

Addendum to the North Camino Ramon Specific Plan EIR Iron Horse Village Project City of San Ramon, Contra Costa County, California

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ACRONYMS AND ABBREVIATIONS

µg/m ³	micrograms per cubic meter
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACI	Alameda County Industries
ACTM	Airborne Toxics Control Measure
ADA	Americans with Disabilities Act
ADT	Average Daily Trips
AERMOD	American Meteorological Society/EPA Regulatory Model
Air Basin	San Francisco Bay Air Basin
APN	Assessor's Parcel Number
AQP	Air Quality Plan
ARB	California Air Resources Board
ASHRAE	American Society of Heating, Refrigerating, and Air Conditioning Engineers
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BERD	California Built Environment Resource Directory
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALgreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Standards Code
CBG	Carlson, Barbee, & Gibson, Incorporated
CCTA	Contra Costa Transportation Authority
Central San	Central Contra Costa Sanitary District
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
COA	Condition of Approval

CPUC	California Public Utilities Commission
CREC	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DBR	daily breathing rate
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
EBMUD	East Bay Municipal Utility District
EIR	Environmental Impact Report
EMF	electromagnetic field
EMFAC	Emissions Factors
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
EVA	Emergency Vehicle Access
FAR	floor area ratio
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gas
GIS	Geographic Information System
GPD	gallons per day
HAA	Housing Accountability Act
HI	hazard index
HRA	Health Risk Assessment
HREC	Historically Recognized Environmental Condition
HVAC	heating, ventilation, and air conditioning
IMP	Integrated Management Practices
ISO	Insurance Services Office
kWh	kilowatt-hours
L-1	Light Industrial
lbs	pounds
L _{dn}	day/night average sound level
L _{eq}	equivalent sound level
LID	Low Impact Development
L _{max}	maximum noise/sound level

LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MCE	Marin Clean Energy
MERV	Minimum Efficiency Reporting Values
mgd	millions gallons per day
MIR	Maximally Impacted Sensitive Receptor
MLD	Most Likely Descendant
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MT	metric tons
MTC	Metropolitan Transportation Commission
MU	Mixed Use
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSR	New Source Review
NWIC	Northwest Information Center
OEHHA	Office of Environmental Health Hazard Assessment
OMU	Office Mixed Use
OSHA	Occupational Safety and Health Administration
PG&E	Pacific Gas and Electric Company
PM ₁₀	particulate matter, including dust, 10 micrometers or less in diameter
PM _{2.5}	particulate matter, including dust, 2.5 micrometers or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
REC	Recognized Environmental Condition
REL	Reference Exposure Level
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SMP	Soil Management Plan
SRA	State Responsibility Area

SRPD	San Ramon Police Department
SRVFPD	San Ramon Valley Fire Protection District
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
TIA	Traffic Impact Analysis
TIS	Traffic Impact Study
TPA	Transit Priority Area
UBC	Uniform Building Code
USGS	United States Geological Survey
USPS	United States Postal Service
UST	underground storage tank
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WSA	Water Supply Assessment

SECTION 1: INTRODUCTION

This Addendum, checklist, and attached supporting documents have been prepared to determine whether and to what extent the North Camino Ramon Specific Plan Certified Environmental Impact Report (State Clearinghouse [SCH] No. 2010092014, certified July 24, 2012) and Addendum to the North Camino Ramon Specific Plan Environmental Impact Report (EIR) dated October 26, 2021 (previous certified EIR and Addendum) prepared for the City of San Ramon remains sufficient to address the potential impacts of the proposed Iron Horse Village Project (proposed project), or whether additional documentation is required under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] § 21000, *et seq.*).

1.1 - Environmental Checklist

Pursuant to Public Resources Code Section 21166, and CEQA Guidelines Sections 15162 and 15164, subd. (a), the attached Addendum has been prepared to evaluate the proposed project. Consistent with the thresholds used by the Lead Agency in the previous certified EIR and Addendum, the attached Addendum uses the standard environmental checklist categories provided in Appendix G of the CEQA Guidelines but provides answer columns for evaluation consistent with the provisions of CEQA Guidelines Section 15162, subd. (a).

1.2 - Environmental Analysis and Conclusions

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

An Addendum need not be circulated for public review but can be included in or attached to the Final EIR or ND (CEQA Guidelines § 15164, subd. (c)). The decision-making body shall consider the Addendum to the Final EIR prior to making a decision on the proposed project (CEQA Guidelines § 15164, subd. (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent EIR or ND pursuant to Section 15162 (CEQA Guidelines § 15164, subd. (e)).

Consequently, once an EIR or ND has been certified for a project, no subsequent EIR or ND is required under CEQA unless, based on substantial evidence:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous certified EIR and Addendum or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;¹

¹ CEQA Guidelines Section 15382 defines “significant effect on the environment” as “... a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance...” (see also PPRC § 21068).

- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous certified EIR and Addendum or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous certified EIR and Addendum was certified as complete or the ND was adopted . . . shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous certified EIR and Addendum or ND.
 - B. Significant effects previously examined will be substantially more severe than shown in the previous certified EIR and Addendum or ND.
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous certified EIR and Addendum or ND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines§ 15162, subd. (a); see also PRC § 21166).

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

This Addendum addresses the conclusions of the North Camino Ramon Specific Plan Environmental Impact Report (hereinafter referred to as the “previous certified EIR and Addendum”) in light of the proposed project.

1.2.1 - Findings

There are no substantial changes proposed by the Iron Horse Village Project or under the circumstances in which the proposed project would be undertaken that would require major revisions of the previous certified EIR and Addendum. The proposed revisions do not require preparation of a new subsequent or supplemental EIR due to either (1) the involvement of new significant environmental effects, (2) a substantial increase in the severity of previously identified significant effects, or (3) new information of substantial importance. No mitigation measures or alternatives previously found not to be feasible would in fact be feasible nor has the Iron Horse Village Project proponent declined to adopt any additional mitigation measures or alternatives that would substantially reduce one or more significant effects on the environment. Applicable mitigation measures from the previous certified EIR and Addendum are identified and discussed in this Addendum.

As illustrated herein, the proposed project is generally consistent with and within the scope of the previous certified EIR and Addendum; therefore, an Addendum is appropriate and required CEQA compliance for the proposed project.

1.2.2 - Conclusions

The impacts of the proposed project remain within the impacts analyzed in the previous certified EIR and Addendum (CEQA Guidelines § 15164).

1.3 - Mitigation Monitoring Program

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

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SECTION 2: PROJECT DESCRIPTION

2.1 - Location and Setting

2.1.1 - Location

The approximately 9.5-acre project site is located at 3401 Crow Canyon Road in the City of San Ramon (City), in Contra Costa County (County), California (Exhibit 1). The project site is bounded by Crow Canyon Road to the north; Alcosta Boulevard to the east; Iron Horse Trail to the west; and an existing post office to the south (Exhibit 2). The project site corresponds to Assessor's Parcel Numbers (APNs) 213-020-037 and 213-020-046-08. The project site is located on the *Diablo, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map, Township 2 South, Range 1 West, Mount Diablo Principal Meridian (Latitude 37° 46' 47" North; Longitude 121° 57' 54" West).

The proposed project is located within the 2012 North Camino Ramon Specific Plan (Specific Plan). The Specific Plan is divided into seven blocks ("A" through "G"). The proposed project would be located fully within Block F, which consists of approximately 28.3 acres (Exhibit 3).

2.1.2 - Environmental Setting

Existing Land Use Activities

The project site currently contains two large commercial buildings and paved parking areas. The building in the northern portion of the project site has been used as Pacific Gas and Electric Company (PG&E) office space since approximately 2008 but has since been vacated. The building in the southern portion of the project site is partially vacant. As shown in Exhibit 2, this building is adjacent to an off-site building that houses United States Postal Service (USPS) offices. Additionally, high-voltage power lines and the Iron Horse Regional Trail are located along the western boundary of the project site.

The existing buildings are surrounded by surface parking and landscaping consisting of mature trees and shrubs. Vehicular access is currently taken from one unsignalized driveway on Crow Canyon Road. Access is also provided via drive aisles from the USPS building parking area which is accessed from one unsignalized driveway on Alcosta Boulevard. Photographs of the project site are provided in Exhibit 4.

Surrounding Land Uses

There are residential uses to the east (across Alcosta Boulevard) and to the northeast (across Crow Canyon Road), approximately 0.08 to 0.09 mile away from the project site, respectively. A parking lot, the PG&E San Ramon Valley Conference Center, and US Bank are located west of the project site (across the Iron Horse Regional Trail). Additionally, the PG&E Technological and Ecological Services Research Laboratory, designated Light Industrial (L-1) by the Town of Danville, is located to the north of the project site across Crow Canyon Road.

2.1.3 - Land Use Designation and Zoning

Land Use Designation

The San Ramon General Plan 2035 (General Plan) designates the project site as Mixed Use (MU). The MU designation is intended for an integrated mix of residential and nonresidential uses at intensities of up to 0.70 floor area ratio (FAR) with residential densities in the range of 14-30 dwelling units per acre. According to the General Plan, development should reflect high-quality design with integrated open space and recreational and/or cultural amenities, and opportunities for workforce housing. Mixed use development can be both vertical and horizontal to provide a compatible mix of land uses consistent with the policies of the General Plan. Under a horizontal mixed use configuration, a project may have a commercial street frontage with other residential uses set to the back of the project site while still maintaining the overall mix of compatible uses. The residential density of the proposed project would be 20 dwelling units per net acre, which would be consistent with the MU land use requirements of the City's General Plan.

As discussed above, the proposed project is located within the Specific Plan and is designated as Office Mixed Use (OMU). The OMU designation primarily reflects office and conference facilities that are in close proximity to residential uses, as well as the Mixed Use Core within the Specific Plan area. The OMU designation allows second-story residential, and, if found consistent with the economic goals of the Specific Plan, ground floor residential. The Specific Plan also provides that its intent for the project site is to encourage high-quality multi-family residential development to provide housing to support the employment base in the area, and to provide residents to support the retail uses in the City Center and Park Commons. As discussed below, the General Plan designation governs the proposed use of the site.

A city's general plan is the "constitution for all future development," and any subordinate codes or decisions must be consistent with the general plan (*Leshar Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540, 544; see also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 570-571). The general plan is the single most important planning document.

By statute, specific plans must be consistent with general plans (Government Code § 65454.). This concept is known as "vertical consistency," and requires that the subservient document, including any specific plans and zoning actions, be consistent with the general plan. The test for consistency is whether the secondary document "furtheres the objectives and policies of the general plan and does not obstruct their attainment." (*City of Morgan Hill v. Bushey*, (2018) 5 Cal.5th 1068, 1080; See also, Government Code § 65860I).

Additionally, the Housing Accountability Act (HAA), enacted in 1982, establishes limitations to a local government's ability to deny, reduce the density of, or make infeasible housing development projects that are consistent with objective local development standards and contribute to meeting housing need. The State Legislature recently amended the HAA to expand and strengthen its provisions, explicitly finding that the lack of housing and the lack of affordable housing, is a critical problem that threatens the economic, environmental, and social quality of life in California (Government Code § 65589.5(a)). The HAA clarifies that where vertical consistency is not clearly established, for example if zoning standards and criteria in a Specific Plan are inconsistent with

applicable, objective general plan standards, if the development project is consistent with the applicable objective general plan standards for the site, then the housing development project cannot be found inconsistent with the standards and criteria of the zoning. Further, if such an inconsistency exists, the local agency may not require rezoning prior to housing development project approval (Government Code § 65589.5 (j)(4)).

The Specific Plan allows residential uses on the ground floor with limited circumstances in the OMU zone and does not permit live/work units. However, the General Plan allows both horizontal and vertical mixed use without a need to make economic findings to support horizontal mixed use. The General Plan also allows live/work units to be considered as a mixed-use option in addition to more traditional retail and commercial options. The Specific Plan's limitation on ground floor residential and prohibition on live/work units is not consistent with the General Plan and is therefore overridden and would be inapplicable to the proposed project.

Zoning

The project site zoning is governed by the Specific Plan. Ordinance No. 431 amended the San Ramon Zoning Ordinance and Zoning Map to redesignate the property located within the Specific Plan area to the Specific Plan. Areas on the zoning map designated as a Specific Plan area defer to the development guidelines and regulations established by the Specific Plan.

2.2 - Project Background

2.2.1 - North Camino Ramon Specific Plan

The San Ramon City Council adopted the Specific Plan and certified the associated EIR in July 2012. The Specific Plan also included Ordinance 431, which amended the City's Zoning Ordinance to designate the project site as OMU. Amendments to the Specific Plan were subsequently adopted October 26, 2021, and November 4, 2021, pursuant to addendums to the certified EIR consistent with State CEQA Guidelines Section 15164. An additional amendment was approved on May 10, 2022, pursuant to a finding of consistency with the Specific Plan. Collectively, the prior environmental review is referred to as the previous certified EIR and Addendum.

As discussed above, the MU General Plan land use designation for the site overrides the Specific Plan designation because the Specific Plan is subordinate to the General Plan. This Addendum therefore utilizes the General Plan's designation of MU when evaluating land use and planning impacts; however, the rest of the Addendum analyzes the proposed project in relation to the previous certified EIR and Addendum.

The previous certified EIR and Addendum concluded that the buildout of the Specific Plan would include approximately 11,089,000 square feet of development over seven blocks. The previous certified EIR and Addendum evaluated the buildout of residential units within the Specific Plan area to be approximately 1,650,000 square feet with 1,500 residential dwelling units.

The proposed project is located fully within Block F within the Specific Plan, specifically within Sub Area F1.² The Specific Plan encourages future development of Block F to consolidate small parcels to allow for more integrated development of the area over time and to provide high-quality multi-family residential to support the employment base in the area. As described in the previous certified EIR and Addendum, Block F was projected to include up to 965,326 square feet of development, including up to 490,000 square feet of new commercial uses and up to 385,000 square feet of new residential uses, resulting in 350 multi-family dwelling units. Additionally, the previous certified EIR and Addendum included a residential density minimum of 20 dwelling units per acre for all new development in the Specific Plan area.³ The residential density of the proposed project would be 20 dwelling units per net acre, which would be consistent with the Specific Plan and MU district density permitted by the City's General Plan. The addition of the proposed project in addition to the existing uses in Block F is consistent with the mixed use development intended for Block F under the Specific Plan.

2.3 - Project Characteristics

2.3.1 - Project Summary

The proposed project includes the removal of the existing commercial buildings and development of a residential component consisting of 117 residential dwelling units at the project site, including 31 attached multi-family condominium townhomes and 86 detached single-family condominium homes. The proposed project also includes a nonresidential component consisting of eight live-work units within the multi-family condominium townhomes. The proposed project would consist of approximately 413,767 gross square feet of new residential uses with approximately 20 dwelling units per net acre density. The proposed project would also include 338 total parking spaces, including 39 on-street parking spaces. When completed, the proposed project is expected to generate 345 residents. Exhibit 5 depicts the conceptual site plan.

Table 1 describes the existing uses at the project site, the projected uses for Block F as described in the previous certified EIR and Addendum, and the proposed uses for the project.

Table 1: Comparison of the Existing Site and 2012 North Camino Ramon Specific Plan Block F to the Proposed Project Summary

Site	Office Uses Gross Square Feet	Commercial Uses Gross Square Feet	Residential Uses		Parking Spaces	Total Gross Square Feet
			Dwelling Units	Gross Square Feet		
Projected Block F Development in the Specific Plan	—	580,326	350	385,000	—	1,229,845
Existing Development at the Project Site	(212,224)	—	—	—	(572)	(212,224)

² City of San Ramon. 2012. North Camino Ramon Specific Plan. Chapter 11, Implementation.

³ The projections were made solely for purposes of analysis under CEQA. The square footages are not a limit on development in Block F.

Site	Office Uses Gross Square Feet	Commercial Uses Gross Square Feet	Residential Uses		Parking Spaces	Total Gross Square Feet
			Dwelling Units	Gross Square Feet		
Proposed Project	—	—	117	284,125 ¹	338	413,767
Notes: All square footage values are approximate. Parentheses indicate proposed demolition. ¹ Includes 1,808 square foot commercial live/work floor area. Source: City of San Ramon 2023.						

Residential Dwelling Units

Housing Products

Dwelling units would consist of for-sale homes with a mix of two housing types: attached multi-family condominium townhomes (includes live/work units) and detached single-family condominium homes. All homes are planned to be 3-story wood frame construction. The product mix would include 2-, 3-, 4-, and 5-bedroom homes, with living areas ranging from 1,162 to 2,989 square feet.

Attached Multi-family Condominium Townhomes

The attached multi-family condominium townhomes would include one 7-plex and three 8-plexes along the northern boundary of the project site. These townhomes would include five floor plans, ranging from 1,162 to 1,644 square feet, and 2-car tandem or standard garages in each dwelling unit. The proposed nonresidential component with eight live-work units is incorporated into the Plan 4 and Plan 4X designs. Table 2 summarizes the unit summary for the attached multi-family condominium townhomes.

Table 2: Attached Multi-family Condominium Townhome Unit Summary

Plan Type	Qty of this Plan Type	Bedroom/Bathroom Description	Unit Square Feet	Total Square Feet of this Plan Type	Garage Description	Garage Square Feet
Plan 1	4	2 bed/2.5 bath	1,162	4,648	2-car tandem garage	502
Plan 2	15	3 bed/3 bath	1,339	20,085	2-car tandem garage	561
Plan 3	4	2 bed/2.5 bath	1,361	5,444	2-car tandem garage	511
Plan 4	4	3 bed/3.5 bath/1 live-work office	1,624	7,400	2-car standard garage	555
Plan 4X (end units)	4	3 bed/3.5 bath/1 live-work office	1,644	7,480	2-car standard garage	555
Total	31	—	—	45,057	—	16,907

Source: Lennar 2022.

Detached Single-family Condominium Homes

The detached single-family condominium homes would include five floor plans, ranging from 2,593 to 2,989 square feet, and 2-car standard to 3-car standard garages in each dwelling unit. Table 3 summarizes the unit summary for the detached single-family condominium homes.

Table 3: Detached Single-family Condominium Home Unit Summary

Plan Type	Qty of this Plan Type	Bedroom/Bathroom Description	Unit Square Feet	Total Square Feet of this Plan Type	Garage Description	Garage Square Feet
Plan 1	21	4 bed/3.5 bath/tech area	2,593	54,453	2-car standard garage	495
Plan 2	14	4 bed/3.5 bath/loft	2,676	37,464	2-car standard garage	518
Plan 2X	18	4 bed/3.5 bath/loft	2,752	49,536	2-car standard garage	518
Plan 3	14	5 bed/3.5 bath/office	2,916	40,824	3-car tandem garage	702
Plan 3X	19	5 bed/3.5 bath/office	2,989	56,791	3-car tandem garage	702
Total	86	—	—	239,068	—	50,137

Source: Lennar 2022.

Design and Appearance

Architecture would be modern and contemporary in character and would be consistent with the surrounding uses. The architecture and the site plan are intended to integrate the design guidelines of the Specific Plan with a mixed density all residential project. The design would be compatible with the framework of the Specific Plan, adopted in 2012, creating a transition and a pedestrian connection between the proposed project and surrounding land uses.

Amenities

The proposed project would include several amenities, including informal lawn and bench seating in the southwest corner of the project site; two paseos in the center of the project site in between K Court and L Court as well as M Court and N Court, respectively; and additional bench seating just east of D Street at the western side of the proposed project (Exhibit 5). The proposed project would also include internal sidewalks throughout the project to the Iron Horse Trail, which is a regional Class I paved multiuse trail that borders the western edge of the project site. It passes through many residential, commercial, and business districts as well as through the Pleasanton/Dublin Bay Area Rapid Transit (BART) station.

2.3.2 - Circulation and Parking

Circulation

The proposed project would continue to allow access from Crow Canyon Road. An internal network of private streets and alleys would link the residential uses with Crow Canyon Road. No primary access (Emergency Vehicle Access [EVA] only) would be taken from the adjacent parking lot to the south.

Parking

The proposed project would provide 299 on-site, off-street parking spaces and 39 on-street parking spaces, which would be used as guest parking, totaling 338 parking spaces. Of the off-street parking spaces, the proposed project would include 62 spaces for the attached multi-family townhomes, including one electric vehicle (EV) parking space and one Americans with Disabilities Act (ADA) compliant space. The proposed project would also include 237 off-street parking spaces for the detached single-family homes.

Additionally, long-term, secure bicycle storage would be available in each residence garage, resulting in a total of 117 long-term bicycle parking spaces. Six short-term bicycle parking spaces would also be available on the project site for guests.

2.3.3 - Storm Drainage

The proposed project would include the installation of an on-site storm drainage system to meet applicable C.3 requirements, including six bioretention basins located throughout the project site as shown on Exhibit 5. New storm drainpipes would be used to convey stormwater from each proposed bioretention facility down the center of the project site connecting to an existing storm drain at the western edge of the site, adjacent to Iron Horse Trail and connects to a stormwater main in Crow Canyon Road. Storm drain facilities would be owned and maintained by the City. Post-construction, site runoff would be less than the existing condition.

2.3.4 - Utilities

Potable Water

The project site is currently served with potable water service provided by East Bay Municipal Utility District (EBMUD). The proposed project would continue to be served with potable water service provided by EBMUD and would connect to the 12-inch main along Crow Canyon Road.

Wastewater

The project site is currently served with wastewater collection and treatment service provided by Central Contra Costa Sanitary District (Central San). The proposed project would continue to be served with wastewater collection and treatment service provided by Central San and would connect to the existing 30-inch interceptor main.

Electricity and Natural Gas

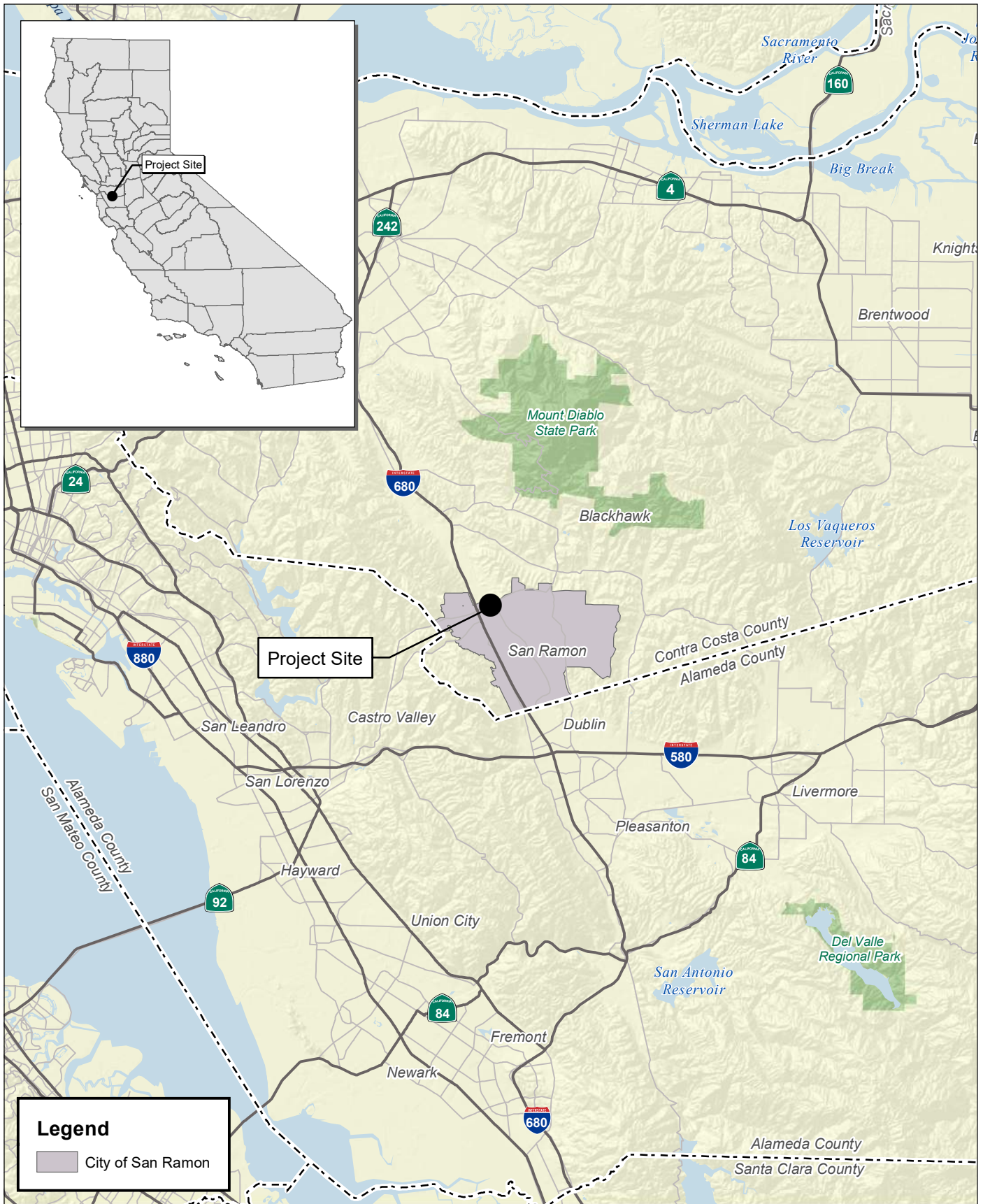
The City, including the project site, is currently served with electricity and natural gas service provided by Marin Clean Energy (MCE) and PG&E, respectively.⁴ The proposed project would continue to be served with electricity and natural gas service provided by MCE and PG&E and would connect via service laterals to existing underground facilities.

2.4 - Discretionary Approvals

The proposed project requires the following discretionary approvals from the City of San Ramon:

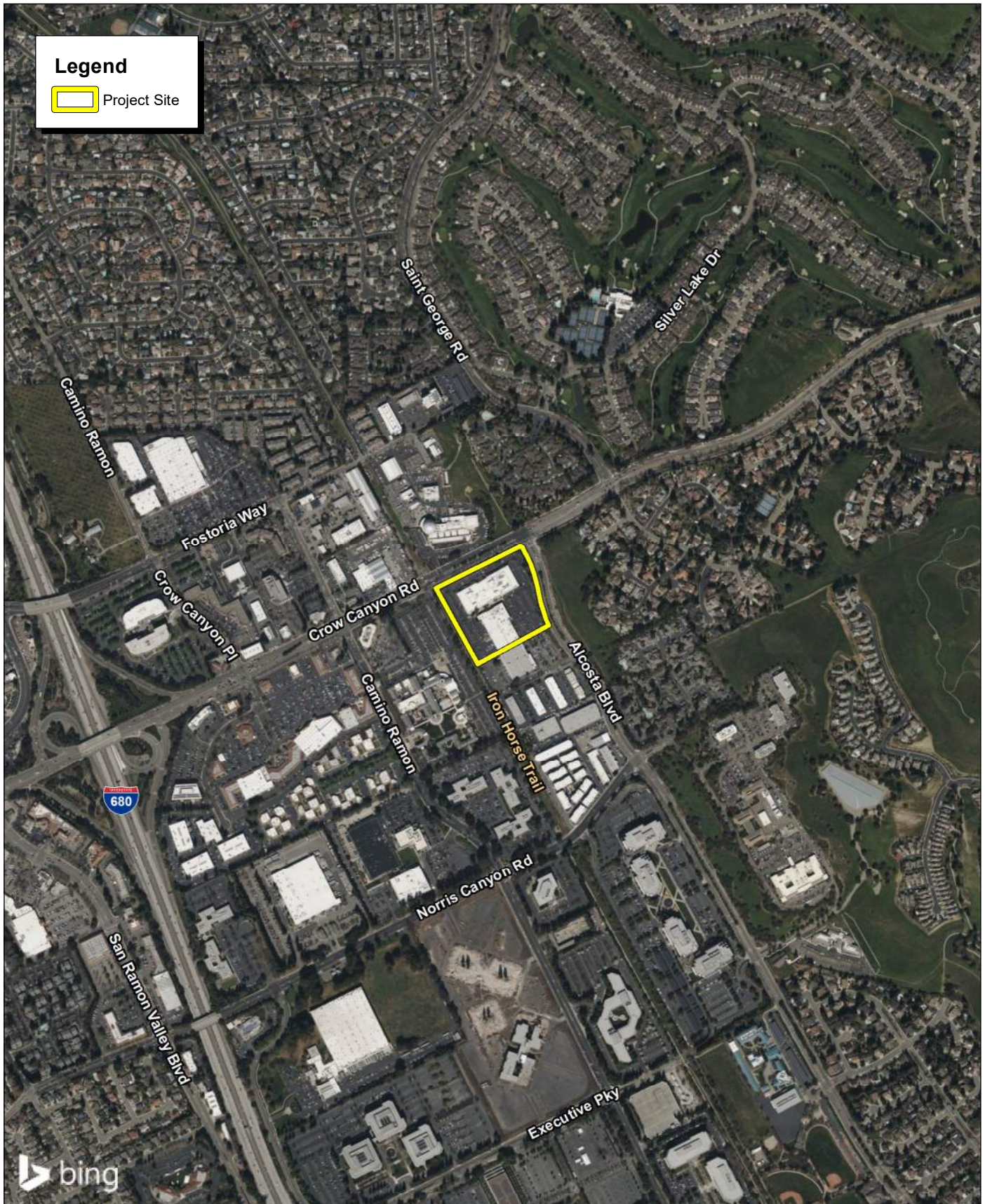
- Development Plan
- Vesting Tentative Map
- Minor Use Permit
- Tree Removal Permit

⁴ Marin Clean Energy (MCE). 2023. Website: <https://www.mcecleanenergy.org/faq/>. Accessed May 12, 2023.



Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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Source: Bing Aerial Imagery.

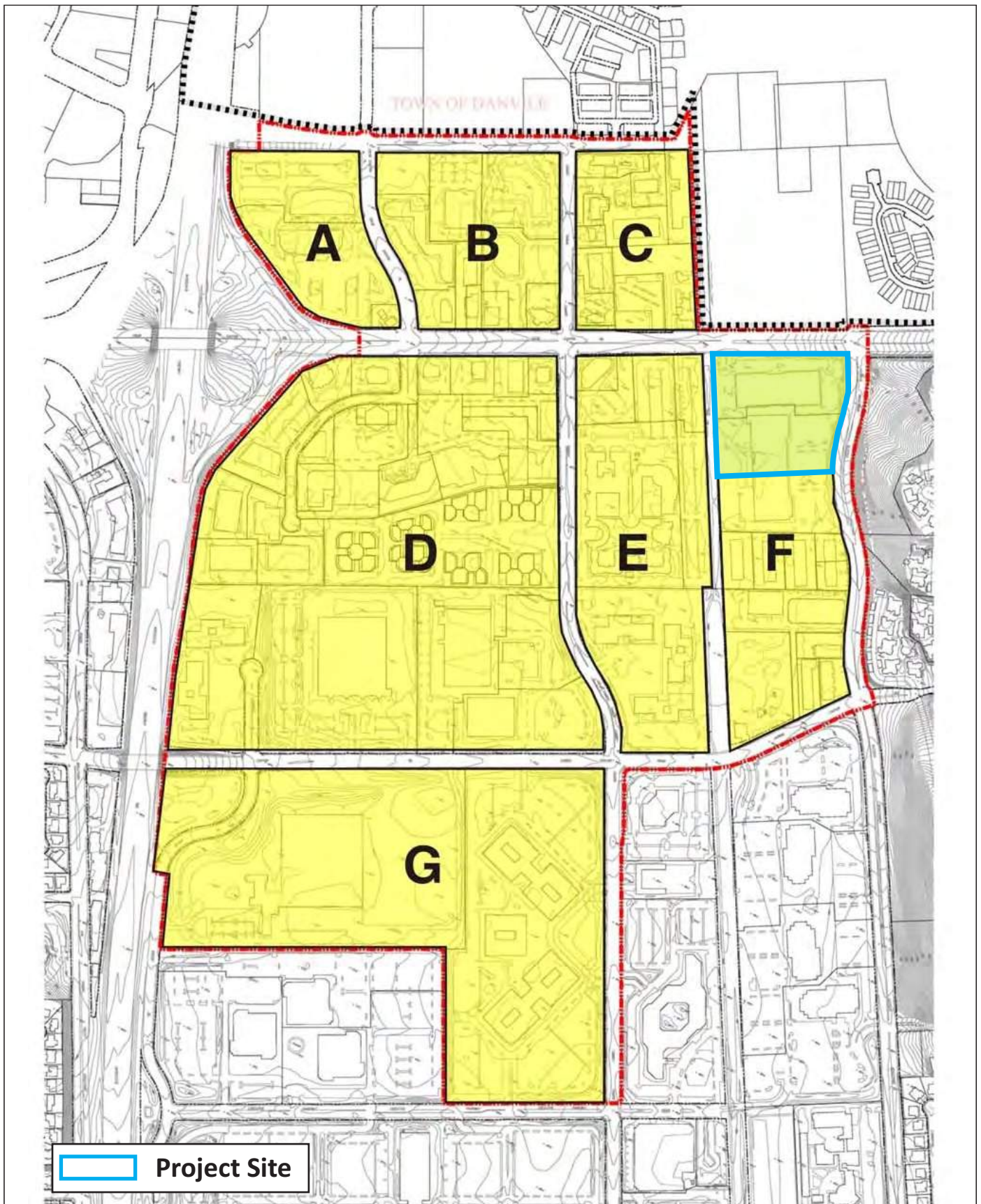
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Exhibit 2 Local Vicinity Map

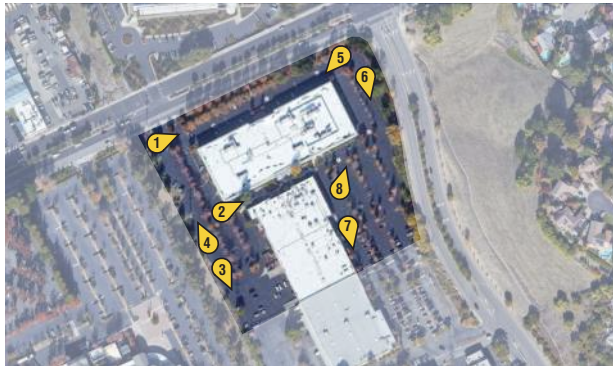
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Source: NCRSP Internal Administrative Draft, December 6, 2011.



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Source: Lennar; WHA Architects Planners Designers. 10/07/2022.

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Exhibit 4 Site Photographs

CITY OF SAN RAMON
IRON HORSE VILLAGE PROJECT
ADDENDUM

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Source: Lennar; WHA Architects Planners Designers; Environmental Foresight, Inc. 10/07/2022.

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SECTION 3: CEQA CHECKLIST

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

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the previous certified EIR and Addendum. These environmental categories might be answered with a “no” in the checklist, since the proposed project does not introduce changes that would result in a modification to the conclusion of the previously approved CEQA document.

This Addendum addresses the conclusions of the North Camino Ramon Specific Plan Environmental Impact Report.

