard Assessment
PD	Planned Development
PG&E	Pacific Gas & Electric
PM	evening
PM_{10}	particulate matter no more than 10 microns in diameter
$PM_{2.5}$	particulate matter no more than 2.5 microns in diameter
PPD	pounds of disposal per person per day
PPV	peak particle velocity
proposed project	East County Service Center
RCRA	Resource Conservation and Recovery Act
RECs	recognized environmental conditions
rms	root-mean-square
ROG	reactive organic gas
RTP	regional transportation plan
RTPCs	Regional Transportation Planning Committees
SB	Senate Bill
SCS	sustainable communities strategy
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SLF	Sacred Lands File
SMP	soil management plan
SO_2	sulfur dioxide
SR	State Route
SWCP	Stormwater Control Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants

Acronym	Definition
TAZ	Travel Analysis Zone
TNM	Traffic Noise Model
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service
VdB	velocity decibels
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WEAP	Worker Environmental Awareness Program
ZEV	zero-emission vehicle

Chapter 1
CEQA Environmental Checklist Form

1. **Project Title:**
   East County Service Center
   County File No. CP#25-39, County Project No. WH429A

2. **Lead Agency Contact:**
   Syd Sotoodeh, Senior Planner, (925) 655-2877
   syd.sotoodeh@dcd.cccounty.us
   Contra Costa County Department of Conservation and Development
   30 Muir Road
   Martinez, CA 94553

3. **Contact Person and Phone Number:**
   Shravan Sundaram, Environmental Analyst II, (925) 812-7702
   shravan.sundaram@pw.cccounty.us
   Contra Costa County Public Works Department, Environmental Services Division
   255 Glacier Drive
   Martinez, CA 94553

4. **Project Sponsor's Name and Address:**
   Contra Costa County Public Works Department
   255 Glacier Drive
   Martinez CA 94553

5. **General Plan Designation:**
   The project site is owned by Contra Costa County (County) and located in the city of Brentwood. Thus, there is no Envision Contra Costa County 2045 General Plan (County General Plan) designation for the project site. The proposed project is not required to comply with the City of Brentwood General Plan (City General Plan) designations for the project site; the designations are provided for informational purposes only. According to the City General Plan, the project site has Business Park (BP) and Brentwood Boulevard Specific Plan (BBSP) general plan designations.

6. **Zoning Designation:**
   The project site is owned by the County and located in the city of Brentwood. Thus, there is no County zoning designation for the project site. The proposed project is not required to comply with the Brentwood Municipal Code zoning designations for the project site; the designations are provided for informational purposes only. According to the Brentwood Municipal Code, the project site has Planned Development (PD-42) and BBSP zoning designations.

7. **Project Location:**
   The approximately 7.86-acre project site is located along Technology Way south of Sand Creek Road, between Business ~~Circle~~ Center Drive and Brentwood Boulevard, in Brentwood (Assessor's Parcel Numbers [APNs] 016-410-008, 016-410-009, 016-410-010, 016-410-011, 016-410-012, 016-410-013, and 016-120-024).

8. Description of Project:

The County proposes construction of a new East County Service Center (proposed project) at Technology Way and Brentwood Boulevard in the city of Brentwood, East Contra Costa County (see Figure 1). The project site is a flat, grassy undeveloped lot with no trees, buildings, or utilities. A gravel staging area exists in the northwest portion of the project site.

The new facility would house multiple County departments and provide a centralized service center for residents of East Contra Costa County, which is one of the fastest-growing regions within the county. The new three-story building would provide approximately 120,000 gross square feet of usable space and have a maximum height of approximately 58 feet~~, including~~ to the mechanical penthouse/mechanical roof equipment and approximately 52 feet to the ~~mechanical~~ roof ~~equipment (i.e., the parapet)~~ (see Figures 2 and 3). The building would include a lobby area, administrative offices for approximately 10 County departments, conference rooms, building support rooms, and other amenities. For the public, there would be one main entrance to the lobby area and two ancillary entrances on the side of the building. Similarly, for staff, there would be one main entrance to the lobby area and two ancillary entrances on the side of the building. In addition, there would be 16 restrooms, including 6 for the public and 10 for staff use. Two public elevators, two staff-only elevators, and three stair towers (one with roof access) would provide access to the upper floors. One open staircase would lead from the main lobby to the second-level lobby area. The on-site staff would have access to the roof terraces on the second and third levels; the terraces would have a pedestal paver system. Table 1-1 provides an overview of the proposed project.

Table 1-1: Proposed Project Overview

Feature	Overview
Project Site	7.86 acres at Technology Way and Brentwood Boulevard in the city of Brentwood
Building Gross Square Footage	120,000 gross square feet
Building Height	3 stories Approximately 58 feet high ~~, including~~ to the mechanical penthouse/mechanical roof equipment and approximately 52 feet high to the ~~mechanical~~ roof ~~equipment (i.e.,~~parapet~~)~~
Employees	Approximately 441 County staff members
Vehicular Parking	409 parking stalls (286 for staff, 79 for visitors, and 44 for fleet vehicles)
Bicycle Parking	58 spaces (22 long-term spaces and 36 short-term spaces)
Sustainability	Leadership in Energy and Environmental Design (LEED) Silver rating, at a minimum

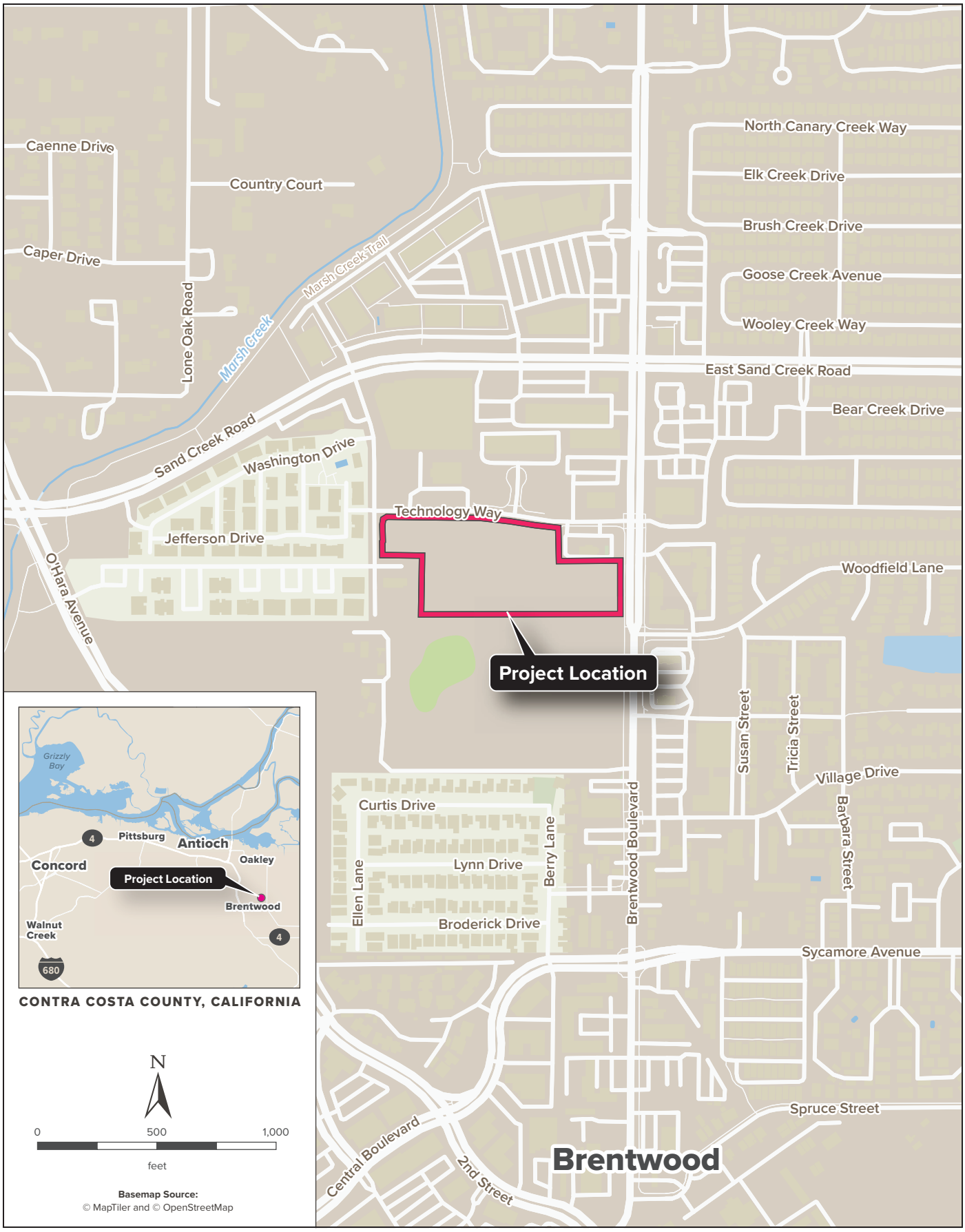
~~The building structure would be mass timber, and exterior siding would be glass-fiber reinforced concrete. A curtain wall system and cast-in-place concrete with metal fin accents for consistency with other modern County buildings would also be used.~~ The building is designed with a mass timber super structure and with glass-fiber reinforced concrete exterior siding. There ~~is~~would be a glass curtain wall system in prime locations on the building façade for enhanced natural light and views, supplemented by punched windows in all other locations. The project ~~will~~would employ metal panel

cladding siding in a few locations with metal fin architectural accents~~:~~; this design element complements other modern County buildings.

The proposed project would be fully electric. The proposed project would include a rooftop photovoltaic system to supply on-site renewable energy. In addition, as an option, the proposed project could include a photovoltaic system in the parking lot south of the proposed building; if the photovoltaic system is constructed in the parking lot, up to 40 fewer trees would be planted as part of the project. The photovoltaic system would be connected to an approximately 688-kilowatt battery back-up system. The battery back-up system would be located in the vehicle parking area south of the proposed building. In addition, the proposed building would include a hybrid heating, ventilation, and air-conditioning (HVAC) system consisting of both a closed-loop geothermal system and a heat pump. The geothermal system would include approximately 60 wells down to a maximum of 400 feet. The pumphouse would be located west of the proposed building and the wells would be located throughout the vehicle parking areas. The heat pump would be located on the roof of the proposed building. Building systems would be designed by the Architect on Record/Engineer on Record. The proposed project would achieve, at a minimum, a Leadership in Energy and Environmental Design (LEED) Silver rating.

The project site would be developed with stormwater treatment basins, pedestrian walkways, and a public plaza along the north façade that would wrap around the corner entry. These treatment features are expected to decrease the rate and volume of stormwater runoff. A trellis or gazebo would be provided for outdoor functions. A covered area outside the conference rooms would be located at the east end of the building. There would be a 180-foot passenger drop-off zone with permeable pavers running parallel to the public plaza on the north side of the building adjacent to a secure child play area. An approximately 8-foot-tall fence would be installed along the perimeter of the staff and fleet vehicle parking areas and at the east end of the building.

Regarding site improvements, the proposed project would include approximately 43,000 square feet of concrete paving, 10,000 square feet of sidewalk, and 1,200 linear feet of curbing. Regarding roadways and parking, the proposed project would include approximately 160,000 square feet of asphalt concrete paving, 11,000 linear feet of concrete curbing, and 500 square feet of permeable pavers. A planned plaza and right-of-way planting would require approximately 42,000 square feet of paving. Landscaping is planned for approximately 28,000 square feet of the project site. New plantings would include a mix of native, drought-tolerant plants. There are currently no trees on the project site; thus, the proposed project would not require the removal of any trees. Approximately 70 trees would be planted as part of the proposed project.



Graphics ... 104857 Co Contra Costa East County (04-21-2025)

Figure 1
Project Location
East County Service Center Project

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Source: Perkins & Will 2025

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Figure 2
Conceptual Site Plan
East County Service Center Project

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Aerial View Looking Southeast

Note: Note: Image is conceptual until after project approval. The proposed building would be approximately 58 feet high to the mechanical penthouse/mechanical roof equipment and approximately 52 feet to the roof parapet.

Source: Perkins & Will 2025

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Figure 3
Conceptual Building Heights
East County Service Center Project

Access and Parking

The East County Service Center would be accessed by the public from Technology Way, with staff-only gated entrances on Business Center Drive and Brentwood Boulevard. Access points would be constructed to comply with City of Brentwood (City) standards for the portions within the public right-of-way. The two public parking lots would be accessed from Technology Way, while staff-only parking would be accessed from Business Center Drive and Brentwood Boulevard via automated gates.

The proposed project would include approximately 409 parking stalls, with 286 stalls for employees, 79 stalls for visitors, and 44 stalls for fleet vehicles (see Figure 2 and Table 1-1). The project would include 108 EV-capable spaces, with 82 Type 2 electric vehicle (EV) chargers and 4 DC fast charging stations . The proposed project would also include 17 covered bike parking spaces for staff members and four spaces for the public. In addition, the proposed project would include the following modifications to the circulation system:[1]

- Brentwood Boulevard at Technology Way – Northbound Left-Turn Movement (NB-L): The existing raised median would be modified to allow the extension of the turn pocket and increase the storage capacity.
- Brentwood Boulevard at Sand Creek Road – Eastbound Right-Turn Movement (EB-R): Modify roadway painting to use the existing available spacing between the turn pocket's western terminus and the eastern limit of an existing driveway 30 feet west of the western terminus of the turn pocket.
- Business Center Drive at Sand Creek Road – Eastbound Left-Turn Movement (EB-L): Modify the existing raised median to allow the extension of the turn pocket and increase the storage capacity.

Modifications (e.g., access points, modifications to the circulation system, utility connections, etc.) within the public right-of-way would be constructed to comply with City standards.

Occupancy

The proposed project would result in approximately 441 County employees working at the project site, including approximately 150 relocated employees from other County facilities.

Security

The proposed project would include on-site security provided by Contra Costa County Office of the Sheriff or a private contractor.

Construction Schedule and Construction Activities

Project construction is anticipated to begin in early 2026 and be completed by the end of 2027, a period of approximately 20 months. The phases of project construction include:

- Phase 1: Site mobilization and site preparation, which would take approximately 1 month.

[1] The traffic impact study included as Attachment E to the Draft IS/MND identifies updated signal timing at the following intersections: Brentwood Boulevard at Technology Way, Brentwood Boulevard at Sand Creek Road, and Business Center Drive at Sand Creek Road. The updated signal timings noted in the traffic impact study are design considerations and not mitigation measures.

- Phase 2: Rough grading, site utilities, and geothermal work, which would take approximately 10 weeks.
- Phase 3: Foundations, which would take approximately 6 weeks.
- Phase 4: Construction of the building, which would take approximately 15 months.
- Phase 5: Paving and landscaping, which would take approximately 1 month.
- Phase 6: Application of architectural coatings, which would take approximately 1 month.

Construction grading is anticipated to affect the entire project site (i.e., approximately 7.86 acres, or 340,000 square feet). Approximately 2,200 cubic yards of soil would be off-hauled over the course of project construction. The maximum depth of excavation for the project is up to 400 feet for the proposed closed-loop geothermal system; no dewatering during construction of the project would be required.

9. **Surrounding Land Uses and Setting:**
Surrounding land uses include residential neighborhoods to the west, commercial buildings to the north, commercial buildings to the east across Brentwood Boulevard, and a grassy agricultural field to the south.

10. **Other Agencies Whose Approval Is Required:**
Although the County is the California Environmental Quality Act (CEQA) lead agency for the project, other agencies also have discretionary authority related to the project, including approvals or responsibilities. Table 1-2 provides a list of the agencies and potential permits and approvals that may be required.

Table 1-2: Potential Permits and Approvals

Agency	Permits/Approvals
Contra Costa County Department of Conservation and Development, Building Inspection Division	Grading and Building Permits
East Contra Costa County Habitat Conservancy	Development Fees
Contra Costa County Fire Protection District	Fire Code Compliance
City of Brentwood	Encroachment Permit

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

Yes, tribes that previously requested to be notified of projects within Contra Costa County under Assembly Bill (AB) 52 include Wilton Rancheria and the Confederated Villages of Lisjan Nation (CVLN). The County conducted outreach to initiate consultation on February 24, 2025. CVLN did not provide information about resources or request consultation, but did provide recommendations on avoidance, mitigation, and monitoring measures. Wilton Rancheria requested consultation on February 24, 2025. The County consulted with Wilton Rancheria regarding the methods of resource investigation identification and avoidance, mitigation, and

monitoring measures. Measures were agreed upon, and consultation was concluded on September 10, 2025.

Environmental Factors Potentially Affected

The environmental factors checked below could be affected by this project, with at least one impact that would be a "potentially significant impact," as indicated by the checklists on the pages below.

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

Environmental Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards and 2) has been addressed by mitigation measures, based on the earlier analysis, as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Syd Sotoodeh

Syd Sotoodeh, Senior Planner
Contra Costa County Department of Conservation and Development

February 27, 2026
Date

Chapter 2
Environmental Checklist

2.1 Aesthetics

		Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Except as provided in Public Resources Code Section 2.1099, would the project:					
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees. rock outcroppings. and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas. substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source or substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☒	☐	☐

2.1.1 Discussion

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

According to the City General Plan and the County General Plan (City of Brentwood 2014; Contra Costa County 2024), the County has one main scenic resource in the project vicinity in addition to localized scenic features such as hills, ridgelines, and open space areas. The main scenic resource, Mount Diablo, is approximately 12.5 miles southwest of the project site and is visible from the project site (Google Earth 2024). The primary public viewing corridors of Mount Diablo in the project site vicinity are Brentwood Boulevard and Technology Way. The proposed project could partially obstruct views of Mount Diablo from some portions of Brentwood Boulevard and from some portions of Technology Way. However, views from other portions of Brentwood Boulevard and Technology Way would not be affected, depending on the position of the viewer in relation to the project site. Overall, the project would not have a substantial adverse effect on the scenic vista, considering the developed nature of the existing surroundings, ~~, and~~ the relative height of the proposed building (approximately 58 feet ~~, including~~ to the mechanical penthouse/mechanical equipment and approximately 52 feet to the ~~mechanical~~ roof ~~equipment [i.e., parapet]~~), and the setback of the proposed building from Brentwood Boulevard by approximately 400 feet. Thus, the majority of viewers along Brentwood Boulevard and Technology Way would not be affected by the proposed project. ~~The approximately 58-foot-tall building would be of a height similar to that of many of the trees surrounding the project site, which would reduce the obstructive effect of the proposed building.~~ In addition, the viewers who would be most affected would be worker receptors in commercial uses directly across Brentwood Boulevard from the project site; such viewers have lower viewer sensitivity than residential or recreational receptors, which would not be affected. Therefore, the project would have a **less-than-significant impact**.

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

The project site is not within a state scenic highway (California Department of Transportation [Caltrans] 2018). The County General Plan supports preservation and enhancement of natural and human-made features that contribute to the scenic quality of the landscape and viewshed along designated scenic routes and discourages projects that interfere with public views of those features (County 2024). State Route (SR) 4, which is approximately 2.5 miles west of the project site, is identified as a County scenic route in the County General Plan. However, the project site is in an urbanized area east of SR 4 and not within the SR 4 corridor or visible from SR 4. There are no historic buildings, rock outcroppings, or other potentially scenic resources within the project site. Furthermore, there are no trees on the project site; thus, the proposed project would not require the removal of trees and would not affect the scenic quality of the area. Therefore, the project would have **no impact**.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project site is a flat, undeveloped lot bordered by residential uses to the west; commercial uses to the north and east across Brentwood Boulevard; and a grassy undeveloped area to the south. The project site is owned by the County and located in the city of Brentwood. Thus, there is no County General Plan designation for the project site. Because the project site is owned by the County, the proposed project is not required to comply with the City General Plan designations or City zoning designations for the project site. The project's consistency with the designations are provided below for informational purposes only. The City General Plan land use designation for the project site is Business Park (BP), which allows integrated business and research parks, large corporate establishments, professional and administrative office centers, and light industrial complexes. Complementary commercial activities and limited residential uses may also be allowed. The City of Brentwood Code of Ordinances designates the project site as Planned Development (PD-42), Subarea F, which allows a variety of commercial uses (e.g., general retail; office uses; medical and dental offices and laboratories; nurseries and day-care centers; public and quasi-public uses, such as trade schools; and industrial and service uses with conditional use permits) (City of Brentwood 2025). The project, which involves a centralized service center that would include administrative uses, falls into the Subarea F category of allowed uses. The maximum building height in Subarea F is three stories, or 40 feet. Structures greater than 40 feet, like the proposed project, may be permitted with conditional use permit approval, however the County is not required to comply nor obtain this permit. The proposed building would have a maximum height of approximately 58 feet~~, including~~ to the mechanical penthouse/mechanical roof equipment and approximately 52 feet to the ~~mechanical~~ roof ~~equipment (i.e., parapet)~~. As an option, the proposed project could include a photovoltaic system in the parking lot south of the proposed building; if the photovoltaic system is constructed in the parking lot, up to 40 fewer trees would be planted as part of the project. The proposed project would be required to comply with CALGreen requirements related to shading, which would ensure that views of the project would be visually enhanced by trees. The project would not conflict with applicable zoning or other regulations governing scenic quality because development of the service center would not remove elements that define the area or introduce buildings, structures, or other features that would not be compatible with the character of the area. Therefore, the project would have a **less-than-significant impact**.

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

Construction is anticipated to occur during daylight hours, although temporary nighttime lighting during construction could be present for safety and security purposes. In addition, if unforeseen circumstances necessitate night work that requires nighttime lighting, it would be temporary and require approval by the County construction management firm, which will be available to address any concerns. Therefore, the project would have a **less-than-significant impact** related to construction.

During operation, the proposed project would introduce new sources of interior and exterior lighting, including security lighting in parking areas, that currently do not exist on the project site. Although operations would be limited to weekday daytime shifts (7:00 a.m.–5:30 p.m.), nighttime lighting would be present for safety and security purposes. The project site is located in an urbanized area with existing sources of nighttime lights, including streetlights and headlights from vehicles and existing interior lighting from surrounding residential and commercial uses. In addition, the project would incorporate landscaping, including trees around the perimeter of the site, which would diminish additional nighttime lighting perceived outside of the project site. However, the exterior lighting and security lighting for the parking lot would create new onsite light sources that could shine on adjacent properties and provide undesirable ambient light, which could result in a potential adverse impact due to new light on neighboring properties, which could be significant. In addition, glare could be caused by light reflected from pavement, vehicles, and building materials, such as reflective glass and polished surfaces within the project site, which could result in a potential adverse impact due to new glare on neighboring properties, a potentially significant impact. Implementation of **Mitigation Measure AES-1** and **Mitigation Measure AES-2**, below, would reduce the spillover of lighting and glare from within the project site to adjacent properties. Therefore, the project would have a **less-than-significant impact with mitigation incorporated.**

Mitigation Measures AES-1: Shielded Lighting Fixtures

The final lighting plan shall include lighting with decorative lighting fixtures that are shielded to face down and screened away from adjacent properties to ensure no off-site glare is generated by the proposed project.

Mitigation Measure AES-2: Glazing Window Treatments

The final design plan shall include glazing window treatments to minimize the intensity of daylight glare.

2.1.2 Sources of Information

California Department of Transportation. 2018. *California State Scenic Highway System Map.* Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

City of Brentwood. 2014. *City of Brentwood General Plan*. Adopted July 22, 2014. Available: https://www.brentwoodca.gov/home/showpublisheddocument/2900/63870028552070000.

City of Brentwood. 2025. *City of Brentwood Code of Ordinances*. Title 17, Article VIII, Planned Development Zone. Chapter 17.492 PD-42. Available: https://ecode360.com/43622536#43622596.

Contra Costa County. 2024. *Contra Costa County 2045 General Plan*. Adopted: November 5, 2024. Available: https://www.contracosta.ca.gov/DocumentCenter/View/84957/Contra-Costa-County-2045-General-Plan-PDF---Large-file-782-MB.

Google Earth. 2024. Directions from Technology Way to Mount Diablo.

2.2 Agriculture and Forestry Resources

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220[9]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned for timberland production (as defined by Government Code Section 51104[9])?	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment that, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forestland to non-forest use?	☐	☐	☐	☒

2.2.1 Discussion

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

According to the 2016 Contra Costa County Important Farmland Map, the project site is classified as "Urban and Built-Up Land" (California Department of Conservation 2018). As such, development of the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. Therefore, the project would have **no impact.**

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site is not zoned for agricultural use; therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, the project would have **no impact**.

c) Would the project conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220[9]), timberland (as defined by Public Resources Code Section 4526). or timberland zoned for timberland production (as defined by Government Code Section 51104[9])?

The project site is not zoned for forestland, timberland, or timberland production. Therefore, the project would have **no impact.**

d) Would the project result in the loss of forestland or conversion of forestland to non-forest use?

The project site is not forestland and therefore would not result in the loss of forestland and/or conversion of forestland. Therefore, the project would have **no impact.**

e) Would the project involve other changes in the existing environment that, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forestland to non-forest use?

There is no nearby farmland or forestland. The project vicinity is developed primarily with residential and commercial uses; therefore, the project would not result in the conversion of farmland to non-agricultural use. Therefore, the project would have **no impact.**

2.2.2 Sources of Information

California Department of Conservation. 2018. *Contra Costa County 2016 Important Farmland Mapping and Monitoring Program*. Division of Land Resource Protection. Available: https://www.conservation.ca.gov/dlrp/fmmp.

2.3 Air Quality

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

2.3.1 Discussion

Setting

The project site is in the city of Brentwood, which is in Contra Costa County and the San Francisco Bay Area Air Basin (SFBAAB). Concentrations of ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead, and particulate matter (PM_{10} [particulate matter no more than 10 microns in

diameter] and $PM_{2.5}$ [particulate matter no more than 2.5 microns in diameter]) are commonly used indicators of ambient air quality conditions. These pollutants are known as criteria pollutants and regulated by the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) through the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. The NAAQS and CAAQS limit criteria pollutant concentrations to protect human health and prevent environmental and property damage.

Regional Attainment Status

CARB and EPA maintain ambient air quality monitoring stations within California. Local monitoring data are used to designate areas as nonattainment, maintenance, attainment, or unclassified areas for ambient air quality standards. The four designations are defined below. Table 2-1 summarizes the attainment status of Contra Costa County.

- Nonattainment—assigned to areas where monitored pollutant concentrations consistently violate the standard in question
- Maintenance—assigned to areas where monitored pollutant concentrations exceeded the standard in question in the past but are no longer in violation of that standard
- Attainment—assigned to areas where pollutant concentrations meet the standard in question over a designated period of time
- Unclassified—assigned to areas where data are insufficient for determining whether a pollutant is violating the standard in question.

Table 2-1. Federal and State Attainment Status for the Contra Costa County Portion of the San Francisco Bay Area Air Basin

Criteria Pollutant	Federal Designation	State Designation
Ozone (O_3 [8-hour standard])	Marginal nonattainment	Nonattainment – Transitional
Carbon monoxide (CO)	Attainment	Attainment
Particulate matter (PM_{10})	Unclassified	Nonattainment
Fine particulate matter ($PM_{2.5}$)	Moderate nonattainment (2006)	Nonattainment
Nitrogen dioxide (NO_2)	Attainment	Attainment
Sulfur dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(no federal standard)	Attainment
Hydrogen sulfide	(no federal standard)	Unclassified
Visibility-reducing particles	(no federal standard)	Unclassified

Sources: CARB 2023; EPA 2025.

Existing Toxic Air Contaminant Sources and Health Risks

The Bay Area Air District (Air District) maintains an inventory, which is available online, of health risks associated with all permitted stationary sources within the SFBAAB (Air District 2024). Within 1,000 feet of the project site, there is one permitted facility: a gasoline dispensing facility, Brentwood Petroleum, at 7920 Brentwood Boulevard. Aside from stationary sources, emissions of toxic air contaminants (TACs) around the project site are also generated from mobile sources on

roads and highways, such as SR 4, which is approximately 2.1 miles west of the project site, and diesel-powered locomotives on railroad tracks, which are approximately 0.4 mile southwest of the project site. Health risks associated with the nearby permitted stationary source, roads, and railways are considered in the analysis of the project's cumulative health risks.

Environmental Burdens

The Office of Environmental Health Hazard Assessment (OEHHA) maintains the California Communities Environmental Health Screening Tool (CalEnviroScreen), which provides relative rankings of census tracts, based on 21 environmental, health, demographic, and socioeconomic indicators (e.g., O_3 concentrations, groundwater threats, education levels). Scores are given on a scale of 0 to 100, with larger numbers representing areas with relatively high existing pollution burdens and population sensitivities. The proposed project is in Census Tract 6013303102, which has a CalEnviroScreen percentile score of 51. This score indicates that the census tract experiences more minor levels of pollution, as well as secondary effects, than the rest of the state (OEHHA 2023). Because the census tract has a CalEnviroScreen score lower than 70 percent, it is not considered an overburdened community, per Air District guidance (Air District 2023).