3.1 - Explanation of Checklist Evaluation Categories

(1) Conclusion in Previous Certified EIR and Related Documents

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

(2) Do the Proposed Changes Involve New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(1), this column indicates whether the changes represented by the revised project will result in new significant environmental impacts not previously identified or mitigated by the previous certified EIR and Addendum or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

(3) New Circumstances Involving New Impacts?

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

(4) New Information Requiring New Analysis or Verification?

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

- (A) The project will have one or more significant effects not discussed in the previous certified EIR and Addendum or ND;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous certified EIR and Addendum;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous certified EIR and Addendum would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If the additional analysis completed as part of this environmental review were to find that the conclusions of the previous certified EIR and Addendum remain the same and no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered “no” and no additional environmental document would be required.

(5) Mitigation Measures Implemented or Address Impacts

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3), this column indicates whether the previous certified EIR and Addendum provides mitigation measures to address effects in the related impact category. Any previously adopted mitigation measures will be identified. The response will also address proposed revisions to previously adopted mitigation measures. These mitigation measures will be implemented with the construction of the project, as applicable. If “NA” is indicated, the Final EIR has concluded that the impact either does not occur with this project or is not significant, and therefore no additional mitigation measures are needed.

3.2 - Discussion and Mitigation Sections

The following sections include three components for each environmental checklist question: discussion of each checklist question and any potential impacts to the environment, any mitigation measures required, and a conclusion of the analysis. Each component is further described below:

(1) Discussion

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

(2) Applicable Specific Plan Mitigation Measures

Applicable mitigation measures from the previous certified EIR and Addendum that apply to the proposed project are listed under each environmental category.

(3) Conclusions

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

3.3 - Environmental Topics

The following topics are evaluated in accordance with current CEQA Guidelines and requirements:

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

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Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
I. Aesthetics, Light, and Glare <i>Except as provided in Public Resources Code Section 21099, would the project:</i>					
a) Have a substantial adverse effect on a scenic vista?	No impact.	No	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	Less than significant impact.	No	No	No	None
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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact.	No	No	No	None
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that there were no scenic vistas within the Specific Plan area. The primary scenic vistas visible from the Specific Plan area are the Dougherty Hills, Wiedemann Hill, and Mount Diablo; however, views of these features are intermittent because of the existing urban land uses. The previous certified EIR and Addendum

concluded that implementation of development and land uses within the Specific Plan area would increase the existing density but would not be expected to result in significant impacts to existing views of the Dougherty Hills, Wiedemann Hill, and Mount Diablo. Therefore, no impacts on scenic vistas would occur.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be developed within Sub Area F1 of the Specific Plan area analyzed in the previous certified EIR and Addendum, where no scenic vistas were identified. Furthermore, as demonstrated previously in Table 1, the project proposes an overall reduction in square footage as compared to what was assumed for the site by the Specific Plan. Additionally, the proposed project building height would be limited to approximately 35 feet or 3 stories, which is lower than the 85 feet or 5 stories analyzed and allowed within the Specific Plan. Because the proposed project would reduce density and building heights compared to development analyzed and allowed under the Specific Plan it would not be expected to result in any new impacts to existing scenic vistas.

Additionally, the proposed project would undergo review that would verify compliance with massing and building height standards, which are designed to ensure the proposed project would not interfere with any existing views. Therefore, the proposed project would not introduce new significant environmental impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum identified Interstate 680 (I-680) as an officially designated State Scenic Highway that serves the western boundary of the Specific Plan area. Generally, views of surrounding ridgelines and hillsides are available from I-680, and there is one existing billboard—a sign for Bishop Ranch—located at Norris Canon Road along I-680 on the western side of the Specific Plan area. The previous certified EIR and Addendum concluded that although the Specific Plan would allow higher density mixed uses to be developed along I-680, buildout of the Specific Plan would be consistent with the existing urban development within the Specific Plan boundaries, therefore, redevelopment of these properties would maintain the urban character of this area.

The Specific Plan would allow buildings to be constructed to heights of 85 feet or 5 stories (whichever is less); however, there are several multi-story buildings adjacent to I-680 (e.g., Legacy Plaza) that are of similar height, so this would not represent a significant visual change to the I-680 viewshed. Additionally, the Specific Plan included adoption of design guidelines that would ensure that the development contemplated by the Specific Plan implements a contemporary design that would not diminish I-680's status as a State Scenic Highway. Therefore, impacts on State Scenic Highways would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be developed approximately 3,166 feet east of I-680, within Sub Area F1 of the Specific Plan. The proposed project would decrease buildout allowed by the Specific Plan for Sub Area F1 by approximately 816,000 square feet and would limit building heights to approximately 35 feet or 3 stories, which is lower than 85 feet or 5 stories analyzed and allowed within the Specific Plan.

Overall, the proposed project would result in the development of 117 units, resulting in up to 637 total dwelling units in the Specific Plan area, which includes the proposed Iron Horse Village Project in Sub Area F1 as well as two other previously approved residential projects. The 637 total dwelling units is much fewer than 1,500 residential units approved pursuant to the previous certified EIR and Addendum and 1,124 units evaluated in the General Plan for the Specific Plan area.

Furthermore, the proposed residential development would have a density of approximately 20.0 dwelling units per acre, which meets the minimum density of 20 dwelling units per acre proposed as a development standard for the Specific Plan area in the previous certified EIR and Addendum. Additionally, the proposed project is within the density range of 14 to 30 units per acre established by the General Plan for the MU land use designation. Additionally, the proposed project would not be visible from I-680 as it would be screened by landscaping along the interstate and buffered by intervening development and therefore would have no impact on scenic resources in a State Scenic Highway. Therefore, the proposed project would not introduce new significant environmental impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the redevelopment of the 295-gross-acre Specific Plan area to support up to 6,720,000 square feet of commercial and residential development at full buildout would alter the visual character within the Plan boundaries, although this change in itself was not considered a potentially significant environmental impact because the quality of viewscape would not be substantially diminished. The impact analysis included an assessment of existing visual character, an evaluation of the Specific Plan's development standards and design guidelines, and an evaluation of the visual compatibility of the Specific Plan project with its surroundings.

Most of the Specific Plan parcels are now developed with existing commercial uses, including the project site. There are no significant natural features (creeks, ridgelines, forested areas, meadows, etc.) or significant historic resources within the Specific Plan boundaries, therefore, the Specific Plan area can be characterized as fully committed to contemporary urban uses. The Specific Plan also included adoption of development standards and design guidelines for each sub-area, ensuring that the development and land use activities contemplated by the Specific Plan achieve a high-quality design and be visually compatible with surrounding land uses.

The Specific Plan sets forth development standards and design guidelines that apply to new development within the Specific Plan boundaries. These development standards and design guidelines establish a minimum lot size of 80,000 square feet, a height limit of 85 feet or 5 stories, a maximum average FAR of 0.70 for the entire Specific Plan area, and a minimum residential density of 20 units per acres. The design guidelines also promote development and land use activities that reflect the vision of the Specific Plan and basic architectural principles for new development. Regarding visual compatibility, the area surrounding the Specific Plan boundaries includes urban uses on all sides, including retail uses, residential uses, medical offices, and office uses. The previous certified EIR and Addendum found that although the buildout of the Specific Plan would result in a significant visual change to the plan area, the development and land use activities contemplated by the Specific Plan would achieve a high-quality design that would be visually compatible with surrounding land uses. As such, the impacts were found to be less than significant.

Iron Horse Village Project Analysis and Conclusions

Buildout of the proposed project would result in a net decrease of approximately 816,000 total commercial and residential square feet as compared to the projected buildout of the Specific Plan for Sub Area F1; however, the proposed project would also alter the existing visual character of the project site. Consistent with the Specific Plan, the proposed change in visual character would not be considered significant because the quality of viewscape would not be substantially diminished. The proposed project would comply with the development standards and design guidelines adopted as part of the Specific Plan, ensuring that the development would be visually compatible with surrounding land uses.

The proposed project is within the Specific Plan area analyzed in the previous certified EIR and Addendum and would be compatible with the existing contemporary urban uses developed pursuant to the Specific Plan and all applicable standards adopted to protect scenic quality. The architecture of the proposed project would have a modern and contemporary character and would also integrate the Specific Plan's development standards and design guidelines. The development would be compatible with the framework of the Specific Plan, specifically through the development of a transition and a pedestrian connection between the proposed project and surrounding land uses. Therefore, the proposed project would not introduce new significant environmental impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that light and glare impacts are reduced under the Specific Plan compared to existing conditions. There are existing sources of light and glare from 3.4 million square feet of development within the Specific Plan area, including sources that illuminate continuously during the nighttime hours.⁵ At buildout, the Specific Plan contemplates as much as 6.72 million square feet of commercial and residential development, or a net increase of 3.32 million square feet relative to conditions prior to its adoption. Buildout of the Specific Plan replaces surface parking lots—which generally involve the

⁵ City of San Ramon. 2012. North Camino Specific Plan EIR.

continuous illumination of large expanses of area with high-intensity lighting—with structured parking and on-street parking that generally involve illumination of smaller areas with lower intensity lighting. The previous certified EIR and Addendum found that light and glare impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

As shown in Table 2, the proposed project would result in a reduction in buildout by approximately 816,000 total square feet as compared to the adopted Specific Plan and would also include 117 residential dwelling units that would include standard or tandem 2- or 3-car garages for each unit. Consequently, development of the proposed project would replace the high-intensity lighting associated with the existing surface parking lots with lower intensity street lighting. The proposed project would also be required to comply with the City's Zoning Ordinance Site Planning and Project Design Standards for outdoor lighting, including the maximum illumination level limitations for residential areas.⁶ Therefore, the proposed project would not introduce any additional light or glare, but rather would reduce the intensity of nighttime lighting overall as a fully residential project compared to the residential and commercial uses proposed by the Specific Plan for Sub Area F1. The proposed project would not introduce new significant environmental impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to aesthetics. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

⁶ City of San Ramon Zoning Ordinance. 2020. Division D3 Site Planning and Project Design Standards. Adopted February 28, 2020. Available: https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_10826046/File/Our%20City/Departments/Community%20Development/Planning/Zoning%20Ordinance/Division%20D-3%2002.28.20.pdf. Accessed May 12, 2023.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
II. Agriculture and Forestry Resources <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	No impact.	No	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	No impact.	No	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact.	No	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No impact.	No	No	No	None

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	No impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan area does not contain any active farmland, agricultural operations, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. This condition precludes the possibility of the Specific Plan converting Important Farmland to nonagricultural use. As such, no impact to farmland would occur through implementation of the Specific Plan.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located within Sub Area F1 of the Specific Plan area that was analyzed in the previous certified EIR and Addendum. The 9.5-acre project site would be located in an urbanized area that the California Department of Conservation identifies as urban and built-up land; no agriculture land uses currently exist.⁷ Therefore, the proposed project would not convert farmland to nonagricultural land uses and would not introduce new significant environmental impacts related to the conversion of farmland land uses to nonagricultural land uses or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan area does not contain agricultural uses and no acreage within the Specific Plan boundaries are under a Williamson Act Contract, therefore, no conflicts with a Williamson Act Contract would occur. Parcels located within the Specific Plan are zoned for commercial uses, therefore, no conflicts with agricultural zoning would occur. As such, no impact to land zoned for agricultural use or a Williamson Act Contract would occur through implementation of the Specific Plan.

⁷ California Department of Conservation. 2018. Contra Costa County Important Farmland Map. Website: <https://www.conservation.ca.gov/dlrp/fmmp/Pages/ContraCosta.aspx>. Accessed May 12, 2023.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located within Sub Area F1 of the Specific Plan and does not contain any agricultural uses or acreage that is under a Williamson Act Contract and is not zoned for agricultural uses. As such, the proposed project would not conflict with existing agricultural zoning or a Williamson Act Contract. Therefore, the proposed project would not introduce new significant environmental impacts that would conflict with existing agriculture zoning or a Williamson Act Contract or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan area does not contain any acreage zoned for forestland or timberland. Therefore, land use and development activities that are consistent with the Specific Plan would not impact these zoning designations or resources, and no impacts would occur.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located within Sub Area F1 of the Specific Plan, which does not contain any areas zoned for forestland or timberland. Therefore, the proposed project would not conflict with existing forestland or timberland. Therefore, the proposed project would not introduce any new significant environmental impacts or create substantially more severe impacts than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan EIR

As discussed in Impact II(c), the Specific Plan EIR concluded that the project site does not contain any forest land or timberland. Therefore, the land use and development activities included in the Specific Plan area would not convert any forest land to non-forest uses. As such, no impacts would occur.

Iron Horse Village Project Analysis and Conclusions

As discussed above, the proposed project would be located within Sub Area F1 of the Specific Plan area, which does not contain forest land or timberland. Therefore, the proposed project would not introduce any new significant environmental impacts or create substantially more severe impacts than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

e) Summary of 2012 North Camino Ramon Specific Plan EIR

As previously discussed, there is no farmland or forest land present within any of the areas surrounding the Specific Plan area. This precludes the possibility of the proposed project contributing to changes in the existing environment that could result in the conversion of

farmland to nonagricultural use or forest land to non-forest use. Therefore, no impacts would occur.

Iron Horse Village Project Analysis and Conclusions

The project site does not contain or border agriculture or farmland uses, nor does it contain or border forestlands or forest uses. The site is already developed for urban uses and its redevelopment would not create new pressure to convert agricultural or forest lands to urban uses. Therefore, the proposed project would not introduce any new significant environmental impacts related to the alteration of existing farmland or forestland to non-agriculture use or non-forest use or create substantially more severe impacts than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to agriculture and forestry resources. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the adoption of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
III. Air Quality <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant impact.	No	No	No	None
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	Less than significant impact with mitigation incorporated.	No	No	No	MM AIR-4
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact with mitigation incorporated.	No	No	No	MM AIR-4
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan would support the Bay Area Air Quality Management District (BAAQMD) 2010 Clean Air Plan by providing an infill, higher density, mixed-use, transit-oriented, pedestrian-oriented, and compact development. The previous certified EIR and Addendum determined that the Specific Plan would be consistent with the 2010 Clean Air Plan control strategies because the stationary source measures would not apply, and Specific Plan design features would ensure consistency with transportation and energy and climate control measures. Furthermore, the previous certified EIR and Addendum concluded that although the Specific Plan would increase Vehicle Miles Traveled (VMT) and population compared to existing conditions, the infill nature of the Specific Plan near transit centers and promotion of alternative modes of travel would provide lower

VMT per capita and per employee than would otherwise occur in the plan area. Therefore, impacts related to consistency with an Air Quality Plan (AQP) would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The BAAQMD is the regional agency responsible for overseeing compliance with State and federal laws, regulations, and programs within the San Francisco Bay Area Air Basin (Air Basin). The BAAQMD, with assistance from the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC), prepares and implements air quality management plans to ensure the Air Basin meets and maintains compliance with State and federal ambient air quality standards, the most recent and comprehensive of which is the Bay Area 2017 Clean Air Plan. In formulating compliance strategies, the BAAQMD relies on land use patterns envisioned by local planning efforts, such as a Specific Plan or General Plan. Land use planning affects the extent and type of building operations and vehicle travel, which, in turn, affects region-wide emissions of air pollutants and greenhouse gas (GHG) emissions.

A measure for determining whether the proposed project supports the primary goals of the BAAQMD 2017 AQP is if the proposed project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQPs. This measure is determined by evaluating whether the proposed project was reasonably accounted for in the AQP. The Specific Plan was adopted in 2012 and the General Plan was adopted in April 2015, which was prior to the BAAQMD's adoption of the latest 2017 AQP and as a result, was accounted for in the 2017 AQP.

The BAAQMD's latest AQP utilizes growth projections from Plan Bay Area 2040, which relies on growth projections and land use patterns from local general plans and was adopted after the adoption of the General Plan.

The proposed project would adhere to the General Plan's MU designation to allow for an integrated mix of residential and nonresidential land uses in a horizontal mixed use format, where commercial uses exist elsewhere in Specific Plan Sub Area F. The General Plan MU designation allows for a minimum of 14 dwelling units per acre and a maximum of 30 dwelling units per acre for this site. The residential density of the proposed project would be 20.0 dwelling units per acre, which would be consistent with the MU district requirements of the City's General Plan.⁸ Consistent with the General Plan, the proposed project would not conflict with the latest Clean Air Plan planning efforts since construction and operational emissions would be below the BAAQMD thresholds. Thus, development of the project site has been reasonably accounted for in the BAAQMD's latest AQP.

Furthermore, as discussed further in Impact III(b), implementation of the proposed project would not exceed the BAAQMD operational or construction thresholds for criteria pollutants

⁸ Calculation: (117 dwelling units) / (5.86 acre developed site area) = 20.0 units per acre. This is calculated by dividing the total amount of dwelling units by the net site area that would be developed for residential uses. Based on the site plans prepared for the proposed project on April 2023, the total site area would be 9.5 acres. However, 3.64 acres would be excluded from this calculation due to unbuildable land and easements and only 5.86 acres would be used for the residential development.

on an average daily or annual basis. Additionally, consistent with Mitigation Measure (MM) AIR-4 of the previous certified EIR and Addendum, this analysis includes a Health Risk Assessment (HRA) to evaluate the impact from toxic air contaminant (TAC) exposure from I-680 on new residential uses as part of the proposed project, although such an analysis of the environment on a project is not required by CEQA. Finally, as discussed in Section VIII, Greenhouse Gases, and Section VI, Energy, the proposed project would meet existing California Building Standards Code (CBC) requirements, which result in more energy efficient residential buildings, reducing associated GHG emissions, than were contemplated by the Specific Plan or General Plan EIRs.

Further, as noted in Section XVII, Transportation, of this Addendum, the proposed project would remove the existing office uses, which would result in a net decrease of 1,280 daily vehicle trips to and from the project site as compared to the previous certified EIR and Addendum. Therefore, the proposed project would not result in any new or more severe impacts related to conflicts with implementation of the applicable AQP beyond what was analyzed in the previous certified EIR and Addendum.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum found that because the background level of ozone, particulate matter, including dust, 10 micrometers or less in diameter (PM₁₀), and particulate matter, including dust, 2.5 micrometers or less in diameter (PM_{2.5}) are, at times, higher than the ambient air quality standards, the BAAQMD designated the Air Basin under a nonattainment status for ozone, PM₁₀ and PM_{2.5} criteria pollutants.

Additionally, the previous certified EIR and Addendum determined that construction activities would generate substantial amounts of fugitive dust; however, with incorporation of General Plan Policy 12.6-I-3, which requires construction and grading activities to incorporate particulate matter reduction measures, the previous certified EIR and Addendum determined that the BAAQMD's dust abatement requirements would be satisfied. The previous certified EIR and Addendum determined that 1-hour and 8-hour average carbon monoxide (CO) concentrations in combination with background concentrations (unmitigated) would be below the State and national ambient standards.

Iron Horse Village Project Analysis and Conclusions

This impact is related to the cumulative effect of a proposed project's regional criteria pollutant emissions. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the San Francisco Bay Air Basin (Air Basin), and this regional impact is a cumulative impact. Currently in the Air Basin, 8-hour average ozone (both State and national), 1-hour average ozone (State), annual arithmetic mean PM₁₀ (State), 24-hour average PM₁₀ (State), annual arithmetic mean PM_{2.5} (State), and 24-hour average PM_{2.5} (national) are still in nonattainment status. New development projects (such as the proposed project) within the Air Basin would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air

quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable, when evaluated in combination with past, present, and future development projects.

Potential localized and regional impacts would result in exceedances of State or federal standards for nitrogen oxides (NO_x), particulate matter (PM₁₀ and PM_{2.5}), or CO. NO_x emissions are of concern because of potential health impacts from exposure during both construction and operation and as a precursor in the formation of airborne ozone. PM₁₀ and PM_{2.5} are of particular concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust). CO emissions are of particular concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion.

Reactive organic gas (ROG) emissions are also important because of their participation in the formation of ground level ozone. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and can cause substantial damage to vegetation and other materials. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, elderly, and young children.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines,⁹ the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the proposed project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the proposed project would result in regional emissions that exceed the BAAQMD regional thresholds of significance for construction and operations on a project level. The thresholds of significance represent the allowable amount of emissions each project can produce without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a proposed project that would not exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

Construction Emissions

Construction Fugitive Dust

As previously mentioned, fugitive dust (PM₁₀ and PM_{2.5}) would be generated during earthmoving activities but would largely remain localized near the project site.

The BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, the BAAQMD bases the determination of significance for fugitive dust on

⁹ California Department of Natural Resources. 2019. Website: <https://resources.ca.gov/admin/Legal/CEQA-Supplemental-Documents>. Accessed July 8, 2022.

considering the control measures to be implemented. If all appropriate emissions control measures are implemented for a project as recommended by the BAAQMD, then fugitive dust emissions during construction are not considered significant.

Adopted General Plan Policy 12.6-I-3, requires the same construction mitigation measures recommended by the BAAQMD to ensure that adequate dust control measures are implemented at the project site. As stated in the General Plan Policy 12.6-I-3, “. . . This implementation policy supports the Bay Area Air Quality Management District’s Clean Air Plan. Best management practices for construction and grading such as site watering, and use of diesel particulate filters are often required as mitigation measures in environmental documents and as standard conditions for projects requiring a grading plan in combination with any additional dust control measures identified and implemented by the SWPPP for the proposed project.” As a result, Condition of Approval (COA) AIR-2 would require the applicant to provide documentation to the City of San Ramon upon issuance of grading permit that demonstrates how the construction contractor would implement dust control measures consistent with the BAAQMD recommendations. With the implementation of COA AIR-2 and a Storm Water Pollution Prevention Plan (SWPPP), short-term construction impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation would be less than significant for fugitive dust.

Construction Air Pollutant Emissions: ROG, NO_x, PM₁₀, and PM_{2.5}

The California Emissions Estimator Model (CalEEMod), Version 2022.4.0, was used to estimate the proposed project’s construction emissions. CalEEMod provides a consistent platform for estimating construction and operational emissions from a wide variety of land use projects and is the model recommended by the BAAQMD for estimating project emissions. Estimated construction emissions are compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5} construction emissions to determine significance for this criterion.

Construction of the proposed project is expected to start in January 2024 and to conclude in April 2027. For the purposes of this analysis, construction of the proposed project was assumed to correspond to these dates. If the construction schedule moves to later years, construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements that would affect future construction equipment.

As shown in Table 4, the proposed project would be constructed in a total of 870 workdays. For a more detailed description of the construction parameters used in estimating air pollutant emissions modeling, please refer to the CalEEMod Notes Document in Appendix A.

Table 4: Project Construction Schedule

Construction Activity	Phase Start Date	Phase End Date	Working Days per Week	Total Number of Working Days
Demolition	1/1/2024	5/31/2024	5	110

Construction Activity	Phase Start Date	Phase End Date	Working Days per Week	Total Number of Working Days
Site Preparation	6/1/2024	6/14/2024	5	10
Grading	6/15/2024	7/17/2024	5	23
Trenching	7/18/2024	9/30/2025	5	314
Paving	10/1/2025	10/31/2025	5	23
Building Construction	11/1/2025	4/30/2027	5	390
Architectural Coating	4/1/2026	4/1/2027	5	262

Average daily construction emissions are compared with the BAAQMD's significance thresholds in Table 5 below.

Table 5: Project Construction Emissions (Unmitigated)

Construction Year	Air Pollutants ¹ (tons/year)			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
2024	0.23	2.40	0.10	0.09
2025	0.17	1.44	0.06	0.02
2026	2.41	1.45	0.05	0.08
2027	0.80	0.45	0.02	0.01
Entire Construction Duration (All Phases of Construction)				
Total Emissions (tons)	3.61	5.75	0.23	0.20
Daily Average				
Total Emissions (lbs)	7,227	11,480	460	400
Average Daily Emissions (lbs/day) ²	8.31	13.19	0.52	0.48
Significance Threshold (lbs/day)	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
Notes: lbs = pounds 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 gases ¹ Totals may not add up due to rounding. Calculations use unrounded totals. ² Calculated by dividing the total lbs of emissions by the total number of nonoverlapping working days of construction (870 workdays). Source: CalEEMod Output (see Appendix A).				

As shown in Table 5, the construction emissions from all construction activities are below the recommended thresholds of significance; therefore, project construction would have less than significant impact related to emissions of ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. As previously discussed, the proposed project would implement adopted General Plan Policy 12.6-I-3 as COA AIR-2 for dust control to reduce potential impacts related to fugitive dust emissions during project construction. Therefore, the construction of the proposed project would have a less than significant impact.

Operational Emissions

The 2022 BAAQMD CEQA Guidelines present screening criteria for operational and construction-related impacts from the sizes of single land use projects.¹⁰ The screening levels, themselves, are not thresholds of significance but indicate whether project emissions would exceed the thresholds of significance for land uses based on certain default assumptions and allow for projects to screen out of further detailed analysis. The screening tables were derived by running California Emissions Estimator Model Version 2020.4.0 with default assumptions, using Emissions Factors (EMFAC) 2021 mobile source emission factors. Each land use subcategory was modeled to determine the project size at which any criteria air pollutant or precursor threshold of significance may be exceeded. If project sizes are below these thresholds, then emissions would be less than those predicted at the threshold project size and impacts would be less than significant.

The screening thresholds were developed for construction and operations separately and are appropriate for projects where construction and operations do not overlap. The thresholds modeling scenarios also did not include stationary sources, including emergency generators and, as such, should not be applied to projects with stationary emission sources. Similarly, default parameters do not include earthmoving and demolition for the construction scenarios, and the screening methods are not to be applied to projects with demolition or significant earthmoving activity. The thresholds are appropriate to use for projects with sequential default construction phases and are not appropriate for construction schedules with the simultaneous occurrence of two or more construction phases (e.g., paving and building construction would occur simultaneously). Furthermore, construction-related fugitive dust was not included in the development of the screening table because these emissions are controlled through Best Management Practices (BMPs). BAAQMD management practices that should be implemented at construction projects to reduce both regional and local exposures to PM_{2.5}/PM₁₀ (fugitive dust).

For this project, the City elects to use the BAAQMD screening thresholds to demonstrate that the operational emissions from criteria pollutants and precursors would be less than significant. The proposed project would develop two land uses characterized as single-family residential and condo/townhouse land use, does not have overlapping construction and operations, nor stationary sources of air pollution (e.g., generators). Therefore, the use of

¹⁰ Bay Area Air Quality Management District (BAAQMD). 2023. BAAQMD CEQA Handbook, Chapter 4 Screening for Criteria Air Pollutants and Precursors. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed April 24, 2023.

screening land uses sizes listed in the BAAQMD CEQA Air Quality Guidelines for operational emissions are appropriate.

The operational screening size for the “single-family residential” land use is 421 dwelling units and for the “condo/townhouse” land use is 637 dwelling units.¹¹ The proposed project would develop 86 single-family dwelling units and 31 condo/townhouse dwelling units, which would be smaller than the respective thresholds and would not result in the generation of operational criteria pollutant emissions and/or precursor emissions which exceed the BAAQMD significance thresholds. Operational impacts would be less than significant, and the proposed project would not need to perform a detailed air quality assessment of its operational criteria air pollutants and precursor emissions.

Operational Carbon Monoxide Hotspot

The CO emissions from traffic generated by the proposed project are a concern at the local level. Congested intersections can result in the potential for high, localized concentrations of CO, known as a CO hotspot.

The BAAQMD recommends a screening analysis to determine whether a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is necessary. The proposed project would result in a less than significant impact to air quality for local CO if all the following screening criteria are met:

- The project is consistent with an applicable Congestion Management Program (CMP) established by the County Congestion Management Agency (CMA) for designated roads or highways, regional transportation plan, and local CMA plans; and
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and
- The project 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, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The Iron Horse Village Traffic Study methodology prepared for the proposed project¹² was reviewed and supported by the City of San Ramon Traffic Engineering Department prior to use in this analysis. As described in the Traffic Study, the proposed project would result in a net decrease in vehicle trips compared to existing conditions, and as such, would not impact Level of Service, consistent with the City of San Ramon standards. Moreover, the Traffic Study evaluated project VMT impacts according to the applicable CMA, the Contra Costa Transportation Authority (CCTA), and the City of San Ramon threshold of 20.02 VMT. As described in the Traffic Study, the proposed project would not exceed this threshold and would

¹¹ Bay Area Air Quality Management District (BAAQMD). 2022. Chapter 4, 2022 California Environmental Quality Act Guidelines. Website: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?la=en. Accessed August 31, 2023.

¹² TJKM. 2023. Iron Horse Village Final Focused Traffic Impact Study.

be consistent with the CCTA and City of San Ramon VMT thresholds. As a result, the proposed project would be consistent with the local CMA and associated plans.

Deborah Fehr, Senior Engineer with the City of San Ramon Traffic Engineering Department, provided information about the existing roadway volumes at the Crow Canyon Road and Alcosta Boulevard Intersection adjacent to the project site (provided in Appendix G). Based on the data provided, this intersection would experience an Average Daily Trips (ADT) of 33,406 vehicles per day and maximum hourly vehicle volumes no greater than 4,000 vehicles per hour as of May 2023. As described in the Traffic Study, the proposed project would result in a net reduction in AM and PM peak-hour vehicle trips compared to existing conditions. As a result, no existing intersections near the project site experience 44,000 or more vehicles per hour and project-generated traffic would not increase traffic volumes on intersections that experience 44,000 or more vehicles per hour.

Nonetheless, CO hotspots can still occur when a transportation facility's design or orientation prevents the adequate dispersion of CO emissions from vehicles, resulting in the accumulation of local CO concentrations. The design or orientation of a transportation facility that may prevent the dispersion of CO emissions include tunnels, parking garages, bridge underpasses, natural or urban canyons, below-grade roadways, or other features where vertical or horizontal atmospheric mixing is substantially limited. However, adjacent roadways that would receive new vehicle trips generated by the proposed project do not include transportation facilities where vertical or horizontal atmospheric mixing is substantially limited. For example, adjacent or nearby roadways (such as Crow Canyon Road and Alcosta Boulevard, which are the nearby roadways that would receive vehicle trips generated by the proposed project) are all exposed surface roadways with none of the design features discussed previously that could prevent atmospheric mixing.

Therefore, based on the above criteria, the proposed project would be considered consistent with the local CMP and would not exceed the CO screening criteria and would have a less than significant impact related to CO. As such, the proposed project would not introduce new significant environmental impacts or create substantially more severe environmental impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum addressed the potential impacts to sensitive receptors from TAC, naturally occurring asbestos, and asbestos during demolition. The previous certified EIR and Addendum determined that implementation of MM AIR-4 would reduce the potential impacts to sensitive receptors from TACs to a less than significant level. Additionally, the previous certified EIR and Addendum concluded that impacts from naturally occurring asbestos would be less than significant because the Specific Plan area would not likely contain naturally occurring asbestos. Furthermore, the previous certified EIR and Addendum determined that the release of airborne asbestos emissions from demolition activity in the Specific Plan area would not result in a significant impact with implementation of BAAQMD

Regulation 11, Rule 2 (Asbestos Demolition, Renovation, and Manufacturing). The previous certified EIR and Addendum concluded that at the time of preparation, specific locations of residential land uses within the plan area were unknown and new sensitive receptors resulting from development in the plan area could be exposed to significant TAC emissions and potential health risks from existing sources, such as stationary sources and mobile vehicle emissions from I-680. As a result, the previous certified EIR and Addendum included MM AIR-4, which would require any new residential use proposed in the plan area to determine the health risk from existing stationary sources and I-680 to sensitive receptors. Therefore, impacts related to sensitive receptors would be less than significant with implementation of MM AIR-4.

Iron Horse Village Project Analysis and Conclusions

Similar to the findings identified under the previous certified EIR, the proposed project would have a less than significant impact associated with exposing sensitive receptors to pollutant concentrations with the incorporation of applicable mitigation. The proposed project would require the implementation of MM AIR-4 as identified in the previous certified EIR.

Project Construction Toxic Air Pollutants

An assessment was made of the potential health impacts to surrounding sensitive receptors of resulting TAC emissions during construction. A summary of the assessment is provided below, while the detailed assessment is provided Appendix A.

Diesel particulate matter (DPM) has been identified by the California Air Resources Board (ARB) as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery truck and worker activities. For purposes of this analysis, DPM is represented as exhaust emissions of PM_{2.5}.

Estimation of Construction DPM Emissions

Construction DPM emissions were estimated using CalEEMod, Version 2022.0, as described in the discussion for Impact III(b). As presented in Table 3, the proposed project's construction is anticipated to occur from January 2024 through April 2027. Construction emissions were calculated for each construction activity, as displayed in Table 5. On-site and off-site emissions generated during project construction were modeled with a working schedule of 8 hours per day, 5 days per week.

Based on the analysis presented in this section, emissions were estimated for unmitigated project construction and mitigated project construction.

Estimation of Cancer Risks and Hazards

The BAAQMD has developed a set of guidelines for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young

children to exposures to TAC.^{13,14} These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The following equations are drawn from the California Office of Environmental Health Hazard Assessment (OEHHA) HRA guidelines and were adjusted with values identified for adjustment in the BAAQMD guidelines.

$$\text{Cancer Risk} = \text{CPF} \times \text{DOSE}_{\text{AIR}} \times \text{ASP} \times \text{ED/AT} \times \text{FAH} \quad (\text{EQ-1})$$

Where:

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

CPF = Inhalation Cancer Potency Factor (1.1)

ASP = Age Sensitivity Factor (see Appendix A)

ED = Exposure Duration (duration of construction activity)

AT = Averaging Time for lifetime cancer risk (70 years expressed in days)

FAH = Fraction of time-at-home (see Appendix A)

$$\text{DOSE}_{\text{AIR}} = C_{\text{AIR}} \times \text{DBR} \times A \times \text{EF} \quad (\text{EQ-2})$$

Where:

C_{AIR} = TAC concentration from air dispersion model ($\mu\text{g}/\text{m}^3$)

DBR = Daily Breathing Rate (see Appendix A)

A = Inhalation Absorption factor (1)

EF = Exposure Frequency (see Appendix A)

The BAAQMD- and OEHHA-recommended values for the various cancer risk parameters, shown in EQ-1 and EQ-2, are provided in Appendix A.

Estimation of Non-Cancer Chronic Hazards

TACs can also cause chronic (long-term) effects related to non-cancer illnesses, such as reproductive effects or birth defects, or adverse environmental effects. Non-cancer health risks

¹³ Bay Area Air Quality Management District (BAAQMD). 2016. BAAQMD Air Toxics NSR Program Health Risk Assessment Guidelines. December. Website: https://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en. Accessed April 13, 2022.