Regulatory Setting

The Air District is responsible for ensuring that the NAAQS and CAAQS are met within the SFBAAB. Specifically, the Air District manages air quality through a comprehensive program that includes long-term planning, regulations, and incentives for technical innovation, education, and community outreach. The Air District's 2017 Clean Air Plan (*Spare the Air, Cool the Climate*) is the current air quality attainment plan for the SFBAAB. It provides an integrated strategy for reducing O_3, particulate matter, TACs, and greenhouse gas (GHG) emissions in a manner that is consistent with federal and state air quality programs and regulations. Specifically, the Clean Air Plan:

- Describes the Air District plan for attaining all state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities;
- Defines a vision for transitioning the region to the post-carbon economy needed to achieve ambitious GHG reduction targets for 2030 and 2050;
- Provides a regional climate protection strategy that will put the Bay Area on a pathway to achieving GHG reduction targets; and
- Includes a wide range of control measures to decrease emissions of air pollutants that are harmful to Bay Area residents, such as particulate matter, O_3, and TACs; reduce emissions of methane and other GHGs with high global warming potential that are potent climate pollutants for the near term; and decrease emissions of CO by reducing fossil fuel combustion.

In addition to air quality plans, the Air District also adopts rules and regulations to improve existing and future air quality. The proposed project may be subject to the Air District rules below.

- Regulation 2, Rule 2 (New Source Review)—contains requirements for best available control technology and emission offsets
- Regulation 2, Rule 5 (New Source Review of Toxic Air Contaminants)—outlines guidance for evaluating TAC emissions and their potential health risks
- Regulation 6, Rule 1 (Particulate Matter)—restricts emissions of particulate matter darker than a 1 on the Ringlemann Chart to less than 3 minutes in any 1 hour

- Regulation 7 (Odorous Substances)—establishes general odor limitations for odorous substances and specific emission limitations for certain odorous compounds
- Regulation 8, Rule 3 (Architectural Coatings)—limits the amount of reactive organic gas (ROG) in architectural coatings

Air District California Environmental Quality Act Air Quality Guidelines

In April 2023, the Air District published the most recent version of its *California Environmental Quality Act Air Quality Guidelines* (Air District CEQA Guidelines). The Air District CEQA Guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process, consistent with CEQA requirements, and include recommended thresholds of significance, mitigation measures, and background air quality information. They also include recommended assessment methodologies for TACs and odors as well as best practices for centering environmental justice, health, and equity.

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

As described under *Regulatory Setting*, the current air quality attainment plan for the SFBAAB is the Air District's 2017 Clean Air Plan, which defines control strategies for reducing emissions and ambient concentrations of air pollutants; safeguards public health by reducing exposure to the air pollutants that pose the greatest health risks, with an emphasis on protecting the communities most heavily affected by air pollution; and reduces GHG emissions to protect the climate (Air District 2017). According to the Air District CEQA Guidelines, determination of 2017 Clean Air Plan consistency should consider the following for project-level analyses (Air District 2023):

- Does the project support the primary goals of the 2017 Clean Air Plan?
- Does the project include all applicable control measures from the 2017 Clean Air Plan?
- Does the project disrupt or hinder implementation of any 2017 Clean Air Plan control measures?

The project includes numerous components that would support the primary goals of the 2017 Clean Air Plan and regional attainment of the NAAQS and CAAQS. The project would be fully electric, thereby avoiding emissions from operational energy use compared to a similar development that uses natural gas. The all-electric design is possible because of the hybrid HVAC system, which comprises a closed-loop geothermal system and a heat pump. The project would also provide EV charging parking. In addition, the project is expected to achieve, at a minimum, a LEED Silver rating.

Because the project site would be less than 0.25 mile from the Brentwood Boulevard and Sand Creek Road bus stop, which is served by Tri Delta Transit's 300X Brentwood Park & Ride and the Antioch Bay Area Rapid Transit (BART) line, project employees would have the option of using transit instead of driving. This would promote transit use and be in line with the 2017 Clean Air Plan's goal to reduce transportation-related emissions (Tri Delta Transit 2025). Overall, the project is expected to reduce driving distances for County employees and residents who would work at or visit the site, respectively. The addition of a new County services center means that people living in the eastern portion of Contra Costa County would not have to travel as far to work or receive services provided by the County. Although this effect has not been quantified, the expected result is that driving distances and, therefore, air pollution would be reduced.

Finally, as discussed under Impact b, emissions from both construction and operation would remain below the applicable Air District significance thresholds, which would help to reduce emissions and ambient concentrations of air pollutants in the SFBAAB. The project would therefore support the primary goals of the 2017 Clean Air Plan.

With respect to the project's consistency with the control measures from the 2017 Clean Air Plan, most of the measures, such as those related to energy, buildings, water, stationary sources, and agriculture/natural and working lands, would not apply to the project because the implementation action required is not under the control of the project sponsor. For example, electric utilities or local governments would need to implement energy measures. In addition, other measures apply to land uses that are unrelated to the project, such as agricultural land uses.

As detailed above, the project would incorporate a variety of sustainable design features to reduce emissions associated with transportation and energy, the primary contributors to criteria air pollutant emissions. For these reasons, the project would not fundamentally conflict with the 2017 Clean Air Plan. Therefore, the project would have a **less-than-significant impact**.

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

Regional Criteria Pollutant and Precursor Emissions

Construction

Construction of the project would generate ROG, nitrogen oxides (NO_X), PM_{10}, and $PM_{2.5}$ emissions that could result in short-term air quality effects. Construction would start in 2026 and be completed over approximately 20 months. Activities during construction would include site preparation and underground utility work, grading, geothermal construction, building construction, paving, and architectural coating applications. Emissions would be released from off-road equipment, employee vehicles, vendor trucks, and haul trucks. Fugitive dust would result from site grading and earthmoving, suspended road dust would result from vehicle travel, and off-gassing would result from architectural coating applications and paving.

Consistent with Air District guidance, average daily emissions have been calculated to assess construction impacts, as shown in Table 2-2 (Air District 2023). Short-term emissions generated by project construction were calculated with use of the California Emissions Estimator Model (CalEEMod), version 2022.1, which relies on vehicle emission factors from CARB's EMFAC2021, as recommended by the Air District and other air districts in California (California Air Pollution Control Officers Association [CAPCOA] 2022). Modeling was based on default values from CalEEMod, as generated by the model, that consider a project's location and land use type as well as project-specific information where available, including building type and size, expected construction phase duration, earthwork, and the area to be graded or paved. Daily emissions vary, depending on the type and intensity of construction activities occurring simultaneously. Detailed model assumptions and inputs for the calculations are provided in Attachment A.

Table 2-2. Average Daily Criteria Pollutant Emissions from Project Construction (pounds per day)

Construction Year	ROG[a,b]	NO_X[a,b]	PM_{10} Exhaust[a,b]	$PM_{2.5}$ Exhaust[a,b]
2026	2	19	1	1
2027	7	8	< 1	< 1
Maximum	7	19	1	1
Threshold	54	54	82	54
Exceeds threshold?	No	No	No	No

Source: Attachment A.
Notes: Emissions are rounded to the nearest whole number; exceedances, if they occur, are underlined.
[a.] This is a pollutant or a precursor to a pollutant for which the project area is designated as nonattainment.
[b.] Emissions from mobile sources have been adjusted externally to CalEEMod to remove the emissions benefit from the Advanced Clean Trucks, Zero-Emission Airport Shuttle, Warranty Phase 1, and Heavy-Duty Omnibus Regulation (CARB 2025). Attachment A shows the factors that were used to adjust mobile-source emissions.
NO_X = nitrogen oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; ROG = reactive organic gas

As shown in Table 2-2, construction of the project would not generate ROG, NO_X, PM_{10} exhaust, or $PM_{2.5}$ exhaust emissions that would exceed the applicable Air District thresholds. Project construction would not contribute a significant level of pollution that would degrade regional air quality within the SFBAAB. Therefore, the project would have a **less-than-significant impact**.

Fugitive Dust

Project construction activities would generate fugitive dust emissions, including both PM_{10} and $PM_{2.5}$. As noted in the Air District CEQA Guidelines, projects that implement the district's recommended basic best management practices (BMPs) are generally considered to have a less-than-significant impact with respect to construction-related fugitive dust emissions (Air District 2023). Without BMPs, the impact of fugitive dust emissions could be significant. Although the Air District's BMPs are effective in mitigating mass emissions of fugitive dust, construction activities could still result in a potentially significant impact with respect to the Air District's health-protective $PM_{2.5}$ concentration threshold, as discussed further in Impact c, below. To mitigate the impact associated with $PM_{2.5}$ concentrations during construction, as evaluated in Impact c, one of the Air District's basic BMPs has been modified to require watering in exposed areas three times per day instead of the standard two. Although the additional watering is not necessary to reduce mass emissions of fugitive dust, the BMPs are relevant to both the mass emissions analysis (Impact b) and the concentration-based analysis (Impact c); therefore, the modified BMPs are presented in this section. Implementation of **Mitigation Measure AQ-1**, below, would require adherence to the Air District's BMPs and increased watering in exposed areas. The project's construction-related fugitive dust emissions would not result in a significant contribution to regional air pollution within the SFBAAB. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure AQ-1: Require Implementation of Modified Bay Area Air District Basic Best Management Practices for Construction-Related Fugitive Dust Emissions

The County shall require its contractor(s), as a condition of contracts (e.g., standard specifications), to reduce construction-related fugitive dust emissions by implementing the following modified Air District basic BMPs:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered three times per day.[2]
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks are to be paved as soon as possible. Building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or more from a paved road shall be treated with a 6- to 12-inch layer of compacted wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's general air pollution complaints number shall also be visible to ensure compliance with applicable regulations.

The County or its contractor(s) shall submit evidence of compliance to the County, including relevant documentation (e.g., engineering plans, training records, inspection and testing protocols), demonstrating implementation of the modified BMPs prior to grading permit issuance.

Operation

The project is expected to be fully operational by 2027. Project operation would generate emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ that could result in long-term air quality effects during operations. Emissions would stem from motor vehicles traveling to and from the project site, operation of landscape equipment, the use of cleaning supplies, and the periodic reapplication of architectural coatings.

Emissions from operational sources were calculated using CalEEMod, version 2022.1, as recommended by the Air District and other air districts in California (CAPCOA 2022). Modeling was based on project-specific information where available, including information regarding the land use categories and stationary equipment, and default values from CalEEMod, which are generated by the model according to a project's location and land use type.

Because the project would be all electric, it would not result in any on-site criteria pollutant emissions; therefore, there are no energy sources associated with the project. Table 2-3 presents the project's estimated average daily operational emissions, which are evaluated against the applicable Air District thresholds. Detailed model assumptions and inputs for the calculations are provided in Attachment A.

[2] This component of the mitigation measure modifies Air District BMPs by increasing the watering frequency from two times per day to three times. The increased frequency is not needed to mitigate Impact b but is needed to mitigate Impact c.

Table 2-3. Average Daily Operational Criteria Pollutant Emissions (pounds per day)

Source	ROG[a]	NO_X[a]	PM10[a]	PM2.5[a]
Mobile sources	7	5	9	2
Area sources	3	< 1	< 1	< 1
Energy sources	—	—	—	—
Total Project	**10**	**5**	**9**	**2**
Threshold	54	54	82	82
Exceeds threshold?	No	No	No	No

Source: Attachment A.
Notes: Emissions are rounded to the nearest whole number.
[a] This is a pollutant or a precursor to a pollutant for which the project area is designated as nonattainment.
NO_X = nitrogen oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; ROG = reactive organic gas

As shown in Table 2-3, project operation would not generate ROG, NO_X, PM_{10}, or $PM_{2.5}$ emissions in excess of the Air District's numeric thresholds. Project operation would not contribute to a significant level of pollution that would degrade regional air quality within the SFBAAB. Therefore, the project would have a **less-than-significant impact**.

Localized Carbon Monoxide Emissions

Heavy traffic congestion can contribute to high levels of CO. Individuals exposed to such "hot spots" may have a greater likelihood of developing adverse health effects. The Air District has adopted screening criteria that provide a conservative indication of whether project-generated traffic would cause a potential CO hot spot. If the screening criteria are not met, a quantitative analysis, through site-specific dispersion modeling of project-related CO concentrations, is not necessary. A project would not cause localized violations of the CAAQS for CO if the Air District's CO screening criteria, summarized below, are met (Air District 2023).

- The project is consistent with an applicable congestion management program established by the County congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Based on information provided by the project's traffic consultant, TJKM, none of the study intersections are designated under the Congestion Management Program (CMP). Therefore, CMP requirements do not apply, and the project would not conflict with the applicable CMP. As a result, the Air District's screening volumes are used to assess the project's potential for localized CO hot spots. Based on the volume summaries provided by TJKM, maximum traffic volumes at the affected intersections would not exceed the screening criterion of 44,000 vehicles per hour or the screening criterion of 24,000 vehicles per hour recommended for areas where vertical or horizontal mixing is substantially limited. Consequently, the project would not exceed the Air District's screening thresholds for local CO hot spots and would not be expected to cause or contribute to CO

concentrations that would exceed the applicable NAAQS or CAAQS. Therefore, the project would have a **less-than-significant impact**.

Health Effects of Regional Criteria Pollutant and Precursor Emissions

The Air District's regional thresholds consider existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. Although the Air District recognizes that air quality is a cumulative problem, it considers projects that generate criteria pollutant and O_3 precursor emissions below the thresholds to be minor in nature; therefore, such projects would not adversely affect air quality to the extent that the health-protective NAAQS or CAAQS would be exceeded.

As shown in Tables 2-2 and 2-3, project construction and operation would not generate regional criteria pollutants in excess of the applicable Air District thresholds. As such, the project would not be expected to contribute a significant level of air pollution that would degrade air quality within the SFBAAB. Therefore, the project would have a **less-than-significant impact**.

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

Diesel Particulate Matter and $PM_{2.5}$

The project would generate emissions of diesel particulate matter (DPM),[3] a TAC, and fine particulate matter ($PM_{2.5}$) during construction. These emissions would stem primarily from the use of off-road diesel-powered equipment and heavy-duty trucks. $PM_{2.5}$ emissions, including both diesel and non-diesel exhaust as well as fugitive dust, would be generated by off-road equipment, on-site soil disturbance, and vehicle travel by heavy-duty trucks and construction workers. Given the proximity of sensitive receptors to the project site, a health risk assessment (HRA) was conducted to evaluate potential impacts from these emissions.

The project may also generate minor DPM emissions from heavy-duty truck activity and $PM_{2.5}$ emissions from employee vehicle trips during operation. However, because most operational trips would be made in passenger cars and light-duty trucks, which typically do not emit significant levels of DPM, the number of trips with the potential to generate DPM would be minimal. Furthermore, because operational activities would not coincide with construction, and $PM_{2.5}$ emissions from mobile sources during operation would be substantially lower than those during construction, operational emissions are not expected to influence the maximum annual $PM_{2.5}$ concentration resulting from the project. As such, DPM and $PM_{2.5}$ emissions from mobile operational sources were not included in the HRA.

The HRA was prepared by using the AERMOD View 13.0.0 air dispersion model and incorporating the most current methodology outlined in the Air District CEQA Guidelines (Air District 2023). Table 2-4 presents the unmitigated incremental health risks for off-site residential, student, and worker receptors within 1,000 feet of the project site. The results reflect implementation of the Air District's basic dust-reducing BMPs, as written in the Air District CEQA Guidelines. Because the BMPs are required for a project's impact to be considered less than significant with respect to mass emissions of fugitive dust, their implementation is required regardless of the HRA results. Therefore, the scenario shown in Table 2-4 is considered unmitigated for the purposes of the HRA.[4]

[3] Per Air District guidance, PM_{10} exhaust is used as a surrogate for DPM.

[4] The mitigated HRA scenario incorporates the modified set of BMPs required by Mitigation Measure AQ-1, as discussed below.

Table 2-4. Estimated Unmitigated Project-Level Health Risk Results from Construction

Off-site Receptor Type	Cancer Risk (cases per million)[a]	Non-Cancer Chronic Risk	Annual $PM_{2.5}$ Concentrations (µg/m³)
MEIR – Resident[b]			
Project construction	**13.5**	0.02	0.14
Threshold	10	1.0	0.3
Exceeds threshold?	*Yes*	*No*	*No*
MEIR – Student[c]			
Project construction	**20.5**	0.01	0.09
Threshold	10	1.0	0.3
Exceeds threshold?	*Yes*	*No*	*No*
MEIR – Worker[d]			
Project construction	2.1	0.04	**0.31**
Threshold	10	1.0	0.3
Exceeds threshold?	*No*	*No*	*Yes*

Source: See Attachment A for detailed modeling files.

Notes:

[a.] The evaluation of cancer risks in the HRA was based on an exposure duration of 1.56 years for project construction.

[b.] The resident MEIR is approximately 20 feet west of the project site at UTM (x, y) coordinates 614271.18, 4200418.41.

[c.] The student MEIR is at the Goddard School of Brentwood, approximately 125 feet north of the project site at UTM (x, y) coordinates 614351.18, 4200538.41.

[d.] The worker MEIR is approximately 20 feet north of the project site at UTM (x, y) coordinates 614491.18, 4200458.41.

Exceedances are bolded and underlined.

MEIR = maximally exposed individual receptor; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less µg/m³ = micrograms per cubic meter

As shown in Table 2-4, the unmitigated results would not exceed the non-cancer risk hazard index threshold. However, the project would result in cancer risks that would exceed the applicable threshold for residential and student receptors as well as the annual $PM_{2.5}$ concentration threshold for worker receptors. Therefore, impacts would be potentially significant. Implementation of **Mitigation Measure AQ-1** (refer to Impact b) would reduce construction-related $PM_{2.5}$ emissions by requiring the Air District's basic dust-reducing BMPs, with a modification to require exposed surfaces to be watered three times daily instead of two times daily. This mitigation measure would reduce worker exposure to $PM_{2.5}$ concentrations during construction. Implementation of **Mitigation Measure AQ-2,** below, would reduce construction-related DPM emissions by requiring EPA Tier 4 Final diesel equipment. The primary intent of this mitigation measure is to reduce the significant cancer risk at resident and student receptors. Results for the mitigated scenario are presented in Table 2-5.

Table 2-5. Estimated Mitigated Project-Level Health Risk Results from Construction

Off-site Receptor Type	Cancer Risk (cases per million)[a]	Non-Cancer Chronic Risk	Annual $PM_{2.5}$ Concentrations (µg/m³)
MEIR – Resident[b]			
Project construction	2.5	< 0.01	0.09
Threshold	10	1.0	0.3

Off-site Receptor Type	Cancer Risk (cases per million)[a]	Non-Cancer Chronic Risk	Annual $PM_{2.5}$ Concentrations ($\mu g/m^3$)
Exceeds threshold?	*No*	*No*	*No*
MEIR – Student[c]			
Project construction	3.8	< 0.01	0.05
Threshold	10	1.0	0.3
Exceeds threshold?	*No*	*No*	*No*
MEIR – Worker[d]			
Project construction	0.4	0.01	0.2
Threshold	10	1.0	0.3
Exceeds threshold?	*No*	*No*	*No*

Source: See Attachment A for detailed modeling files.

Notes:

[a.] The evaluation of cancer risk in the HRA was based on an exposure duration of 1.56 years for project construction.

[b.] The resident MEIR is approximately 20 feet west of the project site at UTM (x, y) coordinates 614271.18, 4200418.41.

[c.] The student MEIR is at the Goddard School of Brentwood, approximately 125 feet north of the project site at UTM (x, y) coordinates 614351.18, 4200538.41.

[d.] The worker MEIR is approximately 20 feet north of the project site at UTM (x, y) coordinates 614491.18, 4200458.41.

MEIR = maximally exposed individual receptor; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less; $\mu g/m^3$ = micrograms per cubic meter

As shown in Table 2-5, with implementation of **Mitigation Measure AQ-1** and **Mitigation Measure AQ-2**, cancer risks and annual $PM_{2.5}$ concentrations would be below the applicable thresholds for all receptor types. Project-generated construction emissions would not expose sensitive receptors to substantial pollutant concentrations or associated health risks. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure AQ-1: Require Implementation of Modified Bay Area Air District Basic Best Management Practices for Construction-Related Fugitive Dust Emissions

Refer to Impact b, above.

Mitigation Measure AQ-2: Use Clean Diesel-Powered or Electric Equipment during Construction to Control Construction-Related Emissions

The County shall require its contractor(s), as a condition of contracts (e.g., standard specifications), to ensure that all off-road diesel-powered equipment greater than 50 horsepower used during construction is equipped with EPA-approved Tier 4 Final engines or cleaner[5] to reduce exhaust $PM_{2.5}$ emissions. The construction contractor shall submit evidence of the use of EPA-approved Tier 4 Final engines or cleaner to the Contra Costa County Public Works Department prior to the commencement of project construction activities. Exceptions can be made in limited circumstances when Tier 4 Final engines are not available or otherwise cannot be feasibly obtained. The County or its contractor(s) must identify the pieces of equipment that would not have Tier 4 Final engines, submit evidence documenting the unavailability or infeasibility, and ensure that the equipment has an engine that meets the

[5] Cleaner engine technology includes electric equipment and engines built to CARB Tier 5 engine standards, which are expected to begin in 2028.

cleanest feasible emission standard. The County shall present evidence in a publicly accessible location, documenting that the equipment substitution(s) would not cause an exceedance of the Air District cancer risk threshold at any receptor.

Cumulative Health Risk Assessment

According to the Air District CEQA Guidelines, risk levels from project-generated sources and existing sources within 1,000 feet of a project site should be combined and compared to the Air District's cumulative health risk thresholds (Air District 2023).

Under the proposed project, existing and project-generated health risks could contribute to a cumulative health risk for sensitive receptors near the project site. Potential existing TAC sources include permitted stationary sources (e.g., emergency generators and gas stations), roadways, railways, and other development projects in the surrounding area. Within 1,000 feet of the project site, there is one permitted facility: a gasoline dispensing facility, Brentwood Petroleum, at 7920 Brentwood Boulevard. This facility is approximately 920 feet south of the project site. The Air District's inventory of stationary health risks was used to estimate the combined level of health risk from the existing permitted facility, in combination with the project's contributions. Mobile sources on nearby railways and roadways such as Sand Creek Road and SR 4 would also generate TAC emissions. A railway is approximately 1,700 feet west of the project site; SR 4 is approximately 2.1 miles west of the project site. Geographic information system (GIS) raster files provided by the Air District were used to estimate railway and roadway emissions within 1,000 feet of the project site (Air District 2022). None of the development projects that have recently been approved or may soon be approved by the County would be close enough (i.e., within 1,000 feet) to the site to combine with project-generated health risks.

Table 2-6 summarizes the mitigated health risks for the project's maximally exposed receptors, along with contributions from existing stationary and mobile sources within 1,000 feet of the site. The combined health risk values are compared to the Air District's cumulative thresholds. Additional details on individual background source contributions are provided in Attachment A.

As shown in Table 2-6, health risks associated with existing stationary, roadway, and railway sources in combination with the project would not exceed the Air District's cumulative thresholds. All results would be below the Air District's thresholds by a substantial margin. Therefore, the cumulative effect of health risks associated with TACs emitted by the project in combination with health risks associated with existing TAC sources would not result in cumulatively considerable local health risks at sensitive land uses. Therefore, the project would have a **less-than-significant impact**.

Table 2-6. Cumulative Mitigated Health Risk Results

Pollutant/Receptor Type	Cancer Risk (cases per million)	Non-Cancer Chronic Risk	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
MEIR – Resident (Mitigated)			
Existing sources			
Stationary sources[a]	—	—	—
Roadway sources	4.4	0.02	0.12
Rail sources	0.1	< 0.01	< 0.01
Total	4.5	0.02	0.12

Pollutant/Receptor Type	Cancer Risk (cases per million)	Non-Cancer Chronic Risk	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Project construction	2.5	< 0.01	0.09
Total cumulative	**7.0**	**0.02**	**0.21**
Threshold	100	10	0.8
Exceeds threshold?	*No*	*No*	*No*
MEIR – Student (Mitigated)			
Existing sources			
Stationary sources[a]	—	—	—
Roadway sources	5.5	0.02	0.20
Rail sources	0.1	< 0.01	< 0.01
Total	5.5	0.02	0.20
Project construction	3.8	< 0.01	0.05
Total cumulative	**9.3**	**0.03**	**0.26**
Threshold	100	10	0.8
Exceeds threshold?	*No*	*No*	*No*
MEIR – Worker (Mitigated)			
Existing sources			
Stationary sources[a]	—	—	—
Roadway sources	4.0	0.01	0.09
Rail sources	< 0.1	< 0.01	< 0.01
Total	4.0	0.01	0.09
Project construction	0.4	0.01	0.20
Total Cumulative	**4.4**	**0.02**	**0.29**
Threshold	100	10	0.8
Exceeds threshold?	*No*	*No*	*No*

Source: Attachment A.

[a] The permitted stationary source is 920 feet south of the project site and more than 280 meters from the maximally exposed residential, student, and worker receptors. Because the Air District's distance adjustment factors are defined only for receptors within 280 meters, health risk values from this source are not quantified for these receptors.

MEIR = maximally exposed individual receptor; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less; $\mu g/m^3$ = micrograms per cubic meter

Asbestos

Asbestos is a naturally occurring mineral that was previously used in building construction due to its heat resistance and strong insulating properties. Exposure to asbestos, however, has been shown to cause many disabling and fatal diseases, including lung cancer, mesothelioma, and pleural plaques. Because the site is currently an undeveloped lot, construction activities would not involve the demolition of existing structures. As such, there would be no anticipated disturbance of asbestos-containing materials, and project construction activities would not pose a risk of asbestos exposure to workers or nearby receptors. Therefore, the project would have a **less-than-significant impact**.

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

Odor impacts could occur if a project were to introduce a new odor source near existing sensitive receptors. The project site is surrounded primarily by commercial and residential uses; a day-care center is located to the north. Consequently, students, residents, and workers are within 1,000 feet of the project site. According to the Air District, land uses associated with odor complaints include wastewater treatment plants, landfills, food manufacturing plants, and other types of odor-generating facilities, as detailed in Table 5-4 of the Air District CEQA Guidelines (Air District 2023). The project does not propose any of these uses and would not result in changes that would introduce odor-generating facilities.

Potential odor emitters during construction activities include diesel exhaust, asphalt paving, and the use of architectural coatings and solvents. During operation, odors could result from vehicle exhaust and the reapplication of architectural coatings, but these would be limited to areas adjacent to the building. Both construction equipment- and generator-related odors would be temporary and would dissipate rapidly with distance. In addition, the project would comply with the Air District's Regulation 7 (Odorous Substances), which limits emissions of odorous compounds from all non-exempt entities within the Air District's jurisdiction. Accordingly, project construction and operation are not expected to create objectionable odors that would affect a substantial number of people. Therefore, the project would have a **less-than-significant impact**.

2.3.2 Sources of Information

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California Air Resources Board. 2023. *Maps of State and Federal Area Designations*. Available: https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed: April 2025.

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U.S. Environmental Protection Agency. 2025. *California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants.* Available: https://www3.epa.gov/airquality/greenbook/anayo_ca.html. Accessed: June 2025.

2.4 Biological Resources

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

2.4.1 Discussion

The project site is a disturbed vacant lot within an urbanized area. Vegetation on the lot is dominated by non-native annual grasses; a few landscape trees are present along the perimeter in adjacent properties. Based on a review of historic aerial photos, the project site appears to be routinely disked. The developed urban area surrounding the project site has existing sources of ambient light, such as streetlights, vehicle headlights, and residential lighting.

East Contra Costa County HCP/NCCP Participation

The project is within the adopted habitat conservation plan/natural community conservation plan (HCP/NCCP) urban development area and a covered activity under bullet two (public service facilities). The HCP/NCCP is intended to provide an effective framework for protecting natural resources and special-status species recovery in eastern Contra Costa County while improving and streamlining the environmental permitting process for impacts on these species and associated habitats. The East Contra Costa County Habitat Conservancy was created to oversee assembly and operation of the HCP/NCCP preserve system and ensure compliance with all terms of the HCP/NCCP, permits, and implementing agreement. Participation in the HCP/NCCP results in payment of fees to mitigate impacts on open space, habitats, and covered species. An assessment of special-status species not covered by the East Contra Costa County HCP/NCCP for the project was prepared by Dudek (Dudek 2024), and an application form and planning survey report to comply with and receive permit coverage under the East Contra Costa County HCP and NCCP was prepared for the proposed project by Dudek (Dudek 2025) (refer to Attachment B). To characterize biological resources on the project site, searches of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Rare Plant Inventory were conducted (CDFW 2025; CNPS 2025). In addition, a U.S. Fish and Wildlife Service (USFWS) species list was obtained through the Information for Planning and Consultation (IPaC) web portal (USFWS 2025). A reconnaissance-level field survey was conducted on December 11, 2024, by a Dudek biologist.