¹⁴ Bay Area Air Quality Management District (BAAQMD). 2020. BAAQMD Health Risk Assessment Modeling Protocol. December. Website: https://www.baaqmd.gov/~media/files/ab617-community-health/facility-risk-reduction/documents/baaqmd_hra_modeling_protocol_august_2020-pdf.pdf?la=en. Accessed April 13, 2022.

are conveyed in terms of the hazard index (HI), a ratio of the predicted concentration of the facility's reported TAC emissions to a concentration considered acceptable to public health professionals. A significant risk is defined as an HI of 1 or greater. An HI of less than 1 indicates that no significant health risks are expected from the facility's TAC emissions. The relationship for the non-cancer hazards of TACs is given by the following equation:

$$HI = C_{\text{ann}}/\text{REL}$$

Where:

HI = Hazard Index: an expression of the potential for chronic non-cancer health risks

C_{ann} = Annual average TAC concentration ($\mu\text{g}/\text{m}^3$)

REL = Reference Exposure Level: the DPM concentration at which no adverse health effects are anticipated

Annual concentrations of DPM as predicted by the air dispersion model are used to estimate chronic non-cancer hazards. The OEHHA has defined a Reference Exposure Level (REL) for DPM of $5 \mu\text{g}/\text{m}^3$.

Estimation of Health Risks and Hazards from Project Construction

To assess impacts to off-site sensitive receptors, receptor locations within the American Meteorological Society/United States Environmental Protection Agency (EPA) Regulatory Model (AERMOD) were placed at locations of existing residences located in the vicinity of the project boundary. The closest sensitive receptors near the project site within 1,000 feet include:

- Single-family residences 380 feet to the east of the project site boundary on Java Drive.
- Townhomes located 400 feet northeast of the project site on Oneida Circle.

As previously discussed, project construction is anticipated to start in January 2024 and conclude in April 2027 (see Table 4). The following AERMOD modeling parameters were utilized to identify the DPM concentration at identified receptors.

- Sensitive receptors (e.g., schools, daycare facilities, hospitals, care facilities, residences) in the immediate project vicinity are represented in the model with discrete Cartesian receptors at a flagpole height of 1.2 meters.
 - The urban dispersion coefficient was used as greater than 50 percent of the surrounding three kilometers is developed.
- Emissions were characterized in the model using area and volume sources to represent different activities. The following describes the emission sources utilized in the model for each model scenario.
 - On-site construction activities were represented using the polygon area-source tool.

Off-site emissions from construction vehicle trips were represented with line volume sources on the adjacent roadways, Crow Canyon Road and Alcosta Boulevard. Off-site emissions were adjusted to account for off-site emissions that would occur within approximately 1,000 meters of the project site (see Appendix A).

Table 6 presents a summary of the proposed project's construction cancer risk, chronic non-cancer hazard, and annual PM_{2.5} concentration impacts at the Maximally Impacted Sensitive Receptor (MIR). The MIR would experience the highest TAC impacts during the construction period compared to any other receptor and would be a single-family home located at 3426 Java Drive, San Ramon, California.

Table 6: Estimated Health Risks and Hazards During Project Construction

Impact Scenario	Cancer Risk (risk per million)	Chronic Non- Cancer Hazard Index ¹	Annual PM _{2.5} Concentration (µg/m ³)
Unmitigated Project Construction	9.828	0.006	0.028
BAAQMD Thresholds of Significance	10	1	0.3
Exceeds Individual Source Threshold?	No	No	No
Notes: µg/m ³ = micrograms per cubic meter BAAQMD = Bay Area Air Quality Management District MIR = Maximally Impacted Receptor PM _{2.5} = particulate matter 2.5 microns or less in diameter ¹ Chronic non-cancer hazard index was estimated by dividing the annual diesel particulate matter (DPM) concentration (as PM _{2.5} exhaust) by the Reference Exposure Level (REL) of 5 µg/m ³ . Source: Appendix A.			

The off-road construction equipment emissions and the corresponding HRA are based on CalEEMod default values using Statewide construction fleet averages, which include a mix of Tier 0 to Tier 4 equipment, based on populations Statewide. The proposed project would most likely use a newer construction fleet, and primarily Tier 4 Interim and Tier 4 Final equipment (e.g., engine manufactured in year 2012 and later), DPM emissions and risk from construction are most likely lower and calculated risk in Table 6 is a conservative estimate.

As shown in Table 6, health risks associated with the proposed project's construction DPM emissions at the MIR would not exceed the BAAQMD's cancer risk, chronic non-cancer HI, or annual PM_{2.5} thresholds of significance.

Cumulative Health Risk Assessments: Construction

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. For a project-level analysis, the BAAQMD provides several tools for use in screening potential sources of TACs. The tools used in this analysis include:

- Roadway Screening Data Layers.** For cumulative analysis, the BAAQMD Health Risk Screening and Modeling web page, mobile source screening map, provides conservative health risk estimates reflective of 2022 for residents living near roadways (freeways and surface streets), rail lines, and rail yards. The roadway screening data layers provide estimated cancer risks, hazards, and PM_{2.5} concentrations for all Bay Area highways and surface streets, that is based on County-specific vehicle inventories using emission factors from the latest version of EMFAC2021.¹⁵ The roadway screening data layers were developed using vehicle travel data, including traffic volume, vehicle speed, and fleet mix, to develop the emission inventories. The latest available screening tool is in the form of a Geographic Information System (GIS) raster file.¹⁶ The nearest freeways to the proposed project include I-680, approximately 2,700 feet west of the project site, and the estimated cancer risks, hazards, and PM_{2.5} concentrations are included in the roadway screening data.
- Stationary Source Risk and Hazard Screening Tools.** The BAAQMD prepared a GIS tool with the location of permitted sources and provides a health risk calculator that estimates and refines screen-level cancer risk, a non-cancer health HI, and PM_{2.5} concentrations using emissions data from BAAQMD's permitting database.¹⁷ For each emissions source, the BAAQMD provides conservative estimates of cancer risk and PM_{2.5} concentrations. Based on information from the GIS tool, three BAAQMD-permitted stationary sources exist within the vicinity of 1,000 feet of the project site, as described in Table 7.
- Rail Screening Tools.** The BAAQMD prepared GIS tools that contain estimated cancer risks and PM_{2.5} concentrations from railroad operations at any point within the Air Basin. No railways are within 1,000 feet of the project site or within several miles of the project site.

A cumulative HRA was performed that examined the cumulative impacts of the proposed project's construction emissions and sources of TAC emissions within 1,000 feet of the project site. The analysis was performed for the off-site MIR, during construction, and the highest values are presented below.

The cumulative construction health risk results, including health risks from the existing stationary sources, are summarized during project construction in Table 7. Cumulative construction health risk results shown therein are representative of the health risks to the MIR that would experience the highest concentration of pollutants. The MIR would be a single-family home located at 3426 Java Drive, San Ramon, CA.

¹⁵ Bay Area Air Quality Management District (BAAQMD). 2022. Health Risk Screening and Modeling. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/health-risk-screening-and-modeling>. Accessed June 20, 2023.

¹⁶ Ibid.

¹⁷ Bay Area Air Quality Management District (BAAQMD). 2022. Permitted Stationary Sources Risk and Hazards. Website: <https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=2387ae674013413f987b1071715daa65>. Accessed May 22, 2023.

Table 7: Summary of the Cumulative Health Impacts at the Off-site MIR During Construction

Source/Impact Scenario	Source Type	Distance from the Project Site (feet)	Distance from the MIR (feet)	Cancer Risk (per million)	Chronic HI	PM _{2.5} Concentration (µg/m³)
Project						
Project Construction	Diesel Construction Equipment	–	435	9.828	0.006	0.028
Existing Stationary Sources (BAAQMD Facility Number) ¹						
PG&E (#14158)	Generator	570	300	0.027	0.000	0.000
Verizon Wireless (Danville) (#19115)	Generator	1,050	745	0.720	0.002	0.001
San Ramon Valley Unified School District	Gas Dispensing Facility	400	560	1.517	0.007	0.000
Major Roadways						
Existing Local Roadway Network (Crow Canyon Road) and Existing Freeways (I-680) ²		–	n/a	9.8897	0.0272	0.1772
Rail						
Existing Rail in the Air Basin		>1,000	n/a	0.00	0.00	0.00
Cumulative Health Risks						
Cumulative Maximum with Project DPM Emissions (Unmitigated)	21.982		0.042		0.2053	
BAAQMD’s Cumulative Thresholds of Significance	100		10		0.8	
Threshold Exceeded in Either Scenario?	No		No		No	
Notes: BAAQMD = Bay Area Air Quality Management District DPM = diesel particulate matter HI = Hazard Index MIR = Maximally Impacted Sensitive Receptor No Data = no data available PG&E = Pacific Gas and Electric Company µg/m³ = micrograms per cubic meter ¹ Assumes emissions remain constant with time. ² Cancer risks, chronic HI, and PM _{2.5} concentration values from major roadways are measured from the closest MIR, which is located 3426 Java Drive, San Ramon, CA. Source: Appendix A.						

As noted in Table 7, the cumulative impacts from the project construction and existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance. In addition, the combined cancer risk, PM_{2.5} concentration, and HI values would not exceed their respective cumulative thresholds. As a result, the proposed project would not introduce a new TAC source with the potential to adversely affect existing sensitive receptors in the project vicinity or significantly exacerbate existing cumulative TAC impacts. Thus, the cumulative health risk impacts from project construction at the MIR would be less than significant.

Cumulative Health Risk Impacts: Operation

The previous certified EIR and Addendum concluded that at the time of preparation, specific locations of residential land uses within the plan area were unknown and new sensitive receptors resulting from development in the plan area could be exposed to significant TAC emissions and potential health risks from existing sources, such as stationary sources and mobile vehicle emissions from I-680. As a result, the previous certified EIR and Addendum included MM AIR-4, which would require any new residential use proposed in the plan area to determine the health risk from existing stationary sources and roadway traffic volumes, including I-680, to new sensitive receptors. The following analysis satisfies this requirement.

The BAAQMD established several thresholds to determine whether significant health risk impacts from TACs would occur to the siting of new sensitive receptors, such as the proposed project.¹⁸ The first type of threshold is a single source threshold for receptors, which is intended to recognize that within a defined project area there can be variations in risk levels that may be significant. The BAAQMD has set a single source threshold of 10 in a million cancer risk, 1.0 chronic HI, and 0.3 µg/m³ annual PM_{2.5} concentration. The second type of threshold is a cumulative threshold, which is designed to account for the effects of all sources of TACs within the defined area.¹⁹ The BAAQMD has set a cumulative threshold of 100 in a million cancer risk, 10 chronic HI, and 0.8 µg/m³ annual PM_{2.5} concentration.

In order to determine the greatest single source of TAC emissions that would impact future project residents, this analysis used the same BAAQMD tools as the construction HRA described previously to determine the existing stationary source, roadway, and rail cancer risks, chronic HI, and PM_{2.5} concentrations. In order to determine the MIR on the project site during operation, several points were selected based on the project site plan and the Raster Tool was used to determine the health risk, chronic HI, and PM_{2.5} concentration. Note that roadway vehicle volumes from I-680 are accounted for in the Raster Tool data. The greatest single source of TAC emissions was determined to be from roadway vehicle traffic on Crow Canyon Road and no other existing sources would exceed the 10 in a million threshold. As a result, the MIR during operation would be the townhome/condo unit closest to the southwest corner of the Crow Canyon Road/Alcosta Boulevard intersection. Table 8 summarizes the associated

¹⁸ Bay Area Air Quality Management District (BAAQMD). 2023. BAAQMD CEQA Handbook, Chapter 3 Thresholds of Significance. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed April 24, 2023.

¹⁹ Ibid.

single source cancer risk, chronic HI, and PM_{2.5} concentration at the project MIR during operation from roadway vehicle traffic on Crow Canyon Road.

Table 8: Single Source Risks and Hazards Analysis For the Project Site As A Receptor

Impact Scenario	Cancer Risk (risk per million)	Chronic Non- Cancer Hazard Index ¹	Annual PM _{2.5} Concentration (µg/m ³)
Existing Local Roadway Network (Crow Canyon Road) and Existing Freeways (I-680)	38.576	0.129	0.823
BAAQMD Single Source Threshold of Significance	10	1	0.3
Exceeds Individual Source Threshold?	Yes	No	Yes
Existing Local Roadway Network (Crow Canyon Road) and Existing Freeways (I-680) with MERV 13 Project Ventilation Condition of Approval	7.715	0.026	0.165
BAAQMD Single Source Threshold of Significance	10	1	0.3
Exceeds Individual Source Threshold?	No	No	No
Notes: BAAQMD = Bay Area Air Quality Management District MERV = Minimum Efficiency Reporting Values MIR = Maximally Impacted Receptor PM _{2.5} = particulate matter 2.5 microns or less in diameter ¹ Chronic non-cancer hazard index was estimated by dividing the annual diesel particulate matter (DPM) concentration (as PM _{2.5} exhaust) by the Reference Exposure Level (REL) of 5 µg/m ³ . Source: Appendix A.			

As shown in Table 9, new residents from the proposed project at the MIR would be exposed to cancer risks and PM_{2.5} concentrations above the BAAQMD single source thresholds without additional project design features. As a result and as required to comply with Specific Plan MM AIR-4, the proposed project would include the installation of Minimum Efficiency Reporting Values (MERV) 13 air filtration devices on all proposed residential units as part of the project heating, ventilation, and air conditioning (HVAC) systems as a design feature. MERV 13 filters would capture DPM and prevent this particulate matter from entering future residents' homes, thus preventing health risk impacts. While MERV 13 filters have an arrestive control efficiency of over 95 percent, meaning that MERV 13 filters trap about 95 percent of particulate matter by design, the actual reduction of indoor air particulate concentrations depends on the amount of time the HVAC system is operational and other factors. Studies show that the effectiveness of MERV 13 filtration in integrated HVAC systems ranges from 80-90 percent. In order to provide a conservative estimate, a lower efficiency rate of 80 percent is assumed in this analysis.^{20,21} Therefore, it is assumed that the occupants of all future residential units on the proposed project site would be exposed to a reduced quantity of DPM emissions that is 20

²⁰ Stephens, B., T. Brennan, and L. Harriman. 2016. Selecting Ventilation Air Filters to Reduce PM_{2.5} Of Outdoor Origin. ASHRAE Journal.

²¹ San Francisco Department of Public Health and Bay Area Air Quality Management District (BAAQMD). 2018. Measurement Study to Evaluate Controls for Reducing In-Home Pollutant Exposures at Homes Near High Trafficked Roadways. Website: https://sf.gov.org/sfc/sites/default/files/Asthma/SFDPH_IndoorAir7%20interactive.pdf. Accessed September 14, 2022.

percent of the existing background levels. As shown in Table 9, with the implementation of MERV 13 filters, future residents would not be exposed to cancer risk, chronic HI, and PM_{2.5} concentrations above the BAAQMD single source thresholds.

The cumulative operational health risk results, including health risks from the existing stationary source, are summarized in Table 9. As shown in Table 9, none of the new project residents would be exposed to cancer risk, chronic HI, and PM_{2.5} concentrations above the BAAQMD cumulative thresholds. In addition, the use of MERV 13 filters would further reduce impacts, as described previously. Therefore, the proposed project would not expose future sensitive receptors to significant health risks from existing single source and cumulative sources of TACs.

Table 9: Cumulative Source Risks and Hazards Analysis For the Project Site As A Receptor

Source/Impact Scenario	Source Type	Distance from the Project Site (feet)	Cancer Risk (per million)	Chronic HI	PM _{2.5} Concentration (µg/m ³)
Major Roadways					
Existing Local Roadway Network (Crow Canyon Road) and Existing Freeways (I-680)		–	38.576	0.129	0.823
Existing Stationary Sources (BAAQMD Facility Number)¹					
PG&E (No. 14158)	Generator	570	0.027	0.000	0.000
Verizon Wireless (Danville) (No. 19115)	Generator	1,050	0.720	0.002	0.001
San Ramon Valley Unified School District	Gas Dispensing Facility	400	1.517	0.007	–
Cumulative Health Risks					
Cumulative Totals			40.840	0.138	0.824
Cumulative Totals With MERV 13 Project Ventilation Condition of Approval²			9.382	0.033	0.165
BAAQMD's Cumulative Thresholds of Significance			100	10	0.8
Threshold Exceeded in Either Scenario?			No	No	No
Notes: BAAQMD = Bay Area Air Quality Management District HI = Hazard Index MERV = Minimum Efficiency Reporting Values No Data = no data available PG&E = Pacific Gas and Electric Company PM _{2.5} = particulate matter 2.5 microns or less in diameter µg/m ³ = micrograms per cubic meter ¹ Assumes emissions remain constant with time. ² Cumulative total includes the entire cancer risk from the San Ramon Valley USD stationary source, because gas dispensing facilities emit volatile organic compounds (VOCs), and do not emit PM _{2.5} . MERV filters are only designed to reduce particulate matter and cannot trap gases such as VOCs. As a result, the entire risk was included in the cumulative total. Source: Appendix A.					

d) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that a portion of the Specific Plan area would be located within the screening distance for painting/coating operations. An odor source with five or more confirmed complaints per year averaged over 3 years is considered to have a significant impact on receptors within the screening distance. The previous certified EIR and Addendum concluded that the BAAQMD records showed no odor complaints for any of the existing painting/coating facilities within the most recent 3-year time frame. The previous certified EIR and Addendum concluded that impacts related to odor exposure would be less than significant.

Iron Horse Village Project Analysis and Conclusions

As stated in the BAAQMD 2022 Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard.²² The ability to detect odors varies considerably among the populations and is subjective. The BAAQMD does not have a recommended odor threshold for construction activities. However, the BAAQMD recommends operational screening criteria that are based on the distance between receptors and types of sources known to generate odors. For projects within the screening distances, the BAAQMD has the following threshold for project operations:

An odor source with five or more confirmed complaints per year averaged over 3 years is considered to have a significant impact on receptors within the screening distance shown in Table 3-3 [of the BAAQMD's guidance].

Two circumstances have the potential to cause odor impacts:

- A source of odors is proposed to be located near existing or planned sensitive receptors, or
- A sensitive receptor land use is proposed near an existing or planned source of odor.

Projects that would site an odor source or a receptor farther than the applicable screening distance, shown in Table 10 below, would not likely result in a significant odor impact.

Table 10: Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile

²² Bay Area Air Quality Management District (BAAQMD). 2022. Website: https://www.baaqmd.gov/~/_media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines?outercontent_1_sidenavavigationcontainercontent_1_twocolumnmd39block2_0_innercontent_7_radGridChangePage=2_5. Accessed May 16, 2023.

Land Use/Type of Operation	Project Screening Distance
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Source: Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Air Quality Guidelines. Website: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines/archived-ceqa-guidelines . Accessed May 16, 2023.	

The BAAQMD also identifies that the presence of an odor impact is dependent on a number of variables including:

- Nature of the odor source (e.g., wastewater treatment plant, food processing plant);
- Frequency of odor generation (e.g., daily, seasonal, activity-specific);
- Intensity of odor (e.g., concentration);
- Distance of odor source to sensitive receptors (e.g., miles);
- Wind direction (e.g., upwind or downwind); and
- Sensitivity of the receptor.

Project Construction

Diesel exhaust and ROG, which are objectionable to some, would be emitted during construction of the proposed project; however, emissions would disperse rapidly from the project site and would be short-term and intermittent in duration and frequency. Therefore, project construction would not generate objectionable odors affecting a substantial number of people. As such, similar to the findings of the previous certified EIR, construction odor impacts would be less than significant.

Project Operation

Project as an Odor Receptor

Land uses typically associated with generating substantial odors include wastewater treatment facilities, waste disposal facilities, agricultural operations, or other operations listed previously in Table 10. Using Google Maps, no odor generating land uses were identified within the associated screening distances of the project site. Public records retrieved from the BAAQMD show that one unconfirmed odor complaint and two confirmed complaints were filed for

sources in the City of San Ramon between 2017 and 2022 (odor complaint history records included in Appendix A). None of the complaints filed were for odor generating land uses, as shown in Table 10, and none of the complaint source addresses were located within two miles of the project site. As a result, the proposed project as a receptor during operation would not experience peculiar odor impacts, because no odor generating sources existing within the applicable screening distances or based on site-specific information.

Project as an Odor Generator

The proposed project would result in the construction of 117 new residential units, whose operations could lead to odors from associated residential laundry cleaning, vehicle exhaust, outdoor cooking, and waste disposal. However, such odors generated by project operation would be small in quantity and duration and would not pose an objectionable odor impact to future and existing receptors. Additionally, the proposed project would comply with the City's Zoning Ordinance Section D3-8.L odor performance standard, which states that no activity, process, or use shall produce obnoxious or objectionable odors or fumes that are perceptible by a person at the property line of the project site.²³

To summarize, the proposed project as a source or receptor would not generate any peculiar emissions nor odors that adversely affect a substantial number of people. Therefore, the proposed project would not result in new significant impacts or substantially more severe impacts than analyzed in the previous certified EIR and Addendum.

Applicable Specific Plan Mitigation Measures

MM AIR-4 Prior to the final discretionary approval for any residential use that occur pursuant to the North Camino Ramon Specific Plan, the City of San Ramon shall determine the area of impact from toxic emissions from Interstate 680 (I-680) and existing stationary sources that may potentially exceed the Bay Area Air Quality Management District (BAAQMD) significance criteria for cancer or non-cancer toxic air contaminant (TAC) exposure. Emissions from I-680 shall be estimated using the BAAQMD roadway screening tool. Impacts from stationary sources near the project shall be compared with the distance threshold recommended by the California Air Resources Board's (ARB) Land Use Handbook distance guidance. If residential projects are proposed within an area exceeding the threshold, the City shall require a Health Risk Assessment (HRA) to determine the refined impact level and to identify design features such as high efficiency ventilation and cooling systems that shall be installed to reduce the impact to less than significant levels. The City shall prohibit the construction of any sensitive receptor land use within the area of impact of I-680 or stationary source as described above unless the risk is less than the BAAQMD's significance criteria for TACs exposure.

In compliance with this mitigation measure, a Health Risk Assessment (HRA) was prepared for this proposed project. As required by this mitigation measure, the

²³ City of San Ramon. 2023. City of San Ramon Municipal Code Section D3-8.L – Performance Standards. Website: <https://online.encodeplus.com/regs/sanramon-ca/doc-viewer.aspx#secid-4592>. Accessed August 8, 2023.

proposed project would include Minimum Efficiency Reporting Values (MERV) 13 air filtration in all proposed heating, ventilation, and air conditioning (HVAC) systems as a design feature, which would satisfy MM AIR-4.

Conditions of Approval

In compliance with adopted General Plan Policy 12.6-I-3, the following COA shall be required to ensure that dust control air quality impacts from the proposed project would be reduced to less than significant.

COA AIR-2

Pursuant to Adopted General Plan Policy 12.6-I-3, prior to issuance of grading or building permit, whichever occurs first, the project applicant shall provide documentation to the City of San Ramon Community Development Department, Planning Services, demonstrating that any construction and grading activities shall incorporate dust control measures as recommended by the Bay Area Air Quality Management District (BAAQMD), such as:

- All exposed non-paved surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and access roads) shall be watered at least two times per day and/or non-toxic soil stabilizers shall be applied to exposed non-paved surfaces.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered and/or shall maintain at least 2 feet of freeboard.
- All visible mud or dirt tracked 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 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes, as required by the California Airborne Toxics Control Measure (ACTM) Title 13, Section 2485 of California Code of Regulations. Clear signage regarding idling restrictions shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- The prime construction contractor shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. The City and the construction contractor shall take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to air quality. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IV. Biological Resources <i>Would the project:</i>					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or United States Fish and Wildlife Service?	Less than significant impact with mitigation incorporated.	No	No	No	MM BIO-1
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or United States Fish and Wildlife Service?	No impact.	No	No	No	None
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No impact.	No	No	No	None
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native	No impact.	No	No	No	None

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?					
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant impact.	No	No	No	None
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	No impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan area contains no habitat suitable for any special-status plant or wildlife species. However, nesting birds protected by the Migratory Bird Treaty Act (MBTA) may nest in mature trees within the Specific Plan area. The Specific Plan area contains mature trees suitable for nesting birds protected by the MBTA.

Iron Horse Village Project Analysis and Conclusions

The project site currently contains two large commercial buildings and paved parking areas. The building in the northwestern portion of the project site has been used as PG&E office space since approximately 2008 but has been vacated. The building in the southeastern portion of the project site is partially vacant. The building is also adjacent to an off-site building that houses USPS offices. Additionally, high-voltage power lines and the Iron Horse Regional Trail are located along the western boundary of the project site. The existing buildings are surrounded by surface parking and landscaping consisting of mature trees and shrubs. Residential and industrial land uses surround the project site. The site is 466 feet above sea

level and, as it is fully developed, does not offer habitat outside of marginal roosting habitat for bats and nesting habitat for migratory birds and raptors.

The proposed project does not propose any substantial changes compared to what was already analyzed in the previous certified EIR and Addendum. The proposed project would not include changes to construction or operation activities that could increase impacts or result in previously unidentified impacts to special-status plant and wildlife species beyond those analyzed in the previous certified EIR and Addendum. Moreover, the proposed project would not expand the Specific Plan area and would not propose land use types not previously considered. As noted in the previous certified EIR and Addendum, implementation of the Specific Plan may include the removal of trees, and therefore, could result in adverse impacts to nesting birds if active nests are present,²⁴ as well as roosting bats, which may also utilize trees and the existing office buildings proposed for demolition. The proposed project would include the removal of some of the trees analyzed in the previous certified EIR and Addendum and, as such, would be subject to the mitigation measure to reduce impacts associated with tree removal consistent with the Specific Plan. Implementation of Specific Plan MM BIO-1 would reduce potentially significant impacts to birds to a less than significant level. In addition, General Plan Policies 8.1-I-1 and 8.1-I-2 require new development to protect special-status species. To ensure compliance with this General Plan Policy, the proposed project would be required to implement a measure that would protect special-status bats that may be roosting in trees or buildings. Therefore, the proposed project would not introduce new impacts or create more severe impacts than those previously analyzed in the previous certified EIR and Addendum. No additional mitigation or analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded the project area would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. The project area consists of existing urban, built-up land uses and does not contain any riparian habitat or other sensitive natural communities. This impact was addressed in Section 7.2.3, Effects Found not to be Significant, in the previous certified EIR and Addendum.

Iron Horse Village Project Analysis and Conclusions

The site currently consists of a fully developed office park with two large commercial buildings, paved parking areas, and mature landscaping. Additionally, surrounding properties consist mainly of industrial development and residential land uses. No sensitive natural communities or riparian habitat are present within the project site. Therefore, the proposed project would not propose any substantial changes to construction or operation activities that could have the potential to adversely affect any riparian habitat or other sensitive natural community beyond those analyzed in the previous certified EIR and Addendum. There have been no changes in circumstances and no new information of substantial importance. No additional analysis is required.

²⁴ City of San Ramon. 2012. North Camino Ramon Specific Plan.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded the project area would not have a substantial adverse effect on State or federally protected wetlands. The project area consists of existing urban, built-up land uses and does not contain any State or federally protected wetlands or associated habitat. This potential impact was addressed in Section 7.2.3, Effects Found not to be Significant, in the previous certified EIR and Addendum.

Iron Horse Village Project Analysis and Conclusions

The fully developed project site does not provide availability for any jurisdictional wetland habitat to exist within the site. Additionally, surrounding properties consist mainly of industrial development and residential land uses. Therefore, no wetland habitat is present within the project site or the surrounding areas. The proposed project would be consistent with the construction and operation impacts analyzed in the previous certified EIR and Addendum and the existing office land use on the site. The project site does not contain any State or federally protected wetlands or associated habitat, and the proposed project thus would not have an adverse impact on any State or federal wetlands. The changes to the project do not result in new significant impacts or substantially more severe impacts than analyzed in the previous certified EIR and Addendum. There have been no changes in circumstances or new information of substantial importance that would alter the conclusion. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded the project area would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. The project area consists of existing urban, built-up land uses and does not contain any features that would facilitate fish or wildlife movement (e.g., creeks, arroyos, or ridgelines). This potential impact was included in Section 7.2.3, Effects Found not to be Significant, in the previous certified EIR and Addendum.

Iron Horse Village Project Analysis and Conclusions

The project site is surrounded by industrial and residential development. However, the Iron Horse Regional Trail does border the western side of the project site and acts as a potential wildlife movement corridor. The proposed project would be developed within currently developed portions of the project site, and therefore, would not impact the adjacent trail. Therefore, the proposed project would not propose any substantial changes to construction or operation activities that could have the potential to 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, beyond those analyzed in the previous certified EIR and Addendum. There have been no changes in circumstances and no new information of substantial importance. No additional analysis is required.

e) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum describes multiple City policies outlined in the General Plan and Municipal Code related to the protection of biological resources. As described below, the previous certified EIR and Addendum concluded that the Specific Plan would be consistent with all applicable General Plan and Municipal Code policies related to biological resources and impacts would be less than significant.

- General Plan Policies 8.1-G-1, 8.1-I-1, and 8.1-I-2 require the protection and maintenance of biological resources, including special-status species and critical habitat. The Specific Plan area contains no habitat suitable for any special-status plant or wildlife species.
- General Plan Policy 8.3-I-1 requires the preservation, protection, and maintenance of significant native oak woodlands. The Specific Plan area does not contain native oak woodlands.
- General Plan Policies 8.3-I-2 and 8.3-I-3 call for the enhancement, preservation, and protection of significant creek corridors and riparian areas. General Plan Policy 8.3-I-8 encourages public access to creek corridors. General Plan Policy 8.3-I-9 requires the consideration of alternatives to culverting or channelizing waterways. The Specific Plan area contains a single ephemeral drainage along the west side of the Iron Horse Trail between Crow Canyon Road and Fostoria Way. All other drainage facilities consist of inlets and underground piping that are part of the City's municipal storm drain system. The Specific Plan would not disrupt the ephemeral drainage or reduce public access. Therefore, the Specific Plan is consistent with these policies.
- General Plan Policy 8.3-I-11 stipulates that the City shall continue to participate in the Contra Costa Clean Water Program to control stormwater pollution and protect the quality of the City's waterways. The Specific Plan would not adversely impact the ephemeral drainage along the Iron Horse Trail. In addition, development implemented under the Specific Plan would apply stormwater pollution controls during construction and operations to prevent the release of pollutants into local waterways, consistent with the policies of the Contra Costa Clean Water Program. Therefore, the Specific Plan is consistent with this policy.
- At the time of the previous certified EIR and Addendum certification, the San Ramon Municipal Code Division C4 Chapter III required that permits be obtained for the removal of any tree that are 30 inches or greater in circumference. The Municipal Code exempts City-initiated development plans, subdivision maps, or grading permits from the provisions of this policy. The Specific Plan adoption was considered a City-initiated development plan, and therefore, granted an exemption from this policy. Therefore, the Specific Plan is consistent with this policy.

Iron Horse Village Project Analysis and Conclusions

The proposed project would not propose any substantial changes to construction or operation activities that could have the potential conflict any local policies or ordinances protecting biological resources beyond those analyzed in the previous certified EIR and Addendum. However, the current San Ramon Municipal Code Division D5 Chapter II requires that permits

be obtained for discretionary applications that propose the removal of certain protected trees. Consistent with the requirement, a tree removal application would be required for trees meeting the Municipal Code criteria. An arborist report of the project area identified 244 living trees within the site, many of which were identified as in poor condition, showing signs of drought stress, poor growth form, and old age (Appendix B). This is partially due to their location in compact hardscape within a parking lot. Many of the trees were identified as unsuitable for preservation and recommended for removal. Several trees were identified with diameters of 6 or more inches, measured 54 inches above grade, which would require permits to be obtained for their removal.²⁵ Consistency with the City's Tree Preservation and Protection Ordinance mandates that the applicant submits a tree removal application for the removal of any trees protected pursuant to the Ordinance. The proposed project would comply with the Ordinance by planting replacement trees and/or paying the in lieu fee, which allows the City to plant trees elsewhere. Thus, project approval would include the Tree Removal Permit Application. Compliance with this ordinance would lower possible impacts if trees are lost and not replaced within the City to a less than significant level. No additional analysis is required.

f) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded the project area would not fall within the boundaries of an adopted Habitat Conservation Plan or Natural Community Conservation Plan. This condition precludes the possibility of land use and development activities within the project area conflicting with the provisions of such a plan. This potential impact is addressed in Section 7.2.3 Effects Found not to be Significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project does not fall within the boundaries of an adopted Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, the proposed project would not conflict with such a plan, and the conclusion is the same as in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

- MM BIO-1** If suitable avian nesting habitat is intended to be removed during the nesting season (February 1 through August 31), a qualified Biologist shall conduct a nesting bird survey to identify any potential nesting activity no more than 7 days prior to initial construction activities. If passerine birds are found to be nesting, or there is evidence of nesting behavior within 250 feet of the impact area, the Biologist shall determine an appropriate buffer that shall be required around the nests. No vegetation removal or ground disturbance would occur within this buffer. For raptor species—birds of prey such as hawks and owls—this buffer would generally be up to 500 feet. A qualified Biologist shall monitor the nests closely until it is determined

²⁵ City of San Ramon. 2020. City of San Ramon Zoning Ordinance – Chapter II, Tree Preservation and Protection. Website: https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_10826046/File/Our%20City/Departments/Community%20Development/Planning/Zoning%20Ordinance/Adopted%20Entire%20Zoning%20Ordinance%2002.28.20.pdf. Accessed August 4, 2023.

that the nests are no longer active, at which time construction activities may commence within the buffer area. Construction activity may encroach into the buffer area at the discretion of the Biological Monitor. Tree or vegetation removal activities that occur outside of the nesting season (September 1 through January 31) are not subject to the requirements of this mitigation measure.

To enhance the effectiveness of MM BIO-1 and to ensure compliance with General Plan Policy 8.1-G-1, the proposed project shall adhere to the following condition of approval:

A qualified Wildlife Biologist shall conduct a survey for special-status bats between April 1 and October 15 during the appropriate time of day to maximize detectability to determine whether bat species are roosting near the work area no less than 7 days prior to beginning ground disturbance and/or construction, including tree removal. Survey methodology may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g., Anabat).

Visual surveys will include trees within 100 feet of project construction activities. No less than 7 days prior to building demolition, the applicants for development on the project parcel shall ensure that a qualified Biologist (i.e., one familiar with the identification of bats and signs of bats) survey buildings and trees proposed for removal for the presence of roosting bats or evidence of bats. If no roosting bats or evidence of bats are found in the structure, demolition may proceed. If the Biologist determines or presumes bats are present (if there are site access issues or structural safety concerns), the Biologist shall exclude the bats from suitable spaces by installing one-way exclusion devices. After the bats vacate the space, the Biologist shall close off the space to prevent recolonization. Building demolition shall only commence after the Biologist verifies 7 to 10 days later that the exclusion methods have successfully prevented bats from returning. To avoid impacts on roosting and non-volant (i.e., nonflying) bats, the Biologist shall only conduct bat exclusion and eviction outside of the maternity season for bats (generally from March 1–August 31).

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to biological resources. The conclusions from the previous certified EIR and Addendum regarding biological resources remain unchanged.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
V. Cultural and Tribal Cultural Resources <i>Would the project:</i>					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Less than significant impact with mitigation incorporated.	No	No	No	MM CUL-1
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant impact with mitigation incorporated.	No	No	No	MM CUL-1
c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant impact with mitigation incorporated.	No	No	No	MM CUL-4
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>					
d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	None identified.	No	No	No	MM CUL-1 and CUL-4
e) 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	None identified.	No	No	No	MM CUL-1 and CUL-4

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.					

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

Historic Resources

The previous certified EIR and Addendum concluded that there are no known historical resources that are listed on a national, State, or local level located within the Specific Plan area, including the project site. The closest historic resource, Borel Ranch, is located more than 0.5-mile from the Specific Plan boundaries. Subsurface construction activities associated with buildout of the Specific Plan, such as trenching and grading, could potentially damage or destroy previously undiscovered, buried historic resources. Accordingly, the Specific Plan identified this as a potentially significant impact and required implementation of MM CUL-1 to reduce this potentially significant impact to a level of less than significant. As required by MM CUL-1, if a historic resource is encountered, ground disturbance in a 100-foot radius around the find shall cease until a qualified Archaeologist studies the resource further and makes their determination. If the resource is determined to be significant under CEQA, the qualified Archaeologist shall prepare and implement a research design and archaeological data recovery plan. The qualified Archaeologist shall also perform appropriate technical analyses, prepare a full written report, file it with the appropriate information center, and provide for permanent curation of the recovered resources.

Iron Horse Village Project Analysis and Conclusions

Historic Resources

The proposed project is located in Sub Area F1 of the Specific Plan area. FirstCarbon Solutions (FCS) conducted a records search on June 29, 2023, at Northwest Information Center (NWIC), located at Sonoma State University. Based on the records search there are no known archaeological or historic resources located within the project site (Appendix C). There is one historical resource (P-07-004639 Borel Ranch) within a 0.5-mile radius of the project area. Review of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California State Historical Landmarks, California Points of Interest, and California Built Environment Resource Directory (BERD) for Contra Costa County did not identify any historical resources within the project site. In addition, FCS Director of Cultural Resources/Principal Investigator Dr. Dana DePietro, RPA, and FCS Archaeologist and Historian,

Ti Ngo, MA, conducted a pedestrian survey for unrecorded cultural resources at the project site. The survey covered the roughly rectangular subject property in its entirety, beginning in the southeast corner of the project site and moving north and west, using east–west transects spaced at 10-meter intervals wherever project. The project site is completely hardscaped with imported soils for landscaping elements. As a result, visibility of native soils was non-existent.

Survey conditions were documented using digital photographs and field notes (Appendix C). During the survey, Dr. DePietro and Mr. Ngo examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, toolmaking debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). Particular attention was paid to the built environment and recording buildings and structures that appeared to be more than 45 years in age.

Dr. DePietro and Mr. Ngo encountered two commercial office buildings in the project site. An analysis of Historic Aerials found that both structures were built after 1979. They do not appear to qualify for the CRHR or the NRHP.

The proposed project did not reveal any significant changes from what was evaluated and disclosed in the previous certified EIR and Addendum. There is no new information of substantial importance, project changes, or changes in circumstances that would create new or substantially more severe significant impacts on historical resources. Consistent with the conclusions of the previous certified EIR and Addendum, implementation of MM CUL-1. In addition, to ensure compliance with General Plan Policy 8.7-I-4 and Public Resources Code Section 21083.2, the proposed project would also implement COA-1, which requires the project applicant to provide cultural resources sensitivity training for all construction personnel and preservation in places procedures. There are no new significant impacts as a result of the proposed project.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

Archaeological Resources

The previous certified EIR and Addendum concluded that prior to the construction and development of the existing buildings, the properties were graded and soiled engineered to support urban development, indicating that any archaeological resources that may have been discovered were recovered and removed, nevertheless, subsurface excavation could potentially damage or destroy previously undiscovered archaeological resources. Additionally, the City of San Ramon adopted MM CUL-1 to further reduce impacts to less than significant. The proposed project would also implement COA CUL-1.

Iron Horse Village Project Analysis and Conclusions

Archaeological Resources

The records search conducted at the NWIC on June 29, 2023, indicated that no archaeological or historical resources were identified within the proposed project site. Borel Ranch (P-07-004639), a historic resource, is within a 0.5-mile radius of the project area. In addition, FCS contacted the NAHC to determine whether any sacred sites were located within the project site or its vicinity. A response was received on May 25, 2023, indicating that the Sacred Lands File search produced a negative result for Native American cultural resources in the project area. The NAHC included a list of 15 tribal representatives available for consultation. Although no consultation is required for addendums, on May 30, 2023, a letter containing project information and requesting any additional information was sent to each tribal representative. No responses have been received to date. The pedestrian conducted on June 28, 2023, failed to locate or identify any archaeological resources indicating that the proposed project site is developed, with little to no visibility of native soils. The proposed project site did not reveal any significant changes and remains consistent with what was evaluated and disclosed in the previous certified EIR and Addendum.

The proposed project would be required to comply with laws designed to protect historical and archaeological resources that may be discovered through ground disturbance. As required by Public Resources Code Section 21083.2, if it can be demonstrated that a project will cause damage to a historical or unique archaeological resource, the Lead Agency requires reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources are not preserved in place or not left in an undisturbed state, the Lead Agency can require treatment, including studies and testing. Excavation as mitigation is restricted to those parts of a unique archaeological resource that would be damaged or destroyed by the project and is not required if testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource.

There is no new information of substantial importance, project changes, or changes in circumstances that would create new or substantially more severe significant impacts on archaeological resources. Accordingly, implementation of MM CUL-1 and compliance with General Plan policies (COA CUL-1) and implementation measures that protect cultural resources would reduce any potential impacts to less than significant.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

Burial Sites

The previous certified EIR and Addendum concluded that any burial sites that may have been present would have been removed prior to grading and soil engineering of the Specific Plan boundaries. Nevertheless, excavation of previously disturbed soil still has the potential to damage or destroy previously undiscovered burial sites, thus, implementation of MM CUL-4, which states that all activity should cease at a 100-meter radius around the find, and immediately notify Contra Costa County Coroner's office. If Coroner determines that the

remains are Native American, and, in turn, will notify the NAHC within 24 hours and the person determined to be the Most Likely Descendant (MLD), who will make determinations on recovering of the remains. The MLD may, with the permission of the landowner, inspect the site of the discovery and make recommendations for treating or disposing of the human remains and any associated grave goods. The MLD would complete their inspection and make their recommendation within 48 hours of being granted access to the site by the landowner. Until the landowner has conferred with the MLD, they shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, the discovery is adequately protected according to generally accepted cultural or archaeological standards or practices, and further activities take into account the possibility of multiple burials. If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner would inter the human remains and associated items with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Iron Horse Village Project Analysis and Conclusions

Burial Sites

The records search conducted at the NWIC on June 29, 2023, indicated that no archaeological resources were identified within the proposed project site or its 0.5-mile radius. No archaeological resources or human remains were identified within the project site during the pedestrian survey. Subsurface Archaeological Sensitivity Assessment examines three variables in determining the probability of encountering a prehistoric burial site, those being: (1) age of the underlying soil contemporaneous with period of human occupation of the area; (2) proximity to permanent or semi-permanent water sources capable of supporting long-term or seasonal occupation of the area; and (3) flat or gently sloped topography conducive to human habitation. Geologic mapping indicated that the proposed project site is underlain by Holocene deposits, which are contemporaneous with human occupation of California. Additionally, the proposed project site is relatively flat. Located in a commercially developed area, it is not in close proximity to a natural water source. As required by MM CUL-4, the proposed project would comply with relevant law protecting human remains. There is no new information of substantial importance, project changes, or changes in circumstances that would create new or substantially more severe significant impacts on historical resources. MM CUL-4 continues to be applicable, and with that mitigation measure, impacts remain less than significant.

Tribal Cultural Resources

d) Summary of 2012 North Camino Ramon Specific Plan EIR

Since the preparation of the previous certified EIR, Assembly Bill (AB) 52 was signed into law on September 25, 2014, and provides that any public or private “project with an effect that may cause a substantial adverse change in the significance of a Tribal Cultural Resource (TCR) is a project that may have a significant effect on the environment.” TCRs include “[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the CR or included in a local register of historical

resources.” Under prior law, TCRs were typically addressed under the umbrella of “cultural resources,” as discussed above. AB 52 formally added the category of “tribal cultural resources” to CEQA and extends the consultation and confidentiality requirements to all projects, rather than just projects subject to Senate Bill (SB) 18.

SB 18 (Government Code § 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the NAHC SB 18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that may be affected by the proposed adoption or amendment to a general or specific plan.

List of Eligible Resources

After the preparation of the certified EIR, AB 52 amended CEQA to identify an additional category of resources to be considered under CEQA called “tribal cultural resources” and added Public Resources Code Section 21074 which further defines TCRs. However, according to the previous certified EIR, the City completed the tribal consultation process in accordance with State law prior to the adoption of the Specific Plan and certification of the previous EIR.

Iron Horse Village Project Analysis and Conclusions

The records search conducted at the NWIC on May 25, 2023, indicated that no Native American cultural resources were recorded within the project site or its 0.5-mile radius. Additionally, the Sacred Lands File search conducted with the NAHC on May 25, 2023, yielded negative results for TCRs. No known listed or eligible TCRs are present with the project site. Implementation of MM CUL-1 and COA CUL-1, which would include cultural resources sensitivity training for all construction personnel and preservation in places procedures, and MM CUL-4 will reduce potential impacts to less than significant.

e) Summary of 2012 North Camino Ramon Specific Plan EIR

Lead Agency Identified Resources

After the preparation of the certified EIR, AB 52 amended CEQA to identify an additional category of resources to be considered under CEQA called “tribal cultural resources” and added Public Resources Code Section 21074 which further defines TCRs. However, according to the previous certified EIR, the City completed the tribal consultation process in accordance with State law prior to the adoption of the Specific Plan and certification of the previous EIR.

Iron Horse Village Project Analysis and Conclusions

Lead Agency Identified Resources

The Sacred Lands File search conducted by the NAHC on May 25, 2023, yielded negative results for TCRs within the project area. The NAHC included a list of 15 representatives available for consultation. FCS reached out to all tribal contacts on May 30, 2023, with a request for information about resources within or near the project site. To date, FCS has received no responses. Tribal consultation pursuant to SB 18 is not required for the proposed project as the proposed project would not include an amendment to the City's General Plan or the Specific Plan. Additionally, to date, the City in its capacity as Lead Agency has not identified any TCRs that will be adversely impacted by the proposed project. Accordingly, implementation of MM CUL-1, enhanced to include cultural resources sensitivity training for all construction personnel and preservation in places procedures, and MM CUL-4, updated with NAHC contact procedures, will reduce the potential impacts to a less than significant impact.

Applicable Specific Plan Mitigation Measures

- MM CUL-1** If a potentially significant prehistoric or historic resource is encountered during subsurface activities, all construction within a 100-foot radius of the find shall cease until a qualified Archaeologist determines whether the resource requires further study. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified Archaeologist. Potentially significant cultural resources consist of, but are not limited to, glass, ceramics, stone, bone, wood, and shell artifacts or features, including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, a qualified Archaeologist shall prepare and implement a research design and archaeological data recovery plan, if necessary. The Archaeologist shall also perform appropriate technical analyses, prepare a full written report, and file it with the appropriate information center, and provide permanent curation of the recovered resources.
- MM CUL-4** If human remains are encountered during earth-disturbing activities, all work within 100 feet of the find shall stop immediately and the Contra Costa County Coroner's office shall be notified. If the Coroner determines the remains are Native American in origin, the Native American Heritage Commission (NAHC) shall be notified and, in turn, shall notify the person determined to be the Most Likely Descendant (MLD). The MLD shall provide recommendations for treatment of the remains (CEQA Guidelines § 15064.5; Health and Safety Code § 7050.5; Public Resources Code [PRC] § 5097.94 and 5097.98).

Conditions of Approval

In compliance with the requirements of MM CUL-1 of the previous certified EIR and Addendum, the following COA shall be required to ensure that impacts to cultural and tribal cultural resources from the proposed project would be reduced to less than significant.

COA CUL-1 Prior to the start of ground-disturbing activities, a qualified Archaeologist shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of Archaeologist resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains.

Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. In compliance with Public Resources Code Section 21083.2, preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If a significant prehistoric or historic resource is encountered during subsurface activities and preservation in place is determined to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the qualified Archaeologist that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The appropriate Native American tribal representatives shall be consulted in determining any treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resources, beyond those that are scientifically important, are considered. The plan shall include provisions for the final disposition of the recovered resources, which may include on-site reburial, curation at a public, non-profit institution, or donation to a local Native American tribe, school, or historical society.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to cultural and tribal cultural resources. To date, the City, in its capacity as Lead Agency, has not identified any TCRs that would be adversely impacted by the proposed project. Accordingly, implementation of MM CUL-1 and MM CUL-4 will reduce the potential impacts to less than significant. The conclusions from the previous certified EIR and Addendum regarding Historical, Archaeological, and TCRs remain unchanged.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VI. Energy <i>Would the project:</i>					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than significant impact.	No	No	No	None
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum found that project construction and operation would result in energy usage in the form of fuel consumption through the use of construction equipment, construction worker vehicle trips to the project site, and transportation fuel and building/equipment energy (e.g., electricity and natural gas) once the project was operational. However, the previous certified EIR and Addendum concluded that all construction within the Specific Plan area would be required to abide by General Plan 2030 policies that would reduce construction energy usage, such as construction equipment idling times, and operational energy usage by requiring additional energy efficiency measures. Therefore, the previous certified EIR and Addendum concluded that the Specific Plan would not result in the wasteful, inefficient, or unnecessary consumption of energy resources and impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

Construction

Project construction would require energy for the transportation of building materials, preparation of the site (e.g., site clearing, and grading), and the construction of the buildings. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, front-end loaders, forklifts, and cranes. Construction equipment is estimated to consume a total of 89,111 gallons of diesel fuel over the entire construction duration (Appendix A).

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB EMFAC model mobile source emission model version 2021. EMFAC2021 reflects the revocation of the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule.²⁶ The specific parameters used to estimate fuel usage are included in Appendix A. In total, the proposed project is estimated to generate 486,701 VMT and a combined 36,431 gallons of gasoline and diesel for vehicle travel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Singlewide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 37,841 kilowatt-hours (kWh) during the roughly 39-month construction period (Appendix A).

The proposed project's construction is not anticipated to result in unusually high energy use. As noted in the previous certified EIR and Addendum, construction of the proposed project would be required to implement General Plan policies that would reduce energy consumption. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. Similarly, compliance with State regulations would limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. Additionally, the overall construction schedule and process is already designed to be efficient to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Further, redevelopment of this area has been long planned by the City and responds to a need for housing, the construction of which would occur elsewhere (and perhaps in an area farther from jobs) if not here. Therefore, consistent with the findings of the previous certified EIR, construction of the proposed project would not result in wasteful, inefficient, and unnecessary energy consumption.

Operation

The proposed project would be considered to result in a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. The

²⁶ California Air Resource Board (ARB). Availability of CARB's EMFAC2021 (v1.0.2) Model. Website: <https://content.govdelivery.com/accounts/CARB/bulletins/314a532>. Accessed August 31, 2023.

project's proposed land uses would be constructed according to the most recent California Building Code and Title 24 Building Energy Efficiency standards, which are more energy efficient than the code in place when the previous certified EIR and Addendum was prepared. Moreover, the proposed project would include an all-electric design that would incorporate rooftop photovoltaic solar panels on all residential homes and buildings on-site, which would further reduce the amount of operational electricity required from the grid that the proposed project would consume and eliminate the demand for natural gas. The proposed project would consume approximately 910,911 kWh per year, without the inclusion of solar power generated electricity, compared to a total estimated 12.7 million kWh of electricity consumed per year for residential land uses within the Specific Plan area, and 123,415 gallons of fuel from all operational activities. Further, as noted in Section XVII, Transportation, of this Addendum, the proposed project would remove the existing office uses, which would result in a net decrease of 1,280 daily trips to and from the project site as compared to existing conditions. The decrease in operational vehicle trips would further reduce the amount of project operational energy. Therefore, due to the removal of existing office uses and associated daily vehicle trips, implementation of the proposed project would result in lower energy consumption than existing conditions. Therefore, the proposed project would not result in any new or more severe impacts related to energy consumption beyond what was analyzed in the previous certified EIR and Addendum.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that construction and operation would result in energy consumption. However, the previous certified EIR and Addendum found that all development would be designed and constructed pursuant to the CBC and the Title 24 Energy Efficiency Standards, which the City would review compliance when specific building plans are submitted. Therefore, the previous certified EIR and Addendum concluded that the Specific Plan would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

Implementation of the proposed project would include less development than is allowed by buildout under the existing Specific Plan and would therefore result in less energy consumption than was previously anticipated from construction and operation, which includes construction equipment and worker vehicle trips, as well as operations from vehicular traffic, building energy demand, and water and wastewater conveyance.

The construction and operation of the proposed project would be required to comply with General Plan policies and goals related to energy efficiency. The project's proposed land uses would be constructed according to the most recent CBC and Title 24 Building Energy Efficiency standards, which are the most energy efficient, and require energy efficiency design features such as low-flow appliances and fixtures, low energy demand lighting, and drought tolerant landscaping. Further, as noted in Section XVII, Transportation, of this Addendum, the proposed project would remove the existing office uses, which would result in a net decrease of 1,280

daily trips to and from the project site as compared to existing conditions. The decrease in operational vehicle trips would further reduce the amount of project operational energy consumption. Therefore, due to the removal of existing office uses and associated daily vehicle trips, implementation of the proposed project would result in lower energy consumption than existing conditions. Moreover, the proposed project would include an all-electric design that would incorporate rooftop photovoltaic solar panels on all residential homes and buildings on-site, which would further reduce the amount of operational electricity that the proposed project would consume from the grid as well as eliminate the need for natural gas. Furthermore, the proposed project would include EV charging infrastructure consistent with the most recent California Green Building Standards Code (CALgreen) that would allow for future residents to install EV charging stations that meet the needs of their personal vehicles. Therefore, the proposed project would not result in any new or substantially more severe impacts related to conflicts with or obstructions of a State or local plan for renewable energy or energy efficiency.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to energy. The conclusions from the previous certified EIR and Addendum regarding energy resources remain unchanged.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VII. Geology, Seismicity, and Soils <i>Would the project:</i>					
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.	Less than significant impact with mitigation incorporated.	No	No	No	MM GEO-1b
ii) Strong seismic ground shaking?	Less than significant impact with mitigation incorporated.	No	No	No	MM GEO-1b
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact with mitigation incorporated.	No	No	No	MM GEO-1b
iv) Landslides?	Less than significant impact with mitigation incorporated.	No	No	No	MM GEO-1b
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant impact with mitigation incorporated.	No	No	No	MM HYD-1a and MM HYD-1b
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project,	Less than significant impact with mitigation incorporated.	No	No	No	MM GEO-1b

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?					
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than significant impact with mitigation incorporated.	No	No	No	MM GEO-1b
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No impact.	No	No	No	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant impact with mitigation incorporated.	No	No	No	MM CUL-3

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

As discussed more fully below, the previous certified EIR and Addendum concluded that development and land use activities contemplated by the Specific Plan may expose people or structures to potential substantial adverse effects associated with seismic hazards, such as fault rupture, strong ground shaking, and seismic-related ground failure or liquefaction.

Fault Rupture

The previous certified EIR and Addendum determined that the Specific Plan area does not contain an Alquist-Priolo Earthquake Fault Zone. However, an Alquist-Priolo Earthquake Fault Zone associated with the Calaveras Fault is present less than 0.5 mile to the west of the Specific Plan boundary. In addition, a splay of the Calaveras Fault may extend into the western edge of the Specific Plan boundaries near the Crow Canyon Road interchange; however, this feature is not assigned an Alquist-Priolo Earthquake Fault Zone designation. Nonetheless,

further investigation of fault rupture may be warranted for properties located near I-680. The previous certified EIR and Addendum concluded that impacts would be less than significant with incorporation of MM GEO-1a, which requires development within 500 feet of I-680 to prepare a fault investigation study, and, if warranted, identify appropriate setbacks pursuant to the Alquist-Priolo Earthquake Fault Zoning Act. This measure provides certainty that the development within the Specific Plan area would not be at risk from fault rupture.

Seismic Ground Shaking

The previous certified EIR and Addendum determined that a major seismic event on one of the faults listed in Table 3.5-1 of the previous certified EIR and Addendum may result in strong ground shaking within the Specific Plan area and that development must, therefore, meet the applicable seismic design standards of the CBC. The previous certified EIR and Addendum concluded that impacts would be less than significant through compliance with the seismic design standards of the CBC and with implementation of MM GEO-1b, which requires a design-level geotechnical study.

Seismic-related Ground Failure

The previous certified EIR and Addendum determined that the potential for liquefaction within the Specific Plan area is moderate and that compliance with the CBC seismic design standards and implementation of MM GEO-1b, which requires a design-level geotechnical study to analyze the potential for ground failure, impacts would be less than significant.

Landslides and Slope Failure

The previous certified EIR and Addendum determined that because the Specific Plan area is generally characterized by flat relief with slopes of less than 5 percent, the Specific Plan area is not at risk of earthquake-induced land sliding. Therefore, impacts were found to be less than significant.

Iron Horse Village Project Analysis and Conclusions

A Preliminary Geotechnical Exploration was prepared by ENGEO for the proposed project dated April 4, 2022, and included in Appendix D of this document. The Geotechnical Exploration concluded that there are no major geotechnical issues that would preclude development of the site as proposed. The primary geotechnical issues affecting the proposed development would be: (1) the presence of moderately to highly expansive near-surface soil and (2) the presence of variable thickness of select fill across the site. The project site is located in a seismically active region as is all of the San Francisco Bay Area. The Preliminary Geotechnical Exploration found that a trace of the Pleasanton Fault runs across the northeast corner of the proposed project site. However, the Fault Evaluation Report concluded that there is no evidence to suggest that the Pleasanton Fault is active or producing surface fault rupture across the proposed project site. Consistent with MM GEO-1b, the Preliminary Geotechnical Exploration included preliminary conclusions and recommendations to address expansive soil, foundations and settlement, seismic design, grading and excavation considerations, soil corrosivity, and additional recommendations based on the design-level geotechnical report. As

required by MM GEO-1b, all recommendations will be incorporated into the project design and grading/building plans to ensure that appropriate grading and construction methods are implemented to address any site-specific conditions.

Fault Rupture

Historically, ground surface displacements closely follow the trace of geologically young faults. The project site is not within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act. However, mapping of Quaternary Faults by USGS shows a trace of the Pleasanton Fault across the northeast corner of the proposed project site. However, the Fault Evaluation Report from ENGEO found no evidence to suggest that the Pleasanton Fault is active or producing surface fault rupture across the proposed project site. Therefore, the risk of fault offset at the site from a known active fault is very low. In a seismically active area, the remote possibility exists for future faulting in areas where no faults previously existed; however, the risk of surface faulting and consequent secondary ground failure from previously unknown faults is also very low. Therefore, the proposed project would not introduce new impacts or create substantially more severe impacts related to fault rupture than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Seismic Ground Shaking

Major active faults in the area are the Calaveras Fault, Mount Diablo Thrust, and Hayward Fault. The nearest major fault to the project site is the Calaveras Fault, which is capable of producing a 7.43 moment magnitude earthquake. Therefore, the seismicity of the project site is governed by the activity of the Calaveras Fault, although ground shaking from future earthquakes on other faults, including the Diablo Thrust and Hayward Fault, could also be felt at the site. Additionally, a trace of the Pleasanton Fault runs across the northeast portion of the project site. However, the Preliminary Geotechnical Exploration found no evidence to suggest that the Pleasanton Fault is active. The intensity of earthquake ground motion at the site would depend upon the characteristics of the generating fault, distance to the earthquake epicenter, and magnitude and duration of the earthquake. Strong to very strong ground shaking could occur at the site during a large earthquake on one of the nearby faults. Consistent with the conclusions of the previous certified EIR and Addendum, implementation of the CBC seismic design standards and MM GEO-1b, which requires a design-level geotechnical study and incorporation of all construction-related recommendations to address site-specific conditions, would reduce potential impacts to less than significant. Therefore, the proposed project would not introduce new impacts or create substantially more severe impacts related to ground shaking than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Seismic-Related Ground Failure

The Preliminary Geotechnical Exploration indicated that there are thin soil layers considered to have liquefaction potential (Appendix D). Additionally, the project site is located in a zone of moderate liquefaction potential. However, where evaluated, the potentially liquefiable layers are relatively thin (less than 2 feet thick), so the potential for surface manifestation of the liquefaction is very low. The Preliminary Geotechnical Exploration concluded that because of

the relatively flat site grades and the absence of a free face in the site topography, as well as the relative thickness of the potentially liquefiable layers, the risk of lateral spreading is very low. The Preliminary Geotechnical Exploration did not determine the extent of existing non-engineered fill on the project site, but it did anticipate that existing fill may be encountered in the upper 2 to 3 feet across the project site. The Preliminary Geotechnical Exploration explained that a portion of any consolidation-induced settlement would occur during construction, but the remaining differential consolidation-induced settlement could be accommodated in the structural foundation design. Consistent with the conclusions of the previous certified EIR and Addendum, implementation of the CBC seismic design standards and MM GEO-1b, which requires a design-level geotechnical study and incorporation of all construction-related recommendations to address site-specific conditions, would reduce potential impacts to less than significant. Therefore, the proposed project would not introduce new impacts or create substantially more severe impacts related to seismic-related ground failure than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Landslides and Slope Failure

The Preliminary Geotechnical Exploration did not make any specific conclusions regarding landslides and slope failures. Landslides can be initiated in slopes already on the verge of movement by changes in groundwater, as well as in combination with a number of other geologic factors. Because the project site is relatively flat, the potential for ground surface settlement resulting from landslides and slope failures is low. The proposed project would not introduce new impacts or create more severe impacts related to seismic-related landslides and slope failure than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan have the potential to result in soil erosion or the loss of topsoil. Construction activities, including grading and excavation, would result in the potential for surface water to carry sediment from on-site erosion into the stormwater system and local waterways. Soil erosion may also occur during construction in areas where temporary soil storage is required. Construction activities within the Specific Plan area would be required to comply with the City Code requirements pertaining to grading and excavation and the National Pollutant Discharge Elimination System (NPDES) Phase II stormwater permitting program which requires the reparation and implementation of a SWPPP for construction activities greater than 1 acre. The SWPPP must identify potential sources of erosion or sedimentation that may be reasonably expected to affect the quality of stormwater discharges as well as identify and implement BMPs that ensure the reduction of these pollutants during stormwater discharges. Typical BMPs intended to control erosion include sandbags, detention basin, silt fencing, landscaping, hydroseeding, storm drain inlet protection, street sweeping, and monitoring of water bodies. Once completed, development projects within the Specific Plan a would be required to implement long-term pollution prevention measures. The previous certified EIR

and Addendum concluded that construction-related erosion impacts would be less than significant with implementation of MM HYD-1a and MM HYD-1b, which require a SWPPP and BMPs to prevent stormwater pollution from construction sources.

Iron Horse Village Project Analysis and Conclusions

Construction activities required by the proposed project would require grading and excavation, which could result in the potential for surface water to carry sediment from on-site erosion into the stormwater system and local waterways. Soil erosion may also occur during construction in areas where temporary soil storage is required. As discussed in the previous certified EIR and Addendum, the proposed project would be required to comply with the City Code requirements pertaining to grading and excavation and the NPDES permitting program. Therefore, the proposed project would be required to prepare and implement a SWPPP that incorporates BMPs to prevent stormwater pollution from construction sources as described in MM HYD-1a and MM HYD-1b. The proposed project would not introduce new impacts or create substantially more severe impacts related to the erosion of topsoil than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan may expose persons or property to hazards associated with unstable geologic units or soils. The Specific Plan area contains soils potentially susceptible to liquefaction and land sliding as a result of underlying geologic conditions. Future development as envisioned in the Specific Plan is required to comply with building code requirements to mitigate and minimize liquefaction and landslide hazards. With implementation of MM GEO-1b, which requires a geotechnical study with preventive measures for liquefaction and landslide, impacts were found to be less than significant.

Iron Horse Village Project Analysis and Conclusions

As discussed previously, the Preliminary Geotechnical Exploration concluded that the project site is relatively flat and the potentially liquefiable soil layers encountered during the consultation are relatively thin. Therefore, the potential for liquefaction, as well as landslides, would be very low. The proposed project would be required to implement MM GEO-1b identified in the previous certified EIR and Addendum, which requires a design-level geotechnical study and incorporation of all construction-related recommendations to address site-specific conditions. Resulting impacts would be reduced to less than significant, similar to the conclusions of the previous certified EIR and Addendum. The proposed project would not introduce new impacts or create substantially more severe impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapse than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan may result in unacceptable risks associated with expansive soils. The Specific Plan area contains four soil types, all of which exhibit shrink-swell characteristics consistent with expansive soils. The previous certified EIR and Addendum concluded that implementation of MM GEO-1b would determine the presence of expansive soils and indicate where further grading, excavation, and soil engineering should be performed. The previous certified EIR and Addendum concluded that impacts related to expansive soils would be less than significant with implementation of MM GEO-1b.

Iron Horse Village Project Analysis and Conclusions

Preliminary data from fault trenching at the proposed project site suggests that high plasticity clays may be present underlying the existing fill. The Preliminary Geotechnical Exploration found that selective grading or blending would be necessary to create relatively low expansion potential surface conditions to mitigate potential damage from expansive soil (Appendix D). Selective grading typically involves careful planning of cut and fill, along with blending and disking to mix soil types. These grading methods would create low expansion soil conditions. Any recommendations from the design-level study are required to be implemented according to MM GEO-1b. Resulting impacts would be reduced to less than significant, similar to the conclusions of the previous certified EIR and Addendum. The proposed project would not introduce new impacts or create substantially more severe impacts related to expansive soils than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

e) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum determined that there would be no impacts related to septic systems or other alternative wastewater disposal systems, since the area receives sewer service by the Central San. No septic or alternative wastewater disposal systems exist within the plan boundaries, and none would be installed as a result of development within the Specific Plan area. No impact would occur.

Iron Horse Village Project Analysis and Conclusions

The proposed project would also use sewer services provided by Central San. The proposed project does not propose the use of septic tank systems. Therefore, the proposed project would not introduce septic tank or alternative wastewater system impacts or create substantially more severe septic tank or alternative wastewater system impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

f) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan could potentially damage or destroy previously undiscovered paleontological resources. The Specific Plan boundaries contain mostly urban,

built-up land uses that were previously graded, and soil engineered to support urban development, indicating that any fossils that may have been present have likely already been removed. Nonetheless, the previous certified EIR and Addendum acknowledged that subsurface excavation beyond previously disturbed soils could potentially damage or destroy previously undiscovered paleontological resources. The previous certified EIR and Addendum concluded that impacts would be less than significant with implementation of MM CUL-3, which requires a qualified Paleontological Monitor to be retained prior to initiation of excavation procedures.

Iron Horse Village Project Analysis and Conclusions

Similar to the conclusions of the previous certified EIR and Addendum, the proposed project site contains existing urban land uses, although subsurface excavation beyond previously disturbed soil could impact undiscovered paleontological resources. Therefore, the proposed project would be required to implement MM CUL-3, which requires a qualified Paleontological Monitor to be retained prior to initiation of deep excavation procedures. Therefore, the proposed project would not introduce new environmental impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

- MM CUL-3** Prior to initiation of deep excavation procedures at depths greater than 10 feet, a qualified Paleontological Monitor shall be retained to conduct an on-site monitoring program to ensure protection of previously unknown paleontological specimens. In the event a fossil is discovered during construction of the proposed project when the Paleontological Monitor is not present, excavation within 100 feet of the find shall be temporarily halted until the discovery is examined by a qualified Paleontologist, in accordance with Society of Vertebrate Paleontology standards. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The Paleontologist shall notify the City and project applicant of the procedures that must be followed before construction is allowed to resume at the location of the find. If the find is determined to be significant and the City determines that avoidance is not feasible, the Paleontologist shall design and carry out a data recovery plan consistent with the Society of Vertebrate Paleontology standards. The plan shall be submitted to the City for review and approval. Upon approval, the plan shall be incorporated into the project.
- MM GEO-1b** Prior to issuance of building permits for new construction on any property within the Specific Plan, the project applicant shall submit a design-level geotechnical study and building plans to the City of San Ramon for review and approval. The building plans shall demonstrate that they incorporate all applicable recommendations of the design-level geotechnical study and comply with all applicable requirements of the most recent version of the California Building Standards Code (CBC). A licensed

Professional Engineer shall prepare the plans, including those that pertain to soil engineering and structural foundations. The approved plans shall be incorporated into the proposed project. All on-site soil engineering activities shall be conducted under the supervision of a licensed Geotechnical Engineer or Certified Engineering Geologist.

MM HYD-1a Prior to the issuance of grading permits for areas larger than 1 acre within the Specific Plan area, the project applicant shall prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) and Grading Plan to the City of San Ramon that identify specific actions and Best Management Practices (BMPs) to prevent stormwater pollution from construction sources. The plans shall identify a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The applicant shall include conditions in construction contracts requiring the plans to be implemented and shall have the ability to enforce the requirement through fines and other penalties. The plans shall incorporate control measures in the following categories:

- Soil stabilization practices
- Dewatering practices (if necessary)
- Sediment and runoff control practices
- Monitoring protocols
- Waste management and disposal control practices

Once approved by the City, the applicant's contractor shall be responsible throughout the duration of the project for installing, constructing, inspecting, and maintaining the control measures included in the SWPPP and Grading Plan.

MM HYD-1b The City shall ensure that Storm Water Pollution Prevention Plans (SWPPPs) for projects within the Specific Plan area identify pollutant sources that could affect the quality of stormwater discharges from the construction site. Control practices shall include those that effectively treat target pollutants in stormwater discharges anticipated from project construction sites. To protect receiving water quality, the SWPPP shall include but not be limited to the following elements:

- Temporary erosion control measures (such as fiber rolls, staked straw bales, detention basins, temporary inlet protection, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) shall be employed for disturbed areas.
- No disturbed surfaces will be left without erosion control measures in place during the winter and spring months.
- Sediment shall be retained on-site by a system of sediment basins, traps, or other appropriate measures. Of critical importance is the protection of existing catch basins that drain to San Ramon Creek.
- The construction contractor shall prepare Standard Operating Procedures for the handling of hazardous materials on the construction site to eliminate or reduce discharge of materials to storm drains.