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

Special-Status Plants

Special-status plant species were not observed during the field survey and are not expected to occur on the project site due to a lack of suitable habitat. Therefore, the project would have **no impact**.

Special-Status Wildlife

The database searches identified 71 special-status wildlife species that are occurring or potentially occurring in the project vicinity (CDFW 2025; USFWS 2025). Of these, 68 species were eliminated from consideration due to the absence of suitable habitat within the project site, the project's location outside of the species' known range, or the presence of urbanization and human activity in areas surrounding the project site that would render potentially suitable habitat unsuitable for some species (Dudek 2025). The 68 species are not discussed further.

Planning surveys and a review of occurrence databases indicated that there is moderate potential for western burrowing owl (*Athene cunicularia*), Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), and non-special-status migratory or nesting birds to occur on the project site. Project construction would result in the loss of suitable habitat. Furthermore, construction activities may result in injury, mortality, or disruption of normal behaviors if the aforementioned species are present. During project operations, landscape and building maintenance, the presence of humans and vehicles during weekday daytime shifts (7:00 a.m.–5:30 p.m.), and permanent nighttime lighting for security purposes may result in injury, mortality, or disruption of normal behaviors for special-

status wildlife. Therefore, project impacts would be potentially significant. The mitigation measures described below, which are consistent with the species-level measures in the East Contra Costa County HCP (Jones and Stokes 2006), are provided to reduce impacts to a less-than-significant level.

Western Burrowing Owl

Western burrowing owl is a candidate for listing under the California Endangered Species Act (CESA) and a California Species of Special Concern. Ruderal land cover within the project site is considered suitable habitat and therefore would be able to support this species. In addition, numerous California ground squirrel burrows are present on the east side of the project site. However, no burrowing owls, or indicators of their presence, were observed during the planning survey, and none of the burrows on-site are of a diameter that would be suitable for burrowing owl (Dudek 2024).

One CNDDB occurrence of western burrowing owl overlaps the northeast corner of the project site; however, the occurrence appears to have been extirpated by development and passive relocation (Occurrence No. 1155) (CDFW 2025). Nine other CNDDB occurrences have been reported within 1 mile of the project site. Many were in areas that are now densely developed; these have most likely been extirpated. No additional occurrences within proximity of the project site have been recorded since 2012.

Although no burrows of suitable size were documented during the planning survey, site conditions may change. In addition, California ground squirrels and gophers, which can create burrows, are present on-site. Therefore, potentially suitable burrows could be present during project construction. Project construction and operations could result in injury, mortality, or disturbance of normal behaviors for western burrowing owl if present, which would be a potentially significant impact. Implementation of **Mitigation Measure BIO-1**, below, would require preconstruction surveys; if burrowing owl is present, avoidance measures and construction monitoring would be implemented. Therefore, the project would have a **less-than-significant impact with mitigation incorporated.**

Mitigation Measure BIO-1: Preconstruction Survey for Burrowing Owls

Prior to any ground disturbance related to covered activities, a qualified biologist with experience identifying burrowing owl and its habitat will conduct a preconstruction survey in areas identified in the planning surveys as having potential burrowing owl habitat. The surveys will establish the presence or absence of western burrowing owl and/or habitat features and evaluate use by owls in accordance with CDFW survey guidelines (California Department of Fish and Game 2012).

On the site where the activity is proposed, the biologist will survey all suitable burrowing owl habitat within the proposed disturbance footprint and a 500-foot radius from the perimeter of the proposed footprint to identify burrows and owls. Adjacent parcels under different land ownership or without suitable habitat (e.g., sites that are paved) will not be surveyed. Surveys should take place near sunrise or sunset in accordance with CDFW guidelines. All burrows or burrowing owls will be identified and mapped. Surveys will take place no more than 30 days prior to construction. During the breeding season (February 1–August 31), surveys will document whether burrowing owls are nesting in or directly adjacent to disturbance areas. During the nonbreeding season (September 1–January 31), surveys will document whether burrowing owls are using habitat in or directly adjacent to any disturbance area. Survey results

will be valid only for the season (breeding or nonbreeding) during which the survey is conducted.

This measure incorporates avoidance and minimization guidelines from CDFW's Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game 2012).

If burrowing owls are found during the breeding season (February 1–August 31), project construction activities will avoid all nest sites that could be disturbed by project construction during the remainder of the breeding season or while the nest is occupied by adults or young. Avoidance will include establishment of a non-disturbance buffer zone (described below). Construction may occur during the breeding season if a qualified biologist monitors the nest and determines that the birds have not begun egg-laying and incubation or that juveniles from the occupied burrows have fledged. During the nonbreeding season (September 1–January 31), construction activities will avoid the owls and the burrows they are using, to the extent possible. Avoidance will include the establishment of a buffer zone (described below).

During the breeding season, buffer zones of at least 250 feet, in which no construction activities can occur, will be established around each occupied burrow (nest site). Buffer zones of 160 feet will be established around each burrow being used during the nonbreeding season. The buffers will be delineated by highly visible temporary construction fencing.

If occupied burrows for burrowing owls cannot be avoided, passive relocation will be implemented during the nonbreeding season (September 1–January 31) prior to construction activities.

If passive relocation is proposed, at least 30 days prior to any ground-disturbing activities, the County will prepare and submit a burrowing owl relocation plan to be approved by CDFW within 14 days. The burrowing owl relocation plan will describe site-specific passive relocation procedures, which will follow the most current agency-accepted methodology. Included will be procedures and materials for passive relocation with and without exclusion, the criteria and timing for the use of exclusion devices, the names and qualifications of biologists, procedures for monitoring burrows identified for passive relocation, information regarding the timing for burrow excavation and construction initiation, and reporting requirements.

Swainson's Hawk

Swainson's hawk is listed as Threatened under CESA. No trees are present on the project site; however, trees that could be suitable for nesting were documented adjacent to and within 1,000 feet of the project site. Ruderal portions of the project site provide suitable low-quality foraging habitat for Swainson's hawk, and suitable prey species, such as California ground squirrel and gophers, are present (Dudek 2024).

One CNDDB occurrence overlaps the project site (Occurrence #1911, from 1921). However, this occurrence, which was roughly mapped to the city of Brentwood, describes a nest located along a slough, which is not present on-site (CDFW 2025). One other occurrence was reported 0.6 mile from the project site (Occurrence # 1712, from 2006) (CDFW 2025).

Project construction would result in the loss of potential foraging habitat. Construction and operations could result in injury, mortality, or disturbance of normal behaviors for Swainson's hawk if present, a potentially significant impact. Implementation of **Mitigation Measure BIO-2**, below, would require preconstruction surveys; if Swainson's hawk is present, avoidance measures and

construction monitoring would be implemented. Therefore, the project would have a **less-than-significant impact with mitigation incorporated.**

Mitigation Measure BIO-2: Preconstruction Survey and Avoidance, Minimization, and Mitigation Measures for Swainson's Hawks

Preconstruction Survey

Prior to any ground disturbance related to construction activities during the nesting season (March 15–September 15), a qualified biologist will conduct a preconstruction survey no more than 1 month prior to construction to establish whether any Swainson's hawk nests within 1,000 feet of the project site are occupied. If potentially occupied nests are within 1,000 feet but off the project site, then their occupancy will be determined by observations from public roads or by observations of Swainson's hawk activity (e.g., foraging) near the project site. If nests are occupied, minimization measures and construction monitoring will be required (see below).

Avoidance and Minimization and Construction Monitoring

During the nesting season (March 15–September 15), project construction activities within 1,000 feet of occupied nests or nests that are under construction will be prohibited to prevent nest abandonment. If site-specific conditions or the nature of the activities (e.g., dense vegetation, limited activities) indicate that a smaller buffer could be used, the qualified biologist will coordinate with CDFW to determine the appropriate buffer size.

If young fledge prior to September 15, covered activities can proceed normally. If the active nest is shielded from view as well as noise from the project site by other development, topography, or other features, the County can coordinate with CDFW to gain approval for waiver of this measure. While the nest is occupied, activities outside the buffer can take place.

All active nest trees will be preserved on-site, if feasible. Nest trees, including non-native trees, lost to covered activities will be mitigated by the project proponent, according to the requirements below.

Mitigation for Loss of Nest Trees

The loss of non-riparian Swainson's hawk nest trees will be mitigated by the project proponent, as follows:

- If feasible on-site, planting 15 saplings for every tree lost, with the objective of having at least five mature trees established for every tree lost, according to the requirements listed below.

  AND either

- Paying the implementing entity an additional fee to purchase, plant, maintain, and monitor 15 saplings on the HCP/NCCP preserve system for every tree lost, according to the requirements listed below, OR
- The project proponent planting, maintaining, and monitoring 15 saplings for every tree lost at a site to be approved by the implementing entity (e.g., within an HCP/NCCP preserve or existing open space linked to HCP/NCCP preserves), according to the requirements listed below.

The following requirements will be met for all planting options:

- Tree survival shall be monitored at least annually for 5 years, then every other year until year 12. All trees lost during the first 5 years will be replaced. Success will be reached at the end of 12 years if at least five trees per lost tree survive without supplemental irrigation or protection from herbivory. Trees must also survive for at least 3 years without irrigation.
- Irrigation and fencing to protect the site from deer and other herbivores may be needed for the first several years to ensure maximum tree survival.
- Native trees suitable for this site should be planted. When site conditions permit, a variety of native trees should be planted for each tree lost to provide trees with different growth rates, maturation rates, and life spans and provide a variety of tree canopy structures for Swainson's hawk. This variety will help to ensure that nest trees will be available in the short term (5 to 10 years for cottonwoods and willows) and in the long term (e.g., valley oak, sycamore). This will also minimize the temporal loss of nest trees.
- Riparian woodland restoration conducted as a result of covered activities (i.e., loss of riparian woodland) can be used to offset the nest tree planting requirement above if the nest trees are riparian species.
- Whenever feasible and when site conditions permit, trees should be planted together in clumps or with existing trees to provide larger areas of suitable nesting habitat and create a natural buffer between nest trees and adjacent development (if plantings occur on the development site).
- Whenever feasible, plantings on the site should occur closest to the suitable foraging habitat outside the urban development area.
- Trees planted in the HCP/NCCP preserves or other approved off-site location will occur within the known range of Swainson's hawk in the inventory area and as close as possible to high-quality foraging habitat.

White-Tailed Kite

White-tailed kite is a California Fully Protected species. The project site contains suitable open habitat and small mammal prey species. Trees adjacent to the project site are suitable for nesting by this species. Four CNDDB occurrences between 2004 and 2017 were 2.9 to 3.1 miles north of the project site (CDFW 2025).

Project construction and operations could result in injury, mortality, or disturbance of normal behaviors of white-tailed kite if the species is present, a potentially significant impact. Implementation of **Mitigation Measure BIO-2**, above, and **Mitigation Measure BIO-3**, below, would require pre-construction surveys for nesting Swainson's hawks and non- special-status migratory and nesting birds, which would also detect any white-tailed kites nesting in the site vicinity, and avoidance measures and construction monitoring would be required if the species is present. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Non-Special-Status Migratory and Nesting Birds

Non-special-status migratory and nesting birds are protected by the federal Migratory Bird Treaty Act (MBTA). Disturbing or destroying active nests is a violation of the MBTA. In addition, nests and eggs are protected under California Fish and Game Code Section 3503.

The ruderal land cover on the project site and the adjacent trees may provide suitable habitat for several migratory and nesting bird species, such as red-tailed hawk (*Buteo jamaicensis*), mourning dove (*Zenaida macroura*), and savannah sparrow (*Passerculus sandwichensis*).

Project construction and operations could result in injury, mortality, or disturbance of normal behaviors for non-special-status migratory and nesting birds if present, a potentially significant impact. Implementation of **Mitigation Measure BIO-3**, below, would require preconstruction surveys; if nesting birds are present, avoidance measures and construction monitoring would be implemented. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure BIO-3: Preconstruction Survey for Nesting Birds

To avoid direct impacts on nesting birds, the following measures would be implemented:

- Vegetation removal and initial ground disturbance at the project site will be conducted outside of the nesting season (February–September) to the extent feasible. If not feasible, the measures detailed below will be implemented to avoid or minimize impacts on nesting birds.
- A qualified biologist shall conduct a preconstruction survey for nesting birds no more than 7 days prior to vegetation or structure removal or any ground-disturbing activities conducted during the nesting season (February–September). The survey shall cover the limits of construction as well as suitable nesting habitat within 1,000 feet for raptors and 100 feet for other nesting birds, as feasible and accessible.
- If any active nests are observed during surveys, a qualified biologist shall establish a suitable avoidance buffer around the active nest. The buffer distance shall typically range from 50 to 500 feet and be based on factors such as the species of bird, topographic features, the intensity and extent of the disturbance, the timing relative to the nesting cycle, and the anticipated construction schedule. To avoid active nests, the limits of construction shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.
- If vegetation removal activities are delayed, additional nest surveys shall be conducted so that no more than 7 days elapse between the survey and vegetation removal activities.
- If an active nest is identified in or adjacent to the construction zone after construction has started, work in the vicinity of the nest shall be halted until the qualified biologist can provide appropriate avoidance and minimization measures, ensuring that the nest will not be disturbed by construction. Appropriate measures may include establishing a no-disturbance buffer until the birds have fledged and/or implementing full-time monitoring by a qualified biologist during construction activities conducted near the nest.

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

The project site consists of only Urban and Ruderal land cover types; no riparian habitat or other sensitive natural communities are present. Therefore, the project would have **no impact.**

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

No aquatic or wetland features were identified during the planning survey. The topography of the project site is relatively flat, with no depressions or channels. No standing water, aquatic vegetation, or wetlands were documented during the planning survey. Therefore, the project would have **no impact.**

d) Would the 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?

The project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or migratory wildlife corridors or impede the use of wildlife nursery sites. No rookeries or other nursery sites, water bodies, riparian areas, or wildlife corridors are located on the project site. The project site is a flat, grassy undeveloped lot with no trees. Surrounding land uses include residential neighborhoods to the west; commercial buildings to the north; commercial buildings to the east across Brentwood Boulevard; and a grassy agricultural field to the south (Dudek 2024). While the grassy agricultural field may provide some habitat for wildlife, the existing highly urbanized surrounding areas likely obstruct most wildlife movement through the area. Urban-adapted wildlife would move around the Project site unhindered. Therefore, the project would have a **less-than-significant impact**.

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

The project would not conflict with any local policies or ordinances protecting biological resources. There are no trees on the project site. Therefore, the project would have **no impact.**

f) Would the project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

The project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. The project is within the urban development area of the East Contra Costa County HCP (Jones and Stokes 2006) and considered a covered activity under the plan. The project has been designed to comply with the provisions of the East Contra Costa County HCP, which include implementing all applicable conservation measures. The project would follow all mitigation measures (as identified above) from the planting survey report and provide mitigation fees to offset impacts in compliance with the HCP/NCCP. New plantings would be a mix of native, drought-tolerant plants. In addition, the project would not occur within any East Contra Costa County HCP preserve system lands. Therefore, project impacts would be **less than significant.**

2.4.2 Sources of Information

California Department of Fish and Game. 2012. *Staff Report on Burrowing Owl Mitigation*. March 7. Sacramento, CA. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843. Accessed: July 7, 2025.

California Department of Fish and Wildlife. 2025. *California Natural Diversity Database*. RareFind, Version 5 (commercial subscription). Sacramento, CA: Biogeographic Data Branch. Available: http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp. Accessed July 1, 2025.

California Native Plant Society. 2025. *Inventory of Rare and Endangered Plants* (online edition, v9-01 1.5). Rare Plant Program. Sacramento, CA. Available: http://www.rareplants.cnps.org. Accessed: July 1, 2025.

Dudek. 2024. *Application form and planning survey report to comply with and receive permit coverage under the East Contra Costa County Habitat Conservation Plan and Natural Community Conservation Plan.*

Dudek. 2025. *Assessment for Special-Status Species Not Covered by the East Contra Costa County Habitat Conservation Plan/Natural Community Conservation Plan, East County Service Center Project, Brentwood, California (Project WH429A).* Memo to Contra Costa County.

Jones & Stokes. 2006. *East Contra Costa County Habitat Conservation Plan and Natural Community Conservation Plan*. October. (J&S 01478.01.) San José, CA.

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2.5 Cultural Resources

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

2.5.1 Discussion

CEQA requires lead agencies to determine if a project will have an adverse impact on a significant cultural resource, including historical, archaeological, and tribal cultural resources (Public Resources Code Sections 21084, 21084.1, 21083.2). The agency must first determine if a resource is historically significant, then determine if the project would cause a "substantial adverse change" in its significance (Public Resource Code Section 21068, State CEQA Guidelines Section 15382). According to the State CEQA Guidelines, a resource is considered historically significant if it 1) is listed in or has been determined eligible for listing in the California Register of Historical Resources (CRHR); 2) is included in a local register of historical resources, as defined in Public Resources Code Section 5020.l(k); 3) has been identified as significant in a historical resources survey, as defined in Public Resources Code Section 5024.1 (g); or 4) is determined to be historically significant by the CEQA lead agency (California Code of Regulations Title 14, Section 15064.S[a]).

The following CRHR eligibility criteria are considered when making a significance determination:

- The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- The resource is associated with the lives of persons important in our past;
- The resource embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual or possesses high artistic values; or
- The resource has yielded, or may be likely to yield, information important regarding prehistory or history.

A cultural resources assessment report for the project was prepared by Cogstone (Cogstone Resource Management 2025). A search of the California Historical Resources Information System (CHRIS) was conducted by Northwest Information Center (NWIC) staff members at Sonoma State University on August 2, 2024. Included was the entire project area as well as a 0.5-mile radius. Results of the record search indicate that 41 previous studies have been conducted within 0.5 mile of the project area. Of these, 16 cultural resources studies have been completed within the project area. The 16 cultural studies are all overview reports for multiple cities in Contra Costa County, including the city of Brentwood. No previous studies were completed within the project area that included an intensive pedestrian-level survey.

The NWIC records search also determined that no previously recorded resources were located within the project area. Four cultural resources were located within 0.5 mile of the project area. The cultural resource types include one historic archaeological site, one multicomponent site (i.e., the site is both a historic archaeological site and historic resource), and two historic built-environment resources.

In addition to the NWIC records search, a variety of sources were consulted in September 2024 to obtain information regarding the cultural context of the County. Sources included the CRHR, National Register of Historic Places (NRHP), Built-Environment Resource Directory (BERD), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). These searches returned no results for the project area.

A Sacred Lands File (SLF) search was conducted by the Native American Heritage Commission (NAHC). It resulted in negative results for archaeological resources. However, the NAHC provided a list of 15 Native American tribes and 33 individuals who may have information about the project area. Refer to Section 2.18, *Tribal Cultural Resources*, for further discussion of the consultation meetings.

On December 13, 2024, ICF archaeologist Shelby Caulder conducted an intensive pedestrian-level archaeological survey of the project area. Survey methods consisted of walking 15-meter-wide, east/west-oriented transects across the entirety of the 7.8-acre project area. Surface visibility ranged from good (75 to 80 percent) in the southern and western portions of the project area, along Business Center Drive, to poor (5 to 10 percent) in the northern portion of the project area, along Technology Way. Sediments in the southern portion of the project area consisted of a brown silty clay that appeared to have been tilled recently. Sediments in the western portion of the project area, along Business Center Drive, consisted of gravel; shrubbery was scattered throughout. Ground cover in the northern portion of the project area, along Technology Way, consisted of mostly annual grasses and forbs, which obstructed visibility. In areas with low ground visibility, areas with exposed soil due to rodent backdirt piles or other types of soil exposure were intensively inspected. No cultural resources were identified during the pedestrian-level survey.

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

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

The NWIC record search did not identify any historical resources in the project area, nor did searches of the NRHP, CRHR, BERD, CHL, and CPHI. As discussed above, no cultural resources were identified during the pedestrian-level survey. The project site contains no historic-age built-environment resources. As such, a built-environment survey of the project site was not conducted. However, based on information obtained during tribal consultation, the potential for subsurface pre-historic archaeological resources or tribal cultural resources being discovered during project construction is high and, therefore, a potentially significant impact. Implementation of **Mitigation Measure CUL-1**, **CUL-2, CUL-3, and CUL-4,** below, would require BMPs and other procedures in the event that unanticipated historic or pre-historic resources are encountered. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure CUL-1: Environmentally Sensitive Area and Tribal Monitoring

The County in consultation with the consulting Tribes, shall establish an Environmentally Sensitive Area (ESA) areas where ground disturbance would occur with potential to impact Tribal Cultural Resources. Ground disturbing activities within the ESA will be monitored by representatives of the Wilton Rancheria (Tribal Monitor). Tribal Monitors who have specific knowledge of the Tribal cultural resources in the project area shall direct construction and archaeological workers when midden soils, or other types of soils that may contain human remains, cultural materials, and sacred items are uncovered. Tribal monitors will be allowed to inspect spoils piles periodically if monitoring is reduced to spot checking. Sensitive soils that require additional attention from the Tribal Monitors will be preserved in place to the maximum extent feasible. If sensitive soils cannot be preserved in place, Wilton Rancheria will be notified, and tribal monitors will be allowed to thoroughly inspect the soils. If there are any findings of significance within the soils, the County and Wilton Rancheria will coordinate next steps. A lock box shall be kept on site before the start of work in case storage of isolated finds is necessary.

Mitigation Measure CUL-2: Cultural Awareness Training

Contractor shall be notified of the possibility of encountering historic or archaeological materials during ground-disturbing activities. A standard inadvertent discovery clause will be included in every construction contract to inform Contractors of requirements during construction.

Prior to the initiation of any grading or construction activities, a Cultural Awareness Training (CAT) training shall be provided to all construction personnel with an overview of applicable laws, Project mitigation measures, and procedures to be followed with regards to historical, archaeological, and Tribal cultural resources that may be encountered over the course of the project. The CAT will be given to any new personnel that is brought onto the project. The CAT will be provided by a representative(s) from the consulting Tribes or a representative(s) approved by the consulting Tribes who have completed CATtraining. The program will underscore the requirement for confidentiality and culturally appropriate treatment of any finds of significance to the Tribes.

Mitigation Measure CUL-3: Procedures for Inadvertent Discovery of Unanticipated Historic Resources or Tribal Cultural Resources

Procedures for discovery include:

- If potential archaeological or Tribal cultural resources materials are uncovered during construction, the Contractor shall cease all ground disturbing activities immediately within a 100-foot radius of the find and the find must be evaluated for eligibility for listing in the CRHR and NRHP. The Contractor shall immediately notify the County Resident Engineer or their designated representative to request an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and the Native American Tribe(s) that have requested consultation and/or demonstrated interest in the project site, Wilton Rancheria and Confederated Villages of Lisjan Nation, to assess the nature and significance of the find under CEQA and/or the Tribe. The archaeologist shall stake the area of discovery, placing stakes no more than 10 feet apart, forming a circle having a radius of no less than 100 feet from the point of discovery.
- If the finding(s) is not determined to be potentially significant, work may resume.
- If the finding(s) is determined to be potentially significant, the archaeologist in consultation with the Tribal representatives shall develop a mitigation plan outlining management of the resource, analysis, reporting of the find, and curation or reburial of cultural items. The plan shall be implemented by the County in accordance with state guidelines and in consultation with the consulting Tribes. The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribes and a qualified archaeologist. Examples of appropriate avoidance and mitigation for the Tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, heritage recovery, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, construction monitoring of any further activities by a Tribal representative, and/or returning the objects to a location that will be set aside within the Project area or area agreed upon with consulting Tribes where they will be protected in perpetuity not be subject to future impacts such as development. Preservation in place (i.e., avoidance) is typically the preferred manner of treatment of Tribal resources and cultural items. Tribal Cultural Resources shall not be permanently curated, unless specifically requested by the Tribe. Work may resume according to the recommendations in the mitigation plan.
- Any previously undiscovered resources found during construction within the Project Site shall be recorded on appropriate California Department of Parks and Recreation (DPR) 523 forms. These forms shall be submitted to Contra Costa County Department of Conservation and Development, and the Northwest Information Center (NWIC), as required. County will follow an unanticipated discovery plan developed with the Tribe for curation or reburial of resources.

Mitigation Measure CUL-4: Communication Protocols for Tribal Monitoring

The contractor shall develop a set of communication protocols, to the satisfaction of the County and Wilton Rancheria, to identify all points of contact and to ensure that tribes are notified when the applicant will proceed with authorized construction activities. Points of contact will be

established for the applicant, construction supervisor, monitoring tribes, and County archaeologist, and the contact numbers and email addresses must be documented and shared among all parties. Points of contact are responsible for identifying backup representatives in the event they are unable to perform due to an absence or other reasons.

The contractor shall provide advanced notice of the anticipated work schedule involving earthmoving activities of the project within a minimum of ten (10) business days prior to the specified work commencing.

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

No human remains or cultural resources were identified from the NWIC record search, or other research, or during the pedestrian-level survey of the project area. In addition, no formal cemeteries are present within or adjacent to the project site. However, project construction could discover human remains if present within the project site, a potentially significant impact. Implementation of **Mitigation Measure CUL-5**, below, details the course of action if human remains are discovered. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure CUL-5: Stop Work and Notification Procedures for Human Remains

In the event of the accidental discovery or recognition of any human remains, there shall be no further excavation or disturbance within 100 feet of the remains. The Contra Costa County Coroner will be contacted immediately to determine whether the remains are Native American and if an investigation of the cause of death is required. At the same time, an archaeologist shall be contacted to assess the situation.

If the Coroner determines the remains may be those of a Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours of this identification. The NAHC shall identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated funerary objects. [Pursuant to California Health and Safety Code Section 7050]

If the MLD recommend keeping ancestral remains and funerary objects in situ and protected, the County shall make every effort to follow the recommendation. If removal of ancestral remains and related funerary objects is necessary, Tribal representatives shall work with the qualified archaeologist to ensure that excavation and documentation are conducted carefully, ethically, and the ancestral remains are treated respectfully. No photography or scientific study, destructive or non-destructive, shall be conducted on ancestral human remains. No presentations or other in-person displays of data shall be done without explicit and written approval from Wilton Rancheria. The archaeologist shall prepare a report of all activities, including the recommendations of the MLD for the treatment of the human remains and any associated funerary objects. The report shall be submitted to the County, the Northwest Information Center, and the Tribe(s). [Pursuant to California Public Resources Code Section 5097.98]

The County, as the landowner, in consultation with the Tribe(s) shall provide a secure, climate-controlled storage facility for any recovered ancestral remains until completion of the excavation process. If no such facility exists, the remains shall be secured in a lockbox on-site. The County shall also be responsible for securing exposed but unrecovered ancestral remains during the excavation process. This may include hiring temporary security staff or covering the exposed excavation area with large metal plates that do not contact the remains.

Native American human remains and associated funerary objects shall be treated with appropriate dignity until reburial by Tribal representatives either: 1) In accordance with the recommendations of the MLD if available; or 2) In the project vicinity at a location agreed upon by the MLD and the County, where the reburial would be protected in perpetuity and would not be subject to further subsurface disturbance. The discovery is to be documented on DPR523 forms or submitted to the Native American Heritage Commission (NAHC) and otherwise kept confidential and secure to prevent any further disturbance.

2.5.2 Sources of Information

Cogstone Resource Management. 2025. *Cultural Resources Assessment Report for the East County Service Center Project.* Contra Costa County Project No. WH429A. Prepared for Contra Costa County, City of Brentwood, CA.

2.6 Energy

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

2.6.1 Discussion

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

The project would not result in the wasteful, inefficient, or unnecessary consumption of energy. Although energy would be used during both construction and operation of the proposed project, the project would be designed to minimize its impact through compliance with regulatory standards. The project would be constructed pursuant to Part 6 of the California Energy Code, which ensures a baseline level of energy efficiency and design. To further reduce energy consumption, the project would incorporate renewable energy sources and infrastructure, including a solar photovoltaic system to generate electricity on-site, a closed-loop geothermal system to heat and cool the building, and EV supply equipment (EVSE). Furthermore, the project would be expected to achieve, at a minimum, LEED Silver certification by incorporating energy efficient designs. Therefore, the project would have a **less-than-significant impact**.

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

The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Locally, although the City of Brentwood is in the process of creating a climate action plan, the County has adopted the 2024 Climate Action and Adaptation Plan (CAAP) as part of the Envision Contra Costa County 2045 General Plan, the County's comprehensive update to its general plan,

zoning code, and climate action plan (County 2024). The CAAP includes goals for expanding renewable energy use and increasing energy efficiency in buildings and infrastructure. The project's design and operational features, such as a solar photovoltaic system to generate electricity on-site, a closed-loop geothermal system to heat and cool the building, and EVSE, would be consistent with the objectives.