- BMP performance and effectiveness shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination (inadvertent petroleum release), is required by the Regional Water Quality Control Board (RWQCB) to determine adequacy of the measure.
- In the event of significant construction delays or delays in final landscape installation, native grasses or other appropriate vegetative cover shall be established on the construction site as soon as possible after disturbance, as an interim erosion control measure throughout the wet season.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to geology, seismicity, and soils. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VIII. Greenhouse Gas Emissions <i>Would the project:</i>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant impact.	No	No	No	None
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development under the Specific Plan was anticipated in the City's Climate Action Plan (CAP) and would contribute to the City's ability to achieve its emission reduction goals, because of the infill, higher density, mixed-use, transit-oriented, pedestrian-oriented, and compact development design characteristics. The previous certified EIR and Addendum concluded that the proposed project would generate an estimated 58,405 metric tons (MT) of carbon dioxide equivalent (CO₂e) which would be a reduction of 50.4 percent compared to the 2008 baseline. Therefore, the previous certified EIR and Addendum determined that the proposed project meets the AB 32 reduction target of 1990 emission levels, expressed as a 15 percent reduction from the 2008 baseline, by 2020 and impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

Both construction and operational activities have the potential to generate GHG emissions. The proposed project would generate GHG emissions during temporary (short-term) construction activities such as demolition, site preparation and grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the project site, asphalt paving, and construction worker motor vehicle trips.

Long-term, operational GHG emissions from the proposed project would result in GHG emissions from vehicular traffic, operation of landscaping equipment, off-site generation of electrical power, energy required to convey water to and wastewater from the project site,

emissions associated with the hauling and disposal of solid waste from the project site, and any fugitive refrigerants from air conditioning or refrigerators.

The BAAQMD updated their GHG thresholds for land use development projects on April 22, 2022, and are included in the most recent 2022 CEQA Guidelines Update. A project would not result in significant impacts if it achieves either threshold A or B:

- A. Projects must include, at a minimum, the following project design elements:
- Buildings
 - The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
 - Transportation
 - Achieve a reduction in project-generated VMT 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:
 - Residential projects: 15 percent below the existing VMT per capita
 - Office projects: 15 percent below the existing VMT per employee
 - Retail projects: no net increase in existing VMT
 - Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALgreen Tier 2.
- B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

As described in the BAAQMD Thresholds of Significance Justification Report, these new thresholds are intended to ensure every new development project contributes its “fair share” of what will be required to achieve California’s long-term 2045 climate goals.²⁷ This analysis evaluates project consistency with Criterion A.

Criterion A

Natural Gas Prohibition Provision

The first provision requires that the proposed project not include natural gas plumbing and instead relies on electricity as the primary building energy source. As noted in the Project Description of this document and based on project applicant provided information, the proposed project would be designed as all-electric, would include rooftop solar panels on all townhomes and single-family residences, and would not include natural gas utilities or

²⁷ Bay Area Air Quality Management District (BAAQMD). 2022. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed May 16, 2023.

hookups. As such, the proposed project would be compliant with this provision under Criterion A.

Wasteful, Inefficient, or Unnecessary Energy Consumption Provision

Section VI Energy describes that the proposed project would not result in any wasteful, inefficient, or unnecessary energy usage during either construction or operation due to compliance with existing State and local regulations, such as Title 24, and the project design features that utilize rooftop solar, low water demand, drought tolerant landscaping, and EV charging utilities within each garage. Title 24 Building Energy Efficiency standards, widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Furthermore, the proposed project would represent an infill development in an already urbanized area that would provide convenient access to the Iron Horse Trail, I-680, and nearby commercial uses, thus reducing wasteful vehicle trips. Moreover, the proposed project would include direct access via new paved paths to the Iron Horse Trail, which would allow for future residents to easily access this multiuse trail and provide the option to bicycle or walk rather than using a passenger vehicle. Therefore, the proposed project would be consistent with this provision under Criterion A.

Electric Vehicle Charging Infrastructure Provision

The proposed project would comply with EV requirements in the most recently adopted version of CALgreen Building Energy Efficiency Standards, Tier 2, because every residential unit will include EV ready infrastructure and listed raceways for a dedicated circuit and an installed charger. As a result, the proposed project would include the appropriate EV charging infrastructure within each private garage and carport sufficient for all dwelling units. Therefore, the proposed project would be consistent with this provision under Criterion A.

Vehicle Miles Traveled Provision

As described in Section XVII, Transportation, of this document, the TIS for the proposed project evaluated project-related VMT as outlined in the adopted CCTA VMT methodology. The TIS calculated trip lengths for two different types of trips: work trips and residential trips. For work trips, the average trip length is 10.8 miles, whereas the residential trip length average is shorter at 6.73 miles. The existing general office generates 2,300 trips daily, which when multiplied by the average work trip length of 10.8 equals a total VMT of 24,840. The proposed project would generate 1,020 trips daily, which when multiplied by the average residential trip length of 6.73 miles results in a total VMT of 6,865. Therefore, the proposed project generates fewer total VMT than the existing office uses. As a result, the proposed project would meet a locally adopted SB 743 VMT target for residential projects. Therefore, the proposed project would meet the criteria shown under threshold A. Therefore, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

The proposed project construction and operational GHG emissions are presented for informational purposes and no longer determine a project's impact significance. The previous

certified EIR and Addendum concluded that the Specific Plan development would generate an estimated 58,405 MT of CO₂e.

Project Construction

The proposed project would emit GHG emissions during construction from off-road equipment, worker vehicles, and material delivery and/or hauling. Detailed construction assumptions are provided in Appendix A. Total GHG emissions generated during all phases of construction were combined and are presented in Table 11.

Table 11: Construction Greenhouse Gas Emissions

Construction Year	MT CO ₂ e per year ¹
2024	546
2025	257
2026	396
2027	130
Total Construction Emissions	1,329
Notes: MT CO ₂ e = metric tons of carbon dioxide equivalent ¹ Emissions are rounded to the nearest whole number. Source: CalEEMod Output (Appendix A).	

As shown in Table 11, construction of the proposed project is estimated to generate approximately 1,329 MT CO₂e over the entire project construction duration.

Project Operation

Operational or long-term emissions occur over the life of a project and are summarized in Table 12. The major sources for operational GHG emissions include:

- **Area Sources:** Area-source GHG emissions usually refer to wood-burning or natural gas hearths and landscape maintenance equipment. In this analysis, area-source GHG emissions are mainly generated by landscape maintenance equipment.
- **Motor Vehicles:** These emissions refer to exhaust related GHG emissions from the cars and trucks that would travel to and from the project landscape maintenance equipment site. Vehicle trips associated with project operations would primarily include residents traveling to and from the proposed townhomes and single-family homes. Trip generation rates used in estimating mobile source emissions were consistent with those presented in the traffic analysis prepared for the project by TJKM.²⁸ The combined trip generation potential is estimated to result in an average of 220 trips per day.

²⁸ TJKM. 2022. Final Focused Traffic Study for the Iron Horse Village Project. October 17.

- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the proposed project. PG&E is a utility providing electricity and natural gas service to the City of San Ramon. Additionally, the proposed project would include a solar photovoltaic system on the roof that would generate on-site renewable energy.
- **Water Transport:** These emissions refer to those associated with the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

Table 12: Operational GHG Emissions

Source	MT CO ₂ e per year ¹
Area	2
Water	9
Waste	26
Mobile	1,135
Energy	55
Refrigerants	1
Total Operational Emissions	1,228
Notes: MT CO ₂ e = metric tons of carbon dioxide equivalent ¹ Emissions are rounded to the nearest whole number. Source: CalEEMod Output (Appendix A).	

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development under the Specific Plan was anticipated in the CAP and would contribute to the City's ability to achieve its emission reduction goals, because of the infill, higher density, mixed-use, transit-oriented, pedestrian-oriented, and compact development design characteristics. The previous certified EIR and Addendum concluded that the proposed project would generate an estimated 58,405 MT CO₂e, which would be a reduction of 50.4 percent compared to the 2008 baseline. Therefore, the previous certified EIR and Addendum determined that the proposed project meets the AB 32 reduction target of 1990 emission levels, expressed as a 15 percent reduction from the 2008 baseline, by 2020 and impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The CAP was published on August 23, 2011, and was developed in order to determine whether General Plan 2030 would not conflict with implementation of AB 32 GHG emission reduction goals. Subsequently, the year 2020 and associated goals with meeting AB 32 have since passed.

Although the CAP has not been updated since more recent climate legislation has been adopted, such as SB 32, that would require California to achieve carbon neutrality by 2045, the CAP is still the most applicable GHG reduction plan relevant to the proposed project.²⁹ The CAP is not being used for CEQA streamlining purposes and outlines the General Plan policies that would decrease GHG emissions from new development as well includes implementation measures for all new development to abide by in order to ensure the City contributes its fair share of GHG emission reductions toward State goals. Table 13 summarizes the proposed project’s consistency with CAP implementation strategies.

Table 13: Project Consistency with City of San Ramon CAP

CAP Implementation Strategy	Project Consistency
ADAPT-1: New projects shall assess the significance of increased wildfires, decreased water supply, changes in agriculture, increased flooding, and any other potential impacts from climate change in California Environmental Quality Act documents.	Consistent. As described throughout this document and in Sections II, X, XV, and XIX, this Addendum evaluates the proposed project’s impacts related to wildfires, water supply, changes in agriculture, flooding, and other potential impacts from climate change consistent with CEQA requirements.
ADAPT-2: Create an outreach and/or rebate program that encourages businesses and residents to construct graywater and rainwater collection systems on their properties. A minimum of one City employee should have appropriate training regarding these systems to help interested parties develop systems (see City of Santa Rosa for example).	Not Applicable. This strategy would be implemented by the City of San Ramon and not individual development projects.
ADAPT-3: Developers shall provide an assessment of a project’s potential impacts on the local and subregional storm drainage systems, so that the City can determine appropriate mitigation to ensure that system capacity and peak flow restrictions are not exceeded.	Consistent. This Addendum evaluates the proposed project’s potential impacts on storm drainage and flooding in Section X – Hydrology and Water Quality. As described in Section X, the proposed project would not result in new or more significant impacts as evaluated in the previous certified EIR and Addendum.
ADAPT-4: To reduce flood peaks, reduce sedimentation, temporarily store floodwaters, recharge aquifers and restore environmental flows, flood management should be integrated with watershed management on open space, agricultural, wildlife areas, and other low-density lands.	Not Applicable. The proposed project would not be a watershed management, open space, agricultural, or wildlife area project and would be located in an urban area surrounded by similar urban uses.
ADAPT-5: Low impact development techniques should be used in new development to infiltrate and store runoff.	Consistent. This Addendum evaluates the proposed project’s potential impacts on storm drainage and flooding in Section X –Hydrology and Water Quality. As described in Section X, the proposed project would include low impact design features specifically for project site generated stormwater and not result in new or more significant impacts as evaluated in the previous certified EIR and Addendum.

²⁹ City of San Ramon. 2023. Qualified Greenhouse Gas Reduction Strategy. Website: https://www.sanramon.ca.gov/our_city/departments_and_divisions/community_development/planning_services/general_plan/climate_action_plan. Accessed: May 16, 2023.

CAP Implementation Strategy	Project Consistency
Source: City of San Ramon CAP. August 23, 2011. Website: https://www.sanramon.ca.gov/our_city/departments_and_divisions/community_development/planning_services/general_plan/climate_action_plan . Accessed June 6, 2023.	

As shown in Table 13, the proposed project would be consistent with all CAP implementation strategies. Similar to what was analyzed in the previous certified EIR and Addendum, the proposed project would result in a net decrease in GHG emissions compared with existing land use, due to its higher density, pedestrian-oriented, and compact development design characteristics. The proposed project constitutes infill development as it would redevelop the project site from existing office uses to residential uses. In addition, the previous certified EIR and Addendum determined that implementation of the Specific Plan would contribute to GHG emission reduction goals envisioned in the CAP, which considers vehicle traffic to be a major source of GHG emissions from the envisioned land use development. As previously analyzed, the proposed project would result in a net decrease in GHG emissions from existing land uses, principally from a net decrease of 1,280 daily vehicle trips as compared to existing office land uses. As a result, the proposed project's GHG emissions fall within the emission budgets contemplated in the previous certified EIR and Addendum and CAP.

Additionally, the proposed project would utilize all-electric design and rooftop solar photovoltaic panels as renewable energy sources. Therefore, the proposed project is consistent with the latest scoping plan's recommendations.³⁰

As discussed above, the proposed project would not result in any new or substantially more severe impacts related to GHG emissions beyond what was analyzed in the previous certified EIR and Addendum.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to GHG emissions. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

³⁰ California Air Resource Board (ARB). 2022. Final 2022 Scoping Plan Update.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IX. Hazards and Hazardous Materials <i>Would the project:</i>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant impact.	No	No	No	None
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant impact.	No	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No impact.	No	No	No	None
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant impact with mitigation incorporated.	No	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result	No impact.	No	No	No	None

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
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?	Less than significant impact.	No	No	No	None
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	No impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that the Specific Plan area contains numerous reported users of hazardous materials. Generally, nearly all users handle, store, and dispose of hazardous materials in accordance with federal and State regulations such that public safety is not exposed to undue risk. Buildout of the Specific Plan would facilitate the redevelopment of the plan boundaries to support higher density mixed uses. Project construction may involve the use and transport of hazardous materials. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, State, and local regulations to ensure that human health and the environment are not exposed to hazardous materials.

The previous certified EIR and Addendum determined that the commercial, office, and residential uses envisioned by the Specific Plan would not be large-quantity users of hazardous materials. Small quantities of hazardous materials would likely be used within the Specific Plan area by individual businesses, including cleaning solvents (e.g., degreasers, paint thinners, and aerosol propellants), paints (both latex- and oil-based), acids and bases (such as many cleaners), disinfectants, and fertilizers. The use of such substances must occur in compliance with applicable storage, handling, usage, and disposal requirements. The potential risks posed by the use and storage of these hazardous materials are primarily limited to the immediate vicinity of the materials. Transportation of these materials would be performed by commercial

vendors who would be required to comply with various federal and State laws regarding hazardous waste transportation. As such, they are not expected to expose human health or the environment to undue risks associated with their use. Businesses that store or intend to store 55 gallons of hazardous materials as liquid, 500 pounds of hazardous materials as solids, or 200 cubic feet of hazardous materials as gas on-site within the Specific Plan area are required to submit a Hazardous Materials Business Plan to the Contra Costa Health Services Hazardous Materials Program. Furthermore, compliance with the Certified Unified Program Agency (CUPA) program is required as part of building permit and fire clearance review for proposed uses within the Specific Plan boundaries. Additionally, the previous certified EIR and Addendum required implementation of MM HAZ-2a, which requires a Phase I Environmental Site Assessment (Phase I ESA) and the incorporation of recommendations into development plans. Therefore, the previous certified EIR and Addendum found that impacts regarding the routine transport, use, or disposal of hazardous materials would be less than significant.

Iron Horse Village Project Analysis and Conclusions

Construction activities associated with the proposed project could include the use of limited quantities of hazardous substances. Consistent with the previous certified EIR and , transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, State, and local regulations to ensure that human health and the environment are not exposed to hazardous materials. As further described in Impact IX(d), a Phase I ESA was conducted for the project site (Appendix E). The results of the Phase I ESA identified that several commercial businesses at the project site have stored and or handled potentially hazardous materials. However, the Phase I ESA did not identify any Recognized Environmental Conditions (RECs) indicating past, current, or material threats of the release of hazardous materials or petroleum hydrocarbons to soil, groundwater, or surface water on the project site. The proposed project would include the use of small quantities of hazardous materials typical for residential uses, including cleaning solvents, paints, household cleaners, disinfectants, and fertilizers. Additionally, the proposed project would include eight live/work units, which would be nonresidential in nature. These units would not establish a business with characteristics for hazardous materials beyond the typical residential use. The use of such substances must occur in compliance with applicable storage, handling, usage, and disposal requirements. The potential risk would be limited to the immediate vicinity of the materials. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that the commercial, office, and residential uses envisioned by the Specific Plan would not be large-quantity users of hazardous materials. Small quantities of hazardous materials would likely be used within the plan area by individual businesses, including cleaning solvents (e.g., degreasers, paint thinners, and aerosol propellants), paints (both latex- and oil-based), acids and bases (such as many cleaners), disinfectants, and fertilizers. The use of such substances must occur in compliance with

applicable storage, handling, usage, and disposal requirements. The potential risks posed by the use and storage of these hazardous materials are primarily limited to the immediate vicinity of the materials. Businesses that store or intend to store 55 gallons of hazardous materials as liquid, 500 pounds of hazardous materials as solids, or 200 cubic feet of hazardous materials as gas on-site within the Specific Plan area would be required to submit a Hazardous Materials Business Plan to the Contra Costa Health Services Hazardous Materials Program. Furthermore, compliance with the CUPA program is required as part of building permit and fire clearance review for proposed uses within the plan boundaries.

In addition to risk of upset conditions associated with the routine transport, use, or disposal of hazardous materials discussed above, the previous certified EIR and Addendum identified potential risk of upset conditions associated with electromagnetic fields (EMFs) and a jet fuel pipeline.

Regarding EMF, an existing 230-kilovolt PG&E power line is located within the Iron Horse Trail corridor within the Specific Plan area. The line is located within an easement, and the Specific Plan does not contemplate new development within this area. There are no required or recommended buffering distances for residential or nonresidential development from high-voltage power lines. There are numerous local examples of where power lines of similar or higher voltage exist close to residential or nonresidential development without any known adverse effects. Therefore, the previous certified EIR and Addendum concluded that the uses contemplated by the Specific Plan would not be at greater risk for risk of upset associated with EMFs than any other similar land use in the project vicinity.

Regarding the jet fuel line, a 10-inch-diameter, underground, pressurized jet fuel pipeline is located within the Iron Horse Trail corridor. The line is located within an easement where no new development is proposed. Furthermore, there are no required or recommended buffering distances for residential or nonresidential development from pressurized pipelines, and therefore, the previous certified EIR and Addendum concluded that development proposed by the Specific Plan would not be at greater risk for adverse impacts associated with risk of upset from pressurized pipeline. Impacts regarding reasonably foreseeable upset and accident conditions would be less than significant.

Iron Horse Village Project Analysis and Conclusions

As discussed above, there have been businesses at the project site that stored or handled potentially hazardous chemicals. The Phase I ESA recommended that a Soil Management Plan (SMP) be prepared before site redevelopment to outline protocols and procedures in case potentially hazardous materials are encountered during demolition or construction. This was anticipated by the previous certified EIR and Addendum given the age of the buildings to be demolished and soil conditions. No RECs have been identified on the project site. As also stated above, because the proposed project is mostly residential, the use of hazardous materials and substances upon project occupancy would be limited to de minimis amounts of cleaning solvents, fertilizers, pesticides, and other substances used in landscaping. Additionally, the proposed project would include eight live/work units, which would be nonresidential in nature.

These units would not establish a business with characteristics for hazardous materials beyond the typical residential use.

Construction would involve the use and transport of some hazardous materials. However, compliance with roadway safety requirements, material handling requirements, and OSHA requirements ensures that there is no reasonably foreseeable accidental release that could occur. The proposed project would not introduce any new conditions relative to the analysis and conclusions in the previous certified EIR and Addendum related to EMF or pressurized pipelines. There are no required or recommended buffering distances for residential or nonresidential development from high-voltage power lines or jet fuel pipelines. Therefore, the proposed project would not introduce new or create substantially more severe impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that the development and land use activities contemplated by the Specific Plan would not involve large-quantity users or producers of hazardous materials. Therefore, land use and development activities contemplated by the Specific Plan would not expose schools to hazardous materials. No impact would occur.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located in Sub Area F1 within the Specific Plan area analyzed in the previous certified EIR and Addendum, which concluded that the Specific Plan would not involve large-quantity users or producers of hazardous materials, and therefore, would have no impact on schools. The nearest school to the project site is Iron Horse Middle School located approximately 0.25 mile to the east. Additionally, as discussed in Impact IX(c), the proposed project is mostly residential, therefore, the quantity and intensity of hazardous materials and substances after construction would be reduced compared to the current uses and mixed uses proposed under the Specific Plan. Additionally, the proposed project would include eight live/work units, which would be nonresidential in nature. These units would not establish a business with characteristics for hazardous materials beyond the typical residential use. Therefore, the proposed project would not introduce or create new or substantially more severe impacts than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development and activities proposed within the Specific Plan area may be exposed to existing contamination. The previous certified EIR and Addendum noted that a number of land uses within the Specific Plan area currently use or formerly used hazardous materials, but that most of these activities involve infrequent use or small quantities of hazardous materials and do not pose a threat to human

health and the environment; only a few properties have reported spill or leak incidents. Those with reported spills and leaks, specifically, the five sites that contained underground storage tanks (USTs), may present contamination issues during redevelopment of the Specific Plan area if proper remediation actions have not occurred.

As shown on Table 3.6-1 of the Specific Plan Draft EIR, several properties within the Specific Plan boundaries are listed on hazardous materials sites compiled pursuant to Government Code Section 65962.5. Of these properties, the ones of most concern are those with reported spills or leaks, specifically the following properties: Electrotest, San Ramon Unified School District, the Thornally property, the RMC cement plant site, and the Shell Service Station. The first four properties are listed as “Case Closed,” which signifies that all necessary remediation has been completed. Therefore, these sites were not considered risks to public health or safety as disclosed in the previous certified EIR and Addendum. At the time of the previous certified EIR and Addendum was prepared, the remaining site (Shell Service station) was listed as “Active” and remediation efforts were ongoing and were being overseen by the San Francisco Bay RWQCB. This case was closed in August 2014.³¹ However, the previous certified EIR and Addendum noted that remediation associated with this site is independent of the proposed Specific Plan and will continue to occur whether the Specific Plan is adopted or not.

The previous certified EIR and Addendum also discussed other sites of concern identified within or near the Specific Plan area, including the former San Ramon Branch Line, the Aerojet General/Aerojet Facility, and the PG&E Technological and Ecological Services Research Laboratory.

The San Ramon Branch Line railroad formerly occupied the Iron Horse Trail corridor. Residue from hazardous materials is sometimes found in soils surrounding railroad lines. However, railroad activities ceased in the late 1970s and all railroad-related equipment (rails, ties, switches, etc.) was removed. Furthermore, significant disturbance was acknowledged to have occurred within the Iron Horse Trail corridor, including the development of the trail and installation of utilities, landscaping, and fencing since the cessation of railroad activities. The previous certified EIR and Addendum noted that the Iron Horse Trail is approximately 600 feet from the project site and, because of the passage of time and the disturbance that has occurred within the trail corridor, it is unlikely that significant quantities of hazardous materials residue are present. The Aerojet General/Aerotest Facility originally housed atomic research facilities and other uses, including the San Ramon Valley Unified School District maintenance facility, various automotive related uses, fast food, and other retail and service uses. Several uses within the former Aerojet General site are recorded on hazardous materials databases for spills, leaks, and cleanup activities (Electrotest, the San Ramon Valley Unified School District maintenance facility, etc.). Given such past activities, the previous certified EIR and Addendum identified the block bounded by Camino Ramon (west), Fostoria Way (north), Iron Horse Trail (east), and Crow Canyon Road (south) as an area of concern related to hazardous materials. As such, the previous certified EIR and Addendum imposed mitigation that requires a site-specific Phase I ESA to be conducted for any development proposed within this area. The PG&E

³¹ Roux. 2021. Phase I Environmental Site Assessment. Prepared January 5, 2021.

Technological and Ecological Services Research Laboratory is immediately adjacent to the Specific Plan boundaries, northeast of the Crow Canyon Road and Iron Horse Trail intersection; however, the PG&E facility does not share a property line with the proposed project and is located approximately 0.48-mile northeast of the project site. The PG&E facility is listed on several databases, including those pertaining to large-quantity hazardous materials generators and hazardous materials spills and leaks. However, the Specific Plan did not propose any commercial or residential development immediately adjacent to this facility. Additionally, the nearest commercial contemplated by the Specific Plan would be located at least 100 feet from the property line, and the nearest residential uses would be located at least 500 feet from the property line and these uses would be physically separated from the facility by the Iron Horse Trail Corridor and Crow Canyon Road. The previous certified EIR and Addendum concluded that these buffering distances would be adequate to protect development and land use activities associated with the Specific Plan from adverse impacts associated with this facility.

Additionally, a number of structures within the Specific Plan boundaries were identified as potentially containing asbestos and lead-based paint, since the construction of these structures pre-dated the federal bans on asbestos-containing building materials and lead-based paint, which were instituted in the late 1970s. As such, removal of structures that were constructed prior to this time period was identified as having the potential to result in exposure to these materials. The previous certified EIR and Addendum imposed mitigation requiring structures constructed prior to 1978 to be evaluated for the potential presence of asbestos-containing building materials and lead-based paint, and if such materials are determined to be present, the mitigation measure requires proper removal and disposal in accordance with federal and State regulations. Therefore, impacts associated with exposure to hazardous materials were determined to be less than significant with implementation of MM HAZ-2a and MM HAZ-2b.

Iron Horse Village Project Analysis and Conclusions

A Phase I ESA was conducted for the project site by ENGEO Incorporated on March 9, 2022, as directed by MM HAZ-2a included in the Specific Plan (Appendix E). This Phase I ESA was performed to identify any RECs, Controlled Recognized Environmental Conditions (CRECs), and/or Historical Recognized Environmental Conditions (HRECs) at the project site, indicating past, current, or material threats of the release of hazardous materials or petroleum hydrocarbons to the soil, groundwater, or surface water. The Phase I ESA was conducted by investigating past property uses, reviewing the results of a search of environmental databases, reviewing records at relevant government agencies, and performing a reconnaissance of the project site. The Phase I ESA for the project site showed that there were no RECs, CRECs, or HRECs identified at the project site.

The project site is located at 3401 Crow Canyon Road and is currently developed with two large commercial buildings and paved parking areas. The Phase I ESA found no documentation of hazardous materials violations or discharge on the project site. Additionally, it did not identify contaminated facilities within the appropriate American Society for Testing and Materials (ASTM) search distances that would reasonably be expected to impact the proposed project.

The following data gaps were identified in the Phase I ESA:

- Because of access issues, ENGEO could not observe the interior of San Ramon Presbyterian Church. However, this data gap does not affect the conclusions as to the presence or lack of presence of REC at the proposed project.
- As of the preparation of the Phase I ESA, ENGEO had not received a response to our file review request from San Ramon Valley Fire Protection District (SRVFPD). However, this data gap does not affect the conclusions as to the presence or lack of presence of RECs on the project site.

A reconnaissance of the project site was conducted for the Phase I ESA to check for visual evidence of past or present use of storage of hazardous materials that could potentially affect the soil, groundwater quality, and soil vapor of the project site. The reconnaissance concluded that there were no observable hazardous substances or petroleum products within the project site. Therefore, the proposed project would not introduce or create new or substantially more severe impacts than analyzed in the previous certified EIR and Addendum. Nor is there any new information of substantial importance that would require additional environmental review. No additional analysis is required.

e) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that the Specific Plan area does not contain any airports and does not overlap with any airport influence areas. The closest airport to the Specific Plan area is Livermore Municipal Airport, located approximately 9 miles to the southeast. Additionally, the Specific Plan boundaries do not contain any private airstrips. Therefore, land use and development activities contemplated by the Specific Plan would not expose persons residing or working in the Specific Plan area to aviation safety hazards or impact private airstrips. No impact would occur.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be developed in the Sub Area F1 with the Specific Plan area analyzed in the previous certified EIR and Addendum, which concluded that the Specific Plan area does not contain any airports, private airstrips, and does not overlap with any airport influence areas. Therefore, the proposed project would not expose future residents to aviation safety hazards or impact private airstrips. Therefore, the proposed project would not introduce or create new or substantially more severe impacts than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

f) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development proposed by the Specific Plan does not contain any characteristics that would impair or otherwise interfere with emergency response, evacuation, or the policies of the Emergency Operations Plan, and that the Specific Plan is located in an area that currently meets adopted standards for emergency response times for police and fire. Moreover, the Specific Plan includes plans for an additional network of streets that would increase circulation in the area, thereby increasing potential EVA

and evacuation routes. Therefore, the development proposed under the Specific Plan would not impair implementation of or physically interfere with an adopted emergency plan or emergency evacuation plan, and impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The previous certified EIR and Addendum concluded that the Specific Plan is located in an area that currently meets adopted standards for emergency response times for police and fire. The San Ramon Police Department and the San Ramon Valley Fire Protection reviewed the proposed project plans and confirmed that their agencies would continue to meet performance standards identified by the City's General Plan. Additionally, the proposed project does not propose any permanent lane closures or obstructions that could impede emergency response to or from the project site from the surrounding streets. Consistent with the Specific Plan, the proposed project would replace the existing uses at the site with an additional network of streets designed to City standards that would increase circulation in the area, and therefore, increasing potential EVA and evacuation routes. Therefore, the proposed project would not introduce or create new or substantially more severe impacts than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

g) Summary of 2012 North Camino Ramon Specific Plan EIR

The North Camino Ramon Specific Plan EIR determined that the Specific Plan area is mostly developed and completely surrounded by urban uses. The City's General Plan does not identify any areas within the Specific Plan boundaries as having wildland fire risks. Therefore, development of the Specific Plan area would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located fully in Sub Area F1 within the Specific Plan area analyzed in the previous certified EIR and Addendum, which concluded that the Specific Plan area is mostly developed, completely surrounded by urban uses, and there are no wildland fire risk areas identified within the boundaries of the Specific Plan area by the City's General Plan. Therefore, the proposed project would not introduce or create new or substantially more severe impacts than analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to hazards and hazardous materials. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
X. Hydrology and Water Quality <i>Would the project:</i>					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant impact with mitigation incorporated.	No	No	No	MM HYD-1a and MM HYD-1b
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant impact.	No	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than significant impact with mitigation incorporated.	No	No	No	MM HYD-1a and MM HYD-1b
(i) result in substantial erosion or siltation on- or off-site;	Less than significant impact with mitigation incorporated.	No	No	No	MM HYD-1a and MM HYD-1b
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than significant impact.	No	No	No	MM HYD-1a and MM HYD-1b

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than significant impact with mitigation incorporated.	No	No	No	MM HYD-1a and MM HYD-1b
(iv) impede or redirect flood flows?	No impact.	No	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No impact.	No	No	No	None
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	None identified.	No	No	No	MM HYD-1a and MM HYD-1b

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan may violate water quality standards or waste discharge requirements. New development consistent with the Specific Plan may result in construction activities that could have the potential to create polluted runoff that could be conveyed off-site and potentially affect the water quality within local streams. Generally, construction activities and the proposed increase in impervious surfaces could generate pollutants such as increased silts, ground rubber, oils from automobiles, debris, litter, chemicals, dust, and dissolved solids related to grading, excavating, dredging, building construction, and painting.

Development resulting from the Specific Plan is required to abide by General Plan Policies 8.3-I-11, 8.3-I-12, and 8.6-I-6, which require participation in clean water programs, monitoring waterways to prevent degradation, and the continued implementation of the City of San Ramon Stormwater Management Program, respectively. Prior to the commencement of construction grading for any development within the Specific Plan area, the applicant must file

a Notice of Intent to comply with the General NPDES Construction Permit issued to the RWQCB and prepare a SWPPP, which identifies measures that shall be included in the project to minimize and control construction and post-construction runoff to the “maximum extent practicable.” The SWPPP will also be uploaded to the RWQCB. Implementation of MM HYD-1a and MM HYD-1b require that each SWPPP and Grading Plan prepared for a project within the Specific Plan area include measures necessary to minimize water quality impacts during construction. Compliance with these requirements and implementation of these mitigation measures were determined to minimize impacts to a less than significant level.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located within Sub Area F1 within the Specific Plan area. Construction activities could have the potential to create or increase polluted runoff within the Specific Plan area, as analyzed in the previous certified EIR and Addendum. The project proposes an overall reduction in building square footage of approximately 816,000 square feet, as well as a reduction in impervious surfaces compared to what was evaluated and disclosed in the Specific Plan. Reducing impervious surfaces reduces stormwater runoff because more stormwater can percolate into the ground through pervious surfaces. Development of the proposed project would also result in a decrease in impervious surface compared to the existing site conditions.

Consistent with the previous certified EIR and Addendum, compliance with regulatory requirements and implementation of MM HYD-1a and MM HYD-1b would ensure the proposed project is compliant with water quality standards. As stated in the Preliminary Stormwater Management Plan prepared by Carlson, Barbee, and Gibson, Incorporated (CBG) (Appendix F) for the proposed project, the proposed project would be required to treat stormwater runoff, per the Contra Costa County Stormwater C.3 Guidebook, prior to discharge to the storm drain system. The proposed project would implement Integrated Management Practices (IMPs) to comply with the Regional Municipal Stormwater Permit issued by the San Francisco Bay RWQCB. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan would not substantially deplete groundwater supplies, interfere substantially with groundwater recharge, or result in groundwater contamination. Water services for the uses within the Specific Plan would be provided by EBMUD, which obtains the majority of its water from surface water sources and does not rely on groundwater from the San Ramon Valley Groundwater Basin. The previous certified EIR and Addendum concluded that this condition precludes the possibility of the proposed project depleting local groundwater supplies.

Groundwater Recharge

Limited groundwater recharges occur within the Specific Plan area, as it consists of mostly urban, built-up land uses that is served by the City's municipal storm drainage system. The Specific Plan emphasizes Low Impact Development (LID) principles, which include stormwater management practices that employ infiltration and percolation, which contribute to groundwater recharge. Accordingly, impacts related to groundwater recharge would be less than significant.