At the state level, the project would support the framework laid out in CARB's 2022 scoping plan update, which emphasizes decarbonizing the electricity sector through efficient energy use and replacing fossil-fueled generation with renewable and zero-carbon resources. The project also support the goals of Senate Bill (SB) 100, which requires renewable and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all retail electricity sales by 2040 (CARB 2022). As mentioned above, the project would include a rooftop photovoltaic system to supply on-site renewable energy, a closed-loop geothermal system to heat and cool the building, LEED Silver certification, and EVSE. Given the project's incorporation of renewable energy infrastructure and compliance with state and County climate planning efforts, the project would have a **less-than-significant impact**.

2.6.2 Sources of Information

California Air Resources Board. 2022. *2022 Scoping Plan for Achieving Carbon Neutrality*. November. Available: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf.

Contra Costa County. 2024. *Contra Costa County 2024 Climate Action and Adaptation Plan*. Adopted November 5, 2024. Available: https://www.contracosta.ca.gov/DocumentCenter/View/84967/Contra-Costa-County-2024-Climate-Action-and-Adaptation-Plan-PDF?bidId=.

2.7 Geology/Soils

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismically related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☒	☐	☐

2.7.1 Discussion

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

The Alquist-Priolo Earthquake Fault Zone Act of 1972 regulates development near active faults for the purpose of preventing surface fault rupture hazards at structures for human occupancy. The project site is not mapped within an Alquist-Priolo Fault Zone or within a currently designated California Earthquake Fault Zone. According to the geotechnical report prepared by ENGEO, no known faults have been mapped on the site (ENGEO 2025). Because no active faults cross the project site, the project would not exacerbate known risks of fault rupture or exacerbate an existing fault rupture risk. Therefore, the project would have **no impact**.

ii) Strong seismic ground shaking?

The project site is in a seismically active region. Small earthquakes occur every year in the San Francisco Bay Area. However, large earthquakes have been recorded and can be expected to occur in the future (ENGEO 2025). The project would not involve any activity, such as groundwater injection, that would exacerbate seismicity. Therefore, the project would have **no impact.**

iii) Seismically related ground failure, including liquefaction?

Research and historical data indicate that soil liquefaction generally occurs in saturated, loose granular soil (primarily fine to medium-grained, clean poorly graded sand deposits) during or after strong seismic ground shaking. It is typified by a loss of shear strength in the affected soil layer, thereby causing the soil to flow as a liquid. Liquefaction increases with the duration and magnitude of cyclic loading. However, because of the higher intergranular pressure of the soil at greater depths, the potential for liquefaction is generally limited to the upper 40 feet of the soil. Potential hazards associated with liquefaction below or near a structure include loss of foundation support, lateral spreading, sand boils, and areal and differential settlement.

The site is within a California Seismic Hazard Zone (California Department of Conservation 2018) and may be susceptible to liquefaction. Therefore, a comprehensive evaluation of the liquefaction

hazard was required. A geotechnical investigation analyzed soil conditions on the project site and found that the subsurface materials encountered in the borings consisted of lean clay (with and without sand) and fat clay with interbedded layers of coarse-grained material at depth (ENGEO 2025). Based on the geotechnical report, it was determined that a zone of potentially liquefiable soil is generally located between 25 and 28 feet below ground surface (bgs) and 34 to 42 feet bgs within groundwater observation locations (i.e., cone penetration tests [CPTs] 1-CPT2, 1-CPT3, 1-CPT4, and 1-CPT6). Silty sand is present below the groundwater table in some regions of the site, as observed at 1-CPT2 and 1-CPT3. Given the relative thickness of non-liquefiable surface soil and the potentially liquefiable soil, the risk of surface disruption is low to negligible. Because the project site is relatively low, a nearby free-face is not present. The risk of liquefaction is low, and the risk of lateral spreading is judged to be very low. The project would not exacerbate liquefaction risks because liquefiable soil would be replaced prior to construction to ensure a steady foundation. Therefore, the project would have a **less-than-significant impact**.

iv) Landslides?

According to Figure HS-18B, Landslide Hazards, of the County General Plan, the project site is not within a potential landslide area (County 2024). The project site is in a generally flat area. There are no nearby slopes that would be vulnerable to landslides. The project would not create substantial slopes and therefore would not exacerbate existing conditions. Therefore, the project would have **no impact**.

b) Result in substantial soil erosion or the loss of topsoil?

The modified grades associated with the completed project would result in negligible changes in topography. Construction of the project would temporarily increase the exposure of soils to stormwater runoff and wind erosion because of grading and excavation. However, standard erosion control BMPs would be implemented during construction to minimize potential impacts. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared consistent with the Statewide Construction General Permit (Order No. 2022-0057-DWQ). See Section 2.10, *Hydrology/Water Quality,* for more details about the SWPPP. Therefore, the project would have a **less-than-significant impact**.

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?

As noted above, the project site is not located in an area that is subject to landslides. The geotechnical investigation determined that the risk of liquefaction is very low, as is lateral spreading and lurch cracking. The project would not exacerbate existing conditions. Therefore, the project would have **no impact**.

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

The *Design-Level Geotechnical Exploration* report (ENGEO 2025) identified potentially expansive lean clay, lean clay with sand, and fat clay near the surface of the site. Laboratory testing indicates that the soil exhibits moderate to high shrink/swell potential, with variations in moisture content. Expansive soil changes in volume with changes in moisture. It can shrink or swell and cause heaving and cracking in slabs, pavement, and structures on shallow foundations. The geotechnical report

recommended that the upper 18 inches of the building pad, extending at least 5 feet laterally beyond building areas, be underlain by fill with relatively low expansion potential (plasticity index [PI] less than 20). The report also recommended that the project assume a lime concentration of 4 percent by dry unit weight of mixed soil to appropriately reduce the expansive nature of the native soil.

Prior to the issuance of a building permit, the County Building Department will review the construction, foundation, and civil plans for consistency with the geotechnical recommendations found in the *Design-Level Geotechnical Exploration* report (ENGEO 2025) to ensure that the construction recommendations are included in construction plans and designs. Therefore, the project would have a **less-than-significant impact**.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?

A new sanitary sewer system would be constructed for the project. A septic tank or alternative wastewater disposal system would not be required. Therefore, the project would have **no impact**.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

The project site is underlain by very young Holocene surficial sediments consisting of Alluvial Loam of Valley Areas (QI) and Alluvial Clay of Valley Areas (Qc) (ENGEO 2025). Although Holocene-age sediments are typically too young to contain fossilized material, they may overlie older deposits, and suitable conditions exist at the project site for the possibility of fossils to exist at depths of 5 to 10 feet below ground surface (De Novo Planning Group 2014). The maximum depth of excavation for the project is up to 400 feet for the proposed closed-loop geothermal system; therefore, the project is likely to encounter paleontological resources if present. In addition, as the exact depth of potentially underlying older deposits cannot be known before excavation, there is the potential for subsurface paleontological resources to be discovered during project construction, a potentially significant impact. Implementation of **Mitigation Measure GEO-1**, below, would require procedures in the event that unanticipated paleontological resources are encountered. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure GE0-1: Procedures for Paleontological Resources

Contractor(s) shall be notified of the possibility of encountering paleontological materials during ground-disturbing activities. A standard inadvertent discovery clause will be included in every construction contract to inform contractors of requirements during construction.

Implement the following measures if potential unanticipated paleontological resources are discovered during project construction.

1) Contractor will be educated on the types of materials that may be encountered.

2) If an inadvertent discovery is made, the contractor will cease all ground-disturbing activities in the area of discovery.

3) Contractor will immediately notify the County who will then request a qualified paleontologist to evaluate the finding(s).

4) If the finding(s) is determined to be potentially significant, the paleontologist will develop a research design and treatment plan outlining management of the resource, analysis, and reporting of the find.

2.7.2 Sources of Information

California Department of Conservation 2018. *EQ Zapp: California Earthquake Hazards Zone Application Earthquake Zones of Required Investigation*. California Geological Survey. Available: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/.

Contra Costa County. 2024. *Contra Costa County 2045 General Plan.* Adopted: November 5, 2024. Available: https://www.contracosta.ca.gov/DocumentCenter/View/84957/Contra-Costa-County-2045-General-Plan-PDF---Large-file-782-MB.

De Novo Planning Group. 2014. *Public Draft Environmental Impact Report for the 2014 Brentwood General Plan Update.* Available: https://www.brentwoodca.gov/home/showpublisheddocument/2832/637794835332370000.

ENGEO, Inc. 2025. *Design-Level Geotechnical Exploration*. Revised: March 28, 2025.

2.8 Greenhouse Gas Emissions

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Generate greenhouse gas emissions. either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

2.8.1 Discussion

Setting

Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thereby enhancing the greenhouse effect and amplifying the warming of Earth. Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution (Intergovernmental Panel on Climate Change [IPCC] 2007). Rising atmospheric concentrations of GHGs, in excess of natural levels, have resulted in increasing global surface temperatures—a process commonly referred to as *global warming*. Higher global surface temperatures have, in turn, resulted in changes to Earth's climate system, including increases in ocean temperature and acidity, reduced sea ice, variable precipitation, and increases in the frequency and intensity of extreme weather events (IPCC 2018). Large-scale changes to Earth's system are collectively referred to as *climate change.*

The principle anthropogenic (human-made) GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds, including sulfur hexafluoride, hydrofluorocarbons (HFCs), and perfluorocarbons. The primary GHGs that would be emitted by project-related construction and operations include CO_2, CH_4, and N_2O. The principal characteristics of these pollutants are discussed below.

- **Carbon dioxide** enters the atmosphere through the combustion of fossil fuel (i.e., oil, natural gas, coal), solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., from manufacturing cement). CO_2 is also removed from the atmosphere, or *sequestered*, when it is absorbed by plants as part of the biological carbon cycle.
- **Methane** is emitted during the production and transport of coal, natural gas, and oil. CH_4 emissions also result from livestock and agricultural practices as well as the anaerobic decay of organic waste in municipal solid waste landfills.
- **Nitrous oxide** is emitted by agricultural and industrial activities as well as the combustion of fossil fuels and solid waste.

Regulatory Setting

California has adopted statewide legislation to address various aspects of climate change and implement GHG emissions mitigation. Much of this legislation establishes a broad framework for the state's long-term GHG reduction and climate change adaptation program. Of particular importance are SB 32 and AB 1279, which outline the state's GHG reduction goals (i.e., achieving a 40 percent reduction in GHG emissions by 2030 [relative to 1990 emissions levels] and net-zero GHG emissions no later than 2045 (i.e., reach a balance between GHGs emitted and removed from the atmosphere). AB 1279 also mandates an 85 percent reduction in statewide GHG emissions (from 1990 levels) by 2045. The 2017 climate change scoping plan and the 2022 scoping plan update provide frameworks for achieving the 2030 and 2045 reduction targets, respectively, by leveraging and enhancing many of the efforts and programs already adopted by the state (CARB 2017 and 2022a).

Recent actions by President Donald Trump have significantly altered the federal climate policy landscape. On January 20, 2025, President Trump signed Executive Order 14154, which includes pausing the disbursement of funds appropriated through the Inflation Reduction Act (2022) and targeting incentives for EVs and other clean energy technologies. Although some of President Biden's policies remain, these new executive orders represent a shift away from the previous administration's focus on reducing GHG emissions and increasing climate resiliency.

The sections that follow describe regional and local regulations relevant to the project.

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the metropolitan planning organization for the nine counties that make up the Bay Area and SFBAAB, including Contra Costa County. In October 2021, MTC and the Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050, the latest regional transportation plan/sustainable communities strategy (RTP/SCS) for the SFBAAB. Plan Bay Area 2050 incorporates emission reduction targets that were updated by CARB in 2018 pursuant to SB 375 and carries forward many of the development and funding strategies of earlier plans (MTC/ABAG 2021a).

Air District

The Air District is the primary agency responsible for managing air quality in the Bay Area, including Contra Costa County. It provides recommended methods for analyzing project-related GHGs in CEQA reviews. In April 2023, the Air District published the most recent version of its Air District CEQA Guidelines, which offer direction for evaluating plan- and project-level air quality and climate

impacts. The guidelines also outline best practices for centering environmental justice, health, and equity thresholds when evaluating a project's impact on air quality (Air District 2023). Appendix B of the guidelines, *CEQA Thresholds for Evaluating the Significance of Climate Impacts*, provides substantial evidence in support of the Air District's updated GHG thresholds and recommendations for assessing project-level climate impacts. This analysis was prepared in accordance with the guidance and recommendations outlined in the Air District CEQA Guidelines.

Construction GHG Emissions

The Air District CEQA Guidelines do not identify a GHG emissions threshold for construction-related emissions (Air District 2023). Nonetheless, the Air District CEQA Guidelines recommend the quantification and disclosure of construction-related GHG emissions. Even though the significance of construction GHG emissions has not been determined, the Air District CEQA Guidelines provide BMPs that projects should incorporate to reduce construction-related GHG emissions (Air District 2023).

Operational GHG Emissions

According to the Air District CEQA Guidelines, the Air District recommends focusing the evaluation of land use projects on contributions to the state's efforts to meet long-term climate goals. If a project would contribute its "fair share"[6] of what would be required to achieve long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (Air District 2023). Applying this approach, the Air District has found that a new land use development project being built today would need to incorporate the design elements provided in Table 2-7 to do its fair share toward meeting the SB 32 target for 2030 and the goal of carbon neutrality by 2045.

[6] The Air District defines "fair share" as the design elements that need to be incorporated into a project to lay the foundation for achieving carbon neutrality by 2045. These design elements are elements that the project has influence or control over. For example, becoming carbon neutral by 2045 will require California's electrical power generators to shift to 100 percent carbon-free energy resources, which is not something that can be controlled through the design of new land use projects and would not be a part of a project's fair share. Other sources that would not be part of the "fair share" are the vehicle fleet mix or indirect off-site emissions (e.g., methane emissions from wastewater or solid waste).

Table 2-7. Air District Greenhouse Gas Thresholds for Land Use Projects

Thresholds for Land Use Projects (Must Include A or B)
A. Projects must include, at a minimum, the following project design elements: 1. Buildings a. The project would not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The project would not result in any wasteful, inefficient, or unnecessary electrical usage, as determined by the analysis required under Section 21100(b)(3) of the CEQA statute and Section 15126.2(b) of the State CEQA Guidelines. 2. Transportation a. Achieve compliance with EV requirements in the most recently adopted version of the California Green Building Standards Code (CALGreen), Tier 2. b. Achieve a reduction in project-generated vehicle miles traveled (VMT) to a level below the regional average, consistent with the current version of the California Climate Change Scoping Plan (currently, 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA: i. Residential projects: 15 percent below existing VMT per capita ii. Office projects: 15 percent below existing VMT per employee iii. Retail projects: no net increase in existing VMT
B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Source: Air District 2023.

If a project is designed and built to incorporate the design elements listed in Table 2-7 (Threshold Option A) or consistent with a local GHG reduction strategy under Section 15183.5(b) of the State CEQA Guidelines (Threshold Option B), then it would contribute its portion of what is necessary to achieve California's long-term climate goals—its fair share—and would not make a cumulatively considerable contribution to global climate change. If the project does not incorporate these design elements and is not consistent with a local GHG reduction strategy, then it should be found to have a significant climate impact because it would hinder the state's efforts to address climate change. This analysis evaluates the project's consistency with the County's CAAP (Threshold Option B) to determine the significance of the project's GHG emissions.

Contra Costa County

Envision Contra Costa County 2045 General Plan

The County General Plan, adopted in November 2024, is the County's primary policy framework for guiding physical development in unincorporated areas (Contra Costa County 2024a). It provides comprehensive policy direction to support clean air, promote community and environmental health equitably, and reduce GHG emissions in alignment with state and local climate goals. As part of this framework, the General Plan identifies the following goal areas, which form the foundation for specific policies and actions aimed at achieving these objectives:

- Goal HS-1: Air quality that supports community and environmental health.
- Goal HS-2: Healthy air quality for all communities, so no community bears the disproportionate burden of environmental hazards and health risks.

- Goal HS-3: Communities that reduce existing and anticipated GHG emissions in support of statewide carbon neutrality goals and other GHG reduction targets.
- Goal HS-4: Resilient communities that are prepared for, responsive to, and able to recover from hazards created or worsened by climate change.

The project's consistency with the County General Plan is evaluated in Section 2.11, *Land Use/Planning.*

Contra Costa County Climate Action and Adaptation Plan 2024 Update

Contra Costa County adopted the 2024 CAAP as part of the Envision Contra Costa 2045 General Plan, the County's comprehensive update to its general plan, zoning code, and climate action plan (Contra Costa County 2024b). The 2024 CAAP builds upon the County's 2015 climate action plan and establishes a strategic framework for both adapting to climate change and reducing GHG emissions in alignment with California's statewide goal of achieving net-zero emissions by 2045.

In coordination with existing and planned state, regional, and local initiatives, the 2024 CAAP introduces a suite of new GHG reduction strategies, aimed at helping the County meet its GHG reduction targets of 658,700 metric tons of CO_2e by 2030 and 164,680 metric tons of CO_2e by 2045. These strategies are organized into five key focus areas:

Clean and Efficient Built Environment (BE)

- BE-1: Require and incentivize new buildings and additions built in unincorporated Contra Costa County to be low carbon or carbon neutral.
- BE-2: Reduce emissions from existing buildings through energy efficiency upgrades and electrification.
- BE-3: Increase renewable energy generation and storage in buildings.
- BE-4: Promote sustainable and low-carbon building materials and construction practices.
- BE-5: Improve energy efficiency and reduce emissions from County facilities and operations.

No-Waste Contra Costa (NW)

- NW-1: Reduce organic waste sent to landfill through diversion, composting, and food recovery.
- NW-2: Reduce construction and demolition waste and promote material reuse.
- NW-3: Promote circular economy practices and reduce consumption of high-emissions goods.

Reduce Water Use and Increase Drought Resilience (DR)

- DR-1: Reduce potable water use in buildings and landscapes.
- DR-2: Increase use of recycled water and greywater systems.
- DR-3: Promote water-efficient landscaping and irrigation practices.

Clean Transportation Network (CT)

- CT-1: Reduce VMT through land use planning and transportation demand management.
- CT-2: Expand and improve public transit options.

- CT-3: Increase active transportation infrastructure and safety.
- CT-4: Accelerate the transition to zero-emission vehicles (ZEVs).
- CT-5: Expand EV charging infrastructure and support ZEV adoption.

Climate Equity (CE)

- CE-1: Ensure equitable access to climate programs and benefits.
- CE-2: Prioritize investments in communities most vulnerable to climate impacts.
- CE-3: Support workforce development and job training in green industries.

City of Brentwood

City of Brentwood General Plan

The current City General Plan, adopted in 2014, includes goals and policies related to air quality and emission reductions (City of Brentwood 2014). These goals and policies include continuing to improve air quality by reducing emissions from construction activities, coordinating air quality planning efforts locally and regionally, and focusing improvements on non-motorized modes of transportation. The project's consistency with the City General Plan is evaluated in Section 2.11, *Land Use/Planning*.

The City's General Plan includes the following goals and policies associated with GHG emissions:

Goal COS 8: Reduce air pollutants and GHG emissions

Policy COS 8-4: Encourage new development or significant remodels to install fireplaces, wood stoves, and/or heaters that meet Air District standards.

Policy COS 8-5: Continue to require all construction projects and ground-disturbing activities to implement Air District dust control and abatement measures.

Policy COS 8-6: Support the development and implementation of a GHG reduction plan, or climate action plan, that addresses and reduces GHG emissions associated with community operations, including, but not limited to, mobile sources (vehicle traffic), energy consumption, and solid waste.

Policy COS 8-7: Coordinate with Contra Costa County and nearby cities to implement regional GHG reduction plans and consolidate efforts to reduce GHGs throughout the county.

Policy COS 8-8: Encourage local businesses and industries to engage in voluntary efforts to reduce GHG emissions and energy consumption.

Policy COS 8-9: Preserve, protect, and enhance, as appropriate, the city's carbon sequestration resources, also referred to as "carbon sinks," to improve air quality and reduce net carbon emissions.

Policy COS 8-10: Encourage public transit, ridesharing and van pooling, shortened and combined motor vehicle trips to work and services, use of bicycles, and walking. Minimize single-passenger motor vehicle use.

Policy COS 8-11: Encourage new construction to incorporate passive solar features.

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

Construction

Construction activities associated with the project would result in short-term GHG emissions, primarily from the combustion of fuel in off-road equipment, construction employee vehicles, vendor trucks, and haul trucks. In addition, electricity use during construction would contribute to indirect GHG emissions. The magnitude of daily emissions would vary, depending on the construction phase, type of equipment in use, daily work activities, and number of employees on-site.

Short-term GHG emissions generated by project construction were calculated with use of CalEEMod, version 2022.1, which relies on vehicle emissions factors from CARB's EMFAC2021, as recommended by the Air District and other air districts in California (CAPCOA 2022). Modeling was based on default values from CalEEMod, which are generated by the model according to a project's location and land use type and project-specific information where available, including building type and size, expected construction phase duration, demolition and earthwork, and the area to be graded or paved. Detailed model assumptions, inputs, and output files for the calculations are provided in Attachment A. Based on the modeling, it is estimated that project-related construction would generate approximately 866 metric tons (MT) of carbon dioxide equivalent (CO_2e) over the construction period (2026–2027). GHG emissions from equipment and vehicle exhaust would be equal to approximately 811 MT of CO_2e, while the remaining emissions, 55 MT of CO_2e, would be from the use of electricity during construction. In addition, the Air District recommends incorporation of BMPs to reduce GHG emissions during construction, as feasible and applicable. The project contractors would implement BMPs recommended by the Air District, as shown in Table 6-1 of the State CEQA Guidelines, to reduce GHG emissions during construction, as feasible and applicable (Air District 2023). Examples of the BMPs that may be implemented include, but are not limited to, the following:

- Use zero-emission and hybrid-powered equipment to the greatest extent possible.
- Use locally sourced or recycled materials for construction materials (goal of at least 20 percent, based on costs for building materials and volume for roadway, parking lot, sidewalk, and curb materials). Wood products used should be certified through a sustainable forestry program.
- Recycle or salvage nonhazardous construction and demolition debris, with a goal of recycling at least 15 percent more by weight than the diversion requirement in Title 24.

As noted above, the Air District has not established a quantitative threshold for assessing construction GHG emissions because emissions from construction are temporary and variable (Air District 2023). Therefore, the determination of the significance of the project's GHG impact is based on the potential for project operation to generate GHG emissions that may have a significant impact on the environment.

Operation

The project is expected to be fully operational by 2027. Operational activities would generate long-term GHG emissions, primarily from motor vehicles traveling to and from the project site, the use of landscaping equipment, electricity consumption, water usage, and solid waste generation. These

activities would generate the highest level of operational emissions in the first year of full buildout (2027).[7] Table 2-8 shows estimated annual GHG emissions associated with full buildout in 2027.

Table 2-8. Operational Greenhouse Gas Emissions by Emissions Source for 2027

Emissions Source	Annual GHG Emissions[a] (MT of CO_2e)
Mobile sources	1,545
Area sources	2
Energy use	354
Water use	47
Solid waste generation	214
Refrigerants	< 1
Total Operational GHG Emissions	2,162

Source: Attachment A.

Notes:

[a] Values may not sum due to rounding.

MT of CO_2e = metric tons of carbon dioxide equivalent

As shown in Table 2-8, the project would generate approximately 2,162 MT of CO_2e during its first year of operation (full buildout). Most of the annual GHG emissions, approximately 71 percent, would be from mobile sources (e.g., County workers, visitors, and delivery drivers traveling to and from the site). Electricity consumed and waste generated at the site would represent 16 percent and 10 percent of total annual emissions, respectively. The remaining sources of emissions (i.e., area sources, water use, refrigerants, stationary sources) represent a combined 3 percent of total annual emissions. Although these emission estimates are not directly used to determine significance under CEQA, they are included here to provide a fully comprehensive assessment of the project's impacts.

Under the Air District's Land Use Threshold Option B, projects must demonstrate consistency with a local GHG reduction strategy. To address this requirement, the following discussion evaluates the project's alignment with the County CAAP. Table 2-9 evaluates the project's consistency with the 2024 CAAP climate action strategies to determine if the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Table 2-9. Project Consistency with the County's 2024 CAAP Climate Action Strategies

Climate Action Strategy	Project Consistency
BE-1: Require and incentivize new buildings and additions built in unincorporated Contra Costa County to be low carbon or carbon neutral.	Consistent. The project would be built to LEED Silver standards. The project would be all electric, and no natural gas infrastructure would be constructed.
BE-2: Retrofit existing buildings and facilities in the unincorporated county, and County infrastructure, to reduce energy use and convert to low-carbon or carbon-free fuels.	Not applicable. The project involves a new building; it would not retrofit an existing building.

[7] Emissions in subsequent years would continually decrease as the statewide vehicle fleet transitions to newer low-carbon-emitting vehicles and electric power is generated from more renewable sources; thus, 2027 represents a worst-case year.

Climate Action Strategy	Project Consistency
BE-3: Increase the amount of electricity used and generated from renewable sources in the county.	Consistent. The project would include a solar photovoltaic system and a closed-loop geothermal system to heat and cool the building.
NW-1: Increase composting of organic waste.	Consistent. The project would include green waste bins and participate in a composting program managed by the County, providing garbage, yard waste, and recycling collection services to the project site.
NW-2: Reduce waste from County operations.	Consistent. The project would be served by the County, which implements three-stream recycling (i.e., trash, recycling, and organic waste).
NW-3: Increase community-wide recycling and waste minimization programs.	Not applicable. This measure involves expanding waste minimization programs, which is not within the scope of a County services center.
NW-4: Reduce emissions from landfill gas.	Not applicable. This measure applies to the operations of County-owned landfills, which is not within the scope of a County services center.
DR-1: Reduce indoor and outdoor water use.	Consistent. The project would be built to LEED Silver standards, which require drought-tolerant landscaping and devices.
DR-2: Ensure sustainable and diverse water supplies.	Not applicable. This measure involves decision-making with respect to water supplies, which is not within the scope of a County services center.
TR-1: Improve the viability of walking, biking, zero-emission commuting, and using public transit for travel within, to, and from the county.	Consistent. The project would include 22 long-term and 36 short-term bicycle parking spaces, thereby supporting active transportation and enhancing the viability of biking as a commuting option for the staff and visitors. The project site is also less than 0.25 mile from the Brentwood Boulevard and Sand Creek Road bus stop, which is served by Tri Delta Transit's 300X Brentwood Park & Ride and the Antioch BART line.
TR-2: Increase the use of zero-emission vehicles. Transition to a zero-emission County fleet by 2035 and a community fleet that is at least 50 percent zero-emission by 2030.	Consistent. The project would include 108 EV-capable spaces, with 82 Type 2 EV chargers and four direct-current fast charging stations. Thus, the project would allow workers and visitors to charge their vehicles, facilitating the transition to a zero-emission fleet in the county.
NI-1: Protect against and adapt to changes in sea levels and other shoreline flooding conditions.	Not applicable. The project site is not near the shoreline and thus less vulnerable to sea-level rise.
NI-2: Protect against and adapt to increases in the frequency and intensity of wildfire events.	Not applicable. The project's purpose is to provide County services rather than protect against increases in the frequency and intensity of wildfire events.
NI-3: Establish and maintain community resilience hubs.	Not applicable. The project's purpose is to provide a County services center rather than a community resilience hub.
NI-4: Sequester carbon on natural and working lands in Contra Costa County.	Not applicable. Sequestration of carbon on natural and working lands is not within the scope of a County services center. The project site is a flat, grassy undeveloped lot with no trees that sequester carbon.