Groundwater Contamination

Leaking USTs are the primary source of groundwater contamination within the City, and there are five leaking UST sites that exist within the Specific Plan area. Of the five sites, the previous certified EIR and Addendum identified four of the sites as "Closed," signifying that remediation has occurred to the satisfaction of the RWQCB. The remaining site (Shell Service station) was identified as "Active" and the previous certified EIR and Addendum determined that remediation efforts were ongoing under the oversight of the San Francisco Bay RWQCB. The previous certified EIR and Addendum concluded that remediation of contamination associated with this site is independent of the proposed Specific Plan and will continue to occur whether the plan is adopted or not. Therefore, the previous certified EIR and Addendum determined that implementation of the Specific Plan would not interfere with remediation of this site, and impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located in Sub Area F1 within the Specific Plan area that was analyzed in the previous certified EIR and Addendum, which concluded that the Specific Plan would not substantially deplete groundwater supplies, interfere substantially with groundwater recharge, or result in groundwater contamination. Water service is provided to the Specific Plan area by the EBMUD, which does not rely on groundwater. LID principles would contribute to groundwater recharge. Groundwater contamination has either been remediated or is in the process of remediation. Consistent with the Specific Plan, the proposed project would continue to be served with potable water service provided by EBMUD and connect to the 12-inch main along Crow Canyon Road. Furthermore, consistent with LID principles emphasized in the Specific Plan, the proposed project would include six bioretention areas and landscaping which would contribute to groundwater recharge and reduce runoff compared to existing conditions. Also, based on the incremental amount of urban runoff that may be generated from the proposed residential uses and the incorporation of a bioretention area to capture urban runoff, development of the project site would not contribute to groundwater contamination. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan

- i) The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan would not create the potential for substantial soil erosion or siltation on- or off-site as a result of alteration of drainage patterns. Compliance with the City's Stormwater Municipal Regional Permit, which requires LID techniques to minimize and treat stormwater runoff, and compliance with NPDES requirements during construction, was determined to be sufficient to ensure appropriate sediment and erosion control. Therefore, the previous certified EIR and Addendum concluded that impacts would be less than significant.
- ii) The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan would not create the potential for flooding as a result of alteration of drainage patterns. The Specific Plan area is highly developed with a significant footprint of impervious surfaces (buildings, parking lots, and roadways). While the previous certified EIR and Addendum determined that implementation of the Specific Plan would alter development types in the area, it would not increase the quantity of impervious surfaces. While existing drainage patterns may be altered, the previous certified EIR and Addendum determined that stormwater would continue to be directed toward the City's network of storm drains, and that impacts would be less than significant.
- iii) The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan would have the potential to create polluted runoff that could affect water quality. As previously discussed, compliance with General Plan Policies 8.3-I-11, 8.3-I-12, and 8.6-I-6; compliance with the General NPDES Construction Permit; implementation of MM HYD-1a and MM HYD-1b, and implementation of LID techniques, were determined to be sufficient to reduce impacts associated with polluted runoff to a less than significant level. Regarding storm drain capacity, the new drainage infrastructure required by the Specific Plan was found to be appropriately sized and modeled through the existing drainage system to ensure proper sizing to handle stormwater flows. Therefore, impacts on the capacity of the storm drain system were determined to be less than significant.
- iv) The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan would not be located in an area at risk of flooding. The Specific Plan is not located within a 100-year Flood Zone as indicated by Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs). Additionally, the Specific Plan area does not contain any levees or dams, nor are any such facilities located upstream of the Specific Plan area. Therefore, the previous certified EIR and Addendum concluded that no impacts would occur.

Iron Horse Village Project Analysis and Conclusions

- i) The proposed project would be located in Sub Area F1 within the Specific Plan area and would develop 117 residential dwelling units within the 9.5-acre site. The project site is already developed with impervious surfaces. Development of the proposed project would decrease the amount of impervious surface on the site compared to

existing conditions and compared to what was evaluated and disclosed in the previous certified EIR and Addendum as a result of implementation of the Specific Plan. The proposed project would be required to comply with the City's Stormwater Municipal Regional Permit, which requires LID techniques to minimize and treat stormwater runoff, and NPDES requirements during construction, which would minimize erosion or siltation impacts. The proposed project would include six bioretention areas and landscaping that would further minimize erosion and/or siltation impacts. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

- ii) As described above, the proposed project would be located in Sub Area F1 within the Specific Plan area and would develop 117 residential dwelling units within the 9.5-acre site. Consistent with the Specific Plan, the proposed project would remove many of the impervious surfaces, specifically the parking lots, at the project site and would reduce the amount of impervious surfaces overall. According to the Preliminary Stormwater Management Plan and Preliminary Hydrology Calculations prepared by CBG for the project (Appendix F), the post development surface water flows, totaling and estimated 13.54 cubic feet per second (cfs), would be lower than the existing surface water flow (14.05 cfs). The proposed project would be required to comply with the City's Stormwater Municipal Regional Permit, which requires LID techniques to minimize stormwater runoff. The proposed project would also include six bioretention areas and landscaping that would further reduce stormwater runoff. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.
- iii) As described above, the proposed project would be located in Sub Area F1 within the Specific Plan area and would develop 117 residential dwelling units within the 9.5-acre site. According to the Preliminary Stormwater Management Plan and Preliminary Hydrology Calculations, the post development surface water flows, totaling an estimated 13.54 cfs would be lower than the existing surface water flow (14.05 cfs) and would not exceed the capacity of existing stormwater drainage systems. The proposed project would be required to treat stormwater runoff prior to discharge to the storm drain system. The proposed project would implement IMPs as required by Contra Costa County to comply with the Regional Municipal Stormwater Permit issued by the San Francisco Bay RWQCB. In compliance with NPDES permitting requirements, and as described in MM HYD-1a and MM HYD-2a, the proposed project would be required to develop a SWPPP and BMPs to prevent the generation of stormwater pollution from construction sources. According to the Preliminary Stormwater Management Plan and Preliminary Hydrology Calculations, the proposed project would include six bioretention areas throughout the project site. The stormwater runoff would be treated at a bioretention area prior to discharge to the existing 48-inch public

storm drain on Crow Canyon Road. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. The proposed project would produce less stormwater runoff than existing conditions and thus would not create substantial additional sources of polluted runoff. No additional analysis is required.

- iv) The proposed project would be located in Sub Area F1 within the Specific Plan area analyzed in the previous certified EIR and Addendum, which concluded that the project site would not be located in an area at risk of flooding. The proposed project site would not be located within a 100-year Flood Zone as indicated by FEMA FIRMs and does not contain any levees or dams, nor are any such facilities located upstream of the project site. The proposed project would not alter conditions in any way that would increase the risk of flooding to the surrounding area, and instead, would reduce stormwater flows and the velocity of the flow that leaves the project site compared to existing conditions. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum determined that the Specific Plan is not located within a 100-Year Flood Zone as indicated by FEMA FIRMs. Additionally, the Specific Plan area does not contain any levees or dams, nor are any such facilities located upstream of the Specific Plan area. Furthermore, the Specific Plan area does not contain any large bodies of water that would be susceptible to a seiche. The Specific Plan area is approximately 29 miles from the Pacific Ocean, a condition that precludes the possibility of tsunami inundation. The Specific Plan area does not contain and is not located adjacent to areas susceptible to mudflows. Therefore, the previous certified EIR and Addendum determined that land use and development activities contemplated by the Specific Plan would not be exposed to a 100-year flood hazards, hazards associated with flooding from levee or dam failure, or hazards from seiches, tsunamis, or mudflows. The previous certified EIR and Addendum concluded that there would be no impacts.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located in Sub Area F1 within the Specific Plan area analyzed in the previous certified EIR and Addendum, which concluded that the proposed project site would not be located within a 100-year Flood Zone, does not include any levees or dams, and does not contain any large bodies of water that would be susceptible to a seiche or tsunami inundation. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. There is no new information of substantial importance or changes

in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

e) Summary of 2012 North Camino Ramon Specific Plan

This checklist question was not included in the previous certified EIR and Addendum because this checklist question did not exist at the time the previous certified EIR and Addendum was prepared. No conclusion was made in the previous certified EIR and Addendum regarding the significance level of impacts related to the project's potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. However, the previous certified EIR and Addendum stated that any development resulting from the implementation of the Specific Plan would be required to comply with General Plan Policies 8.3-I-11, 8.3-I-12, and 8.6-I-6, which require participation in clean water programs, monitoring waterways to prevent degradation, and the continued implementation of the City's Stormwater Management Program.

Iron Horse Village Project Analysis and Conclusions

As previously described, the proposed project would be located in Sub Area F1 within the Specific Plan area analyzed in the previous certified EIR and Addendum, which concluded that all development in the Specific Plan area would require participation in clean water programs, monitoring waterways to prevent degradation, and the continued implementation of the City's Stormwater Management Program. As such, the proposed project would be consistent with these programs and General NPDES Construction Permit requirements. The proposed project would be required to develop a SWPPP and BMPs to prevent stormwater pollution from construction sources, as described in MM HYD-1a and MM HYD-1b. The proposed project would be required to treat stormwater runoff prior to discharge to the storm drain system, through implementing IMPs to comply with the Regional Municipal Stormwater Permit. The proposed project does not rely on groundwater and would have no effect on a sustainable groundwater plan. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

- MM HYD-1a** Prior to the issuance of grading permits for areas larger than 1 acre within the Specific Plan area, the project applicant shall prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) and Grading Plan to the City of San Ramon that identify specific actions and Best Management Practices (BMPs) to prevent stormwater pollution from construction sources. The plans shall identify a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The applicant shall include conditions in construction contracts requiring the plans to be implemented and shall have the ability to enforce the requirement through fines and other penalties. The plans shall incorporate control measures in the following categories:

- Soil stabilization practices
- Dewatering practices (if necessary)
- Sediment and runoff control practices
- Monitoring protocols
- Waste management and disposal control practices

Once approved by the City, the applicant's contractor shall be responsible throughout the duration of the project for installing, constructing, inspecting, and maintaining the control measures included in the SWPPP and Grading Plan.

MM HYD-1b

The City shall ensure that Storm Water Pollution Prevention Plans (SWPPPs) for projects within the Specific Plan area identify pollutant sources that could affect the quality of stormwater discharges from the construction site. Control practices shall include those that effectively treat target pollutants in stormwater discharges anticipated from project construction sites. To protect receiving water quality, the SWPPP shall include but not be limited to the following elements:

- Temporary erosion control measures (such as fiber rolls, staked straw bales, detention basins, temporary inlet protection, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) shall be employed for disturbed areas.
- No disturbed surfaces will be left without erosion control measures in place during the winter and spring months.
- Sediment shall be retained on-site by a system of sediment basins, traps, or other appropriate measures. Of critical importance is the protection of existing catch basins that drain to San Ramon Creek.
- The construction contractor shall prepare Standard Operating Procedures for the handling of hazardous materials on the construction site to eliminate or reduce discharge of materials to storm drains.
- BMP performance and effectiveness shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination (inadvertent petroleum release), is required by the RWQCB to determine adequacy of the measure.
- In the event of significant construction delays or delays in final landscape installation, native grasses or other appropriate vegetative cover shall be established on the construction site as soon as possible after disturbance, as an interim erosion control measure throughout the wet season.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to hydrology and water quality. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XI. Land Use and Planning <i>Would the project:</i>					
a) Physically divide an established community?	Less than significant impact.	No	No	No	None
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?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan boundaries contain developed commercial uses and some public facilities (San Ramon City Hall, the San Ramon Post Office, the San Ramon Valley Unified School District maintenance facility, and the Iron Horse Trail). The previous certified EIR and Addendum determined that redevelopment of the privately-owned commercial properties within the Specific Plan boundaries would not constitute the division of an established community because these land uses are not occupied for residential use and are also not used for “community purposes” (such as a park). Additionally, the three publicly owned facilities within the Specific Plan boundaries are used for administrative, operational, and maintenance purposes, therefore, the previous certified EIR and Addendum determined that their removal would not divide an established community. In addition, the previous certified EIR and Addendum determined that access to the Specific Plan would not impair or impede access to the Iron Horse Trail, and therefore, would not divide an established community that relies on this trail as linkage. Furthermore, the intent of the Specific Plan is to guide the transition of the plan area from a low-density, auto-oriented commercial area to transit- and pedestrian-oriented mixed-use district. Therefore, the previous certified EIR and Addendum found that the Specific Plan would establish a community and would appropriately support it with commercial offerings and infrastructure. As such, the previous certified EIR and Addendum determined that implementation of the Specific Plan would not physically divide an established community. Impacts were determined to be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located within Sub Area F1 of the Specific Plan and develop 117 residential dwelling units, including 31 attached multi-family condominium townhomes and 86 detached single-family condominium homes. The proposed project also includes a nonresidential component consisting of eight live-work units within the multi-family condominium townhomes. The proposed project would result in an overall reduction in building square footage, resulting in a net decrease in development of approximately 816,000 square feet compared to what was anticipated under the Specific Plan. The proposed project, together with other planned development, creates a new neighborhood and would not divide an existing community. The proposed project does not propose any elevated freeways or other features that would cordon off a portion of an existing neighborhood. The proposed project would add sidewalks to enhance connectivity in the area.

Implementation of the proposed project's residential uses would be consistent with this intent and further the implementation of the Specific Plan's mixed use vision through the development of the residential uses in close proximity to commercial uses. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the Specific Plan. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan would be consistent with all applicable goals and policies of the General Plan and would not conflict with any of the applicable provisions of the Municipal Code. The Specific Plan was found to be consistent with the General Plan's MU land use designation and was found to be within the maximum allowable FAR of 0.70 established for the MU land use designation. Implementation of the Specific Plan was found to be in accordance with the General Plan's Implementing Policies 2.3-I-18 and 4.7-I-4 regarding the preparation and implementation of the Specific Plan as a transit-oriented, mixed-use area that is pedestrian/bicycle friendly and provides neighborhood and regional retail opportunities lacking in San Ramon, and vertical and horizontal mixed-use development in proximity to new and existing jobs. The Specific Plan's proposed use of shared parking resources and a centralized parking structure was found to be consistent with Implementing Policy 5.6-I-16. In addition, the Specific Plan envisioned the relocation of the existing Transit Center to a central location within a 10-minute walk from all parcels within the Specific Plan area, thereby obtaining the goal of Implementing Policy 5.5-I-16 regarding a geographically balanced transit center location. The Transit Center is proposed to be located within the Specific Plan area; however, the Specific Plan identifies the proposed Transit Center south of Norris Canyon Road, near the project site, but not within Sub Area F1. The Specific Plan was adopted by ordinance and, as part of the San Ramon Municipal Code, serves as the zoning for all properties within the Specific Plan area. Therefore, impacts regarding conflict with any land use, plan, policy, or regulation adopted to avoid or mitigate an environmental effect were determined to be less than significant.

Noise Land Use Compatibility Analysis

The previous certified EIR and Addendum identified that new residential development within the plan area could be exposed to ambient noise levels (combined transportation and stationary noise sources) in excess of normally acceptable land use compatibility standards for new residential land use development. The analysis concluded that this potential impact would be reduced to less than significant with implementation of MM NOI-1b.

Iron Horse Village Project Analysis and Conclusions

The proposed project would result in the development of 117 residential dwelling units on the project site, including 31 attached multi-family condominium townhomes and 86 detached single-family condominium homes. The proposed project also includes a nonresidential component consisting of eight live-work units within the multi-family condominium townhomes. Additionally, the proposed project would adhere to the General Plan's Mixed Use (MU) land use designation to develop an integrated mix of residential and nonresidential land uses on the project site. The allowable residential densities range for this district is 14 to 30 dwelling units per acre. The residential density of the proposed project would be 20.0 dwelling units per acre, which would be consistent with the MU district requirements of the General Plan. The project includes live/work units to create a mix of uses, as contemplated by the General Plan.

As discussed above, the proposed project is located within the Specific Plan and is designated as OMU. The OMU designation primarily reflects office and conference facilities that are in close proximity to residential uses as well as the Mixed Use Core within the Specific Plan area. The OMU designation allows second-story residential, and, if found consistent with the economic goals of the Specific Plan, ground floor residential. The Specific Plan also provides that its intent for the project site is to encourage high-quality multi-family residential development to provide housing to support the employment base in the area, and to provide residents to support the retail uses in the City Center and Park Commons. As discussed below, the General Plan designation governs the proposed use of the site.

A city's general plan is the "constitution for all future development," and any subordinate codes or decisions must be consistent with the general plan (*Leshar Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540, 544; see also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 570-571). The general plan is the single most important planning document.

By statute, specific plans must be consistent with general plans (Government Code § 65454). This concept is known as "vertical consistency," and requires that the subservient document, including any specific plans and zoning actions, be consistent with the general plan. The test for consistency is whether the secondary document "furthers the objectives and policies of the general plan and does not obstruct their attainment." (*City of Morgan Hill v. Bushey*, (2018) 5 Cal.5th 1068, 1080; See also, Government Code § 65860I).

Additionally, the HAA, enacted in 1982, establishes limitations to a local government's ability to deny, reduce the density of, or make infeasible housing development projects that are consistent with objective local development standards and contribute to meeting housing need. The State Legislature recently amended the HAA to expand and strengthen its provisions, explicitly finding that the lack of housing and the lack of affordable housing, is a critical problem that threatens the economic, environmental, and social quality of life in California (Government Code § 65589.5(a)). The HAA clarifies that where vertical consistency is not clearly established, for example if zoning standards and criteria in a Specific Plan are inconsistent with applicable, objective general plan standards, if the development project is consistent with the applicable objective general plan standards for the site, then the housing development project cannot be found inconsistent with the standards and criteria of the zoning. Further, if such an inconsistency exists, the local agency may not require rezoning prior to housing development project approval (Government Code § 65589.5 (j)(4)).

The Specific Plan allows residential uses on the ground floor with limited circumstances in the OMU zone and does not permit live/work units. However, the General Plan allows both horizontal and vertical mixed use without a need to make economic findings to support horizontal mixed use. The General Plan also allows live/work units to be considered as a mixed-use option in addition to more traditional retail and commercial options. The Specific Plan's limitation on ground floor residential and prohibition on live/work units is not consistent with the General Plan and is therefore overridden and would be inapplicable to the proposed project.

The proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project would comply with the CBC and General Plan policies designed to protect the environment. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the Specific Plan. There is no new information of substantial importance or changes in circumstances that would alter the conclusions of the previous certified EIR and Addendum. No additional analysis is required.

Noise land use compatibility is discussed in Section XIII, Noise. Therefore, the proposed project would not 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, and this impact would be less than significant.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to land use and planning. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XII. Mineral Resources <i>Would the project:</i>					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	No impact.	No	No	No	None
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	None identified.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan area does not contain any mineral extraction operations or known deposits of minerals of Statewide or local importance (such as aggregate, oil, or precious metals). Therefore, the previous certified EIR and Addendum determined that land use and development activities included in the Specific Plan would not result in the loss of availability of minerals of Statewide or local importance. No impact would occur.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be implemented within Sub Area F1 of the Specific Plan area analyzed in the previous certified EIR and Addendum, so the project site does not contain any mineral extraction operations or known mineral resources. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan

This checklist question did not exist at the time the previous certified EIR and Addendum was prepared. However, as discussed in Impact XII(a), there are no mineral extraction operations or known deposits of minerals of Statewide or local importance at the project site. Therefore, the Specific Plan area does not contain a locally important mineral resource recovery site

delineated on a local general plan, specific plan, or other land use plan. As such, no impact would occur.

Iron Horse Village Project Analysis and Conclusions

As discussed in Impact XII(a), the proposed project would be implemented within Sub Area F1 of the Specific Plan area, so the project site does not contain any mineral extraction operations or known mineral resources. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to mineral resources. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIII. Noise <i>Would the project:</i>					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant impact with mitigation incorporated.	No	No	No	MM NOI-1a and MM NOI-1b
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than significant impact with mitigation incorporated.	No	No	No	MM NOI-2a and MM NOI-2b
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No impact.	No	No	Np	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum concluded that temporary noise impacts related to construction activities would be less than significant with implementation of MM NOI-1a. The analysis also concluded that implementation of the Specific Plan would result in less than significant increases in traffic noise levels. The analysis also showed that potential permanent impacts to noise-sensitive receptors from stationary sources would also be less than significant. Finally, the analysis concluded that, with implementation of MM NOI-1b, noise impacts to new residential development would be reduced to less than significant and would

ensure compliance with the City's 60 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) exterior noise standard, and the 45 dBA interior noise standard.

Iron Horse Village Project Analysis and Conclusions

Short-term Construction Impacts

Implementation of the proposed project would result in a similar, although slightly less, level of development as was analyzed in the previous certified EIR and Addendum. Such development would include construction equipment operations that would result in potential short-term noise impact for individual development sites within the Specific Plan area. Reasonable worst-case combined noise level during the loudest phase of construction would be maximum noise levels of 90 dBA maximum noise/sound level (L_{max}), and an hourly average of 86 dBA equivalent sound level (L_{eq}), as measured at a distance of 50 feet from the acoustic center of a construction area. The nearest residential land use to the project construction footprint is located over 400 feet east of the project site. At this distance, reasonable worst-case maximum construction noise levels would attenuate to below 72 dBA L_{max} ; and to below 68 dBA L_{eq} over a reasonable worst-case hourly average. The nearest office land use to the project construction footprint is located over 250 feet west of the project site. At this distance, reasonable worst-case maximum construction noise levels would attenuate to below 76 dBA L_{max} ; and to below 72 dBA L_{eq} over a reasonable worst-case hourly average at the nearest office land use.

However, any development project within the Specific Plan area is required to comply with the best management noise reduction practices outlined in MM HYD-a, of the previous certified EIR and Addendum. These measures restrict construction activities to the hours between 7:30 a.m. and 6:00 p.m., Monday through Friday, and between 9:00 a.m. and 6:00 p.m. on Saturday and Sundays. No construction activities shall be permitted on federal holidays. Furthermore, the identified reasonable worst-case construction noise levels would comply with the maximum noise level exposure standards identified in the mitigation measure (i.e., they would be less than 90 dB over 8 continuous hours and less than 105 dB over 1 continuous hour as measured at any nearby office or residential use). Therefore, similar to the findings of the previous certified EIR and Addendum, implementation of MM NOI-1a would ensure that temporary construction noise impacts would be reduced to less than significant.

Operational/Mobile Source Noise Impacts

Based on the trip generation calculated for the proposed project, implementation of the proposed project would generate a net reduction in daily trips compared to existing trips generated by the existing land use. Therefore, the proposed project would result in lower traffic noise levels on local roadways than what is currently experienced and project-related traffic noise impacts would be less than significant.

Operational/Stationary Source Noise Impacts

The proposed project would include new stationary noise sources such as residential type of mechanical ventilation equipment operations. However, the existing land use currently has commercial grade mechanical ventilation equipment in operation in addition to parking lot activity and truck loading and unloading activity, all of which would no longer be active on the

project site with implementation of the proposed project. Therefore, the proposed project would result in lower stationary source operational noise levels than what is currently experienced on the project site and project-related stationary source operational noise impacts would be less than significant.

Noise Land Use Compatibility

MM NOI-1b of the previous certified EIR and Addendum requires analysis of potential noise impacts to new residential development to ensure compliance with the City's 60 dBA CNEL exterior noise standard, and the 45 dBA interior noise standard. According to the City's General Plan, noise levels up to 70 dBA CNEL are conditionally acceptable for residential uses. New residential development in such areas is permitted after a project-specific noise analysis, which is provided by this Addendum.

The previous certified EIR and Addendum identified in Exhibit 3.9-7, that year 2030 with project traffic noise contours along Crow Canyon Road adjacent to the project site range from 70 dBA to 75 dBA CNEL up to 120 feet from the edge of the roadway; and from 65 dBA to 70 dBA CNEL up to 340 feet from the edge of roadway; and from 60 dBA to 65 dBA CNEL for the remainder of the project site. Also, traffic noise contours along Alcosta Boulevard adjacent to the project site range from 70 dBA to 75 dBA CNEL up to 60 feet from the edge of the roadway; and from 65 dBA to 70 dBA CNEL up to 240 feet from the edge of roadway. These traffic noise levels on the project site could potentially exceed the City's conditionally permitted exterior threshold for residential land use development.

Based on these projected traffic noise levels, all proposed residential private outdoor yard spaces that are located within 340 feet of Crow Canyon Road, or within 240 feet of Alcosta Boulevard, and that have a direct line of sight to either roadway (i.e., not shielded by an intervening structure) would be required to include a minimum 6-foot high solid fence that completely blocks the line of sight from the yard to either roadway. The fence shall be constructed to have a minimum surface weight of 4 pounds per square foot and shall have no vertical or horizontal gaps. This would ensure that traffic noise from these adjacent roadways would be reduced to meet the City's 60 dBA CNEL exterior noise standard for these private outdoor spaces.

Proposed public space outdoor active use areas would be located in the center of the project site or in the southwest corner of the project site and would be shielded from traffic noise by the proposed structures and would not be exposed to noise levels exceeding the City's conditionally acceptable exterior noise standard and no mitigation would be needed.

Furthermore, the proposed project must also ensure compliance with the City's 45 dBA CNEL interior noise level thresholds.

Based on EPA Protective Noise Levels, a combination of walls, doors, and windows provided in accordance with CBC requirements for the proposed residential development would result in a 25 dBA in exterior-to-interior noise reduction with windows closed and a 15 dBA or more with windows open. The proposed project would include mechanical ventilation systems that would

permit windows to remain closed when desired. However, even with windows closed, interior noise levels of the nearest proposed units to adjacent roadways would not meet the interior noise standard of 45 dBA CNEL sound level (Ldn) (i.e., 75 dBA–25 dBA = 50 dBA). Therefore, mitigation must be implemented that would require upgraded wall assemblies for impacted façades.

Wall assemblies of all façades with a direct line of sight of and located within 120 feet of the edge of the nearest travel lane of Crow Canyon Road, or within 60 feet of the edge of the nearest travel lane of Alcosta Boulevard would be required to be constructed to meet a minimum Sound Transmission Class (STC) rating of 35. All windows and doors in these impacted façades must also have a minimum STC rating of 35. As a reference, a standard, single pane window offers an STC rating in the range of 26-28. A wall assembly that has a minimum combined STC rating of 35 would ensure that interior noise levels would meet the interior noise standard of 45 dBA CNEL with an adequate margin of error (i.e., 75 dBA – 35 dBA = 40 dBA).

For façades that are further from these roadways but that could still be exposed to noise levels up to 70 dBA CNEL, it is expected that standard construction, with windows closed, would be sufficient to maintain the interior noise standard of 45 dBA CNEL (i.e., 70 dBA – 25 dBA = 45 dBA). This is a conservative evaluation because the proposed first row of buildings facing the adjoining roadways would provide additional noise shielding for structures set further back from the roadways and traffic noise levels at these second row structures would be expected to be below 70 dBA CNEL due to shielding reduction.

Therefore, with implementation of the site-specific COA NOI-1 (implemented in compliance with the requirements of MM NOI-1b of the previous certified EIR and Addendum and City noise requirements), traffic noise impacts to the proposed project would be reduced to less than significant.

Therefore, the proposed project would not result in new or substantially more severe significant impacts related to construction or operational noise beyond what was previously analyzed in the previous certified EIR and Addendum.

b) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum concluded that temporary vibration impacts related to construction activities would be less than significant with incorporated MM NOI-2a. The analysis also concluded that operational-related vibration impacts would also be reduced to less than significant with implementation of MM NOI-2b.

Iron Horse Village Project Analysis and Conclusions

Short-term Construction Vibration Impacts

Similar to the findings identified in the previous certified EIR and Addendum, the proposed project would result in groundborne vibration during construction. According to MM NOI-2a, a

vibration analysis shall be prepared for any development that would include construction activities located within 130 feet of an off-site sensitive receptor.

Of the variety of equipment used during construction and that would operate closest to off-site structures, the large bulldozers that are anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Large bulldozers produce groundborne vibration levels ranging up to 0.089 inch per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment.

The nearest off-site structure to the project construction footprint is the Post Office building located immediately south of the project site. The façade of this closest structure would be located as close as approximately 10 feet from where large bulldozers would potentially operate. At this distance and due to the change in grade elevation, groundborne vibration levels would attenuate to below 0.35 in/sec PPV from operation of large bulldozers. This is below the Federal Transit Administration (FTA) Construction Vibration Impact Criteria of 0.5 in/sec PPV for this type of structure – a reinforced-concrete and steel framed building. Therefore, project construction activities would not generate groundborne vibration or groundborne noise levels in excess of established standards and the impact of short-term groundborne vibration associated with construction to this nearest off-site receptor would be less than significant.

The next closest off-site structure is located over 215 feet from the nearest construction footprint. At this distance, all construction-related groundborne vibration levels would attenuate to well below established standards and the impact of short-term groundborne vibration associated with construction to these off-site receptors would be less than significant.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to groundborne vibration during construction beyond what was previously analyzed in the previous certified EIR and Addendum.

Operational Vibration Impacts

Anticipated development that would occur under the Specific Plan would not include any permanent sources of vibration that would expose persons in the plan area to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the vicinity of the project site.

Also, in regard to exposure of the proposed noise-sensitive land uses to existing sources of groundborne vibration, the proposed project would also have to comply with MM NOI-2b of the previous certified EIR and Addendum. This measure requires a vibration analysis to be prepared for any residential development that will be located within 50 feet of any private loading area. The proposed project would locate residential units within approximately 20 feet of the Post Office's loading docks. Typical vibration levels from large, loaded truck movements can range up to 0.076 in/sec PPV at 25 feet. Therefore, at 20 feet, such activities could generate groundborne vibration levels of up to 0.106 in/sec PPV as measured at the nearest proposed residential façade. This is well below the FTA Vibration Impact Criteria of 0.2 in/sec

PPV for structures of non-engineered timber and masonry construction. Therefore, groundborne vibration impacts from the Post Office loading dock activities to proposed residential receptors would be less than significant.

Therefore, the proposed project would not result in new or substantially more severe significant impacts related to groundborne vibration beyond what was previously analyzed in the previous certified EIR and Addendum.

c) Summary of 2012 North Camino Ramon Specific Plan

This checklist question was not included in the noise section of the previous certified EIR and Addendum. Rather, this topic was identified as an effect found not to be significant. The previous certified EIR and Addendum found that the Specific Plan area does not contain any airports or private airstrips and does not overlap with any airport influence areas. Therefore, the previously certified EIR and Addendum concluded that land use and development activities associated with the buildout of the Specific Plan would not expose persons residing or working in the Specific Plan area to aviation safety hazards.

Iron Horse Village Project Analysis and Conclusions

The project site would not be located within the vicinity of a private airstrip. The nearest public airport to the project site is the Livermore Municipal Airport, located approximately 9.4 miles southeast of the project site. The project site is located outside of the 55 dBA CNEL airport noise contours of this closest airport. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur. Therefore, the proposed project would not result in new or substantially more severe significant impacts related to airport noise beyond what was previously analyzed in the previous certified EIR and Addendum.

Applicable Specific Plan Mitigation Measures

The following mitigation measures of the previous certified EIR and Addendum shall apply to the proposed project and would ensure that construction noise impacts would be reduced to less than significant.

- MM NOI-1a** All construction contractors shall adhere to the following noise attenuation requirements:
- Construction activities shall be restricted from occurring Monday through Friday between the hours of 6:00 p.m. and 7:30 a.m. or on Saturday and Sunday between the hours of 6:00 p.m. and 9:00 a.m. or anytime on federal holidays. The City of San Ramon shall have the discretion to permit construction activities to occur outside of allowable hours if compelling circumstances warrant such an exception (e.g., weather conditions necessary to pour concrete).

- Construction activities shall not exceed Occupational Safety and Health Administration (OSHA) noise standards of 90 decibel (dB) over 8 continuous hours or 105 dB over 1 continuous hour at any nearby office or residential use.

All construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.

MM NOI-1b An acoustical analysis shall be prepared for any development that includes residential uses within the Specific Plan area. The acoustical analysis shall analyze potential exterior noise impacts to any ground level yards or patios (upper-level balconies shall be exempt from exterior noise standards) in order to determine compliance with the City's 60 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) exterior noise standard. The acoustical analysis shall also analyze potential interior noise impacts to any habitable rooms in order to determine compliance with the City's 45 dBA CNEL interior noise standard. If the analysis determines an exceedance of noise standards will occur, then the analysis shall develop mitigation to reduce noise levels to within the standards.

The noise analysis provided above for the proposed project by FirstCarbon Solutions (FCS) contained within this Addendum satisfies the requirements of MM NOI-1b. No further analysis or mitigation is required.

MM NOI-2a A vibration analysis shall be prepared for any development that would include construction activities located within 130 feet of an off-site sensitive receptor. The vibration analysis shall utilize industry-accepted methodologies that include the recommended vibration assessment procedure and thresholds provided by public agencies such as the California Department of Transportation (Caltrans) or the Federal Transit Administration (FTA).

The analysis summarized above satisfies the requirements of MM NOI-2a. No further analysis or mitigation is required.

MM NOI-2b A vibration analysis shall be prepared for any residential development that will be located within 50 feet of any private loading area or truck route. The vibration analysis shall utilize industry-accepted methodologies that include the recommended vibration assessment procedure and thresholds provided by public agencies such as the California Department of Transportation (Caltrans) or the Federal Transit Administration (FTA).

The analysis summarized above satisfies the requirements of MM NOI-2b. No further analysis or mitigation is required.

Conditions of Approval

In compliance with the requirements of MM NOI-1b of the previous certified EIR and Addendum, the following COA shall be required to ensure that traffic noise impacts to the proposed project would be reduced to less than significant.

- COA NOI-1**
- a. All proposed residential private outdoor yard spaces that are located within 340 feet of Crow Canyon Road, or within 240 feet of Alcosta Boulevard, and that have a direct line of sight to either roadway (i.e., not shielded by an intervening structure) would be required to include a minimum 6-foot high solid fence that completely blocks the line of sight from the yard to either roadway. The fence shall be constructed to have a minimum surface weight of 4 pounds per square foot and shall have no vertical or horizontal gaps. The Applicant may implement alternative sound attenuation features that a noise study prepared by a qualified acoustical professional demonstrates to the City's reasonable satisfaction will reduce outdoor noise levels to meet the conditionally applicable outdoor noise standard.
- b. All wall assemblies of all façades with a direct line of sight of and located within 120 feet of the edge of the nearest travel lane of Crow Canyon Road, or within 60 feet of the edge of the nearest travel lane of Alcosta Boulevard shall be required to be constructed to meet a minimum Sound Transmission Class (STC) rating of 35. All windows and doors in these impacted façades must also have a minimum STC rating of 35. These wall assembly STC rating requirements shall be clearly marked on the final construction documents. The verification of the STC rating of the final design of these wall assemblies shall be verified by a qualified acoustical professional prior to issuance of building permits. The Applicant may implement alternative sound attenuation features that a noise study prepared by a qualified acoustical professional demonstrates to the City's reasonable satisfaction will reduce indoor noise levels to meet the applicable interior 45 dBA CNEL noise standard.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to noise. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the adoption of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIV. Population and Housing <i>Would the project:</i>					
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)?	Less than significant impact.	No	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that development of land use and infrastructure that are contemplated by the Specific Plan would not have significant direct or indirect growth-inducing effects. The Specific Plan is a tool for the systematic implementation of the San Ramon General Plan and establishes a link between the policies of the General Plan and the individual development proposals in the Specific Plan area. Thus, development and land use activities that occur within the Specific Plan boundaries that are consistent with the Specific Plan are inherently “planned growth.” As such, the previous certified EIR and Addendum determined that development of housing within the Specific Plan area would not be considered growth-inducing. The previous certified EIR and Addendum determined that development and land use activities contemplated by the Specific Plan would include the expansion or redevelopment of roads, potable water, recycled water, wastewater, and stormwater facilities. However, the plan area is already served by such services, therefore, the previous certified EIR and Addendum determined that the expansion would not result in indirect growth. Furthermore, the previous certified EIR and Addendum determined that the implementation of increased commercial space would not cause indirect growth since significant commercial space already exists in the plan area, which is located in already highly urbanized region with a sufficient workforce.

The Specific Plan's growth estimates are included in the General Plan 2030 growth projections. The General Plan 2030 Housing Element (2030 Housing Element) contemplated the development of 1,124 dwelling units within the Specific Plan area. The Specific Plan contemplates as many as 1,500 dwelling units, a net increase of 376 dwelling units relative to General Plan 2030. As such, the Specific Plan was determined to be consistent with the 2030 Housing Element's housing projections for the Specific Plan area. Therefore, the previous certified EIR and Addendum determined that the Specific Plan's residential development would be consistent with local and regional housing strategies. Impacts on substantial unplanned population growth, either directly or indirectly, were determined to be less than significant.