Climate Action Strategy	Project Consistency
NI-5: Minimize heat-island effects through the use of cool roofs, green infrastructure, tree canopies, cool paint and pavement, and other emerging strategies.	Consistent. The project would result in tree planting, creating a new tree canopy where one does not currently exist.
NI-6: Protect communities against additional hazards created or exacerbated by climate change.	Not applicable. Protection against hazards created or exacerbated by climate change is not within the scope of a County services center.
CE-1: Provide access to affordable, clean, safe, and healthy housing and jobs.	Consistent. Although the project would not provide housing, it would make valuable services more accessible to community members, who may be more likely to secure employment with access to the services.
CE-2: Invest in solutions to support climate equity.	Consistent. By placing a new services center in an area where no such facility exists, the project would result in County services being more accessible to residents, including vulnerable populations who may be disproportionately affected by climate-related hazards.
CE-3: Increase access to parks and open space.	Consistent. Although the project is a County services center, and the intention of this measure is for the County to take action to increase access to parks and open space, the project would partially fulfill this measure because it would include a public plaza and play area.
CE-4: Ensure residents have equitable, year-round access to affordable, local fresh food.	Not applicable. The intention of this measure is for the County to take action to ensure residents have access to food, which is not within the scope of a County services center.
CE-5: Ensure that large industrial facilities act as good neighbors.	Not applicable. The project is not a large industrial facility.
L-1: Establish Contra Costa County as a leader among local governments for addressing climate issues.	Not applicable. The measure focuses on county-wide leadership and policy initiatives, which is not within the scope of a County services center.
L-2: Continue to recognize the climate crisis as an emergency for Contra Costa County and make addressing climate change a top County priority.	Not applicable. This measure pertains to county-level policy and prioritization, which is not within the scope of a County services center.
IS-1: Monitor and report progress toward achieving Climate Action and Adaptation Plan goals on an annual basis.	Not applicable. This measure pertains to county-level monitoring and reporting, which is not within the scope of a County services center.
IS-2: Continue collaborative partnerships with public agencies, private partners, and community groups that support Climate Action and Adaptation Plan implementation, with an emphasis on residents and community-based organizations from affected communities.	Not applicable. The project does not involve formal partnerships for climate action plan implementation because that is not within the scope of a County services center.
IS-3: Secure necessary funding to implement the Climate Action and Adaptation Plan.	Not applicable. This measure involves securing funding for climate action plan implementation, which is not within the scope of a County services center.
IS-4: Continue to update the baseline emissions inventory and Climate Action and Adaptation Plan every 5 years.	Not applicable. This measure involves updating the emissions inventory in the CAAP, which is not within the scope of a County services center.

Climate Action Strategy	Project Consistency
IS-5: Maintain and update the Climate Action and Adaptation Plan to allow for greater resilience.	Not applicable. This measure involves maintaining and updating the climate action plan, which is not within the scope of a County services center.

As demonstrated in Table 2-9, the project would be consistent with all applicable County 2024 CAAP climate action strategies. The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the project would have a **less-than-significant impact**.

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

California Senate Bill 375/Plan Bay Area 2050

Plan Bay Area 2050, the RTP/SCS for the San Francisco Bay Area, was prepared by MTC pursuant to the requirements of SB 375, as discussed in the *Regulatory Setting* section. Plan Bay Area 2050 is a state-mandated, integrated long-range transportation and land use plan that demonstrates reductions in GHG emissions from passenger cars and light-duty trucks (CARB 2025b).

The project would be consistent with the type and level of development in the City General Plan, which underpins the growth and development assumptions for Plan Bay Area 2050. The project would also be less than 0.25 mile from the Brentwood Boulevard and Sand Creek Road bus stop, with service from Tri Delta Transit's 300X Brentwood Park & Ride/Antioch BART line (Tri Delta Transit 2025). Thus, the project would be consistent with Plan Bay Area 2050 goals that encourage the use of transit as an alternate method of transportation. By redeveloping vacant parcels within existing urban growth boundaries, the project would also support Plan Bay Area 2050 Strategy EN 4 (maintain urban growth boundaries). Moreover, approximately half of the project site is within the MTC-/ABAG-designated Brentwood Boulevard Priority Development Area. The project would therefore result in new jobs in an area near existing job centers and frequent transit that has been identified for its contribution to growth (MTC/ABAG 2021b). Finally, as described in Section 2.17, *Transportation*, the project would have a less-than-significant impact with respect to VMT. Because the project would support Plan Bay Area 2050 goals to reduce VMT and GHG emissions from passenger cars and light-duty trucks, and because its proposed land use types and sizes would fit within the envelope of the uses assumed in Plan Bay Area 2050, the project would not conflict with implementation of Plan Bay Area 2050. Therefore, the project would have a **less-than-significant impact**.

CARB 2022 Scoping Plan

As explained in the *Regulatory Setting* section, CARB's 2022 scoping plan outlines the main strategies the state will use to keep California on track with respect to meeting its SB 32 GHG reduction target (i.e., at least 40 percent below 1990 emissions by 2030, with carbon neutrality by 2045 and a reduction in anthropogenic emissions of 85 percent relative to 1990 levels) (CARB 2022a). Appendix D to CARB's 2022 scoping plan identifies key project attributes that, according to empirical evidence, reduce operational GHG emissions while simultaneously advancing fair housing. In the 2022 scoping plan, CARB concludes that:

> [r]esidential and mixed-use projects that have all of the key project attributes in Table 3 [Key Residential and Mixed-Use Project Attributes that Reduce GHGs] should accommodate growth in a manner consistent with state GHG reduction and equity prioritization goals (CARB 2022b).

In accordance with CARB's guidance, this analysis evaluates the project's consistency with the scoping plan–identified key project attributes to determine whether the project would conflict with the state's plan for meeting its GHG reduction targets. The project's consistency with the attributes is discussed in Table 2-10.

Table 2-10. Project Consistency with CARB 2022 Scoping Plan Key Project Attributes

Project Attribute	Project Consistency
Transportation Electrification	
Provides EV charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval	**Inconsistent**. The project would include 108 EV-capable spaces, with 82 Type 2 EV chargers and four direct-current fast charging stations. This amount of EV parking would not meet the voluntary Tier 2 standards for EV charging infrastructure outlined in CALGreen. As such, the project would be inconsistent with this attribute.
VMT Reduction	
Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	**Consistent**. The project site is a flat, grassy undeveloped lot. The lot is within a suburban community that is presently served by existing utilities and essential public services, like streets and transit. As such, the project would be consistent with this attribute.
Does not result in the loss or conversion of natural and working lands	**Consistent**. The project site is a flat, grassy undeveloped lot with no trees. The lot is within the existing growth boundary of a suburban community. The site lacks land use features identified by CARB as indicative of natural and working lands, including forestland, rangeland, urban green space, wetlands, or farmland (CARB 2025a). The project would not result in the loss or conversion of natural and working lands. As such, the project would be consistent with this attribute.
Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS.	**Consistent.** As previously noted, the project would be less than 0.25 mile from the Brentwood Boulevard and Sand Creek Road bus stop, with service from Tri Delta Transit's 300X Brentwood Park & Ride/Antioch BART line (Tri Delta Transit 2025). As such, the project would be consistent with this attribute.
Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square footage); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or For multi-family residential development,	**Consistent**. As discussed above, there is no County zoning designation for the project site. However, in both Section 84-46 of the County Municipal Code (Administrative Office District) and Section 17.620 of the City Municipal Code, office uses are required to provide one off-street parking space per 200 square feet of gross floor area. Given the proposed 120,000 square feet of office space, the project would require 600 parking spaces. With 424 spaces proposed, the project would provide fewer spaces than required. As such, the project would provide less parking than the standard ratio

Project Attribute	Project Consistency
requiring parking costs to be unbundled from costs to rent or own a residential unit.	specified in the municipal code. The project would be consistent with this attribute.
At least 20 percent of units included are affordable to lower-income residents	**Inapplicable**. The project does not propose the development of any residential units. As such, this attribute does not apply to the project.
Results in no net loss of existing affordable units	**Consistent**. There are currently no affordable housing units on the project site. As such, development of the project would not result in a net loss of existing affordable units, consistent with this attribute.
Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking	**Consistent**. As discussed under Impact a, the project would not include natural gas appliances or natural gas plumbing. As such, the project would be consistent with this attribute.

Source: CARB 2022a.

As discussed in Table 2-10, the project would not meet the voluntary CALGreen Tier 2 EV parking standard identified in Appendix D. However, Appendix D notes that "lead agencies may determine, with adequate additional supporting evidence, that projects that incorporate some, but not all, of the key project attributes are consistent with the state's climate goals" (CARB 2022). Although the project would not meet the voluntary CALGreen Tier 2 EV parking standard, the project would be consistent with all applicable County 2024 CAAP climate action strategies because it would include a relatively large amount of EV parking, as well as 58 bicycle parking spaces, and be in proximity to an existing transit station. Moreover, as discussed in Table 2-10, the project would incorporate all other scoping plan–identified key project attributes. As a LEED Silver all-electric facility with an on-site solar photovoltaic and closed-loop geothermal HVAC system, the project would be consistent with CARB's 2022 scoping plan and align with the state's climate goals.

Because the project would contribute its fair share to what will be required to achieve the state's most recent long-term climate goals, per Air District guidance, and align with the state's climate strategies, as defined in Appendix D, the project would not conflict with implementation of CARB's 2022 scoping plan or attainment of the statewide GHG targets for 2030 and 2045 mandated by SB 32 and AB 1279, respectively. Therefore, the project would have a **less-than-significant impact**.

2.8.2 Sources of Information

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2.9 Hazards and Hazardous Materials

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located 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, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

2.9.1 Discussion

A Soil Investigation Report, a Phase I Environmental Site Assessment (ESA), and Phase II ESA were prepared for the project by Baseline Environmental Consulting (refer to Attachment C) (Baseline Environmental Consulting 2024, 2025a, and 2025b). In addition, Baseline Environmental Consulting performed a peer review for a letter prepared by ACC Environmental Consultants regarding management of pesticide-containing soils (refer to Attachment C) (Baseline Environmental Consulting 2025c). The Soil Investigation Report, Phase I ESA, Phase II ESA, and peer review are summarized as part of Impact b, below.

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

Project construction would involve the routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations. Although solvents, paints, oils, grease, and caulking would be transported, used, and disposed of during the construction phase, these materials are commonly handled on a temporary basis during construction projects; however, their use would not represent the routine transport, use, and disposal of *acutely* hazardous materials. Any spills or releases involving these materials are expected to be small, localized, and cleaned up as they occur. In

addition, a SWPPP would be prepared and implemented during project construction for coverage under the required Construction General Permit,[8] in accordance with the requirements of the State Water Resources Control Board (SWRCB) (2025). The SWPPP would require implementation of BMPs regarding hazardous materials storage, soil stockpiles, inspections, maintenance, employee training, and containment to prevent runoff from entering stormwater collection systems or waterways.

Long-term maintenance activities would involve the use of hazardous chemicals that are typical in an office building environment. Maintenance within the service center would require the use of a wide variety of commercial products that are formulated with hazardous materials (e.g., fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, pesticides/herbicides). Such materials are considered common. They are unlikely to be stored or used in large quantities. Any spills involving these materials would be small and localized and cleaned up as they occur. Therefore, the project would have a **less-than-significant impact**.

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

Due to its historical agricultural use and potential for agriculturally-related chemical[9] contamination on-site (the project site and adjacent properties were used for agriculture as early as 1939), multiple environmental site investigations have been conducted on-site. The following is a summary of the reports reviewed during preparation of this analysis:

- *Soil Investigation Report, Proposed East County Service Center, Contra Costa County Project #WH429A, Brentwood, California*,[10] dated October 3, 2024 (refer to Attachment C), which identified the following:
    - Eight borings were advanced to maximum depths of 2 to 2.5 feet below ground surface (bgs). Locations are denoted in Figure 1 of the soil investigation report. Samples were analyzed for organochlorine pesticides (OCPs), arsenic, metals, total petroleum hydrocarbons, and volatile organic compounds.
    - Concentrations of arsenic exceeded commercial environmental screening levels (ESLs) and construction worker ESLs; however, the arsenic concentrations were considered to be within naturally occurring background levels. Thus, no specific handling or

[8] Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. Dischargers whose projects disturb 1 acre or more of soil or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 acre or more are required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities. Construction grading as part of the project is anticipated to cover approximately 7.86 acres.

[9] Prior to 1950, inorganic pesticides that contained elevated concentrations of metals, such as arsenic, were commonly used in California agriculture. After 1950, OCPs were commonly used in California agriculture until about the mid-1970s. Arsenic from inorganic pesticides and residue from OCPs used in the past have the potential to persist for many decades in shallow soils (where they were applied and generally remain). This can affect human health and the environment. Groundwater in the project site's near vicinity has been recorded at 11 feet bgs; thus, on-site groundwater was not considered at risk of being affected by OCP contamination in shallow soil.

[10] The Soil Investigation Report covers the northern portion of the project site, including the following Assessor's Parcel Numbers: 016-410-008, 016-410-009, 016-410-010, 016-410-011, 016-410-012, and 016-410-013.

disposal requirements were recommended, other than a notification to the contractor redeveloping the site to ensure proper precautions are taken.

- Soils sampled from portions of the site (western, north-central, and northeastern) were considered non-hazardous, while others (south-central and southeastern) were considered California hazardous (or non-Resource Conservation and Recovery Act [RCRA] hazardous) waste for off-site disposal purposes; this based on the analytical results for OCPs exceeding California hazardous waste criteria.
- No other results exceeded hazardous waste criteria.
- The soil investigation report recommended that a soil management plan (SMP) be prepared and implemented during construction activities (Baseline 2024). The SMP would outline how soil would be segregated, managed, tested, reused, and disposed of during excavation and grading.

- *Phase I Environmental Site Assessment, Proposed East County Service Center (Southern Site), Contra Costa County Project #WH429A, Brentwood, California*,[11] (Phase I ESA) dated January 15, 2025 (refer to Attachment C), which identified the following conclusions and recommendations:
  - No recognized environmental conditions (RECs) were identified associated with the site.
  - One item of environmental concern was identified. It was noted as potential pesticide contamination (arsenic and organochlorine pesticides) from historical agricultural use.
  - The Phase I ESA recommended that a Phase II ESA be prepared to collect and evaluate shallow soil samples for potential pesticide contamination within the southern site. Results should be provided to applicable contractors to incorporate into their health and safety and hazard communication programs.
- *Phase II Environmental Site Assessment, Proposed East County Service Center Southern Propoerty, Assessor's Parcel Number 016-120-024, Contra Costa County Project #WH429A, Brentwood, California*,[12] (Phase II ESA) dated February 10, 2025 (refer to Attachment C), which identified the following:
  - Ten borings were advanced to a maximum depth of 2 feet bgs. Locations are denoted in Figure 1 of the Phase II ESA. Samples were analyzed for OCPs, arsenic, metals, total petroleum hydrocarbons, and volatile organic compounds.
  - Concentrations of arsenic exceeded commercial environmental screening levels (ESLs) and construction worker ESLs; however, the arsenic concentrations were considered to be within naturally occurring background levels. Thus, no specific handling or disposal requirements were recommended, other than a notification to the contractor redeveloping the site to ensure proper precautions are taken.
  - Surface soils (to a depth of 1.5 feet bgs) should be classified as California hazardous (or non-RCRA hazardous) waste for off-site disposal; this based on the analytical results for OCPs exceeding California hazardous waste criteria.

[11] The Phase I ESA covers the southern portion of the project site, including the following Assessor's Parcel Number: 016-120-024.

[12] The Phase II ESA covers the southern portion of the project site, including the following Assessor's Parcel Number: 016-120-024.

- No other results exceeded hazardous waste criteria.
- The Phase II ESA recommended a SMP be prepared and implemented during construction activities.

- *Peer Review of ACC Letter Regarding Management of Pesticide-Containing Soils, Planned East County Service Center, Brentwood, California* (Peer Review Memorandum), dated November 14, 2025 (refer to Attachment C), which identified the following:
  - Baseline Environmental Consulting performed a peer review on behalf of the County of an October 2025 letter prepared by ACC Environmental Consultants regarding on-site management of pesticide-containing soils. The letter provided the professional opinion of ACC Environmental Consultants, following review of the soil investigation report and Phase II ESA summarized above.
  - According to the peer review memorandum, the County approves of on-site reuse of soil that would be classified as California hazardous (or non RCRA-hazardous) waste for off-site disposal if it would not cause an unacceptable risk to human health. The County and Baseline Environmental Consulting, based on analytical results of the prior investigations summarized above (refer to Attachment C), determined the only potential unacceptable risk to human health would be potential exposure to Toxaphene concentrations above the residential ESLs in the planned planter/bioswale and playground areas within the northern portion of the project site.
  - Baseline Environmental Consulting recommended the excavation of existing soil within the planter/bioswale and playground areas to a depth of approximately 1.5 feet bgs (locations noted in Figure 1 of the peer review memorandum). The affected material should be replaced with imported clean fill or on-site soil acceptable for reuse. The affected material can be reused on-site as fill material beneath hardscape.

As described above, the project site has undergone multiple site investigations. These investigations concluded that no RECs are associated with the project site. Soil sampling resulted in the classification of on-site soils as California hazardous (or non-RCRA hazardous) waste for off-site disposal. In addition, the 2025 peer review memorandum (summarized above) identified the potential exposure to Toxaphene-affected soils in the planned planter/bioswale and playground areas as an unacceptable risk to human health. Therefore, exposure impacts to construction workers would be potentially significant. Implementation of **Mitigation Measure HAZ-1**, below, would require preparation and implementation of a SMP during all ground disturbance (as recommended in the 2024 Soil Investigation Report and the 2025 Phase II ESA). Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure HAZ-1: Soil Management Plan

The County or its contractor(s) shall prepare and implement, during site preparation and grading activities, an SMP consistent with the recommendations in the Phase II ESA and peer review memorandum prepared for the proposed project. The SMP shall be designed to protect human health and the environment. It shall include protocols (including additional sampling, as necessary), measures, and techniques for the proper handling, management, and disposal of affected materials found on the site during site preparation, grading, excavating, and other earth-disturbing activities. The SMP shall also be designed to protect workers and off-site receptors during site activities and ensure the proper characterization, management, and/or

disposal of contaminated environmental media (including affected media identified in prior environmental investigations conducted within the project site) that is above applicable ESLs. The SMP shall be implemented throughout all ground-disturbing work.

The SMP shall also establish protocols and measures for addressing the discovery of presently unknown environmental conditions or subsurface structures such as underground storage tanks or sumps. If unknown environmental conditions or subsurface structures are uncovered, as directed by an oversight agency, additional site investigation and characterization may be required prior to construction to ensure that potential impacts do not exceed applicable regulatory thresholds. If additional site investigation and characterization are required prior to construction, the County or its contractor(s) shall implement said studies (and their respective recommendations, if necessary) prior to construction.

c) Would the project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The project would be located directly across from the Goddard School of Brentwood on Technology Way, a pre-school. However, as mentioned under Impact a, the routine transport, use, or disposal of hazardous materials would result in less-than-significant impacts with adherence to all applicable regulations and implementation of a SWPPP as part of Construction General Permit requirements. Long-term use of hazardous materials would involve materials that are typically used in maintenance activities. Such materials are considered common. They are unlikely to be stored or used in large quantities or travel far, reducing the potential of a significant impact.

As mentioned under Impact b, portions of on-site soils are classified as California hazardous (or non-RCRA hazardous) waste. Implementation of **Mitigation Measure HAZ-1** (refer to Impact b) would reduce the potential exposure impacts for construction personnel and the surrounding environment (including nearby schools) to a negligible level. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure HAZ-1: Soil Management Plan

Refer to Impact b, above.

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

The 2025 Phase I ESA did not identify any hazardous material release sites within the southern site. In addition, an environmental database search conducted in July 2025 by ICF (using SWRCB's GeoTracker, Department of Toxic Substances Control's [DTSC's] EnviroStor, and California Environmental Protection Agency's [CalEPA's] Cortese List Data Resources) did not identify any hazardous materials sites that would qualify as a Cortese List[13] site within the southern portion of

[13] U.S.C. Section 65962.5 (Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services lists of contaminated drinking water wells, sites listed by SWRCB as having underground storage tank leaks or a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material. Specifically, the following resources provide information regarding facilities meeting "Cortese List" requirements:

- List of hazardous waste and substances sites from DTSC's EnviroStor database.

the project site evaluated in the 2025 Phase I ESA or the northern portion of the project site. Therefore, the project would have **no impact.**

e) For a project located 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 project result in a safety hazard or excessive noise for people residing or working in the project area?

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The closest airports to the project site are Funny Farm Airport, a privately owned airport approximately 2.7 miles east of the project site in the city of Brentwood, and Byron Airport, a public airport approximately 8.2 miles southeast of the project site in Byron. Therefore, the project would have **no impact.**

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

As discussed in Section 2.17, *Transportation*, operation of the proposed project would not have substantial traffic impacts. The proposed access points to the project site would be designed and constructed to comply with City of Brentwood and Contra Costa County standards regarding geometric design to provide users with adequate sight distance visibility and would meet all emergency access standards and compliance would be verified by both agencies prior to and after construction. Furthermore, the proposed project would not alter the existing surrounding street grid during operation. There are no other attributes of the proposed project that would have the potential to interfere with implementation of any emergency response plan prepared by the City or emergency response procedures adopted by any local service providers. The County has not adopted an emergency response plan for the Brentwood area, and thus the project would not impair implementation of or physically interfere with such a plan. The Emergency Alert System and Emergency Digital Information Service are the primary systems used to inform the public of emergencies and threats to health, safety, and welfare. These systems are electronic and are operated by government agencies in conjunction with televisions and radios. In the event of an emergency, these systems are used to broadcast emergency information, such as evacuation alerts, across all radio and television stations in the affected area. Due to the electronic nature of these systems, there is no possibility they would be impacted by the project. Based on the above, the proposed project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the project would have a **less-than-significant impact**.

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

The project site is in a developed area of Brentwood with no wildlands intermixed. Land uses surrounding the project site include commercial (east and north) and residential (west and south). A vacant lot is located between residential uses to the south and the project site. According to the California Department of Forestry and Fire Protection's (CAL FIRE's) State Responsibility Area Fire

- List of leaking underground storage tank sites from SWRCB's GeoTracker database.
- List of solid waste disposal sites identified by SWRCB with waste constituents above hazardous levels.
- List of "active" cease-and-desist orders and cleanup and abatement orders from SWRCB.
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, as identified by DTSC.

Hazard Severity Zones, Contra Costa County Map (California Department of Forestry and Fire Protection [CAL FIRE] 2023), the project site is not within a Very High, High, or Moderate Fire Hazard Severity Zone. The closest high fire area is approximately 2.75 miles west of the project site, beyond SR 4. Thus, the project would not exacerbate wildfire risks of any nature. It is not located in or near a Fire Hazard Severity Zone. Therefore, the project would have **no impact.**

2.9.2 Sources of Information

Baseline Environmental Consulting, Inc. 2024. *Soil Investigation Report, Proposed East County Service Center, Contra Costa County Project # WH429A, Brentwood, California.* Final. 24201-01. Brentwood, CA [Prepared for Environmental Services Division Contra Costa County Public Works Department, Martinez, CA].

———.2025a. *Phase I Environmental Site Assessment, Proposed East County Service Center (Southern Site), Contra Costa County Project # WH429A, Brentwood, California.* Final. 24201-01. Brentwood, CA [Prepared for the Contra Costa County Public Works Department, Martinez, CA].

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———. 2025c. *Peer Review of ACC Letter Regarding Management of Pesticide-Containing Soils, Planned East County Service Center, Brentwood, California.* 24201-01.

California Department of Forestry and Fire Protection. 2023. *State Responsibility Area Fire Hazard Severity Zones*. Available: hhttps://calfire.app.box.com/s/viyymvmweaaciuhwfb2bdxqdok3zo0ke/file/1483768131659. Accessed: September 16, 2025.

State Water Resources Control Board. 2025. *Welcome to the Construction Stormwater Program*. Available: https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html. Accessed: July 10, 2025.

2.10 Hydrology and Water Quality

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of 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 that would:				
i) Result in substantial erosion or siltation on- or off-site,	☐	☐	☒	☐

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;	☐	☐	☒	☐
iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) Impede or redirect floodflows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

2.10.1 Discussion

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

Construction activities associated with the proposed project include ground-disturbing activities such as trenching, backfilling, and grading. Ground-disturbing activities and runoff from work areas could cause soil erosion and sedimentation, reducing water quality. Marsh Creek is less than 0.2 mile northwest of the project site. The potential impacts on water quality are related to sediment and sediment-bound pollutants that may be mobilized into drainage structures or other water bodies. In addition, common hazardous materials (e.g., gasoline, oils, grease, lubricants) from construction equipment could be accidentally released during construction. Accidental discharge of hazardous materials to surface waters during construction could temporarily adversely affect water quality or result in a violation of water quality standards. Contaminants from construction vehicles and equipment and sediment from soil erosion could increase the pollutant load in runoff being transported to receiving waters.

The project would include preparation and implementation of a SWPPP that would be consistent with the Statewide Construction General Permit (Order No. 2022-0057-DWQ). The SWPPP would detail the construction-phase erosion and sediment control BMPs and the housekeeping measures for control of contaminants other than sediment. Erosion control BMPs include source control measures, such as wetting dry and dusty surfaces to prevent fugitive dust emissions and installing an effective soil cover (e.g., geotextiles, straw mulch) or hydroseeding, for inactive areas to prevent sediments from being dislodged by wind, rain, or flowing water. Sediment control BMPs would include measures such as the installation of fiber rolls and sediment basins to capture and remove particles that have already been dislodged. The SWPPP would establish good housekeeping measures such as construction vehicle storage and maintenance, handling procedures for hazardous materials, and waste management BMPs, which would include procedural and structural measures to prevent the release of wastes generated and materials used at the site. The SWPPP also would detail spill prevention and control measures to identify the proper storage and handling techniques for fuels and lubricants and the procedures to follow in the event of a spill.

The project would introduce impervious surfaces that could transport sediment and hazardous substances into area storm drain inlets that drain into waterways. Because of the addition of new impervious surfaces, concentrated polluted flows would increase. Provision C.3 of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit (MRP) requires all projects creating and/or redeveloping at least 5,000 square feet of impervious surface to incorporate stormwater management treatment facilities. The project would create approximately 213,897 square feet (4.91 acres) of impervious surface cover, totaling 62 percent of the project site. However, the project would also include the installation of stormwater treatment basins, permeable pavers, and landscaping. These features would decrease the rate and volume of stormwater runoff, treat runoff, and allow runoff to infiltrate prior to discharge. In accordance with Provision C.3, a Stormwater Control Plan (SWCP) would be prepared and submitted for review and approval by the Contra Costa County Public Works Department, in compliance with the Stormwater Management and Discharge Control Ordinance (Section 1014) and the MRP.

All project activities would be subject to existing regulatory requirements. During operation, the proposed project would be required to meet all applicable water quality objectives for surface waters and groundwater contained in the Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan), would be operated and maintained in accordance with related regulatory agency guidelines, and would meet the goals and objectives of the County General Plan. Furthermore, the discharge of pollutants from urban runoff would be minimized with implementation of practices required by the County Clean Water Program and other County, federal, and state requirements. Therefore, construction and operation would not violate water quality standards or waste discharge requirements. Therefore, the project would have a **less-than-significant impact**.

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

The project site is within the San Joaquin Valley Groundwater Basin – East Contra Costa Subbasin. Because the East Contra Costa Subbasin is considered a medium-priority basin, a groundwater sustainability plan (GSP) is required. On May 9, 2017, eight agencies entered a memorandum of understanding for development and implementation of the East Contra Costa Subbasin GSP. Implementation of the project would increase the impervious area within the project site. However, the project site would be developed with stormwater treatment basins, permeable pavers, and landscaping. These features would decrease the volume of stormwater runoff, treat runoff, and allow runoff to infiltrate prior to discharge into the municipal storm drain. Recharge in the area would continue to occur through infiltration of precipitation. Groundwater pumping or dewatering may be required during project construction because the geotechnical report indicated that groundwater is deeper than 20 feet, which is above the maximum depth of project excavation for the geothermal borings. However, groundwater supplies would not be used during project operation. Therefore, the project would have a **less-than-significant impact**.

c) Would the 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 that would:

i) Result in substantial erosion or siltation on- or off-site,

During construction, existing drainage patterns could temporarily be altered through minor grading, potentially resulting in temporarily increased erosion. BMPs would be implemented to manage runoff and potential erosion, as described in the SWPPP, in compliance with the Construction General Permit. Good housekeeping practices identified in the SWPPP would prevent runoff and contain any associated sediment.

Implementation of the project would result in the addition of impervious surface cover. However, the project site would include stormwater treatment basins and landscaping, which would decrease stormwater runoff and any mobilization of sediment. As a result, excess soil disturbance would be minimized, and associated soil erosion and siltation impacts would also be reduced. Therefore, the project would have a **less-than-significant impact**.

ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;

During construction, existing drainage patterns could temporarily be altered, potentially resulting in increased runoff or flooding. BMPs identified in the SWPPP, in compliance with the Construction General Permit, would be implemented to minimize runoff or flooding. The project would result in an increase in impervious surface area compared to existing conditions. An increase in impervious cover could result in increased surface runoff rates and volumes. However, the project site would include stormwater treatment basins, permeable pavers, and landscaping. These features would decrease the rate and volume of stormwater runoff and allow runoff to infiltrate prior to discharge into the municipal storm drain. Because the project would create more than 1 acre of impervious surface area, an SWCP would also be required. Runoff would be managed according to the approved SWCP to ensure that site drainage features are appropriately sized and connected to drainage infrastructure off-site. Therefore, the project would have a **less-than-significant impact**.

iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

The project site is currently an undeveloped lot with no stormwater infrastructure serving the site. New stormwater infrastructure is proposed that would connect to the existing municipal drainage facilities. Because the project would create more than 1 acre of impervious surface area, an SWCP will be required. Runoff would be managed according to the approved SWCP to ensure that site drainage features would be appropriately sized and connected to drainage infrastructure off-site. In addition, the project site would include stormwater treatment basins, permeable pavers, and landscaping. These features would decrease the rate and volume of stormwater runoff and treat runoff prior to discharge. The project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the project would have a **less-than-significant impact**.

iv) impede or redirect floodflows?

During construction, the drainage pattern of the site may be temporarily altered. However, the project site is within FEMA Zone X, outside of the 100-year floodplain (FEMA 2017). The project would manage runoff flows through implementation of the approved SWCP as well through design features, including stormwater treatment basins. The project would not impede or redirect floodflows. Therefore, the project would have **no impact.**

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

The project site is within Federal Emergency Management Agency (FEMA) Zone X, an area of minimal flood hazard, outside of the 100-year floodplain (FEMA 2017). The project site is approximately 24 miles southeast of the Carquinez Strait and not within a mapped tsunami inundation zone (State of California 2021). There are no reservoirs adjacent to the project site; therefore, the project would not be prone to inundation by seiche. The project would not release pollutants due to project inundation. Therefore, the project would have **no impact.**

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

The proposed project would comply with the applicable water quality objectives for the region. As part of compliance with permit requirements during ground-disturbing or construction activities, implementation of water quality control measures and BMPs would ensure that water quality standards would be achieved, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the Basin Plan. The National Pollutant Discharge Elimination System (NPDES) Construction General Permit also requires stormwater discharges not to contain pollutants that cause or contribute to an exceedance of any applicable water quality objectives or water quality standards, including designated beneficial uses. In addition, implementing the appropriate County General Plan policies would require the protection of groundwater recharge areas and groundwater resources, as required by the East Contra Costa Subbasin GSP. Therefore, the project would have **no impact.**

2.10.2 Sources of Information

Federal Emergency Management Agency. 2017. *National Flood Hazard Layer Viewer.* Map #06013C0354G, dated March 21, 2017. Available: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed: July 2, 2025.

State of California. 2021. *Tsunami Hazard Area Map, Contra Costa County* (displayed at multiple scales). Produced by the California Geological Survey and the Governor's Office of Emergency Services.

2.11 Land Use and Planning

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

2.11.1 Discussion

a) Would the project physically divide an established community?

The project site is a flat, undeveloped lot bordered by residential uses to the west, commercial uses to the north and east across Brentwood Boulevard, and a grassy undeveloped area to the south. The proposed project does not include features, such as new roads or barriers, that would divide an existing community. Therefore, the project would have **no impact.**

b) Would the 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?

County General Plan policies apply to the proposed improvements within the project site because the site is owned by the County. There is no County General Plan designation for the project site because the site is in the city of Brentwood (County 2024). However, the proposed project would be generally consistent with County General Plan goals and policies adopted for the purpose of avoiding or mitigating an environmental effect because it would be consistent with maximum development projections (Policy LU-P1.1), contain development within the urban limit line (Policy LU-P2.1), and encourage infill development (Policy LU-P2.5). In addition, the proposed project would be required to implement the additional construction measures identified in the Air District's CEQA Guidelines to reduce construction air pollutant emissions (Policy HS-P1.9), prohibit nonessential diesel engine idling Countywide as well as nonessential idling of all vehicles within 100 feet of sensitive receptors (Policy HS-P1.10), and prioritize implementation of the Contra Costa County Climate Action and Adaptation Plan to reduce GHG emissions (Policy HS-P3.1). The proposed project would also adhere to the County General Plan policies related to noise and vibration, such as Policy HS-P14.1, which requires a noise analysis; Policy HS-P14.3, which requires an interior noise level analysis; and Policy HS-P14.5, which requires noise mitigation for noise impacts. Any proposed improvements within the public right-of-way or outside of the project site would be subject to City requirements.

Because the project site is owned by the County, neither the County land use/zoning designations nor the City land use/zoning designations apply to the project site. Any proposed improvements within the public right-of-way or outside of the project site would be subject to the requirements of the City. The proposed project is not required to comply with City General Plan designations or City zoning designations for the project site. The project's consistency with the designations are provided below for informational purposes only. In the City General Plan, the project site is within an area designated for BP uses and subject to the Planned Development (PD-42) and BBSP zoning designation. The Planned Development (PD) designation identifies areas where a master planned

project has been approved and entitled and site-specific zoning has been established. The PD land use designation defaults to the zoning that is in place for the subject parcel (City of Brentwood 2014). In addition, the project site is partially located within the boundaries of the BBSP. The Business Park designation provides for integrated business and research parks, large individual corporate establishments, professional and administrative office centers, and light industrial complexes (City of Brentwood 2014). The proposed project is a centralized service center that would be consistent with the intent and assumptions of the Business Park and specific plan designations (City of Brentwood 2015).

Given the above, the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project would have **no impact.**

2.11.2 Sources of Information

City of Brentwood. 2014. *General Plan*. Adopted July 22, 2014.

_____. 2015. *Brentwood Boulevard Specific Plan*. Adopted: March 27, 2012. Amended: October 27, 2015.

Contra Costa County. 2024. *Contra Costa County 2045 General Plan*. Adopted: November 5, 2024. Available: https://www.contracosta.ca.gov/DocumentCenter/View/84957/Contra-Costa-County-2045-General-Plan-PDF---Large-file-782-MB.

2.12 Mineral Resources

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

2.12.1 Discussion

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

There are no mineral resources near or within the city of Brentwood, according to Figure COS-13, Mineral Resource Areas, of the County General Plan (County 2024). Therefore, the project would have **no impact.**

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

There are no mapped mineral resource areas at the project site. Therefore, the project would have **no impact.**

2.12.2 Sources of Information

Contra Costa County. 2024. *Contra Costa County 2045 General Plan.* Mineral Resources. Available: https://www.contracosta.ca.gov/DocumentCenter/View/84957/Contra-Costa-County-2045-General-Plan-PDF---Large-file-782-MB.

2.13 Noise

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	☐	☒	☐	☐
b) Generate excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

2.13.1 Discussion

Noise can be described as any loud, unexpected, or annoying sound. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receptor determine the sound level and characteristics of the noise perceived by the receptor. The standard unit of measurement of the loudness of sound is the decibel (dB). Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was devised to relate noise to human sensitivity because it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The human ear can detect changes in sound levels of approximately 3 dBA under normal conditions. A change of 5 dBA is noticeable to most people in an exterior environment.

Different metrics are used to evaluate the effects of noise on a community. The equivalent sound level (L_{eq}) represents an average of the sound energy occurring over a specified period, typically 1 hour. The maximum sound level (L_{max}) refers to the root-mean-square (rms) sound level corresponding to the loudest 1-second interval occurring during the measurement. The day/night level (L_{dn}, or DNL) is an average of all noise levels recorded over a 24-hour period, with a 10 dBA penalty added to noise levels occurring during nighttime hours between 10:00 p.m. and 7:00 a.m.

Existing Noise Environment in the Project Area

The primary source of existing noise in the project area is traffic on local roads, including Sand Creek Road, Brentwood Boulevard, Technology Way, and Business ~~Circle~~ Center Drive. Other noise sources include periodic aircraft overflights and general residential sources (e.g., air conditioners and landscaping equipment). The closest airports to the project site are Funny Farm Airport, a privately owned airport approximately 2.7 miles east of the project site in the city of Brentwood, and Byron Airport, a public airport approximately 8.2 miles southeast of the project site in Byron, California, a census-designated place in Contra Costa County.

To establish the existing noise environment, long-term noise monitoring was conducted at three locations from April 15 to 17, 2025. Figure 4 identifies the locations of the long-term measurement sites. The purpose of long-term noise measurements was to establish the existing day/night level in the project area and characterize the daily trend in noise levels throughout a 48-hour period. Monitoring was conducted using Piccolo SLM-P3 Type 2 sound-level meters manufactured by Soft dB. These are considered general-purpose grade for field use. The sound-level meters were calibrated prior to the measurement to ensure accuracy using a Larson Davis CAL200 acoustical calibrator. The calibration was also re-checked at the conclusion of each measurement. The noise levels collected during monitoring are summarized in Table 2-11.

Table 2-11. Summary of Noise Measurements

Site	Description	Average[a] 24-Hour Noise Level (dBA L_{dn})	Average Daytime[b] Noise Level (dBA, 1-hour L_{eq})	Average Nighttime[c] Noise Level (dBA, 1-hour L_{eq})
LT-1	West of project site at southern terminus of Business Center Drive	62.4–63.6	62.1	54.4
LT-2	Northwest of the intersection of Technology Way and Business Center Drive	63.4–63.6	61.9	55.4
LT-3	Hampton Inn Brentwood parking lot	62.2–63.0	60.6	54.7

Notes:

[a] Ambient measurement data were collected from 11:00 a.m. on April 15, 2025, to 11:00 a.m. on April 17, 2025.

[b] Daytime is considered to be the hours between 7:00 a.m. and 10:00 p.m.

[c] Nighttime is considered to be the hours between 10:00 p.m. and 7:00 a.m.

dBA = A-weighted decibel level (a logarithmic measurement scale that approximates the frequency response of the human ear); L_{dn} = day/night sound level (L_{dn} describes the average acoustical energy content of noise for a 24-hour period. Nighttime hours between 10:00 p.m. and 7:00 a.m. are assigned a 10 dB penalty to account for human sensitivity to noise at night); L_{eq} = equivalent sound level (L_{eq} describes the average acoustical energy content of noise for an identified period of time, commonly 1 hour)

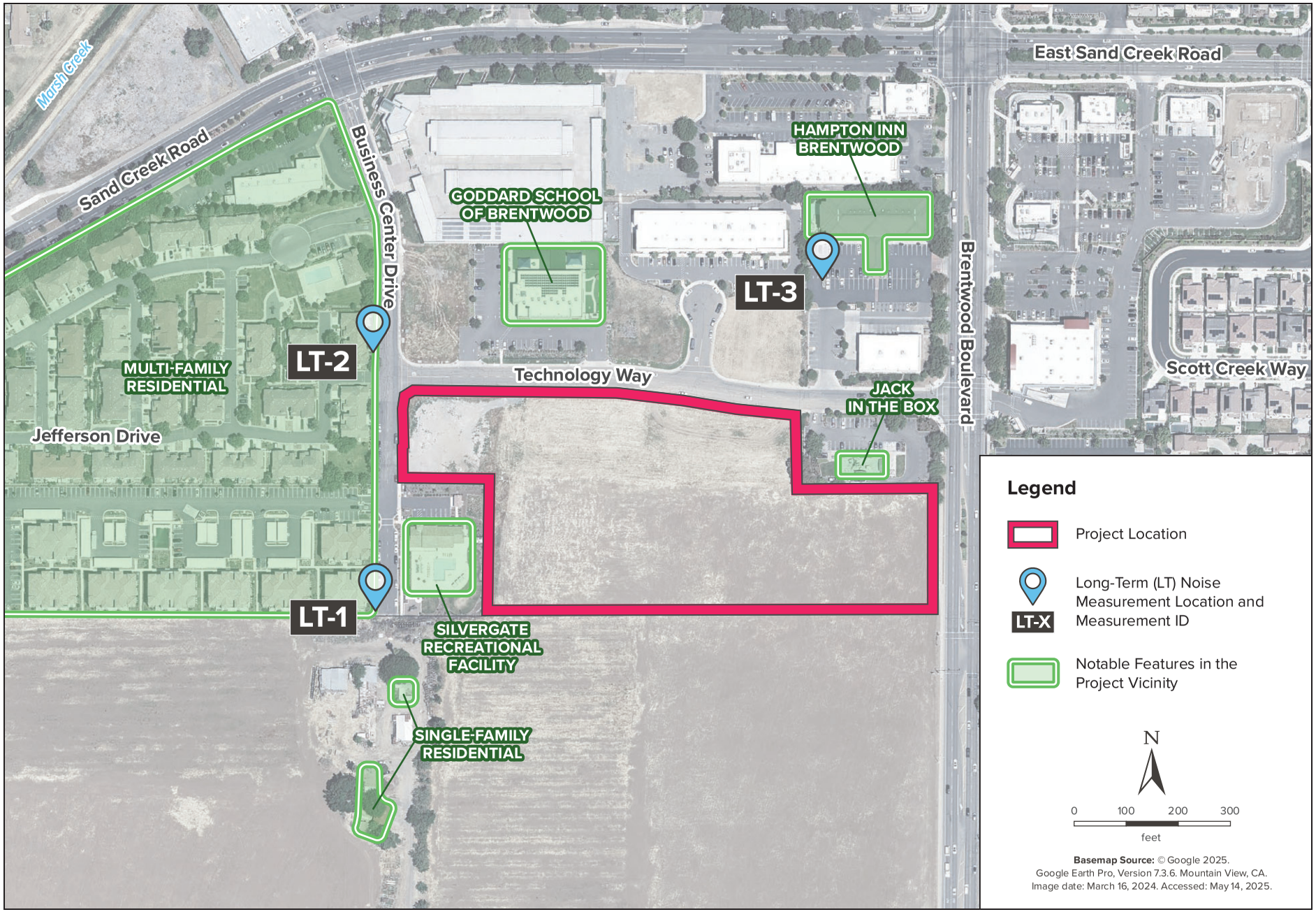

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Figure 4
Noise Measurement Locations
East County Service Center Project

Sensitive Receptors

Sensitive receptors are defined as locations that are sensitive to noise and vibration, such as residences, schools, hotels, and hospitals. As shown in Figure 4, the project site is surrounded by Technology Way to the north, Brentwood Boulevard and a Jack in the Box restaurant to the east, an undeveloped field to the south, and Business Center Drive and the Silvergate Apartments recreational facility to the west. Surrounding land uses and the closest noise-sensitive receptors include residential uses, the Goddard School of Brentwood, and Hampton Inn Brentwood. Multi-family residential complexes are approximately 60 feet west of the project site boundary. Single-family residential uses are about 180 feet southwest of the project boundary. The Goddard School of Brentwood is approximately 130 feet north of the project boundary. Lastly, Hampton Inn Brentwood is approximately 330 feet northeast of the project site boundary.

Federal Regulations

The Federal Transit Administration (FTA) has developed methods for evaluating construction noise levels, including guidelines for noise limits at sensitive land uses, to describe levels that may result in a negative community reaction. These are discussed in Chapter 7 of the *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual) (2018). The methods and guidance in the FTA Manual are used to set noise limits if criteria specific to construction are not specified in a local ordinance or standard. ~~Based on FTA's general assessment methodology for residences, the guideline~~FTA guidance for evaluation of construction noise at residential use suggests a limit of ~~is 90~~ 80 dBA~~,~~ ~~1~~8-hour L_{eq}, during daytime hours (7:00 a.m. to 10:00 p.m.) and ~~80~~ 70 dBA~~,~~ ~~1~~8-hour L_{eq}, during nighttime hours (10:00 p.m. to 7:00 a.m.). For the purposes of the analysis in this section, a metric of 1-hour L_{eq} is equivalent to an 8-hour L_{eq} assuming steady-state noise from construction equipment over the course of the day.

Vibration impact thresholds are discussed in Chapter 7 of the FTA Manual. The structures adjacent to the project site, the Jack in the Box restaurant and Silvergate Apartments recreational facility, are assumed to be a mix of reinforced concrete, steel, or timber (no plaster) for purposes of the vibration analysis prepared for the project. Building damage could result from a vibration level with a peak particle velocity [PPV] of 0.5 inch per second (102 vibration velocity decibels [VdB]). In addition, nearby residences (i.e., single- and multi-family residences) are assumed to be non-engineered timber and masonry buildings. For such structures, damage could result from a vibration level with a PPV of 0.2 inch per second (94 VdB). A construction-related vibration annoyance impact would occur if vibration levels from equipment were readily perceptible at a sensitive receiving land use (i.e., 86 VdB, which is the annoyance impact criterion for "occasional events").

Local Regulations

Envision Contra Costa County 2045 General Plan

The County General Plan, adopted in November 2024, is the County's primary policy framework for guiding physical development in unincorporated areas (Contra Costa County 2024). The County General Plan has a Health and Safety Element with goals, policies, and actions that promote a safe and comfortable noise environment throughout the county. Figure 5 is the land use compatibility matrix from the County General Plan.

Land Use Type	Noise Level, DNL (dB)						
	0-55	56-60	61-65	66-70	71-75	75-80	>81
Residential [a, b]							
Urban Residential Infill							
Schools, Libraries, Hospitals, Religious Institutions, Extended Care Facilities							
Hotels, Motels							
Auditoriums, Concert Halls, Amphitheaters							
Playgrounds, Local Parks							
Sports Arenas, Outdoor Spectator Sports							
Golf Courses, Riding Stables, Water Recreation (e.g., water parks), Cemeteries							
Office, Commercial, and Professional Buildings (i.e., uses that are generally indoors and not noise sensitive)							
Industrial, Manufacturing, Mining, Utilities, Agriculture							

	Normally Acceptable. Specified land use is satisfactory based on the assumption that any buildings involved are of normal, conventional construction, without any special noise insulation requirements.
	Conditionally Acceptable. New construction or development should be undertaken only after a detailed analysis of the noise-reduction requirements is made and needed noise insulation features have been included in the design.
	Unacceptable. New construction or development should not be undertaken.

[a] A DNL of 60 dB or less may not be achievable in all residential areas due to environmental, economic, or aesthetic constraints. One example is small balconies associated with multiple-family housing. In this case, second- and third-story balconies may be difficult to control to the standard. A common outdoor use area that meets the goal can be provided as an alternative.

[b] If the primary noise source is passing trains, the standard for outdoor noise levels in residential areas is a DNL of 70 dB.

Figure 5. Maximum Allowable Noise Exposure by Use

For projects that are required by CEQA to analyze noise impacts, Policy HS-P14.5 states the following:

> Protect noise-sensitive land uses listed in Table HS-3 [Figure 5, above] from adverse noise impacts by requiring mitigation to the degree feasible for projects that would increase long-term noise in excess of the following thresholds, when measured at the sensitive use's property line:
>
> - Greater than 1.5 dBA DNL increase for ambient noise environments of 65 dBA DNL and higher.
> - Greater than 3 dBA DNL increase for ambient noise environments of 60 to 64 DNL.
> - Greater than 5 dBA DNL increase for ambient noise environments of less than 60 dBA DNL.

In addition, Policy HS-P14.6 states that County projects should be designed to minimize long-term noise impacts on existing residents and follow best practices to minimize short-term impacts from construction noise. With respect to short-term construction noise, Policy HS-P14.7 identifies condition entitlements to limit noise-generating construction activities to the following:

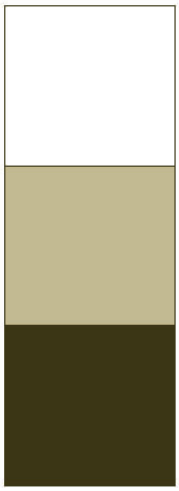
- Weekdays and non-holidays, unless site-specific conditions warrant exceptions.
- Within 1,000 feet of noise-sensitive uses: 7:30 a.m. to 5:00 p.m.
- More than 1,000 feet from noise-sensitive uses: 7:00 a.m. to 6:00 p.m.

The County Code of Ordinances does not provide specific thresholds or exterior noise standards for construction noise or noise from stationary equipment. ~~Therefore, the EIR prepared for the County General Plan used substitute thresholds to assess noise impacts. With respect to~~To evaluate the significance of impacts due to construction noise at sensitive receptors, the EIR prepared for the County General Plan ~~identified~~ applied the FTA construction noise criterion of 80 dBA 8-hour L_{eq} ~~(8 hours) as a suitable threshold to be used in assessing construction noise impacts at sensitive receptors~~(Contra Costa County 2024). For assessing stationary equipment noise, the EIR prepared for the County General Plan considered the maximum allowable exterior noise levels for special events, which are included in Chapter 82-44.410(b) of the County Code of Ordinances. For purposes of EIR analysis, the standards are used to determine significant stationary noise impacts, with revised hours to include both daytime and nighttime periods. During daytime hours (7:00 a.m. to 7:00 p.m.) the allowable exterior noise level is 60 dBA L_{50}. During nighttime hours (7:00 p.m. to 7:00 a.m.), the allowable exterior noise level is 55 dBA L_{50} (Contra Costa County 2024).[14] ~~Refer to Table 5.13-8 of the EIR prepared for the County General Plan for more details~~.

City of Brentwood General Plan

The City General Plan Noise Element contains goals, policies, and actions to promote a safe and comfortable noise environment throughout the city (City of Brentwood 2014). Figure 6 is the City land use compatibility matrix.

[14] The noise metric L_{50} represents the noise level exceeded 50 percent of the time in a measurement period. An equivalent noise level (L_{eq}) is the average noise level measured over a specific measurement period (typically 1 hour). For a conservative analysis of equipment noise levels, the equipment is assumed to run at full capacity for 1 hour. In doing this, L_{50} is conservatively assumed to be equivalent to L_{eq}.



NORMALLY ACCEPTABLE

Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special insulation requirements

CONDITIONALLY ACCEPTABLE

Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design

UNACCEPTABLE

New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies

Figure 6. City General Plan Land Use Compatibility Matrix for Community Noise Environment

For projects that are required by CEQA to analyze noise impacts, Policy N1-7 states the following:

Stationary and Non-Transportation Noise Sources

- A significant impact will occur if the project results in an exceedance of the noise level standards contained in this element or the project will result in an increase in ambient noise levels by more than 3 dB, whichever is greater.

Transportation Noise Sources

- Where existing traffic noise levels are less than 60 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +5 dB L_{dn} increase in roadway noise levels will be considered significant;
- Where existing traffic noise levels range between 60 and 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +3 dB L_{dn} increase in roadway noise levels will be considered significant; and
- Where existing traffic noise levels are greater than 65 dB L_{dn} at the outdoor activity areas of noise-sensitive uses, a +1.5 dB L_{dn} increase in roadway noise levels will be considered significant.

Policy N1-13 also provides the exterior noise-level standards for non-transportation-related noise when the receiving land use is residential. During daytime hours, 7:00 a.m. to 10:00 p.m., noise is limited to 55 dBA L_{eq} and 70 dBA L_{max}. During nighttime hours, 10:00 p.m. to 7:00 a.m., noise is limited to 45 dBA L_{eq} and 65 dBA L_{max}.

Lastly, Policy N1-15 requires construction activities to comply with standard best practices in Action N 1e, as outlined below.

> *Action N 1e*: During the environmental review process, determine if proposed construction will constitute a significant impact on nearby residents and, if necessary, require mitigation measures in addition to the standard best practice controls. Suggested best practices for control of construction noise include:
>
> - Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:30 a.m. and 5:00 p.m. on weekdays. No construction shall occur on weekends or holidays;
> - All equipment driven by internal-combustion engines shall be equipped with mufflers that are in good condition and appropriate for the equipment;
> - The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists;
> - At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences;
> - Unnecessary idling of internal-combustion engines shall be prohibited;
> - Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction activities, to the extent feasible;
> - The required construction-related noise mitigation plan shall also specify that haul-truck deliveries shall be subject to the same hours specified for construction equipment;
> - Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing; and
> - The construction contractor shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall be responsible for determining the cause of the noise complaint (e.g., starting too early, poor muffler) and instituting reasonable measures, as warranted, to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

City of Brentwood Municipal Code

Chapter 9.32, Noise Regulations, of the Brentwood Municipal Code contains the City's standards and thresholds related to noise, which are intended to promote the health, comfort, safety, and welfare of residents. To accomplish this goal, Section 9.32.030(B) contains exterior noise-level standards for residential, commercial, and industrial land use zones. For the noise-sensitive land uses considered in this report, the applicable exterior noise limits are summarized in Table 2-12.

Table 2-12. Applicable City of Brentwood Exterior Noise Standards

Noise Level that May Not Be Exceeded for More than…	Noise Metric Descriptor	Residential	
		Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (10:00 p.m. to 7:00 a.m.)
30 minutes in any hour	L_{50}	60 dBA	45 dBA
15 minutes in any hour	L_{25}	65 dBA	50 dBA
5 minutes in any hour	$L_{8.33}$	70 dBA	55 dBA
1 minute in any hour	$L_{1.67}$	75 dBA	60 dBA
Anytime (i.e., maximum noise level)	L_{max}	80 dBA	65 dBA

Note: If the measured ambient noise level exceeds the permissible level within any of the first four noise-limit categories, the allowable noise exposure standard shall be increased in 5 decibel increments in each category, as appropriate, to encompass the ambient noise level. In the event the ambient noise level exceeds the fifth noise-limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.
dBA = A-weighted decibel; L_{max} = maximum noise level; L_{XX} = noise level exceeded for a percentage of the time

Chapter 9.32 indicates allowable hours for heavy construction activities in Subsection 9.32.050(A) and outdoor carpentry construction in Subsection 9.32.050(B).

Subsection 9.32.050(A) states that:

> All operation of power construction equipment or any other construction device that creates noise in excess of the noise level limits of this article, and all performance of any outside construction work, including, but not limited to, grading and trenching, that creates noise in excess of the noise level limits of this article shall be limited to the following hours:
>
> - Monday Through Friday: 7:00 a.m. to 5:30 p.m.
> - Saturdays: 8:00 a.m. to 5:00 p.m. with the express written approval of the City engineer or designee.
> - Sunday and city holidays: Prohibited.

Subsection 9.32.050(B) states that:

> No person in a residential zone shall operate or permit the operation of any mechanically powered saw, sander, drill, grinder, or similar tool that would create noise above the noise level limits of this article, except during the following hours:
>
> - Monday through Friday from 7:00 a.m. until 7:00 p.m.
> - Saturday from 9:00 a.m. to 5:00 p.m.
>
> No work described in Subsection B may performed on Sunday or any City holiday or on Monday through Saturday outside of the hours specified above, unless all such work is conducted within a completely enclosed structure.

Section 9.32.070 describes noise sources that are exempt from the provisions found in Chapter 9.32. Applicable exemptions include:

- The emission of sound for the purpose of alerting persons to the existence of an actual emergency; the emission of sound in the performance of emergency work shall not be subject to the provisions of this article.
- Warning devices necessary for the protection of public safety; for example, police, fire, and ambulance sirens, including the testing of such devices, shall not be subject to the provisions of this chapter.

- Activities conducted on public playgrounds and public or private school grounds, including, but not limited to, school athletic and entertainment events, are exempt from the provisions of this article.
- Sounds emanating from regularly scheduled athletic events at city parks.
- Construction activity or garbage collection performed by an agency of government, provided that all equipment is operated in accordance with manufacturer's specifications and equipped with all noise-reducing equipment in proper condition.

a) Would the project generate 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?

Construction

Below are discussions of the equipment and haul- truck noise anticipated to occur during project construction. A summary of the construction schedule and construction activities is provided in Chapter 1, ~~s~~*CEQA Environmental Checklist Form*.

Construction Equipment

The analysis of construction noise relies on the equipment noise emission levels developed by FTA (2018). Project construction is specified to be done within the allowable hours outlined in Policy HS-P14.7 of the County General Plan (i.e., between 7:30 a.m. to 5:00 p.m. Monday through Friday). Night work is not anticipated. Construction of the project would involve primarily the use of dozers, tractors, and graders. The ~~construction-period~~ noise level at a given receptor location would depend on the type of construction activity as well as the distance and shielding between the activity and the noise-sensitive receptor. Potential noise levels resulting from construction of the project were evaluated by combining the noise levels of the two loudest pieces of equipment that could operate at the same time to characterize a worst-case operating condition. The worst-case operating condition would include simultaneous use of a grader (81 dBA 1-hour L_{eq}) and a tractor (80 dBA 1-hour L_{eq}), the two loudest pieces of equipment that could be operated simultaneously during the grading and paving phases of the project. This could result in a combined noise level of 84 dBA 1-hour L_{eq} at a distance of 50 feet (assuming no intervening topography or structures). ~~The lower-end of noise generation would be 74 dBA L_{eq} at a reference distance of 50 feet.~~

Based on ~~FTA's general assessment methodology~~FTA impact assessment for residences, impacts would occur if equipment noise levels were to exceed ~~90~~ 80 dBA~~,~~ 1-hour L_{eq}, during daytime hours (7:00 a.m. to 10:00 p.m.) or ~~80~~ 70 dBA~~,~~ 1-hour L_{eq}, during nighttime hours (10:00 p.m. to 7:00 a.m.). At the nearest receptors, the multi-family residences at the Coppergate Apartments, located 60 feet from the project site, construction noise levels could be up to 82 dBA~~,~~ 1-hour L_{eq}. As such, construction noise ~~is not expected to~~would potentially exceed the ~~FTA daytime standard~~construction noise limit of ~~90~~ 80 dBA~~,~~ 1-hour L_{eq}~~,~~ A~~a~~t ~~any~~ sensitive receptors located further away, such as the Silvergate Apartments (100 feet west from the project site), noise levels during construction could be up ~~to be~~ 78 dBA 1-hour L_{eq} ~~,~~during the paving and grading phase, which would be below the 80 dBA 1-hour L_{eq} threshold. ~~surrounding the site. However, when the~~ When comparing construction noise level~~s~~ ~~is compared~~ to the measured ambient noise levels shown in Table 2-11, construction noise is anticipated to exceed the measured ~~L~~$_{eq}$ noise levels by up to 21 dBA~~.~~, which would be noticeable above ambient levels. However, noise from construction of the

project would occur during daytime hours and would be a temporary effect.~~be temporary and intermittent and would cease once construction is complete.~~

Regarding construction noise levels at the Goddard School of Brentwood, construction would most likely coincide with school hours. Construction noise levels could be up to 75 dBA~~,~~ 1-hour L_{eq}, at this location. Noise during construction would be up to 14 dBA above ambient levels at the front façade of the school under worst-case conditions. Although construction noise may be intermittently noticeable outside of the school building, worst-case conditions would generally be limited to the grading and paving phases of the project. The school building would attenuate noise within interior spaces; therefore, construction noise would not interfere with classroom activities. However, construction noise may be more noticeable in some situations (e.g., when windows are open).