The St. James Place Project was under construction at the time of the release of the previous certified EIR and Addendum, and includes a 116-unit residential development, constructed at the former RMC Pacific Materials cement plant site. In Block G, 404 units have been approved and are now under construction in the City Village development.

Iron Horse Village Project Analysis and Conclusions

The proposed project includes the development of a residential component consisting of 117 residential dwelling units at the project site, including 31 attached multi-family condominium townhomes and 86 detached single-family condominium homes. The proposed project also includes a nonresidential component consisting of eight live-work units within the multi-family condominium townhomes. The proposed project would adhere to the General Plan's MU designation and the Specific Plan, which allow residential uses with other uses in the area of the Specific Plan that contains the project site.

The Specific Plan analyzed the development of 1,500 residential units within the Specific Plan area. Overall, the proposed project would result in the development of 117 units, resulting in up to 637 total dwelling units in the Specific Plan area, which includes the proposed Iron Horse Village Project in Sub Area F1 as well as two other previously approved residential projects. The 637 total dwelling units is much fewer than 1,500 residential units approved pursuant to the previous certified EIR and Addendum and 1,124 units evaluated in the General Plan for the Specific Plan area. Therefore, buildout of the proposed project would not exceed the number of residential units projected for the Specific Plan area.

Additionally, the General Plan 2023-2031 Housing Element (2031 Housing Element) facilitates the redevelopment within the Specific Plan area with an increased density range between 20 to 40 dwelling units per acre. The Housing Element identifies 19 subject parcels within the Specific Plan area, including the proposed project, which is identified as a housing opportunity site for redevelopment. The Housing Element anticipated that the proposed project would add 117 residential units to the City. Thus, the proposed project is consistent with the 2031 Housing Element and would not result in unplanned population growth.

Furthermore, the project site is already served by existing infrastructure, therefore, the extension of existing infrastructure to serve the proposed project would not result in indirect growth. In addition, there would be no increase in commercial uses and associated workforce.

Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

At the time of the previous certified EIR and Addendum release, there were no inhabited dwelling units within the Specific Plan boundaries. The St. James Place Project was under construction at the time of the release of the previous certified EIR and Addendum, and includes a 116-unit residential development, consistent with the Specific Plan. As such, the previous certified EIR and Addendum concluded that implementation of the Specific Plan would not result in the displacement of persons or housing.

Iron Horse Village Project Analysis and Conclusions

The proposed project site currently contains two large office buildings, totaling approximately 212,224 square feet, as well as surface parking (approximately 572 spaces), and landscaping consisting of mature trees and shrubs. The removal of the existing uses at the site would not remove any residential uses, therefore, it would not result in the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to population and housing. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XV. Public Services <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>					
a) Fire protection?	Less than significant impact.	No	No	No	None
b) Police protection?	Less than significant impact.	No	No	No	None
c) Schools?	Less than significant impact.	No	No	No	None
d) Parks?	Less than significant impact.	No	No	No	None
e) Other public facilities?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development of the Specific Plan would not result in a need for new or expanded fire protection facilities that have the potential to result in physical impacts on the environment. The SRVFPD provides fire protection and emergency medical services to the Specific Plan area from Fire Station 34, located on Alcosta Boulevard, and Fire Station 38, located on Bollinger Canyon Road. Both stations are located within 1 mile of the Specific Plan boundaries. The new commercial uses and new dwelling units proposed by the Specific Plan were acknowledged to increase demand upon the SRVFPD for fire protection and emergency medical services. The SRVFPD was consulted during the preparation of the Specific Plan regarding public safety issues and identified a primary concern of ensuring adequate access for fire apparatus. Therefore, Specific Plan Policies PF-2.1 and PF 2.2 require that all streets provide sufficient vehicle access and that the new types of mixed-use development are incorporated into the emergency and disaster response plans for the City.

The Specific Plan boundaries are within 1 mile of two fully staffed fire stations, Fire Station 34 and Fire Station 38, both of which were found to provide adequate response times. In addition,

the Fire District has an Insurance Services Office (ISO) rating of 2 (on a scale of 1 to 10, with 1 being the highest rating). The ISO rating measures individual fire protection agencies against a Fire Suppression Rating Schedule, which includes such criteria as facilities and support for handling and dispatching fire alarms, first-alarm response and initial attack, and adequacy of local water supply for fire suppression purposes. The ISO ratings are used to establish fire insurance premiums. Only 5 percent of the more than 44,000 fire agencies in the United States receive an ISO 2 rating or higher. Therefore, the previous certified EIR and Addendum concluded that fire apparatus responding from either station would provide adequate fire protection services to development within the Specific Plan area and would be expected to arrive at emergency calls within acceptable response times, therefore, no new or expanded fire facilities would be required. Impacts were determined to be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located in Sub Area F1 of the Specific Plan area analyzed in the previous certified EIR and Addendum, which is served by SRVFPD. The proposed project is located within approximately 1.08 miles from Fire Station 34 and 1.76 miles from Fire Station 38. Therefore, fire apparatus responding from either station would be expected to arrive at emergency calls at acceptable response times. The proposed project would develop an additional network of streets that would increase circulation in the area and facilitate EVA. The proposed project would comply with Specific Plan policies PF-2.1 and PF 2.2, which require that all streets provide sufficient vehicle access and that new development is incorporated into the emergency and disaster response plans for the City. Additionally, the project proposes an overall reduction in buildout of square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan.

Overall, the proposed project includes a residential component consisting of 117 residential dwelling units at the project site, including 31 attached multi-family condominium townhomes and 86 detached single-family condominium homes. The proposed project also includes a nonresidential component consisting of eight live-work units within the multi-family condominium townhomes. This would result in up to 637 total dwelling units in the Specific Plan area, which includes the proposed Iron Horse Village Project in Sub Area F1 as well as two other previously approved residential projects. The 637 total dwelling units is much fewer than 1,500 residential units approved pursuant to the previous certified EIR and Addendum and 1,124 units evaluated in the General Plan for the Specific Plan area. Therefore, buildout of the proposed project would not exceed the number of residential units projected for the Specific Plan area. Overall development would be less intense than proposed in the previous certified EIR and Addendum. The proposed residential uses would represent a decrease in demand on SRVFPD compared to the existing office complexes. Furthermore, the San Ramon Police Department and the SRVFPD reviewed the proposed project plans and confirmed that their agencies would continue to meet performance standards identified by the City's General Plan. Therefore would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum determined that development of the Specific Plan would not result in a need for new or expanded police protection facilities that have the potential to result in physical impacts on the environment. The San Ramon Police Department (SRPD) provides police protection services to the Specific Plan area. The SRPD headquarters are located 1 mile west of the Specific Plan boundaries on Crow Canyon Road. Response times and staffing were determined to be adequate. The new commercial uses and new dwelling units resulting from the Specific Plan were acknowledged to increase demand on the Police Department for police protection services. The SRPD was consulted during the preparation of the Specific Plan, and the Department noted that the mixed-use nature of the area and the creation of pedestrian-friendly internal streets would lend itself to the Department's Community Policing policies, which are designed to reduce crime and the fear of crime by encouraging a partnership between the police and citizens of the community. As a part of that partnership, the Specific Plan recognized the need for an additional beat with five additional officers to serve the Specific Plan area (Policy PF-3.1) and included the provision for a substation space in the proposed shared parking structure adjacent to the Village Green to help facilitate community policing programs, public outreach, and access (Policy PF-3.2). Because the Specific Plan boundaries are within 1 mile of SRPD headquarters, response times were determined to be adequate. Therefore, no new or expanded police facilities were determined to be required and impacts were found to be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located in Sub Area F1 of the Specific Plan area analyzed in the previous certified EIR and Addendum, which is served by the SRPD. The proposed project is located approximately 1.65 miles east of the SRPD headquarters. Therefore, police units responding from headquarters would be expected to arrive at emergency calls that occur within the Specific Plan boundaries within acceptable response times. In addition, units out on patrol within or near the Specific Plan area may arrive more quickly than those responding from headquarters. As anticipated by the Specific Plan, the proposed project would include an additional network of pedestrian-friendly internal streets and walkways that would lend itself to the SRPD's Community Policing policies to encourage a partnership between the police and community.

Additionally, the project proposes an overall reduction in buildout of square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. Overall, the proposed project would result in the development of 117 units, resulting in up to 637 total dwelling units in the Specific Plan area, which includes the proposed Iron Horse Village Project in Sub Area F1 as well as two other previously approved residential projects. The 637 total dwelling units is much fewer than 1,500 residential units approved pursuant to the previous certified EIR and Addendum and 1,124 units evaluated in the General Plan for the Specific Plan area. Therefore, buildout of the proposed project would not exceed the number of residential units projected for the Specific Plan area. Overall, demand for police protection services would be similar to under the Specific Plan. Therefore, the proposed project would not

create new demand for additional beat officers or facilities. The proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan

The San Ramon Valley Unified School District provides K-12 education to the Specific Plan area. The Specific Plan included development of up to 5,070,000 square feet of commercial uses and as many as 1,500 dwelling units. The Specific Plan EIR discussed potential impacts on K-12 school facilities on page 3.11-13. As noted in the discussion, development under the Specific Plan would be expected to increase K-12 enrollment in local schools and would generate as many as 570 new K-12 students, accordingly, the Specific Plan requires developers of new residential units to pay established school impact fees. Specific Plan Policy PF-4.1 ensures that developers of any new residential units would contribute school impact mitigation fees which, pursuant to SB 50, are considered complete mitigation for identified potential impacts. Government Code Section 65995 establishes that payment of fees is the “full and complete mitigation” for provision of adequate school facilities and prohibits cities and counties from assessing additional fees or exactions for school impacts. Accordingly, the Specific Plan sets forth the appropriate process for mitigating impacts on K-12 school facilities and limits such mitigation to the payment of designated fees as required by law. Therefore, it was determined that the San Ramon Valley Unified School District would have adequate classroom capacity to accommodate students generated by development within the Specific Plan area, and impacts were determined to be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located in Sub Area F1 within the Specific Plan area analyzed in the previous certified EIR and Addendum, which is located within the San Ramon Valley Unified School District. The project proposes an overall reduction in buildout of square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. The proposed project when considered with other residential and mixed-use projects in the Specific Plan area would not cause the Specific Plan area to exceed its planned residential units.

As discussed in Impact XIV(a), the residential development would be within the 1,500 residential units analyzed under the Specific Plan and within the 1,124 analyzed under the General Plan. Additionally, the proposed project would contribute to school impact mitigation fees to be used for capital improvements for school facilities. Therefore, payment of development fees to the San Ramon Valley Unified School District would address the proposed project’s impacts on schools. The proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan

The City and East Bay Regional Parks District provide various parks, trails, and community facilities within the Specific Plan boundaries. The previous certified EIR and Addendum concluded that residential development within the Specific Plan area would increase the City's population and have a corresponding increase in park usage, since both the new commercial uses and the new residential dwelling units proposed in the Specific Plan would be expected to increase park, trail, and community facility use.

In recognition of this, the Specific Plan would include the following additional park facilities and public spaces:

- The Commons would consist of a 1.25-acre, linear landscaped open space stretching from Crow Canyon Road to Norris Canyon Road and would provide space for community events and passive recreation.
- The Village Green would consist of a 2-acre communal activity space near the Specific Plan area's central block and would provide space for a variety of community events and passive recreation.
- The Iron Horse Trail is an existing, linear pedestrian and bicycle trail serving the Specific Plan area and connecting it to Danville, Alamo, Walnut Creek, Pleasant Hill, Concord, and Dublin. The Iron Horse Trail consists of 5.25 acres within the Specific Plan area and would be maintained as part of Specific Plan implementation. Furthermore, the Specific Plan contemplates the development of an overcrossing at Crow Canyon Road, which would enhance the convenience and safety of this facility.
- The Iron Horse Trail Link would consist of a 74-foot-wide landscaped open space containing an 18-foot-wide pedestrian and bicycle path to link the Commons and the Village Green to the Iron Horse Trail. The link would consist of 2 acres within the Specific Plan area.
- The residential park would consist of a 2-acre, multiuse open space area constructed as part of the high-density residential development south of Norris Canyon Road to serve both residents and nearby office employees.

Policy PF-1.3 of the Specific Plan requires residential development in the Planning Area to be conditioned to provide public space amenities or on-site recreation facilities for their residents. Additionally, Policy PF-1.4 of the Specific Plan requires land dedication or park fees for new residential development in the Planning Area for the implementation of the Public Spaces component of the Specific Plan. The previous certified EIR and Addendum determined that implementation of policies within the Specific Plan would ensure that impacts to parks would be less than significant.

Iron Horse Village Project Analysis and Conclusions

Residents of the proposed project would use various parks, trails and community facilities serviced by the City and the East Bay Regional Parks District. The project proposes an overall

reduction in buildout of square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. Overall, the proposed project would result in the development of 117 units, resulting in up to 637 total dwelling units in the Specific Plan area, which includes the proposed Iron Horse Village Project in Sub Area F1 as well as two other previously approved residential projects. The 637 total dwelling units is much fewer than 1,500 residential units approved pursuant to the previous certified EIR and Addendum and 1,124 units evaluated in the General Plan for the Specific Plan area. Therefore, buildout of the proposed project would not exceed the number of residential units projected for the Specific Plan area. Additionally, the proposed project would contribute to park impact fees to accommodate the increase in demand. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

e) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum discussed the need for new or expanded library facilities or adverse impacts on related services as a result of implementation of the Specific Plan. The Contra Costa County Library, in conjunction with the City, operates libraries within the city limits. While the adoption of the Specific Plan would not change the status of the existing library service levels, the previous certified EIR and Addendum determined that implementation of development within the plan boundaries area may result in a decrease in performance standards. The previous certified EIR and Addendum determined that the population increase attributable to buildout of the Specific Plan would be expected to translate into additional demand for library services. At the time of the adoption of the Specific Plan, the City had not met its adopted standards of 0.5 square feet of library space and three volumes per capita. However, the City will ensure compliance with any applicable standards for library space at full buildout of the Specific Plan. As such, the previous certified EIR and Addendum determined that impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

Residents of the proposed project would use libraries operated by the Contra Costa County Library, in conjunction with the City. The project proposes an overall reduction in buildout of square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. Overall, the proposed project would result in the development of 117 units, resulting in up to 637 total dwelling units in the Specific Plan area, which includes the proposed Iron Horse Village Project in Sub Area F1 as well as two other previously approved residential projects. The 637 total dwelling units is much fewer than 1,500 residential units approved pursuant to the previous certified EIR and Addendum and 1,124 units evaluated in the General Plan for the Specific Plan area. Therefore, buildout of the proposed project would not exceed the number of residential units projected for the Specific Plan area.

The City has recommended but has not yet adopted, library service standards, therefore, the proposed project would have no impacts on library services. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to public services. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVI. Recreation <i>Would the project:</i>					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant impact.	No	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	Less than significant impact.	No	No	No	None

Discussion

a, b) Summary of 2012 North Camino Ramon Specific Plan

The previous certified EIR and Addendum concluded that new commercial and residential development within the Specific Plan area would increase park, trail, and community facility usage. The Specific Plan includes additional park facilities and public spaces, such as a 1.25-acre, linear landscaped open space identified as the Commons; a 2-acre communal activity space identified as the Village Green; a pedestrian and bicycle trail as well as an open space (Iron Horse Link) linking the Commons and Village Green to the Iron Horse Trail; and a 2-acre residential park. Additionally, the Specific Plan also encourages smaller public spaces such as paseos, courtyards, and pocket parks to be privately developed. Further, the City has a Park and Recreation Facility Impact Fee, which has been established to provide funding for park facilities for new developments that contain one more new dwelling units. The implementation of policies within the Specific Plan and payment of impact fees would ensure that impacts to parks would be less than significant.

Iron Horse Village Project Analysis and Conclusions

Consistent with the Specific Plan, the proposed project consists of residential development that would increase the City's population and would have a corresponding increase in park usage. The proposed project would provide 117 dwelling units, representing a decrease

compared to the amount of development projected in the EIR under the Specific Plan, which assumed up to 1,500 residential units; therefore, the overall demand on parks would be within the demand anticipated by the Specific Plan. Additionally, the proposed project would include an informal lawn and bench seating in the southwest corner of the project site and two paseos in the center of the project site in between K Court and L Court as well as M Court and N Court, respectively. This would be consistent with the Specific Plan's vision to include privately smaller public spaces such as paseos, courtyards, and pocket parks. Further, the proposed project would pay impact fees that would address the impact of new development on recreational facilities. Thus, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to recreation. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVII. Transportation <i>Would the project:</i>					
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than significant impact.	No	No	No	None
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Less than significant impact.	No	No	No	None
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact.	No	No	No	None
d) Result in inadequate emergency access?	Less than significant impact.	No	No	No	None

Discussion

The following analysis is based, in part, on the Final Focused Traffic Impact Study (TIS) prepared on August 23, 2023, by TJKM (Appendix G).³² The TIS analyzed the potential transportation impacts related to the proposed project. This study specifically investigates four site access alternatives and project trip generation as well as conducts a VMT analysis.

Site Access

Presently, the only access point to the project site is located at an uncontrolled driveway on Crow Canyon Road. There is an existing median break that allows for left turns exiting the project driveway. There is also a left turn pocket for a development on the north side of Crow Canyon Road. However, westbound left turns are prohibited from entering the project driveway. As identified in the TIS, four alternatives were evaluated to determine the recommended access point configuration (Appendix G).

³² TJKM. 2023. Final Focused Traffic Impact Study, Iron Horse Village. Accessed August 10, 2023.

- Alternative 1: This alternative maintains the existing roadway configuration. As discussed in the TIS, this alternative is not recommended (Appendix G).
- Alternative 2: This alternative signalizes the project driveway, replacing the existing signalized trail crossing just west of the driveway. As discussed in the TIS, this alternative is not recommended (Appendix G).
- Alternative 3: This alternative restricts movements from the proposed driveways to right turns in and out only. It would require a modification of the median to provide an eastbound U-turn lane. This can either be provided uncontrolled mid-block (Alternative 3a) or at the signalized intersection at Alcosta Boulevard with a U-turn signal phase (Alternative 3b). According to the TIS, Alternative 3a is the recommended alternative (Appendix G).
- Alternative 4: This alternative restricts left turns out of the project driveway but allows left turns into the driveway. This alternative would require a modification of the median to provide an eastbound U-turn lane. According to the TIS, this alternative is not recommended (Appendix G).

Of the four alternatives, the TIS recommends Alternative 3a, which is the proposed access for the proposed project and is analyzed below.

Trip Generation

According to the TIS, for the proposed project site, the existing office buildings are estimated to generate approximately 2,300 daily trips, including 323 AM peak-hour trips and 306 PM peak-hour trips. The proposed project is estimated to generate approximately 1,020 daily trips, including 73 AM peak-hour trips and 97 PM peak-hour trips. Therefore, the proposed project is anticipated to result in a net decrease of 1,280 daily trips, as well as a net decrease of 250 AM peak-hour trips (-265 inbound, +15 outbound) and a net decrease of 209 PM peak-hour trips (+9 inbound, -218 outbound).

After the release of the previous certified EIR and Addendum in 2012, SB 743 became effective in January 2014 and required the Governor's Office of Planning and Research to change the CEQA Guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifted from driver delay (Level of Service [LOS]) to VMT, in order to reduce GHG emissions, create multimodal networks, and promote mixed-use developments. CCTA developed VMT analysis guidelines consistent with SB 734 in June 2020. As of October 2022, the City had not adopted VMT procedures standards, so the CCTA standards were used for the purposes of this analysis.

This Addendum compared conditions with the proposed project to those without the proposed project. Significant impacts are identified when traffic from the proposed project would result in the impacts described in specific thresholds. The CEQA transportation analysis contains the following thresholds intended to identify impacts:

Threshold 1: Conflicting with Plans, Programs, Ordinances, or Policies

The proposed project would result in a significant impact if it conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and

pedestrian facilities. The proposed project was analyzed for consistency with the Specific Plan goals and policies and City and County planning document and requirements.

Threshold 2: Causing Substantial VMT

The proposed project would result in a significant impact if it causes a substantial increase in VMT. The CCTA has released Draft VMT Methodology, which provides a screening application for the CEQA transportation analyses. A project must meet at least one of the five screening criteria in order to be exempt from conducting a project-level VMT analysis.

Threshold 3: Substantially Inducing Additional Automobile Travel

The proposed project would result in a significant impact if it includes substantial additional VMT, such as through the addition of through traffic lanes on existing or new highways, including general-purpose lanes, high-occupancy vehicle lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges.

Threshold 4: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

The proposed project would result in a significant impact if it substantially increases hazards due to geometric design features of incompatible uses. The TIS conducted a review of a project's access points, internal circulation, and parking access to determine whether the proposed project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts.

Threshold 5: Transportation Safety

The proposed project would result in a significant impact if it causes inadequate emergency access or decreases transportation safety. The evaluation of transportation safety involves the consideration of pedestrian, bicycle, and vehicular safety on the streets surrounding and inside the proposed project and an investigation of the proposed project's potential impacts on the safety of the freeway system serving the project site.

a) Summary of 2012 North Camino Ramon Specific Plan EIR

The Specific Plan identified this checklist question as a CEQA threshold but did not identify it as a specific impact. In the context of this threshold, the previous certified EIR and Addendum followed a quantitative analysis to reflect the policies of General Plan 2030. Specifically, the EIR analyzed whether the proposed project would cause a study intersection to exceed the General Plan's standard of LOS C, with LOS D for more than two hours of the day (AM and PM peak-hours). With mitigation of MM TRANS-1a, MM TRANS-1b, and MM TRANS-1c the previous certified EIR and Addendum found impacts to be less than significant. Additionally, the previous certified EIR and Addendum stated that any development resulting from the implementation of the Specific Plan would be required to comply with General Plan Policies 3.2-I-1 through 3.2-I-6 and 3.3-I-1 through 3.3-I-8, which set forth minimum performance standards for transportation facilities and require new development projects to study impacts to these facilities and mitigate for any associated impacts. The previous certified EIR and Addendum also concluded that the Specific Plan would implement General Plan Policies 5.2-I-1

through 5.2-I-6, which set forth various objectives concerning regional cooperation in implementing transportation improvements, as well as General Plan Policy 5.3-I-5, which requires that traffic mitigation fees be assessed on new residential and commercial development; however, these fees could be offset by credits from existing uses.

Iron Horse Village Project Analysis and Conclusions

The proposed project would contribute to the productivity and use of the regional transportation system by providing residential uses near transit and employment centers, in line with Regional Transit Plan/Sustainable Communities Strategy (RTP/SCS) goals. The proposed project is consistent with the RTP/SCS goal of building a Complete Streets network by enhancing streets to promote walking, biking, and other micro-mobility through sidewalk and street improvements. Thus, the project encourages a variety of transportation options and is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region. The proposed project would provide housing near transit opportunities to serve the office buildings and future residents in the area, as well as provide pedestrian connections to the rest of the Specific Plan area. As such, the proposed project would be consistent with the goals and policies contained in the Specific Plan including the following elements:

GOAL VIS-1 Create an identifiable district with a unique sense of place.

Policy VIS-1.1 Plan for an integrated system of public spaces, transit, and sidewalks to promote walkability and connectivity with a focus on the Central Commons, integrated landscape, and site amenities.

Policy VIS-1.2 Encourage a compatible mix of uses, connectivity, and architectural and visual diversity through the Specific Plan Development Standards and Architectural Guidelines.

GOAL VIS-3 Provide for a variety of housing options in the Planning Area to serve the existing and future housing needs of San Ramon residents.

Policy VIS-3.1 Encourage residential development to serve existing and anticipated employment base in and adjacent to the Plan Area.

Policy VIS-3.3 Limit the number of residential units to a maximum of 1,124 units within the Specific Plan area. The proposed project would include 117 residential dwelling units to the Specific Plan area, bringing the total residential count within the Specific Plan area to 637 units.

Policy VIS-3.5 Require each residential project to provide inclusionary housing consistent with the City's Inclusionary Housing Ordinance. Consistent with the Inclusionary Housing Ordinance, 15 percent of the attached townhomes will be deed-restricted and designated as Affordable Units. An in lieu fee will be paid for the detached Row Homes and detached Courtyard Homes in accordance with the Inclusionary Housing Ordinance.

Additionally, the Specific Plan imposes the City parking requirements for all new developments in the Specific Plan area. The proposed project's parking requirement is based on the anticipated mix of residential units, as shown in Table 14 below:

Table 14: City Parking Code Requirements

Plan Type	Quantity	Specific Plan Parking Standards		Municipal Code Parking Standards	
		Number Required/ Allowed per Unit	Number of Spaces Required/ Allowed	Minimum Required per Unit	Minimum Number of Spaces Required
4-bedroom single-family dwelling units	53	2.0 to 3.0	106.0 to 159.0	2.0	106.0
5-bedroom single-family dwelling units	33	3.0 to 4.0	99.0 to 132.0	3.0	99.0
2-bedroom multi-family dwelling units	8	1.5 to 2.0	12.0 to 16.0	2.0	16.0
3-bedroom multi-family dwelling units	15	1.5 to 2.0	22.5 to 30.0	2.0	30.0
3-bedroom live/work units	8	2.0	16.0	2.0	16.0
Single-family dwelling guest	—	0.25	22.0	N/A	0.0
Multi-family dwellings and live/work units guest	—	0.25	8.0	0.25	8.0
Total Code Parking		—	286 to 383	—	275
Source: TJKM 2023					

As shown in Table 14, a total of 286 parking spaces would be required at minimum and 383 would be permitted at maximum for the project based on standard rates in the Specific Plan. A total of 275 minimum parking spaces would be required to meet the parking standards found within the City's Municipal Code. The proposed project would provide 338 parking spaces and would fulfill the City's Parking Code Requirements.

The proposed project would not preclude the implementation of any City or County planning documents and requirements. Additionally, MM TRANS-1a, MM TRANS-1b, and MM TRANS-1c in the previous certified EIR and Addendum were created to reduce impacts for intersections that are not located in or near Sub Area G4 and therefore, they would not apply to the proposed project site and would not be implemented. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

This checklist question did not exist at the time the previous certified EIR and Addendum was certified. As was common in 2012, VMT was analyzed as part of the air quality analysis. The EIR calculated VMT using the detailed adjusted daily trip generation contained in the TIA. The EIR

concluded that VMT would increase at a lower rate than the project population increase. The EIR explained that the Specific Plan was intended to provide infill and improved pedestrian and transit orientation to reduce overall growth in VMT generation in the City. The EIR concluded that growth under the Specific Plan would produce lower VMT per capita and per employee than would otherwise occur. For this reason, the VMT increase was determined not to be significant, and no mitigation was required.

Additionally, the previous certified EIR and Addendum evaluated LOS, which reflects how an intersection operates from the driver's perspective and is used to rank traffic operation on various types of facilities based on traffic volumes and roadway capacity using a series of letter designations ranging from A to F. Generally, LOS A represents free-flow conditions and LOS F represents forced-flow or breakdown conditions. Overall, traffic patterns were not anticipated to change significantly compared to existing conditions as the only roadway modifications included in the Specific Plan are the new roadways proposed as part of the Specific Plan.

The primary roadway network around the Specific Plan would remain unchanged with implementation of the Specific Plan. The previous certified EIR and Addendum determined that implementation of MM TRANS-1a, which monitors the intersection of Crow Canyon Road/I-680 Northbound Ramps, MM TRANS-1b, which monitors the intersection of Crow Canyon Road/Crow Canyon Place, and MM TRANS-1c, which would monitor the intersection of Bollinger Canyon Road/I-680 Northbound Ramps, would ensure that traffic resulting from Specific Plan buildout would not cause intersection or freeway LOS to degrade beyond acceptable levels.

Iron Horse Village Project Analysis and Conclusions

CEQA Guidelines Section 15064.3, subdivision (b) utilizes VMT to evaluate a project's transportation impacts. As described in the CCTA Draft VMT Methodology, a proposed project can go through a screening application that would evaluate the proposed project for its eligibility for exemption from conducting a project-level VMT analysis.³³ The CCTA guidelines include a screening process that describes five scenarios in which a project would be exempted from a VMT analysis requirement: (1) projects exempt from CEQA analysis, (2) small projects, (3) local serving projects, (4) projects in transit priority areas, and (5) projects in low VMT areas. Even if a project satisfies one or more of the screening criteria, lead agencies may still require a VMT analysis if there is evidence that the project has characteristics that might lead to a significant amount of VMT. The proposed project does not satisfy the requirements for screening criteria 1 through 4, and therefore, the proposed project is not eligible for a VMT analysis exemption.

The TIS for the proposed project evaluated project-related VMT as outlined in the adopted CCTA VMT methodology. The TIS calculated trip lengths for two different types of trips: work trips and residential trips. For work trips, the average trip length is 10.8 miles, whereas the residential trip length average is shorter at 6.73 miles. The existing general office generates 2,300 trips daily, which when multiplied by the average work trip length of 10.8 equals a total

³³ TJKM. 2023. Final Focused Traffic Impact Study: Iron Horse Village.

VMT of 24,840. The proposed project would generate 1,020 trips daily, which when multiplied by the average residential trip length of 6.73 miles results in a total VMT of 6,865. Therefore, the proposed project generates fewer total VMT than the existing office uses.

Therefore, the proposed project would not result in a significant impact related to VMT and would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the existing roadway network within the Specific Plan area consists of high-capacity arterial and collector roadways in a conventional, widely spaced suburban grid. The Specific Plan proposes a grid of smaller, pedestrian-scaled blocks consisting of walkable local streets integrated with active commercial frontages, landscaping, streetscape features, public spaces, and other amenities, intended to encourage walking, bicycling, and exploration of the shop environment. The street grid forms a framework for development of compact commercial and residential mixed-use buildings as well as flexibility for larger retailers, office complexes, and multi-family residential blocks.

The Specific Plan area's roadway network reflects the street classification system established in the General Plan. New roadways contemplated by the Specific Plan would adhere to roadway sections set forth in the General Plan, which establish requirements for lane geometry, width, bicycle facilities, and pedestrian facilities. As such, new roadways would be consistent with City standards and industry standards for mixed-use development. All new intersections are proposed at 90-degree angles or near-90-degree angles, maximizing visibility for all approaches. All new public streets would have through connections to other streets; no cul-de-sacs or dead ends are proposed. In higher density areas, the Specific Plan contemplates the use of service corridors to allow for delivery access to the rear of buildings, which would serve to minimize potential safety issues associated with truck circulation and parking. For these reasons, development and land use activities contemplated by the Specific Plan would not result in hazardous roadway design features or incompatible uses. Impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The TIS reviewed project access points, internal circulation, and parking access to determine whether the proposed project would substantially increase hazards due to geometric design features, including safety, operational, and capacity impacts. Vehicular access to the proposed project would be maintained along Crow Canyon Road on the north side of the project site. No access would be taken from the adjacent parking lot to the south. The proposed project does not intend to widen any roads in the area, nor does it intend to increase the number of access points along the adjacent public street system. The proposed project would restrict movements from the driveways to right turns in and out only. The project proposes to modify the existing median to allow an eastbound U-turn movement as an uncontrolled movement mid-block, approximately 200 feet prior to the intersection at Alcosta Boulevard. It would eliminate the eastbound left turn lane at the existing median break for the property to the

north. Additionally, a flush median break would allow smooth left turn access for emergency vehicles. The location and design of any access points would need to meet the City standards and be approved by the City. According to the TIS, a review of the project site plan does not indicate any potential sight distance, safety, or operational concerns associated with the proposed access location. Additionally, the TIS did not recommend the existing geometry based on City Policy and safety.

The proposed project's internal streets will all be designed to City standards and sight distance at the internal intersections will also meet City design standards. The proposed project would not interfere with the City's continuing implementation of its citywide bicycle and pedestrian systems. The project proposes to connect the sidewalks within the community to an access point to the Iron Horse Trail. Additionally, there is a signalized pedestrian crossing for the Iron Horse Trail currently. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum concluded that the Specific Plan area is located within close proximity of staffed fire protection and police protection facilities, and therefore, would be expected to be served with acceptable emergency response times. The existing roadway network within the Specific Plan area consists of high-capacity arterial and collector roadways in a conventional, widely spaced suburban grid. As previously discussed, the Specific Plan proposes a grid of smaller, pedestrian-scaled blocks consisting of walkable local streets integrated with active commercial frontages, landscaping, streetscape features, public spaces, and other amenities. The street grid forms a framework for development of compact commercial and residential mixed-use buildings as well as flexibility for larger retailers, office complexes, and multi-family residential blocks. The vehicular circulation system also serves to provide emergency access to all parts of the Specific Plan area. All of the streets (and service corridors) are dimensioned to accommodate the SRVFPD's travel way clearances. The growth in land uses allowed under the Specific Plan was determined to increase traffic and associated delays at intersections that may impact the response time for emergency service providers. Maintenance of the City's LOS standards on roadways would ensure that emergency service response time remains at an adequate level. Based on the analysis of land use development resulting from the implementation of the Specific Plan and with the implementation of mitigation, intersections and freeway segments were projected to operate at acceptable levels of services. Therefore, the previous certified EIR and Addendum concluded that future development and land use activities contemplated by the Specific Plan would not result in inadequate emergency access. Impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

As previously concluded in Impact IX(f), the proposed project does not propose any permanent lane closures or obstructions that could impede emergency response to or from the project site from the surrounding streets. Consistent with the Specific Plan, the proposed project would replace the existing uses at the site with an additional network of streets that would increase circulation in the area, and therefore, would increase access for emergency vehicles.

Additionally, as discussed in Impact XV(a), the proposed project would comply with Specific Plan policies PF-2.1 and PF 2.2, which require that all streets provide sufficient vehicle access and that the new types of mixed-use development are incorporated into the emergency and disaster response plans for the City. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conditions of Approval

The following COA shall be required to ensure that impacts to transportation from the proposed project would be reduced to less than significant.

COA TRANS-1 Prior to Site Development Permit issuance, the Applicant shall coordinate with the adjacent property owner, United States Postal Service (USPS), on a Site Plan to reconfigure the USPS parking lot for adequate site circulation and obtain and forward to USPS comments from the Community Development Director and the City Traffic Engineer on recommended adjustments to the Site Plan. The Applicant shall request that USPS include a drive-aisle and a 5-foot wide landscape area (Zoning Ordinance Section D3-21(A)(7)) adjacent to the screen wall between the project site and the adjacent USPS parking aisles with no dead-end parking aisle designs.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to transportation. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVIII. Utilities and Service Systems <i>Would the project:</i>					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant impact.	No	No	No	None
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than significant impact.	No	No	No	None
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	None identified.	No	No	No	None
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?	Less than significant impact with mitigation incorporated.	No	No	No	MM US-4a and MM US-4b

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	None identified.	No	No	No	MM US-4a and MM US-4b

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

Water

EBMUD provides potable water service to the northern and western portions of the City, including the Specific Plan area. Implementation of the Specific Plan would result in an increased demand for potable water. Based on a Water Supply Assessment (WSA) conducted for the Specific Plan, existing potable water demand is approximately 455,000 gallons per day (GPD) of water, and after buildout, would be approximately 892,000 GPD. The WSA concluded that the water demands for the Specific Plan are accounted for in EBMUD's 2005 Urban Water Management Plan (UWMP). The UWMP concluded that adequate water supplies are available to serve existing and projected water demands through 2030. Furthermore, EBMUD recently updated its demand projections as part of the development of its Water Supply Management Program 2040.