~~Project~~ While project construction would occur within the allowable hours outlined in Policy HS-P14.7 of the County General Plan (i.e., between 7:30 a.m. to 5:00 p.m. Monday through Friday), noise from construction could intermittently approach a level of up to 84 dBA, which would exceed the FTA criterion of 80 dBA 1-hour L_{eq} ~~Leq~~ on a temporary basis before implementation of noise control measures. ~~. Nighttime work is not anticipated. Construction would result in an increase in noise levels of up to 21 dBA above ambient noise levels; however, noise from construction would be temporary and intermittent and would cease once construction is complete. Best~~ Best noise control practices ~~for noise control during construction, such as the examples~~ listed in Action N 1e of the City General Plan and Mitigation Measure N-1 of the EIR prepared for the~~Contra Costa~~ County General Plan ~~EIR~~ would reduce noise levels through a combination of measures such as use of temporary barriers (5-10 dB of noise reduction for an area)~~,~~ mufflers (3-10 dB for each piece of equipment), enclosures (up to 20 dB for a single piece of stationary equipment), and prohibiting unnecessary idling. ~~would be implemented to minimize noise levels in the community during construction.~~ Therefore, the project would have a **less-than-significant impact**.

Construction Haul Trucks

Haul and vendor trucks would be used for mobilization and demobilization of construction equipment and materials. The trucks would access northbound and southbound SR 4 via Sand Creek Road. On a worst-case day, project construction would require up to 12 one-way truck trips (e.g., during grading).

Modeling was conducted using the traffic noise levels found in the data tables developed from the Federal Highway Administration (FHWA) Traffic Noise Model (TNM), version 2.5, to estimate average-daily-traffic (ADT) noise levels from haul trucks. A comparison of noise between measured ambient noise levels and combined ambient levels with haul trucks was used to determine if haul-truck noise would exceed the criteria outlined in both County General Plan Policy HS-P14.5 and City General Plan Policy N1-7, as shown in Table 2-13. Refer to Attachment D for complete haul-truck noise modeling inputs and outputs.

Table 2-13. Comparison of Ambient and Ambient-with-Haul-Truck Noise Levels

Roadway	Truck Trips on Segment (per day)	Modeled Distance	Measured Ambient (dBA L_{dn})	Combined Ambient with Modeled Haul Trucks (dBA L_{dn})	Change in dBA L_{dn}
Sand Creek Road	12	50	63.4[a]	63.6	0.2
Brentwood Boulevard	12	50	62.2[b]	62.7	0.5

Roadway	Truck Trips on Segment (per day)	Modeled Distance	Measured Ambient (dBA L_{dn})	Combined Ambient with Modeled Haul Trucks (dBA L_{dn})	Change in dBA L_{dn}
Business Center Drive	12	50	63.4[a]	63.6	0.2
Technology Way	12	50	63.4[a]	63.6	0.2

a. Measurement location LT-2 is representative of this roadway segment.
b. Measurement location LT-3 is representative of this roadway segment.

According to modeling, the increase in noise levels due to haul-truck activity is not anticipated to exceed the City standard of 3 dB along roadways adjacent to the project site. The greatest increase in noise from hauling activity was estimated to be 0.5 dB. Project haul-truck activity would result in less than a 3 dB increase in traffic noise. Therefore, the project would have a **less-than-significant impact**.

Operational

Operational Equipment Noise

The proposed building would include a hybrid geothermal heating, ventilation, and air-conditioning (HVAC) system, which would produce noise. This equipment would be located on the rooftop and on the ground level. On the rooftop, the proposed project would include one air-source heat pump. At ground level, there would be a ground-source heat pump and a new electrical transformer. This analysis conservatively assumes that the equipment would run continuously for 1 full hour, effectively making L_{50} and L_{eq} comparable.

At a distance of 50 feet, a heat pump could produce a sound level of 77 dBA (FTA 2018). Although the precise placement of the rooftop equipment is not known at this time, this analysis conservatively assumes that the project would locate it at the nearest position to a sensitive receptor. With respect to ground-level equipment, the heat pump and transformer would be located west of the proposed building. As previously noted, a heat pump could produce a noise level of 77 dBA at a distance of 50 feet. Noise levels from an electrical transformer were measured at the Streamview Substation in San Diego, California, on November 22, 2019, over 1 minute at a distance of 17 feet. At that distance, measured transformer noise was approximately 66 dBA L_{eq} (or 56 dBA at a normalized distance of 50 feet). Due to the proximity of the equipment, a combined noise level for both pieces of equipment was calculated. The ground-level pump would be located inside a pumphouse structure, which is assumed to result in at least 10 dB of noise reduction (Hoover & Keith 2000). At a distance of 50 feet, combined noise from ground-level equipment is anticipated to be approximately 68 dBA. Tables 2-14 and 2-15 show equipment noise levels from rooftop and ground-level equipment at the nearest receptors, respectively.

Table 2-14 shows that predicted rooftop equipment noise levels would be approximately 1 dB louder than measured daytime noise levels and approximately 8 dB louder than measured nighttime noise levels at the nearest receptors. With respect to ground-level equipment noise, Table 2-15 shows that predicted noise levels are anticipated to be below measured ambient noise levels during daytime and nighttime hours. The results in Tables 2-14 and 2-15 show that existing ambient noise levels in some locations exceed the applicable thresholds. Tables 2-14 and 2-15 also show that rooftop and combined ground-level equipment noise levels are predicted to exceed applicable County and City noise standards at the nearest sensitive receptors.

Table 2-14. Predicted Rooftop Equipment Noise Levels at the Nearest Sensitive Receptors

	Rooftop Equipment[a] Noise level at 50 feet – 77 dBA L_{eq}								
Sensitive Receptor	**Distance to Receptor**	**Predicted Noise Level at Receptor dBA L_{eq}**	**Average Daytime Ambient Noise Level dBA L_{eq}**	**Average Nighttime Ambient Noise Level dBA L_{eq}**	**Increase over Daytime (Nighttime) Ambient**	**Exceed County Daytime Standard?[b]**	**Exceed County Nighttime Standard?[c]**	**Exceed City Daytime Standard?[d]**	**Exceed City Nighttime Standard?[e]**
Goddard School of Brentwood	240	63	61.9[f]	55.4[f]	1.1 (7.6)	Yes	N/A[i]	Yes	N/A[i]
Silvergate Apartments and Coppergate Apartments	310	61	61.9[f]	54.4[g]	-0.9 (6.6)	Yes	Yes	Yes	Yes
Single-Family Residents to South	400	59	62.1[g]	54.4[g]	-3.1 (4.6)	No	Yes	Yes	Yes
Hampton Inn Brentwood	480	57	60.6[h]	54.7[h]	-3.6 (2.3)	No	Yes	Yes	Yes

Notes: This analysis conservatively assumes that equipment would operate continuously, effectively making L_{50} and L_{eq} comparable. Therefore, L_{eq} noise levels are shown in this table and considered acceptable for comparing to the County L_{50} threshold. In addition, distance noise attenuation assumes hard ground conditions, or 6 dB per doubling of distance.

a. Rooftop equipment includes an air-source heat pump

b. The Contra Costa County daytime noise standard used in assessing stationary equipment noise for this analysis is 60 dBA L_{50}.

c. The Contra Costa County nighttime noise standard used in assessing stationary equipment noise for this analysis is 55 dBA L_{50}.

d. The City of Brentwood noise standard used in assessing stationary equipment noise for this analysis is 55 dBA L_{eq}.

e. The City of Brentwood nighttime noise standard used in assessing stationary equipment noise for this analysis is 45 dBA L_{eq}.

f. Average daytime and nighttime noise levels are based on the closest and most conservative (lowest) measured ambient noise levels. In this case, LT-2 was used.

g. Average daytime and nighttime noise levels are based on the closest and most conservative (lowest) measured ambient noise levels. In this case, LT-1 was used.

h. Average daytime and nighttime noise levels are based on the closest and most conservative (lowest) measured ambient noise levels. In this case, LT-3 was used.

i. Nighttime noise standards do not apply to the Goddard School of Brentwood because the school would not be open during nighttime hours.

Table 2-15. Predicted Ground-Level Equipment Noise Levels at the Nearest Sensitive Receptors

	Ground-Level Equipment[a] Noise level at 50 feet – 68 dBA L_{eq}								
Sensitive Receptor	**Distance to Receptor**	**Noise Level at Receptor dBA L_{eq}**	**Average Daytime Ambient Noise Level dBA L_{eq}**	**Average Nighttime Ambient Noise Level dBA L_{eq}**	**Increase over Daytime (Nighttime) Ambient**	**Exceed County Daytime Standard?[b]**	**Exceed County Nighttime Standard?[c]**	**Exceed City Daytime Standard?[d]**	**Exceed City Nighttime Standard?[e]**
Goddard School of Brentwood	270	53	61.9[f]	55.4[f]	-8.9 (-2.4)	No	N/A[i]	No	N/A[i]
Silvergate Apartments and Coppergate Apartments	270	53	61.9[f]	54.4[g]	-8.9 (-2.4)	No	No	No	Yes
Single-Family Residents to South	380	50	62.1[g]	54.4[g]	-12.1 (-4.4)	No	No	No	Yes
Hampton Inn Brentwood	765	44	60.6[h]	54.7[h]	-16.6 (-10.7)	No	No	No	No

Notes: This analysis conservatively assumes that equipment would operate continuously, effectively making L_{50} and L_{eq} comparable. Therefore, L_{eq} noise levels are shown in this table and considered acceptable for comparing to the County L_{50} threshold. In addition, distance noise attenuation assumes hard ground conditions, or 6 dB per doubling of distance.

a. Ground-level equipment includes a ground-source heat pump and an electrical transformer in proximity to one another.

b. The Contra Costa County daytime noise standard used in assessing stationary equipment noise for this analysis is 60 dBA L_{50}.

c. The Contra Costa County nighttime noise standard used in assessing stationary equipment noise for this analysis is 55 dBA L_{50}.

d. The City of Brentwood noise standard used in assessing stationary equipment noise for this analysis is 55 dBA L_{eq}.

e. The City of Brentwood nighttime noise standard used in assessing stationary equipment noise for this analysis is 45 dBA L_{eq}.

f. Average daytime and nighttime noise levels are based on the closest and most conservative (lowest) measured ambient noise levels. In this case, LT-2 was used.

g. Average daytime and nighttime noise levels are based on the closest and most conservative (lowest) measured ambient noise levels. In this case, LT-1 was used.

h. Average daytime and nighttime noise levels are based on the closest and most conservative (lowest) measured ambient noise levels. In this case, LT-3 was used.

I. Nighttime noise standards do not apply to the Goddard School of Brentwood because the school would not be open during nighttime hours.

In addition to HVAC equipment, the project would also include a battery back-up system, which would be located in the vehicle parking area south of the proposed building, along the southern perimeter of the project site. The dominant noise source associated with each battery back-up system would be the climate control system, with an estimated noise level of approximately 55 dBA at a distance of 50 feet, based on reference data for an industrial air conditioner that would be compatible with a modular battery back-up system enclosure (Marvair 2011). The closest sensitive receivers to the battery back-up system are the single-family homes south of the project site, approximately 475 feet away. At that distance, battery back-up system noise levels would be reduced to approximately 35 dBA. This is below the County daytime and nighttime exterior noise standards of 65 and 55 dBA L_{50}, respectively. In addition, this would be below the exterior noise standards outlined in Policy N1-13 of the City General Plan. Compared to existing ambient noise, noise from the battery back-up system is anticipated to be at least 26 dB below existing daytime ambient noise levels and 20 dBA below existing ambient nighttime noise levels.

Operation of HVAC equipment could exceed exterior noise standards identified in the County Code of Ordinances and Policy N1-13 of the City General Plan, resulting in a potentially significant impact. **Mitigation Measure NOI-1**, below, requires building equipment and enclosures to meet County and City noise standards. Therefore, the project would have a **less-than-significant impact with mitigation incorporated.**

Mitigation Measure NOI-1 Design Building Equipment and Enclosures to Meet County and City Noise Standards

Prior to issuance of building permits for a proposed project building that would include mechanical equipment, the County will retain a qualified acoustical consultant to prepare an acoustical report and address mechanical equipment noise issues, based on the selected equipment models and design features. The final report, including the analysis results and any recommended noise control measures, will be provided to and approved by the County at the time of construction permit application for the building. The recommendations of the report will be incorporated into the applicable project plans (e.g., site, architectural, civil, mechanical, as needed) and implemented during project construction. The acoustical report will satisfy the following requirements:

- The analysis will evaluate the design and provide recommendations, as necessary, to ensure that combined noise levels from mechanical equipment at the project building, including the recommended noise-control measures incorporated into the project design, will not exceed the following noise exposure levels:
    - County noise exposure limits (i.e., 60 dBA L_{50} during daytime hours of 7:00 a.m. to 7:00 p.m. and 55 dBA L_{50} during nighttime hours of 7:00 p.m. to 7:00 a.m.) for the nearby residential uses; and
    - City noise exposure limits (i.e., 55 dBA L_{eq} during daytime hours of 7:00 a.m. to 10:00 p.m. and 45 dBA L_{eq} during nighttime hours of 10:00 p.m. to 7:00 a.m.) for the nearby residential uses.
- The analysis will consider all noise-generating equipment, including the anticipated worst-case combination(s) of equipment that could run simultaneously. Noise-generating equipment may include, but is not limited to, ground-source heat pumps, air-source heat pumps, transformers, and battery back-up system units.

- Noise-control recommendations may include, but are not limited to, the following:
  - Changing equipment locations, including locating equipment inside buildings, as feasible,
  - Selecting quieter equipment models,
  - Providing equipment sound power limits in procurement specifications,
  - Shielding equipment with rooftop parapet walls, louvers, screens, or enclosures,
  - Using acoustic absorption materials, and
  - Installing intake or exhaust silencers.

Traffic Noise

Project-specific traffic data, including ADT volumes, roadway speeds, and vehicle mix percentages (i.e., the proportion of automobiles, trucks, buses, and other vehicles), were provided by TJKM. ADT noise levels were modeled using the FHWA TNM under four scenarios: 2018 no project (NP), 2018 with project (WP), 2040 NP, and 2040 WP.[15] Refer to Attachment D for complete traffic noise modeling inputs and outputs.

Based on the measured ambient noise levels shown in Table 2-11 and the criteria outlined in Policy HS-P14.5 of the County General Plan and Policy N1-7 of the City General Plan, a significant impact would occur should traffic noise increases between 2018 NP and 2018 WP exceed 3 dB. Traffic noise levels under 2018 NP and 2018 WP conditions are shown in Table 2-16.

Table 2-16. 2018 No-Project and 2018 with-Project Noise Levels

Roadway	Modeled Distance	Modeled 2018 NP Noise Level (dBA L_{dn})	Modeled 2018 WP Noise Level (dBA L_{dn})	Change in dBA L_{dn}
Sand Creek Road	50	62.6[a]	63.8	1.2
Brentwood Boulevard	50	69	69.8	0.8
Business Center Drive	50	62.6[a]	62.8	0.2
Technology Way	50	62.6[a]	62.8	0.2

Notes:
2018 NP = 2018 no project; 2018 WP = 2018 with project
[a] Measured ambient noise levels (LT-3) were conservatively used to represent this modeling condition.

The results in Table 2-16 indicate that traffic noise due to operation of the proposed project would not result in an increase greater than 3 dB along any of the analyzed roadways. The greatest increase in noise was modeled to be 1.2 dB. Operational traffic noise would not result in an increase of more than 3 dB compared with existing conditions**.** Therefore, the project would have a **less-than-significant impact**.

Play-Area Noise

A play area is proposed on the east side of the project building. Noise measurements collected at Linda Vista Elementary School in San Diego were used to estimate noise levels from play areas. At that site, an average level of 64 dBA L_{eq} was measured at 120 feet. Adjusting for distance, the noise

[15] As discussed in the traffic impact study prepared for the project (refer to Attachment E), baseline conditions from 2018 were used in the latest Contra Costa Transportation Authority Travel Demand Model.

level from the play area at the nearest sensitive receptor would be 50 dBA L_{eq}. This would be below the daytime noise threshold of significance identified in Policy N1-13 of the City General Plan (55 dBA L_{eq}) and below the County exterior noise standard for stationary sources (60 dBA L_{50}). During daytime hours, play-area noise would be occasionally noticeable but below ambient noise levels. Therefore, the project would have a **less-than-significant impact**.

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

Construction Vibration

The use of heavy equipment could result in perceptible levels of groundborne vibration in a very localized area around the construction equipment used at the site. Construction of the project would not require the use of high-impact equipment such as a pile driver. A vibratory roller (PPV of 0.210 inch per second, or 94 VdB, at 25 feet) (FTA 2018) was identified as the piece of equipment that could produce the highest vibration levels during project construction. Refer to Attachment D for complete construction vibration modeling inputs and outputs.

The nearest off-site structures that could be exposed to construction-related vibration damage are the Jack in the Box restaurant and the Silvergate Apartments recreational clubhouse. Jack in the Box is approximately 20 feet north of the "Future Development Opportunity" area identified in Figure 2 and conservatively assumed to be reinforced concrete, steel, or timber (no plaster), which has an FTA damage criterion of 102 VdB (FTA 2018). Note that the "Future Development Opportunity" area is not a part of the proposed project. Development would not occur in that area. However, this analysis conservatively assumes that equipment, including a vibratory roller, could be as close as 20 feet from the Jack in the Box structure. At 20 feet, a vibratory roller is estimated to produce a vibration level of 97 VdB. The use of a vibratory roller within 20 feet of the restaurant would not exceed the FTA damage criterion for reinforced-concrete, steel, or timber (no plaster) structures.

The Silvergate Apartments recreational facility is approximately 45 feet west of the project site. This structure would be considered a non-engineered timber and masonry building, which has a damage threshold of 94 VdB. At a distance of 45 feet, vibration levels from a vibratory roller are estimated to be 86 VdB. Estimated vibration levels at the structure would be below the damage threshold for the type of building. It is anticipated that structures located farther away, such as the Coppergate Apartments, which are about 60 feet from the project site, would be exposed to vibration levels that would be even lower.

With respect to vibration-related annoyance, the nearest residential sensitive receptor, the Coppergate Apartments, is approximately 60 feet to the west. At a distance of 60 feet, vibration levels from a vibratory roller are estimated to be 83 VdB. At a distance of 130 feet, vibration from a vibratory roller is estimated to be 73 VdB. At both the Coppergate Apartments and the Goddard School of Brentwood, worst-case vibration levels would be below the FTA vibration threshold for "readily perceptible" vibration. At greater distances, vibration levels would be reduced and would remain below the FTA threshold for "readily perceptible" vibration.

Given the analysis described above, vibration-intensive construction equipment is not anticipated to cause structural damage at the nearest off-site structures. In addition, groundborne vibration during construction is not expected to result in a negative community reaction. Therefore, the project would have a **less-than-significant impact**.

Operational Vibration

Operation of the project would not involve sources that would generate a noticeable level of vibration. Therefore, the project would have a **less-than-significant impact**.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?

The closest airports to the project site are Funny Farm Airport, a privately owned airport approximately 2.7 miles east of the project site in the city of Brentwood, and Byron Airport, a public airport approximately 8.2 miles southeast of the project site in Byron. Because the project site is more than 2 miles from the nearest airfields, an exposure to excessive aircraft noise at the project site would not occur. Furthermore, the proposed project would not introduce any new aircraft noise sources and would not result in changes to flight operations at any existing airports, airfields, airstrips, or heliports in the region. Therefore, the project would have **no impact.**

2.13.2 Sources of Information

City of Brentwood. 2014. *City of Brentwood General Plan*. July. Available: https://www.brentwoodca.gov/home/showpublisheddocument/29006383010446565000 00. Accessed: May 1, 2025.

Contra Costa County. 2024. *Envision Contra Costa County 2045 General Plan*. November. Available: https://www.contracosta.ca.gov/DocumentCenter/View/84957/Contra-Costa-County-2045-General-Plan-PDF---Large-file-782-MB. Accessed: December 26, 2025.

Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed: May 6, 2025.

Hoover & Keith. 2000. *Noise Control for Buildings, Manufacturing Plants, Equipment, and Products*. Houston, TX.

Marvair. 2011. *AVPA – Outdoor Sound Data*. March.

2.14 Population and Housing

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Induce substantial unplanned 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)?	☐	☐	☒	☐

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

2.14.1 Discussion

a) Induce substantial unplanned 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)?

The project would not include new homes or businesses that could directly induce population growth. It is anticipated that visitors to the proposed service center would be existing residents in the project area; they would not move to the region due to the proposed project. However, the proposed project would result in approximately 441 County employees working at the project site, including approximately 150 relocated employees from other County facilities. The increase in employment compared to existing employment conditions could result in new demand for additional housing within commuting distance. According to the environmental impact report (EIR) prepared for the City General Plan, buildout of non-residential uses within the city may increase employment opportunities and require approximately 21,232 employees (City of Brentwood 2014). Therefore, the 291 employees generated by the proposed project (i.e., those who would not relocate from other County facilities) would equal approximately 1 percent of anticipated employment growth in the city. The number of employees generated by the proposed project would not exceed the City's projections. Furthermore, no infrastructure is proposed that could indirectly induce population growth. Therefore, the project would have a **less-than-significant impact**.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project site is currently vacant. The project would not displace any existing housing; as such, replacement housing would not be necessary. Therefore, the project would have **no impact**.

2.14.2 Sources of Information

City of Brentwood. 2014. *Brentwood General Plan Environmental Impact Report.* April. Available: https://www.brentwoodca.gov/home/showpublisheddocument/2832/637794835332370000. Accessed: August 1, 2025.

2.15 Public Services

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 following public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

2.15.1 Discussion

The following analysis addresses the proposed project's potential impacts related to fire protection, police protection, schools, parks, and other public services. Impacts related to public services would occur if the proposed project were to increase demand for services and require new or expanded facilities that cause environmental impacts.

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 following public services:*

Fire protection?

Fire protection services for the project site are provided by the Contra Costa County Fire Protection District. The fire station closest to the project site is Fire Station No. 92 at 201 John Muir Parkway in the city. The proposed project would not include any residential uses. However, it would result in approximately 441 County employees working at the project site, including approximately 150 relocated employees from other County facilities. In addition, there would be visitors at the proposed service center. Thus, the proposed project would substantially increase the daytime population on the project site compared to existing conditions, which could result in increased demand for fire services. However, the Contra Costa County Fire Protection District would continue to provide services to the project site. Because the proposed project would be located in an urbanized area of the city, it is not anticipated that additional firefighters would be required to serve the proposed project. Therefore, construction of a new or expanded fire station would not be required. In addition, the proposed project would be required to comply with all applicable codes regarding fire safety and emergency access. Given the above, the proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for fire protection. Therefore, the project would have a **less-than-significant impact**.

Police protection?

Police protection services for the project site are provided by the Brentwood Police Department. The police station closest to the project site is at 9100 Brentwood Boulevard in the city. As noted in the discussion above regarding fire protection, the employees and visitors generated by the project would substantially increase the daytime population on the project site compared to existing conditions; this could result in increased demand for police protection. However, the Brentwood Police Department would continue to provide services to the project site. In addition, the proposed project would include on-site security provided by Contra Costa County Office of the Sheriff or a private contractor. Furthermore, an approximately 8-foot-tall fence would be installed around the perimeter of the staff and fleet vehicle parking areas as well as at the north and east ends of the building, which would further deter crime. Because the proposed project would be located in an urbanized area of the city, and because it would not be expected to attract crime or be a source of crime, it is not anticipated that additional sworn officers would be required to serve the proposed project. The construction of a new or expanded police station would not be required. ~~In addition, an approximately 8-foot-tall fence would be installed around the perimeter of the staff and fleet vehicle parking areas as well as at the north and east ends of the building, which would further deter crime.~~ Given the above, the proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for police protection. Therefore, the project would have a **less-than-significant impact**.

Schools?

The Brentwood Union School District (K–5 elementary schools and 6–8 middle schools) and Liberty Union High School District (9–12 high schools) serve the project site. The proposed project would not include any residential uses and would not directly generate any school-age children. However, the proposed project would result in approximately 441 County employees working at the project site, including approximately 150 relocated employees from other County facilities. The increase in employment compared to existing employment conditions could indirectly generate school-age children. It is not anticipated that construction of a new or expanded school as a result of the proposed project would be required to accommodate the school-age children generated by project employees. Given the above, the proposed project would not result in a significant impact on the physical environment due to the incremental increase in the number of school-age children. Therefore, the project would have a **less-than-significant impact**.

Parks?

According to the EIR prepared for the City General Plan, the city has approximately 207 acres of developed parkland, 61 parks and facilities, and 16 miles of multi-use trails (City of Brentwood 2014). The parks closest to the project site are Sparrow Park, to the north, and Sycamore Park, to the east, both of which are 0.6 mile from the project site. As noted in the discussion above regarding fire protection, the employees and visitors generated by the project would substantially increase the daytime population on the project site compared to existing conditions; this could result in increased use of nearby parks. However, the increase in park usage would be minor. The construction of a new or expanded parks would not be required. In addition, the proposed project would include a secure play area on-site for children, which could offset the minor increase in demand for park services. Given the above, the proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for parks. Therefore, the project would have a **less-than-significant impact**.

Other Public Facilities?

Library services for the project site are provided by the Brentwood Library, which is part of the Contra Costa County Library System. The Brentwood Library, at 104 Oak Street, is the only public library in the city. As noted in the discussion above regarding fire protection, the employees and visitors generated by the project would substantially increase the daytime population on the project site compared to existing conditions; this could result in increased demand for library services. However, the increase in library usage would be minor. The Brentwood Library would continue to provide services for the project site. The construction of a new or expanded library would not be required. Given the above, the proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for libraries. Therefore, the project would have a **less-than-significant impact**.

2.15.2 Sources of Information

City of Brentwood. 2014. *Brentwood General Plan Environmental Impact Report.* April. Available: https://www.brentwoodca.gov/home/showpublisheddocument/2832/637794835332370000. Accessed: August 1, 2025.

2.16 Recreation

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

2.16.1 Discussion

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

Refer to Section 2.15, *Public Services*, for a discussion of the parks and recreational facilities in the city and the potential impacts of project related to park facilities. The minor increase in park usage due to the project employees and visitors is not anticipated to result in the deterioration of parks and recreational facilities in the vicinity of the site, including Sparrow Park and Sycamore Park. In addition, there is a sufficient number and variety of open space and recreational opportunities within the project area to accommodate the project employees and visitors. Therefore, the project would have a **less-than-significant impact**.

b) Would the project 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 include an on-site secure child play area and a trellis or gazebo for outdoor functions. The physical effects of these proposed recreational facilities are evaluated under

the applicable resource topics in this initial study, such as in Section 2.3, *Air Quality*; Section 2.8, *Greenhouse Gas Emissions*; and Section 2.13, *Noise*. The proposed project has the potential to incrementally increase the use of nearby parks and recreational facilities, particularly Sparrow Park and Sycamore Park. However, the minor increase in use generated by the proposed project is not anticipated to require the construction or expansion of recreational facilities. Therefore, the project would have a **less-than-significant impact**.

2.17 Transportation

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

2.17.1 Discussion

A traffic impact study for the project was prepared by TJKM (TJKM 2025) (refer to Attachment E).

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

The project site is owned by the County and is in the city of Brentwood. The following policies from the County General Plan apply to the proposed project (County 2024):

- Policy GM-P2.3: Apply CCTA's [Contra Costa Transportation Authority's] travel demand forecasting model and technical procedures to the analysis of general plan amendments affecting land use or circulation and development projects that generate more than 100 peak-hour trips to determine their effects on the regional transportation system and compliance with the applicable Action Plan Multimodal Transportation Service Objectives/Regional Transportation Objectives.
- Policy GM-P2.4: Circulate traffic impact analyses to affected jurisdictions and the RTPCs [regional transportation planning councils] for review and comment and cooperate in assessment and mitigation of traffic impacts in neighboring jurisdictions resulting from County actions.

Operation of the proposed project would have the potential to generate 100 or more morning (AM) or evening (PM) peak-hour trips. The traffic impact study prepared for the proposed project was prepared in accordance with the applicable County General Plan policies identified above.

Circulation System Performance (Level of Service/Queuing)

To evaluate impacts on the transportation system due to the addition of traffic from the proposed project, the traffic impact study evaluated four study intersections and four access points during the weekday AM peak hour and weekday PM peak hour under four study scenarios (existing, existing-plus-project, background, and background-plus-project conditions).[16] The project's average daily traffic would be approximately 3,285 during a typical weekday, with 538 AM peak-hour trips (403 in/135 out) and 401 PM peak-hour trips (172 in/229 out). All intersections would operate at an acceptable level of service under all scenarios during both peak hours.

An intersection queueing analysis was conducted for the same four scenarios referenced above. Under the comparison of existing and existing-plus-project conditions, three of the 95th percentile queueing results exceeded available storage capacities. The observed spillbacks ranged from less than one to two vehicle lengths; spillbacks would be resolved through the following project features:

- Brentwood Boulevard at Technology Way – Northbound Left-Turn Movement (NB-L): The existing raised median would be modified to allow the extension of the turn pocket and increase the storage capacity.
- Brentwood Boulevard at Sand Creek Road – Eastbound Right-Turn Movement (EB-R): Modify roadway painting to use the existing available spacing between the turn pocket's western terminus and the eastern limit of an existing driveway 30 feet west of the western terminus of the turn pocket.
- Business Center Drive at Sand Creek Road – Eastbound Left-Turn Movement (EB-L): Modify the existing raised median to allow the extension of the turn pocket and increase the storage capacity.

The traffic impact study identified updated signal timing at the following intersections: Brentwood Boulevard at Technology Way, Brentwood Boulevard at Sand Creek Road, and Business Center Drive at Sand Creek Road. The updated signal timings noted in the traffic impact study are design considerations and not mitigation measures.

Modifications (e.g., modifications to access points or the circulation system) within the public right-of-way would be constructed to comply with City standards. Given the above, the proposed project would not change operations at the intersections in the vicinity of the project site or impede access to and from the site. Therefore, the project would have a **less-than-significant impact**.

Internal Circulation

Internal vehicle circulation within the site would be separated into three areas, consisting of one area for public parking, one area for County staff-only parking, and one drop-off zone. Internal circulation would be provided by two-way vehicle pathways that would connect public parking areas on the north side of the project site to those on the east side of the project site. Internal circulation for staff-only parking areas would be provided by two-way vehicle pathways running

[16] TJKM used the published trip generation rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th edition, consistent with the methodology published in ITE's *Trip Generation Handbook*, third edition. For a conservative approach, the land use intensity selected had the higher average trip generation rate of the two intensities considered, resulting in a higher trip generation estimate. Table 5 in the traffic impact study provides the project's trip generation estimate.

from the west side of the project site to the south side of the project site. Pedestrian and bicycle circulation throughout the site would be facilitated by a series of new pedestrian pathways, connecting pedestrians walking to and from planned project buildings and parking areas to the existing sidewalks fronting the project site (along Brentwood Boulevard, Technology Way, and Business Center Drive). By using Technology Way for two of the access points, the project would minimize roadway disturbance along Brentwood Boulevard and Business Center Drive. The internal circulation pattern of the project would not conflict with any applicable program, plan, ordinance, or policy related to roadways. Therefore, the project would have a **less-than-significant impact**.

Transit

The project site is in an area with several bus stops that connect users to various bus routes serviced by Tri Delta Transit. Three bus routes have been identified that provide service to four bus stops within a 0.25-mile walk from the project site. The existing transit facilities within the project vicinity have weekday service, with headways between 20 and 60 minutes; on weekends, headways are approximately 60 minutes. It is anticipated that most employees would drive to the project site. Therefore, local transit vehicle capacities are not expected to be exceeded. It is unlikely that the project would generate a large demand for the transit services and facilities that serve the area. The project is not expected to conflict with existing or planned transit facilities. Therefore, the project would have a **less-than-significant impact**.

Bicycle

The project site is in an area with ample bicycle infrastructure, including Class I bike paths (e.g., Marsh Creek Trail and Barrington Trail) and Class II bike lanes. In addition, the project would include bicycle infrastructure on-site, including bicycle parking areas for County staff members and the public, that would support and promote the use of bicycles. Therefore, the project would have a **less-than-significant impact**.

Pedestrian

The project site is in an area with ample pedestrian infrastructure and connectivity to off-site locations along the studied roadways. Identified pedestrian infrastructure includes marked pedestrian crosswalks, pedestrian push buttons at signalized locations, pedestrian countdown heads, and truncated domes. The project would include internal pathways that would connect pedestrians to the existing public pedestrian infrastructure along the streets fronting the project site. Therefore, the project would have a **less-than-significant impact**.

Parking

The project would provide 424 vehicle parking spaces in surface-level parking areas. Bicycle parking would also be provided, with capacity for approximately 58 bicycles (22 long-term spaces and 36 short-term spaces). As a development project involving a new government building, consistent with the findings referenced from the ITE *Parking Generation Manual*, sixth edition (October 2023), the project's parking supply would be above minimum parking demand requirements. Therefore, the project would have **no impact.**

Conclusion

Based on the above, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, the project would have a **less-than-significant impact**.

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

State CEQA Guidelines Section 15064.3 refers to an assessment of VMT. The traffic impact study prepared for the proposed project includes a full VMT analysis that follows the Contra Costa Transportation Authority (CCTA) Growth Management Program Implementation Guidelines, Appendix F, adopted in February 2021 (VMT Guidelines).[17] The VMT analysis considered "base year 2018" and "cumulative year 2040" to determine if the project, located in Travel Analysis Zone (TAZ) #30325, would exceed the CCTA VMT threshold. Under the 2018 base-year run, the threshold is identified as 13.50, while total VMT per worker with the project is 7.43. Under the 2040 cumulative-year run, the threshold is 13.41, and the resultant total VMT per worker with the project is 7.51. Because project-generated VMT per worker is below the applicable 85 percent threshold of the Bay Area regional average for both run years, the project would be consistent with State CEQA Guidelines Section 15064.3(b). Therefore, the project would have a **less-than-significant impact**.

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

The proposed access points to the project site would be designed and constructed in compliance with City of Brentwood and Contra Costa County standards regarding geometric design to provide users with adequate sight distance. Project access points would not be obscured by landscaping at corners that would limit sight lines. In addition, the new access points to the project site would not require changes to the existing roadways in the project area. The project would not increase hazards due to a geometric design feature. Therefore, the project would have a **less-than-significant impact**.

d) Would the project result in inadequate emergency access?

The project would be designed to meet current City of Brentwood and Contra Costa County requirements for emergency vehicle access and operations. Included would be the provision of adequate emergency vehicle access points and internal circulation spacing as well as pathways to facilitate emergency vehicle operations within the project site. Therefore, the ability of emergency vehicles to access and exit the project site would not be impeded by the project. Therefore, the project would have **no impact.**

2.17.2 Sources of Information

Contra Costa County. 2024. *Contra Costa County 2045 General Plan*. Adopted: November 5, 2024. Available: https://www.contracosta.ca.gov/DocumentCenter/View/84957/Contra-Costa-County-2045-General-Plan-PDF---Large-file-782-MB.

TKJM. 2025. *Traffic Impact Study, East County Service Center*. July 14. Prepared for Contra Costa County.

[17] Appendix E to the traffic impact study (refer to Attachment E) includes the full technical memorandum prepared by TJKM describing the project's VMT analysis.

2.18 Tribal Cultural Resources

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
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:	☐	☒	☐	☐
i) listed in 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 Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

2.18.1 Discussion

CEQA states that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code Section 21084.2). In order to be considered a "tribal cultural resource," a resource must be either:

1. Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(K) (see Section 2.5.1 for additional information), or
2. Determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

To help determine whether a project may have such an effect, the lead agency must consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact.

A cultural resources assessment report for the project was prepared by Cogstone (Cogstone Resource Management 2025).

Costa Contra County conducted the tribal consultation for the proposed project. Tribes that previously requested to be notified of projects within Contra Costa County under AB 52 include Wilton Rancheria and Confederated Villages of Lisjan Nation (CVLN). The County conducted

outreach to initiate consultation on February 24, 2025. CVLN did not provide information about resources or request consultation but did provide recommendations on avoidance, mitigation, and monitoring measures. Wilton Rancheria requested consultation on February 24, 2025. The County consulted with Wilton Rancheria regarding the methods of resource investigation identification as well as avoidance, mitigation, and monitoring measures. Measures were agreed upon, and consultation was concluded on September 10, 2025.

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and:*

   i) *Listed in 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 Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Tribal cultural resources were identified during tribal consultation. Due to the proximity of the project to the highly culturally sensitive Marsh Creek, the potential exists for resources that could be considered tribal cultural resources to be uncovered during project construction and subjected to damage, removal, or other such impacts. This would be a potentially significant impact. Implementation of **Mitigation Measures CUL-1 through CUL-5** (refer to Impacts a, b, and c in Section 2.5, *Cultural Resources*) as well as **Mitigation Measures TCR-1 and TCR-2**, below, would ensure procedures are followed in the case of a discovery, including working with the Tribes to determine the appropriate course of action**.** Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

Mitigation Measure CUL-1: Environmentally Sensitive Area and Tribal Monitoring

Mitigation Measure CUL-2: Cultural Awareness Training

Mitigation Measure CUL-3: Procedures for Inadvertent Discovery of Unanticipated Historic Resources or Tribal Cultural Resources

Mitigation Measure CUL-4: Communication Protocols for Tribal Monitoring

Refer to Impacts a and b in Section 2.5, *Cultural Resources*.

Mitigation Measure CUL-5: Stop Work and Notification Procedures for Human Remains

Refer to Impact c in Section 2.5, *Cultural Resources*.

Mitigation Measure TCR-1: Collaboration with Local Native American Tribes to Honor the indigenous Community

The project proponents shall work in collaboration with the Wilton Rancheria to determine how to best honor the indigenous community that lived in the area prior to colonization and the proposed California Indian District. This could be expressed through installation of an

information panel or plaque that describes the importance of the area, and incorporation of indigenous art and design elements and native plants into the design for the project, to honor and acknowledge tribal history and ancestry.

Mitigation Measure TCR-2: Support for Tribal Ceremonies to Preserve the Sacred Nature of the Project Site

If requested by Wilton Rancheria, the project proponents shall accommodate ceremonial practices at the project site, to help preserve and restore the sacredness of the significant Tribal cultural resources that will be affected by construction. The nature and the frequency of the ceremonies will be determined by the Wilton Rancheria, but the project proponents understand that such ceremonies will not unnecessarily impede the project. The County shall negotiate the level of reimbursement to the Wilton Rancheria for the cost of the materials necessary for conducting the on-site ceremonies to be held before the start of project construction.

NON-INTENTIONAL DISTURBANCES

Unless authorized by Wilton Rancheria THPO, contractors, subcontractors, or consultants shall not purposely (1) search for, (2) disturb, (3) photograph/draw or (4) excavate Burials, Burial Objects, Burial Soil, Cemeteries, Sacred Objects, or Sacred Sites and Structures beyond the requirements of the project activity. Any unapproved deliberate search, disturbance or excavation shall be considered to be a violation of this agreement and potentially a violation of the California State Public Resources Code as outlined under heading 5.

Such areas or objects may be unintentionally encountered during the course of ground disturbance. If this occurs, work must be stopped in the Work Area for 100 feet in all directions from the disturbance. Work may not resume in this area until it has been authorized by the Wilton Rancheria THPO or his appointee. Such authorization shall not be unreasonably withheld by Wilton Rancheria, and Wilton Rancheria shall provide a plan for work to resume within two business days of unintentional disturbance.

CONFIDENTIALITY

California Public Records Act, California Government Code §§ 6254.10, 6254(r). Records of Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code maintained by, or in the possession of, the Native American Heritage Commission, another state agency, or a local agency.

Nothing in this chapter requires disclosure of records that relate to archaeological site information and reports maintained by, or in the possession of, the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a California Native American tribe and a state or local agency.

The National Historic Preservation Act (NHPA, 54 U.S.C. § 307103), which provides limited authority for withholding disclosure of information about the “location, character and ownership” of historic resources to the public.

The Archaeological Resources Protection Act (ARPA, 16 U.S.C. § 470hh), which provides authority to limit information on the “nature and location” of archaeological resources.

2.18.2 Sources of Information

Cogstone Resource Management. 2025. *Cultural Resources Assessment Report for the East County Service Center Project*. Contra Costa County Project No. WH429A. Prepared for Contra Costa County, City of Brentwood, CA.

2.19 Utilities and Service Systems

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment (for stormwater drainage), electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during official dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

2.19.1 Discussion

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

The project site is within the Contra Costa Water District (CCWD), Delta Diablo, and Pacific Gas & Electric Company (PG&E) service areas. The proposed project would require the construction of new utility services to the project site because the project site is currently undeveloped. The physical effects of the construction of these proposed utility connections, which would require excavation, trenching, soil movement, and other activities typical of construction of development projects in the city, are included in the analysis of the project as a whole under the applicable resource topics in this initial study (e.g., Section 2.3, *Air Quality*; Section 2.13, *Noise*; and Section 2.17, *Transportation*). In addition, modifications (e.g., utility connections, etc.) within the public right-of-way would be constructed in compliance with City standards.

Water

The City owns and operates a water supply and distribution system that supplies potable water to residences and business within the city; the potable water comes from a combination of surface and

groundwater sources (City of Brentwood 2014). The project site is currently vacant and does not generate any demand for water. The proposed project would result in an increase in water demand at the project site compared to existing conditions, which would result in an incremental increase in the water demand within the city. However, the project would be expected to achieve, at a minimum, LEED Silver certification by incorporating water-efficient features (e.g., water efficient plumbing fixtures), which would reduce the project's water demand. The project site is undeveloped and the proposed project would require the construction of connections to existing water facilities in the vicinity of the project site. As discussed above, the physical effects of the construction of these proposed utility connections are included in the analysis of the project as a whole under the applicable resource topics in this Initial Study (e.g., Section 2.3, *Air Quality*; Section 2.13, *Noise*; and Section 2.17, *Transportation)*. Based on the above, it is not anticipated that the proposed project would require the construction or expansion of water treatment facilities. Therefore, the project would have a **less-than-significant impact**.

Wastewater Treatment

The City of Brentwood Wastewater Treatment Plant is used for the treatment and disposal, or reuse, of wastewater generated within the City's service area. The project site is currently vacant and does not generate any wastewater. The proposed project would result in an increase in wastewater generation at the project site compared to existing conditions, which would result in an incremental increase in the average daily flow to the City of Brentwood Wastewater Treatment Plant. However, the project would be expected to achieve, at a minimum, LEED Silver certification by incorporating water-efficient features (e.g., water efficient plumbing fixtures), which would reduce the project's wastewater generation. The project site is undeveloped and the proposed project would require the construction of connections to existing wastewater facilities in the vicinity of the project site. As discussed above, the physical effects of the construction of these proposed utility connections are included in the analysis of the project as a whole under the applicable resource topics in this Initial Study (e.g., Section 2.3, *Air Quality*; Section 2.13, *Noise*; and Section 2.17, *Transportation)*. Based on the above, it is not anticipated that the proposed project would require the construction or expansion of wastewater treatment facilities. Therefore, the project would have a **less-than-significant impact**.

Stormwater Drainage

As discussed under Impact c in Section 2.10, *Hydrology and Water Quality*, minor grading would temporarily alter existing drainage patterns during construction. The project site is undeveloped and the proposed project would require the construction of connections to existing stormwater facilities in the vicinity of the project site. As discussed above, the physical effects of the construction of these proposed utility connections are included in the analysis of the project as a whole under the applicable resource topics in this initial study (e.g., Section 2.3, *Air Quality*; Section 2.13, *Noise*; and Section 2.17, *Transportation*). In addition, implementation of the project would result in the addition of impervious surface cover. However, the project would include stormwater treatment basins and landscaping, which would decrease the rate and volume of stormwater runoff prior to discharge into the municipal storm drain. Therefore, the project would have a **less-than-significant impact**.

Electricity

The project site is within the PG&E service area. PG&E will supply and distribute electric power to the proposed project. The project site is undeveloped and the proposed project would require the

construction of connections to existing electric facilities in the vicinity of the project site. As discussed above, the physical effects of the construction of these proposed utility connections are included in the analysis of the project as a whole under the applicable resource topics in this initial study (e.g., Section 2.3, *Air Quality*; Section 2.13, *Noise*; and Section 2.17, *Transportation*). Therefore, the project would have a **less-than-significant impact**.

Telecommunications

It is anticipated that telecommunications would be provided by AT&T and potentially Comcast. The project site is undeveloped and the proposed project would require the construction of connections to existing telecommunications facilities in the vicinity of the project site. As discussed above, the physical effects of the construction of these proposed utility connections are included in the analysis of the project as a whole under the applicable resource topics in this initial study (e.g., Section 2.3, *Air Quality*; Section 2.13, *Noise*; and Section 2.17, *Transportation*). Therefore, the project would have a **less-than-significant impact**.

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

The City owns and operates a water supply and distribution system that supplies potable water to residences and business within the city; the potable water comes from a combination of surface and groundwater sources (City of Brentwood 2014). The project site is currently vacant and does not generate any demand for water. The proposed project would result in an increase in water demand at the project site compared to existing conditions, which would result in an incremental increase in the water demand within the city. However, the project would be expected to achieve, at a minimum, LEED Silver certification by incorporating water-efficient features (e.g., water efficient plumbing fixtures), which would reduce the project's water demand. The City of Brentwood 2020 Urban Water Management Plan (UWMP) addresses the City's water system and includes a description of the service area, water use, water supply sources and reliability, water shortage contingency planning, and water conservation activities (City of Brentwood 2021). The Contra Costa Water District 2020 UWMP addresses the district's supply and demand forecasts, conservation programs, water demand management measures, and recycled water opportunities through 2045 (Contra Costa Water District 2021). The City expects no reductions in the normal-year supply during single or multiple dry years and thus does not project water supply shortages in the future. In addition, the CCWD does not anticipate any supply deficits in normal years or single dry years throughout the planning horizon; supply shortfalls of up to 15 percent of demand may occur in future years under multiple dry-year conditions. Any potential supply shortfalls experienced during dry-year conditions will be met through a combination of a short-term conservation program and/or short-term water purchases, consistent with the CCWD's future water supply study. Given the above, the proposed project would not require the relocation or construction of new or expanded off-site water facilities (other than the proposed connection to the City's existing infrastructure in the vicinity of the project site), the construction of which could cause significant environmental effects, and sufficient water supplies would be available to serve the proposed project and reasonably foreseeable development during normal, dry, and multiple dry years. Therefore, the project would have a **less-than-significant impact**.

c) Would the project result in a determination by the wastewater treatment provider that 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?

The City of Brentwood Wastewater Treatment Plant is used for the treatment and disposal, or reuse, of wastewater generated within the City's service area. The project site is currently vacant and does not generate any wastewater. The proposed project would result in an increase in wastewater generation at the project site compared to existing conditions, which would result in an incremental increase in the average daily flow to the City of Brentwood Wastewater Treatment Plant. However, the proposed project would comply with City General Plan Policy IF 1-2, which requires development, infrastructure, and long-term planning projects to be consistent with all applicable City infrastructure plans, including the Water Master Plan, the Wastewater Master Plan, and the Capital Improvement Program. In addition, the proposed project would comply with City General Plan Policy IF 1-3, which requires all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services and that service levels for existing users will not be degraded or impaired. Further, the project would be consistent with County General Plan Policy PFS-P4.6, which requires new development to demonstrate the availability of a safe, sanitary, and environmentally sound wastewater treatment system with adequate capacity. The appropriate wastewater treatment approvals/permits would be obtained from the City prior to construction. Therefore, the project would have a **less-than-significant impact**.

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

The County would provide garbage, yard waste, and recycling collection services to the project site. Solid waste would be taken to the Brentwood Solid Waste Transfer Station and then to Keller Canyon Landfill. According to the EIR prepared for the City General Plan, the Solid Waste Transfer Station has a permitted daily capacity of 400 tons and in 2012, it averaged approximately 155 tons per day (City of Brentwood 2014). The Keller Canyon Landfill handles approximately 2,500 tons of waste per day and the permit allows up to 3,500 tons of waste per day. The Keller Canyon Landfill has approximately 63.4 million cubic yards of remaining capacity and the estimated closure date is 2050 (California Department of Resources Recycling and Recovery 2025). The project site is currently vacant and does not generate any solid waste. The proposed project would result in an increase in solid waste generation at the project site compared to existing conditions, which would result in an incremental increase in the amount of solid waste that would be taken to the City's Solid Waste Transfer Station and then to Keller Canyon Landfill. However, the proposed project would comply with Division 4.4, Material Conservation and Resource Efficiency, of CALGreen, which requires at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations to be recycled and/or salvaged for reuse. The project would also comply with the City's Construction and Demolition Debris Recycling Ordinance, which requires applicable projects to recycle at least 50 percent of their waste stream. In addition, as discussed under Impact e, below, the proposed project would be required to comply with federal, state, and local waste reduction and recycling regulations. Based on the above, the proposed project would be served by a landfill with adequate capacity to serve the proposed project's solid waste disposal needs. Therefore, the project would have a **less-than-significant impact**.

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

The proposed project would be required to comply with federal, state, and local waste reduction and recycling regulations, particularly those contained in the California Integrated Waste Management Act (Assembly Bill 939); Division 4.4, Material Conservation and Resource Efficiency, of CALGreen; and the City's Construction and Demolition Debris Recycling Ordinance. In addition, the amount of solid waste generated by the proposed project would not exceed the permitted capacity of the City's Solid Waste Transfer Station or Keller Canyon Landfill. Therefore, the project would have a **less-than-significant impact**.

2.19.2 Sources of Information

California Department of Resources Recycling and Recovery. 2025. *SWIS Facility/Site Activity Details, Keller Canyon Landfill (07-AA-0032)*. Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4407?siteID=228. Accessed: August 1, 2025.

City of Brentwood. 2014. *Brentwood General Plan Environmental Impact Report.* April. Available: https://www.brentwoodca.gov/home/showpublisheddocument/2832/637794835332370000. Accessed: August 1, 2025.

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Contra Costa Water District. 2021. *2020 Urban Water Management Plan*. June 2021. Available: https://www.ccwater.com/DocumentCenter/View/9851/2020-Urban-Water-Management-Plan-PDF. Accessed: December 9, 2025.

2.20 Wildfire

	Potentially Significant Impact	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

2.20.1 Discussion

The project site is located in an urbanized area. According to CAL FIRE's State Responsibility Area Fire Hazard Severity Zones, Contra Costa County Map (CAL FIRE 2023), the project site is not within a Very High, High, or Moderate Fire Hazard Severity Zone.

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

As discussed above, the project site is not within a Very High, High, or Moderate Fire Hazard Severity Zone. As discussed under Impact f in Section 2.9, *Hazards and Hazardous Materials*, the proposed project would not impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the project would have **no impact.**

b) Would the 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 noted above, the project site is located in a flat area within an urbanized area; it is not located within a designated fire hazard severity zone. There are no areas of dense vegetation that would be susceptible to wildfire. The project involves the construction of a service center that would serve the County. As such, the project would not exacerbate wildfire risk and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the project would have **no impact.**

c) Would the 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?

The project involves the construction of a service center and would require the installation of new water, power, and other utility connections. However, the installation of these connections will not exacerbate fire risk since the project is not located in a fire hazard severity zone, is located in an urbanized area and will be constructed to comply with applicable state and local building, engineering, and environmental standards and regulations. Therefore, the project would have **no impact.**

d) Would the 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?

The project is limited to the construction of a new service center on relatively flat ground where minor amounts of grading will occur and as such, would not expose people or structures to significant risks, including downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes. Therefore, the project would have **no impact.**

2.20.2 Sources of Information

California Department of Forestry and Fire Protection. 2023. *Fire Hazard Severity Zones: Find Your Fire Hazard Severity Zone*. Available: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.

2.21 Mandatory Findings of Significance

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

2.21.1 Discussion

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

As discussed under the applicable resource topics in this Initial Study, the proposed facility would house multiple County departments and provide a centralized service center on an undeveloped. Development of the proposed project could result in potentially significant impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils (specifically paleontological resources), hazards and hazardous materials, noise, and tribal cultural resources. However, these impacts would be reduced to a less-than-significant level through implementation of the mitigation measures identified in those respective sections of this Initial Study. Therefore, with the incorporation of mitigation measures, development of the proposed project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

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

Four projects in the city of Brentwood are within 0.5 mile of the project site, including the following three residential projects and one commercial project (City of Brentwood 2025a, 2025b):

- 536 Saddle Creek Court: one manufactured home, under review
- Emblem Brentwood: 312 apartments and 156 duplex condominiums, under review
- Orchard Grove (formerly Adams Lane): 51 single-family homes, under construction
- 131 Technology Way: commercial/light industrial shell building, approved

There are no County-sponsored projects within 0.5 mile of the project site.

As described throughout Sections 2.1 through 2.20, construction and/or operation of the proposed project would result in individual-level environmental impacts associated with aesthetics, air quality, biological resources, cultural resources, geology and soils (specifically paleontological resources), hazards and hazardous materials, noise, and tribal cultural resources that would be potentially significant without mitigation. Thus, the proposed project could result in cumulative-level impacts in the project area if impacts are unmitigated and coupled with potential impacts related to development of related projects in the broader geographic area, such as the Emblem Brentwood, Orchard Grove, or 131 Technology Way projects. However, all environmental impacts that could occur as a result of the proposed project would be reduced to a less-than-significant level through the implementation of the mitigation measures identified in those respective sections of this Initial Study. In addition, most of the potential impacts associated with the proposed project would be related to construction-period activities, and would be temporary in nature. Thus, the proposed project would not contribute to regional cumulative impacts in the project area. With respect to cumulative traffic noise, an impact is anticipated along a given roadway if a 3 dB increase in noise would occur in areas where existing ambient and modeled Year 2018 NP noise levels are above the applicable land use compatibility standard or if a 5 dB increase in noise would occur in areas where baseline and resulting noise levels are below the applicable land use compatibility standard. Table 2-16 shows the comparison of noise levels for the Year 2018 NP and Year 2040 WP conditions. As shown in Table 2-17, noise increases due to haul truck activity would not be expected to result in an increase in traffic noise greater than 3 dB along any of the analyzed roadways. The greatest increase in noise from hauling activity was modeled to be 1.5 dB. Because both direct and cumulative traffic noise would not result in an increase of more than 3 dB over existing conditions, cumulative traffic noise impacts would be considered less than significant.

Table 2-17. 2018 No Project and 2040 With Project Traffic Noise Levels

Roadway	Modeled Distance	Modeled 2018 NP Noise Level (dBA L_{dn})	Modeled 2040 WP Noise Level (dBA L_{dn})	Delta dBA L_{dn}
Sand Creek Road	50	62.6[a]	62.9	0.3
Brentwood Boulevard	50	69	70.5	1.5
Business Center Drive	50	62.6[a]	62.8	0.2
Technology Way	50	62.6[a]	62.8	0.2

Notes:

[a.] Measured ambient noise levels (LT-3) are conservatively used to represent this modeling condition.

Based on the analysis presented above for noise and throughout this Initial Study, the proposed project would have a **less-than-considerable contribution to cumulative impacts**.

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

Construction of the proposed project could expose human beings to adverse effects with respect to air quality and hazardous materials impacts. As described in Section 2.3, *Air Quality*, implementation of Mitigation Measure AQ-1 would ensure construction-related fugitive dust emissions would be less than significant. As described in Section 2.9, *Hazards and Hazardous Materials*, ground disturbance during construction could expose construction workers to hazardous materials. Implementation of Mitigation Measure HAZ-1 would require preparation and implementation of a SMP during all ground disturbance (as recommended in the 2024 soil investigation and the 2025 Phase II ESA). With implementation of the identified mitigation measures in this Initial Study, the proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. All identified mitigation measures will be included in the conditions of approval for this project, and the project sponsor will be responsible for implementation of the measures. As a result, there would not be any environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, the project would have a **less-than-significant impact with mitigation incorporated**.

2.21.2 Sources of Information

City of Brentwood. 2025a. *Development Projects (Residential).* Available: https://www.brentwoodca.gov/residents/development-projects-residential. Accessed December 12, 2025.

City of Brentwood. 2025b. *Development Projects (Commercial)*. Available: https://www.brentwoodca.gov/residents/development-projects-commercial. Accessed December 12, 2025.

Chapter 3
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