EBMUD indicated that the Specific Plan would not change demand projections included in the Water Supply Management Program 2040. At the time the previous certified EIR was prepared, EBMUD's 2010 UWMP projected customer rationing during the Single Dry Year and Multiple Dry Years scenarios to offset decreases in supply. Additionally, the 2010 UWMP anticipates that recycled water programs will offset demand for potable water by using non-potable water for irrigation. EBMUD's current plan, the 2020 UWMP, includes a similar discussion of demand projections, customer rationing, and recycled water programs to offset demand for potable water.

As identified in the Specific Plan, development within the plan boundaries would be required to comply with the Model Water Efficient Landscape Ordinance, which requires that plans and water usage estimates for landscape irrigation be submitted prior to the issuance of ministerial permits. Furthermore, Specific Plan Policy UTL-1.1 requires water conservation and LID BMPs to be incorporated into all public improvement and private development projects in the Specific Plan area. Finally, the Specific Plan contemplates a comprehensive network of potable water and recycled water distribution facilities. The implementation of these facilities would ensure that adequate infrastructure is available to serve the Specific Plan uses. For these

reasons, the Specific Plan would have a less than significant impact on water supply or facilities.

Wastewater

Central San provides wastewater collection and treatment to the northern and central portions of the City, including the Specific Plan area, and has adequate collection and treatment capacity to serve development within the Specific Plan area. Implementation of the Specific Plan would result in an increased need for wastewater service. However, Central San has indicated that the Specific Plan would not create capacity deficiencies in the existing trunk system and that adequate treatment plan capacity is available. Additionally, the Specific Plan includes a network of sewer collection facilities that would ensure that development that occurs pursuant to the Specific Plan would be adequately served with wastewater collection and treatment. Therefore, impacts would be less than significant.

Stormwater

The City owns and maintains drainage facilities within the city limits. The Specific Plan area is divided into two major drainage basins. The northern portion of the site is drained by a network of storm drainpipes that eventually flows to a 60-inch storm drain located within the Iron Horse Trail corridor. The southern portion of the project area drains to the south via a network of storm drainpipes into a 72-inch storm drain located under Camino Ramon that transitions to an 84-inch-diameter pipe south of the Bollinger Canyon Road and ultimately, to a 96-inch-diameter pipeline located under the Bishop Ranch 1 surface parking areas.

The existing Specific Plan area is highly developed with a significant footprint of impervious surfaces (buildings, parking lots, and roadways). The Specific Plan would alter development types in the area, but it is not anticipated to increase the quantity of impervious surfaces. Development within the Specific Plan boundaries would be required to comply with the San Francisco Bay RWQCB, San Francisco Region's new regional municipal permit. A key element of the permit would require new development to employ LID techniques to minimize and treat stormwater runoff. Therefore, each development within the Specific Plan boundaries would be required to demonstrate that it adequately treats any site runoff to ensure the proper quality of the runoff leaving the site; does not increase the quantity, duration, or peak flow of runoff from a site; and employs proper construction management techniques through the construction process to ensure sediment and erosion control (addressed through the State NPDES requirements). Accordingly, new development within the Specific Plan boundaries would not increase flows within the existing drainage system.

As indicated by the Specific Plan, there are no known deficiencies within the existing drainage system. Furthermore, the Specific Plan contemplates a network of storm drainage facilities that would ensure that development that occurs pursuant to the plan would be adequately served with drainage. New drainage infrastructure required by the Specific Plan would be limited to that required for new roadways and would be appropriately sized and modeled through the existing drainage system to ensure proper sizing to handle stormwater flows. As such, the

Specific Plan would not result in an increased need for off-site stormwater drainage facilities and impacts would be less than significant.

Electricity, Natural Gas, and Telecommunications

PG&E provides electricity and natural gas service to the City and would service the development within the Specific Plan. The California Public Utilities Commission (CPUC) regulates privately-owned telecommunication, electric, natural gas, water, railroad, rail transit, and passenger transportation companies. Telecommunications were supplied by Pacific Bell at the time of the previous certified EIR and Addendum release, but the AT&T campus now serves the area. Infrastructure is currently in place or within the planning parameters of PG&E to service additional development within the Specific Plan area.

Iron Horse Village Project Analysis and Conclusions

Water

The proposed project would continue to be served with potable water service provided by EBMUD and connect to the 12-inch main along Crow Canyon Road. EBMUD's water supply system consists of a network of reservoirs, aqueducts (pipelines), water treatment plants, pumping plants, and other distribution facilities and pipelines that convey Mokelumne River water from Pardee Reservoir to EBMUD customers.³⁴ The project proposes an overall reduction in building square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. According to EBMUD's UWMP, residential water demand is greater than commercial water demand. However, as discussed in Impact XIV(a), the proposed project would be within the 1,500 residential units analyzed in the Specific Plan. Therefore, projected water demand for the proposed project would not exceed the water demand projected in the EIR for the Specific Plan (Appendix H).

Since EBMUD determined, based on a WSA and future water demand projections, that adequate water supply was available to the Specific Plan area with the anticipated development and growth of the Specific Plan, EBMUD would be able to provide water service anticipated by the proposed project. The changes in land use proposed by the project would have a negligible effect on water demand projections for the Specific Plan area. Furthermore, the proposed project would be required to comply with the Model Water Efficient Landscape Ordinance and Specific Plan Policy UTL-1.1. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Wastewater

The proposed project would continue to be served with wastewater collection and treatment service provided by Central San and connect to the existing 30-inch interceptor main. Central San's water treatment plant location in the City of Martinez and has a capacity of 70 million gallons per day (mgd). Central San's treatment plan currently collects and treats approximately

³⁴ East Bay Municipal Utility District (EBMUD). 2020. Urban Water Management Plan. Website: https://www.ebmud.com/download_file/force/9151/735?UWMP-2020-FINAL-bookmarks.pdf. Accessed May 8, 2023.

35 mgd and is expected to collect and treat approximately 37 mgd by 2025, resulting in a remaining capacity of approximately 34 mgd.³⁵

The project proposes an overall reduction in building square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. As discussed in Impact XIV(a), the residential units included in the proposed project would be within the 1,500 residential units analyzed in the Specific Plan. Therefore, projected wastewater generation for the proposed project would not exceed the water demand projected in the EIR for the Specific Plan. Central San has indicated that adequate collection and treatment capacity is available to serve the Specific Plan area with the anticipated development and growth of the Specific Plan. Therefore, Central San would be able to provide wastewater service to the proposed project. The changes in land use proposed by the project would have a negligible effect on the capacity of wastewater collection and treatment facilities that serve the Specific Plan area. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Stormwater

The proposed project would use the drainage facilities owned and maintained by the City. The proposed project would install an on-site storm drainage system to meet applicable C.3 requirements, consisting of bioswales, inlets, underground piping, and basins. Stormwater would be detained and released at a rate no greater than the pre-development condition of the project site into municipal storm drains located on Crow Canyon Road.

The project proposes an overall reduction in building square footage of approximately 816,000 square feet and a reduction in impervious surface, compared to the Specific Plan. Development of the proposed project would also result in a decrease in impervious surface compared to the existing site conditions. As stated in the Preliminary Stormwater Management Plan and Preliminary Hydrology Calculations prepared by CBG for the proposed project, per the Contra Costa County Stormwater C.3 Guidebook, the proposed project would be required to treat stormwater runoff prior to discharge to the storm drain system. The proposed project would implement IMPs as required by Contra Costa County to comply with the Regional Municipal Stormwater Permit issued by the San Francisco Bay RWQCB. Additionally, the proposed project would install an on-site storm drainage system to meet applicable C.3 requirements, consisting of bioswales, inlets, underground piping, and basins. Stormwater would be detained and released at a rate no greater than the pre-development condition of the project site to the existing storm drain system on Crow Canyon Road. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those previously analyzed in the previous certified EIR and Addendum. No additional analysis is needed.

³⁵ East Bay Municipal Utility District (EBMUD). 2020. Urban Water Management Plan. Website: https://www.ebmud.com/download_file/force/9151/735?UWMP-2020-FINAL-bookmarks.pdf. Accessed May 8, 2023.

Electricity, Natural Gas and Telecommunications

At the time the previous certified EIR and Addendum was prepared, PG&E was identified as the electricity and natural gas service provider to the City. The City, including the project site, is currently provided electricity and natural gas service by MCE and PG&E, respectively. The proposed project would continue to be served with electricity and natural gas service provided by MCE and PG&E and connect via service laterals to existing underground facilities.

Infrastructure is currently in place or within the planning parameters of PG&E to serve the project site. The proposed project would be required to implement General Plan policies that would reduce energy consumption. The project's proposed land uses would be constructed according to the most recent California Building Code and Title 24 standard, which is the state-of-the-art for energy efficiency. Further, due to the removal of existing office uses and associated daily vehicle trips, implementation of the proposed project would result in lower energy consumption than what would occur with the buildout of the Specific Plan.

Telecommunications would continue to be provided by AT&T. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan

As previously discussed, based on a WSA conducted for the Specific Plan, EBMUD indicated that water demand for the Specific Plan is accounted for in its long-term water supply planning (2005 UWMP, 2010 UWMP, and Water Supply Management Program 2040). The UWMP evaluates and forecasts water supply availability based on normal year, single dry year, and multiple dry year projections. EBMUD's 2010 UWMP projects customer rationing during the Single Dry Year and Multiple Dry Years scenarios to offset decreases in supply. Additionally, the 2010 UWMP anticipates that recycled water programs will offset demand for potable water by using nonpotable water for irrigation. While EBMUD's 2010 UWMP forecasts a worst-case scenario of a 3-year drought that would result in a need for supplemental water supply, the Specific Plan would not exacerbate this projected deficit because its demand is accounted for in this total. Furthermore, this projection is based on a number of adverse conditions occurring simultaneously, and therefore, is considered a "worst-case" planning scenario. The Specific Plan includes a number of policies requiring water conservation measures to be incorporated into development that occurs pursuant to the plan. For these reasons, the Specific Plan would have a less than significant impact on water supply during a normal, dry, and multiple dry years.

Iron Horse Village Project Analysis and Conclusions

As discussed previously, the project proposes an overall reduction in building square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. As discussed in Impact XIV(a), the residential units included in the proposed project would be within the 1,500 residential units analyzed in the Specific Plan. Therefore, projected water demand would be similar to what was anticipated by the Specific Plan for the project site. As such, the conclusion that projected water demand of the Specific Plan during normal

year, single dry year, and multiple dry years projections is accounted for in EBMUD's UWMP and Water Supply Management Program 2040) applies to the proposed project as well. The changes in land uses proposed would have a negligible effect on water demand projections for the Specific Plan area. Consistent with the Specific Plan, the proposed project would incorporate applicable water conservation measures into the project. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum did not identify any impacts. Although this checklist question did not exist at the time the previous certified EIR and Addendum was prepared, the previous certified EIR and Addendum did discuss the Specific Plan's wastewater treatment provider and whether it has adequate capacity to serve the Specific Plan's project demand in addition to the provider's existing commitments. As previously discussed, the Specific Plan would be served by Central San, which has adequate treatment capacity to serve the development within its service area. Central San treats sewage at its treatment plant in Martinez. Central San indicated that the treatment plant has a "reliable" physical capacity of 53.8 mgd and is expected to be sufficient to accommodate effluent from "currently planned growth" within the service area over the next 15 years. Central San has indicated that adequate treatment plant capacity is available to serve development proposed under the Specific Plan. Additionally, the treatment plant is in compliance with all applicable federal and State environmental health and safety standards for treated wastewater. Therefore, impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

As discussed previously, the project proposes an overall reduction in building square footage, resulting in a net decrease of approximately 816,000 square feet, as compared to the Specific Plan. As discussed in Impact XIV(a), the residential units included in the proposed project would be within the 1,500 residential units analyzed in the Specific Plan. Therefore, projected wastewater generation would be similar to what was anticipated by the Specific Plan for the project site. Therefore, the proposed project would be considered within the "currently planned growth" in the service area, including growth contemplated under the Specific Plan. Additionally, Central San's treatment plan currently collects and treats approximately 35 mgd and is expected to collect and treat approximately 37 mgd by 2025, resulting in a remaining capacity of approximately 34 mgd, so Central San would have adequate wastewater treatment capacity available to serve the proposed project. The changes in land use proposed by the project would have a negligible effect on the capacity of the wastewater treatment facility to serve the Specific Plan area. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

d) Summary of 2012 North Camino Ramon Specific Plan

Implementation of the Specific Plan would generate solid waste during construction and operation. Solid waste collection and disposal in the City is provided by Valley Waste Management. These services include collection of solid waste from commercial, industrial, and residential customers; collection of residential recyclables and yard trimmings; and management of the San Ramon Recycling Center. Commercial recycling services are provided by several companies that have been granted permits by the City and are available to all San Ramon businesses on a competitive basis. Valley Waste Management transports solid waste to the Vasco Road Sanitary Landfill in Livermore. Currently the landfill has capacity until 2025. Implementation of development in accordance with the Specific Plan would include the demolition of approximately 2.65 million square feet of commercial uses, and the construction of 5.07 million square feet of commercial uses and 1.65 million square feet of residential uses. Implementation of the Specific Plan is estimated to generate 218,850 tons of construction and demolition debris. This tonnage would be spread out over the length of construction activities and the actual volumes of construction waste disposed of at any one time are not expected to be more than several tons of debris. However, because 218,850 tons represents a significant amount of construction and demolition waste, MM US-4a is proposed, which would require the applicant to implement construction and demolition recycling to the maximum extent feasible. After construction is completed, the Specific Plan is estimated to generate a net total of 233.75 tons of solid waste on a daily basis and 81,668.75 tons on an annual basis. While regional landfill capacity would be available to accommodate this amount of solid waste, this figure could be substantially reduced through recycling and waste reduction practices and would avoid the unnecessary use of landfill capacity. Implementation of MM US-4b would require development projects within the Specific Plan boundaries to implement operational recycling and waste reduction practices to the maximum extent feasible. The implementation of this mitigation measure would reduce operational solid waste generation substantially and conserve landfill capacity. Therefore, impacts on landfill capacity would be less than significant with mitigation.

Iron Horse Village Project Analysis and Conclusions

Solid waste produced by the proposed project would continue to be collected by Valley Waste Management and recyclables would be collected by Alameda County Industries (ACI). The proposed project would be located fully in Sub Area F1 of the Specific Plan area. Using waste generation rates published by the EPA, demolition and construction waste generation for Sub Area F1 would be approximately 42,926 tons and would have an annual operational waste generation of approximately 9,861 tons. Demolition and construction of the proposed project would generate approximately 17,354 tons of solid waste, and the proposed project would have an annual operational waste generation of approximately 214 tons. Therefore, the proposed project would reduce construction waste generation by 25,572 tons and annual operational waste generation by approximately 9,647 tons. Overall, the proposed project would represent a significant decrease in solid waste generation than anticipated for Sub Area F1. Since Waste Management was determined to be capable of adequately providing solid waste collection and disposal services to the Specific Plan area, including Sub Area F1, the

reduced amount of solid waste that would be generated by the proposed project would not affect collection and disposal services. However, even with the reduction in construction and operational solid waste generation proposed for Sub Area F1, the total solid waste generation of the Specific Plan would incrementally reduce the available capacity of the Vasco Road Sanitary Landfill, which has a remaining capacity of 11,560,000 cubic yards and a closure date of December 31, 2051.³⁶ Therefore, implementation of MM US-4a would help reduce the amount of construction and demolition debris that is disposed at the Vasco Road Sanitary Landfill by recycling to the maximum extent feasible. While the proposed project would substantially reduce operational waste generation in Sub Area F1 and the Specific Plan area waste generation overall, implementation of MM US-4b would reduce the amount of solid waste disposed of at the Vasco Road Sanitary Landfill and has been modified from the previous certified EIR and Addendum to remove references to commercial land uses as the buildout of the proposed project no longer includes commercial development other than live/work units. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

e) Summary of 2012 North Camino Ramon Specific Plan EIR

The previous certified EIR and Addendum did not identify any impacts. Although this checklist question did not exist at the time the previous certified EIR and Addendum was prepared, the previous certified EIR and Addendum stated that the California Integrated Waste Management Act requires each jurisdiction to in the State to set diversion requirements of 50 percent by 2020; establish a comprehensive Statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities; and authorize local jurisdictions to impose fees based on the types or amounts of solid waste generated. In 2007, SB 1016 introduced a new per capita disposal and goal measurement system that uses an actual disposal measurement number as a per capital disposal rate factor. Accordingly, the City's disposal rate goal is 5.7 pounds per person per year. As discussed above, the amount of construction and operational solid waste generation and disposed at the Vasco Road Sanitary Landfill would be reduced through implementation of MM US-4a and MM US-4b which would ensure the development within the Specific Plan area would implement construction and operational recycling measures in order to reduce the amount of solid waste disposed of at the Vasco Road Sanitary Landfill. Therefore, the Specific Plan would be in compliance with the California Integrated Waste Management Act. Impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

As previously discussed, the proposed project would be located in Sub Area F1 of the Specific Plan and would represent a reduction in both construction and demolition debris and operation solid waste, compared to the Specific Plan. The proposed project would also implement MM US-4a and MM US-4b would ensure the development within the Sub Area F1 of the Specific Plan area would implement recycling measures in order to reduce the amount

³⁶ California Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility/Site Activity Details. Vasco Road Sanitary Landfill. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/9?siteID=8>. Accessed May 22, 2023.

of solid waste disposed of at the Vasco Road Sanitary Landfill. MM US-4b has been modified from the previous certified EIR and Addendum to remove references to commercial land uses as the buildout of the proposed project no longer includes any commercial development, although it does include eight live/work units considered as a nonresidential land use. As such, the proposed project would comply with the California Integrated Waste Management Act. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

MM US-4a Prior to the issuance of demolition and construction permits, project applicants within the Specific Plan area shall submit a recycling plan to the City of San Ramon identifying the procedures by which construction and demolition would be salvaged and recycled to the maximum extent feasible. The plan shall include proof that a construction and demolition debris recycler is under contract to the applicant to perform this work.

MM US-4b Prior to the issuance of occupancy permits, project applicants within the Specific Plan area shall submit a Recycling and Waste Reduction Plan to the City of San Ramon identifying practices they and their tenants would implement during project operations that demonstrate at least 50 percent diversion.

Operation recycling and waste reduction practices shall include but not be limited to:

- Compliance with City of San Ramon's 50 percent waste diversion ordinance.
- Installation of common recycling facilities in all residential uses. These facilities shall be equipped to accept aluminum, cardboard, glass, mixed paper, and plastic materials and contain signage clearly identifying accepted materials.
- Periodic notification of residents and commercial tenants about the location of recycling facilities and accepted materials.
- Installation of recyclable materials receptacles in public places (along streets in public parks, plazas, and outside of the Transit Center, etc.). Recycling receptacles shall be of high-quality design and shall display signage clearly identifying accepted materials.
- Common commercial and residential disposal areas shall be designed with sufficient space to accommodate separate containers for solid waste, recyclables, organics, and—for restaurants—tallow, subject to approval of the franchise waste provider and City of San Ramon. Plans should include adequate and safe access for solid waste and recycling vehicles to access and collect materials.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to utilities and service systems. The conclusions from the previous certified EIR and remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in North Camino Ramon Specific Plan EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIX. Wildfire <i>If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:</i>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than significant impact.	No	No	No	None
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?	None identified.	No	No	No	None
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?	None identified.	No	No	No	None
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?	None identified.	No	No	No	None

Discussion

a) Summary of 2012 North Camino Ramon Specific Plan EIR

Evaluation of the impacts on adopted emergency response plan and emergency evacuation plan was evaluated within the Hazards and Hazardous Materials section of the previous certified EIR and Addendum, under Impact 3, *Emergency Response and Evacuation*. The previous certified EIR and Addendum included the following Implementing Policies related to wildfires and emergency response plans and evacuation from the 2020 General Plan:

- Minimize the risks to lives, property, and natural environment due to fire hazards (Guiding Policy 9.5-G-1).
- Require site design features, which are based on a wildfire risk assessment, and fire-retardant building materials to reduce the risk of fire within the City (Implementing Policy 9.5-I-1).
- Require the completion of a Fire Protection Plan for new development adjacent to a Fire Hazard Area in order to determine which mitigation measures are appropriate to minimize fire hazard (Implementing Policy 9.5-I-2).

The previous certified EIR and Addendum concluded that development and land use activities contemplated by the Specific Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The City's existing Emergency Operations Plan addresses emergency response and evacuation procedures during events such as earthquakes, hazardous materials incidents, floods, national security emergencies, wildfires, and landslides. Furthermore, the Specific Plan area is not located within a high fire hazard area and the Specific Plan area is located in an area where existing emergency response times for police and fire meet adopted standards. The Specific Plan does not contain any characteristics that would impair or otherwise interfere with emergency response, evacuation, or the policies of the Emergency Operations Plan. Moreover, the Specific Plan includes plans for an additional network of streets that would increase circulation in the area, thereby increasing potential EVA and evacuation routes. Therefore, impacts to emergency response plans and evacuation plans would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project is not located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones (VHFHSZ). The proposed project does not include changes that could potentially interfere with emergency response, access, or evacuation. Consistent with the previous certified EIR and Addendum, any development within the project site would have to comply with all fire codes and regulations related to emergency access. Therefore, the proposed project would not introduce new significant impacts or create substantially more severe impacts than those analyzed in the previous certified EIR and Addendum. No additional analysis is required.

b) Summary of 2012 North Camino Ramon Specific Plan EIR

The Specific Plan area is not located in or near State Responsibility Areas or lands classified as VHFHSZ. Additionally, as explained in the previous certified EIR and Addendum, the Specific Plan area is mostly developed and surrounded by urbanized uses and the San Ramon General Plan does not identify any areas within the Specific Plan boundaries as having wildfire risks. Additionally, the previous certified EIR and Addendum characterized the immediate vicinity around the Specific Plan area as flat relief with slopes of less than 5 percent. Some areas of moderate slope occur, specifically near the northeastern portion of the plan area; however, most of these slopes are minor. The previous certified EIR and Addendum does not identify any other exacerbating factors that would expose project occupants to pollutant concentrations from wildfire.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located within Sub Area F1 of the Specific Plan, and therefore, would be located in an urbanized area that is not exposed to wildfire risks. The City has not been identified as a city for which the California Department of Forestry and Fire Protection (CAL FIRE) has made recommendations on VHFHSZ indicating the project site is not within a VHFHSZ.³⁷ Additionally, the project site has not been identified as Tier 2 (Elevated) or Tier 3 (Extreme) Risk by the CPUC Fire Threat Map.³⁸ Therefore, the potential for exposure to pollutants from wildfires would be less than significant because the proposed project is not located in or near State Responsibility Areas or lands classified as VHFHSZ and the potential for wildfires is low. The proposed project would not introduce new significant impacts or create substantially more severe impacts than those identified in the previous certified EIR and no additional analysis is required.

c) Summary of 2012 North Camino Ramon Specific Plan EIR

The City has not been identified as a city for which CAL FIRE has made recommendations on a VHFHSZ, indicating the Specific Plan area is not within a VHFHSZ. Infrastructure-related impacts were addressed in the previous certified EIR and Addendum in Section 3.13 – Utility Systems, which described the City's existing utility systems and assessed potential impacts related to the provision of and demand for utility services.

Furthermore, the previous certified EIR and Addendum concluded that development of the Specific Plan would be required to comply with the Implementing Policies of General Plan 2030 to offset any impacts caused by the proposed project, including the following:

- Assure that ongoing budgets provide for adequate maintenance of the City's capital facilities, and establish fees commensurate with services rendered (e.g., application processing fees, planning, building and safety and engineering) to recover costs of these services (Implementing Policy 2.3-I-24).

³⁷ California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zones in SRA. Website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=4466cf1d2b9947bea1d4269997e86553>. Accessed May 8, 2023.

³⁸ California Public Utilities Commission (CPUC). FireMap GIS Tool. Website: <https://ia.cpuc.ca.gov/firemap/#>. Accessed May 8, 2023.

- Require new development to fund public facilities and infrastructure that is deemed necessary to mitigate the impact of that new development (Implementing Policy 3.2-I-3).
- Levy local, subregional, and regional mitigation fees for public facilities and infrastructure improvements in proportion to a new development's impact (Implementing Policy 3.2-I-4).

Iron Horse Village Project Analysis and Conclusions

The previous certified EIR and Addendum analyzed the provision of infrastructure such as roads, fuel breaks, emergency water sources, power lines, and other utilities. The project site is located within Sub Area F1 of the Specific Plan and is not located within a high fire hazard area. The proposed project is not located in or near State Responsibility Areas or lands classified as VHFHSZ. The proposed project does not include any major land use or policy changes that could potentially result in development not contemplated in previous certified EIR and Addendum. The proposed project would adhere to the General Plan's land use designation of MU, which allows for residential and live/work units. Additionally, compliance with the Implementing Policies above would ensure that services are adequately provided to the site and that the proposed project does not exacerbate any risks related to wildfire. Therefore, impacts would be less than significant.

d) Summary of 2012 North Camino Ramon Specific Plan EIR

The City has not been identified as a city for which CAL FIRE has made recommendations on a VHFHSZ, indicating the Specific Plan area is not within a VHFHSZ. Impacts that would cause significant risk to people or structures due flooding and landslides is discussed within other sections of the previous certified EIR and Addendum, and impacts are less than significant.

Wildfire: The previous certified EIR and Addendum concluded that the Specific Plan area is located in an urbanized area and the San Ramon General Plan does not identify any areas within the Specific Plan as having wildfire risks. Therefore, no impacts related to wildfires would occur.

Flooding: As discussed in Impact X(c), the previous certified EIR and Addendum determined that development contemplated by the Specific Plan would not be located in an area at risk of flooding. The previous certified EIR and Addendum concluded that there would be no impacts related to flooding.

Landslides: As discussed in Impact VII(a), the previous certified EIR and Addendum determined that because the Specific Plan area is generally characterized by flat relief with slopes of less than 5 percent, the landslide potential for the Specific Plan area was considered low. The previous certified EIR and Addendum concluded that impacts would be less than significant.

Iron Horse Village Project Analysis and Conclusions

The proposed project would be located within Sub Area F1 of the Specific Plan. The proposed project is not located in or near State Responsibility Areas or lands classified as VHFHSZ. As concluded in Impact XIX(a) above, development of the Specific Plan would not impair an

adopted emergency response plan or emergency evacuation plan. As discussed in Impact XIX(b) and Impact XIX(d) above, the proposed project would not be located in a high fire hazard area with a potential for wildfires or an area at risk of flooding. Additionally, the surrounding area is considered flat and has a low risk for landslides. Therefore, there is no new information of substantial importance or changes in circumstances identifying new significant effects and the proposed project would not introduce new significant impacts or create substantially more severe impacts than those identified in the previous certified EIR and Addendum. No additional analysis is required.

Applicable Specific Plan Mitigation Measures

None.

Conclusion

There is no new information of substantial importance, changes in the project, or changes in circumstances under which it will be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts related to wildfires. The conclusions from the previous certified EIR and Addendum remain unchanged when considering the implementation of the proposed project.

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**Mitigation Monitoring and Reporting Program
for the
Addendum to the North Camino Roman Specific Plan EIR
Iron Horse Village Project
City of San Ramon, Contra Costa County, California**

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PREFACE

Pursuant to Section 21081.6 of the California Environmental Quality Act (CEQA) and CEQA Guidelines Section 15097, the Lead Agency adopted a Mitigation Monitoring and Reporting Program (MMRP) in conjunction with approval of the North Camino Ramon Specific Plan and the North Camino Ramon Specific Plan Certified Environmental Impact Report (State Clearinghouse [SCH] No. 2010092014, certified July 24, 2012). The purpose of the MMRP is to ensure compliance with the mitigation measures occurs during project implementation.

The Addendum to the North Camino Ramon Specific Plan EIR prepared for the Iron Horse Village Project concluded that approved mitigation measures from the previous certified EIR are applicable. This MMRP documents how and when the mitigation measures adopted by the lead agency in the North Camino Ramon Specific Plan EIR will be implemented for the proposed project and confirms that potential environmental impacts are reduced to less than significant levels as identified in the Addendum. If there is a conflict between the mitigation identified in the North Camino Ramon Specific Plan EIR and this Addendum, the language in this Addendum shall control.

This document does not discuss those subjects that the environmental analysis demonstrates would result in less than significant impacts and for which no mitigation was applicable or necessary.

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Table 1: City Village Project Mitigation Monitoring and Reporting Program

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
III. Air Quality					
MM AIR-4: Prior to the final discretionary approval for any residential use that occur pursuant to the North Camino Ramon Specific Plan, the City of San Ramon shall determine the area of impact from toxic emissions from Interstate 680 and existing stationary sources that may potentially exceed the BAAQMD significance criteria for cancer or non-cancer Toxic Air Contaminant exposure. Emissions from Interstate 680 shall be estimated using the BAAQMD roadway screening tool. Impacts from stationary sources near the project shall be compared with the distance threshold recommended by California Air Resources Board’s Land Use Handbook distance guidance. If residential projects are proposed within an area exceeding the threshold, the City shall require a Health Risk Assessment to determine the refined impact level and to identify design features such as high efficiency ventilation and cooling systems that shall be installed to reduce the impact to less than significant levels. The City shall prohibit the construction of any sensitive receptor land use within the area of impact of Interstate 680 or stationary source as described above unless the risk is less than the BAAQMD’s significance criteria for TACs exposure. In compliance with this mitigation measure, a Health Risk Assessment (HRA) was prepared for this proposed project. Conditions of Approval The following condition of approval shall be required to ensure that air quality impacts from the proposed project would be reduced to less than significant. COA AIR-2: Pursuant to Adopted General Plan Policy 12.6-I-3, prior to issuance of grading or building permit, whichever	Preparation of a HRA to determine the refines impact level and identify design features that shall be installed to reduce the impact to a less than significant level	Prior to the final discretionary approval(s) for the proposed project	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
occurs first, the project applicant shall provide documentation to the City of San Ramon Community Development Department, Planning Services, demonstrating that any construction and grading activities shall incorporate dust control measures as recommended by the Bay Area Air Quality Management District (BAAQMD), such as: • All exposed non-paved surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and access roads) shall be watered at least two times per day and/or non-toxic soil stabilizers shall be applied to exposed non-paved surfaces. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered and/or shall maintain at least 2 feet of freeboard. • All visible mud or dirt tracked 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 miles per hour. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes, as required by the California Airborne Toxics Control Measure (ACTM) Title 13, Section 2485 of California Code of Regulations. Clear signage regarding idling restrictions shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified					

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
mechanic and determined to be running in proper condition prior to operation. The prime construction contractor shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. The City and the construction contractor shall take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.					
IV. Biological Resources					
MM BIO-1: If suitable avian nesting habitat is intended to be removed during the nesting season (February 1 through August 31), a qualified Biologist shall conduct a nesting bird survey to identify any potential nesting activity no more than 7 days prior to initial construction activities. If passerine birds are found to be nesting, or there is evidence of nesting behavior within 250 feet of the impact area, the Biologist shall determine an appropriate buffer that shall be required around the nests. No vegetation removal or ground disturbance would occur within this buffer. For raptor species—birds of prey such as hawks and owls—this buffer would generally be up to 500 feet. A qualified Biologist shall monitor the nests closely until it is determined that the nests are no longer active, at which time construction activities may commence within the buffer area. Construction activity may encroach into the buffer area at the discretion of the Biological Monitor. Tree or vegetation removal activities that occur outside of the nesting season (September 1 through January 31) are not subject to the requirements of this mitigation measure.	Submittal of documentation (results of Nesting Bird Survey, results of special-status bats survey, results of buildings and tree survey for roosting bats); Notes on construction plans	Nesting Bird Survey: Prior to tree or vegetation removal activities that occur between February 1 and August 31 Special-status Bats Survey: No less than 7 days prior to beginning ground disturbance and/or construction, including tree removal Roosting Bat Survey: No less than 7 days prior to building demolition. If bats are found and evicted from buildings to be demolished between September 1 and March 31, a qualified Biologist must verify bats did not	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
To enhance the effectiveness of MM BIO-1 and to ensure compliance with General Plan Policy 8.1-G-1, the project shall adhere to the following requirements: A qualified Wildlife Biologist shall conduct a survey for special-status bats between April 1 and October 15 during the appropriate time of day to maximize detectability to determine whether bat species are roosting near the work area no less than 7 days prior to beginning ground disturbance and/or construction, including tree removal. Survey methodology may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g., Anabat). Visual surveys will include trees within 100 feet of project construction activities. No less than 7 days prior to building demolition, the applicants for development on the project parcel shall ensure that a qualified Biologist (i.e., one familiar with the identification of bats and signs of bats) survey buildings and trees proposed for removal for the presence of roosting bats or evidence of bats. If no roosting bats or evidence of bats are found in the structure, demolition may proceed. If the Biologist determines or presumes bats are present (if there are site access issues or structural safety concerns), the Biologist shall exclude the bats from suitable spaces by installing one-way exclusion devices. After the bats vacate the space, the Biologist shall close off the space to prevent recolonization. Building demolition shall only commence after the Biologist verifies 7 to 10 days later that the exclusion methods have successfully prevented bats from returning. To avoid impacts on roosting and non-volant (i.e., nonflying) bats, the Biologist shall only conduct bat exclusion and eviction outside of the maternity season for bats (generally from March 1–August 31).		return 7-10 days prior to demolition			

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
V. Cultural Resources					
MM CUL-1: If a potentially significant prehistoric or historic resource is encountered during subsurface activities, all construction within a 100-foot radius of the find shall cease until a qualified Archaeologist determines whether the resource requires further study. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified Archaeologist. Potentially significant cultural resources consist of, but are not limited to, glass, ceramics, stone, bone, wood, and shell artifacts or features, including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, a qualified Archaeologist shall prepare and implement a research design and archaeological data recovery plan, if necessary. The Archaeologist shall also perform appropriate technical analyses, prepare a full written report, and file it with the appropriate information center, and provide permanent curation of the recovered resources. Conditions of Approval In compliance with the requirements of MM CUL-1 of the previous certified EIR and Addendum, the following COA shall be required to ensure that impacts to cultural and tribal cultural resources from the proposed project would be reduced to less than significant. COA CUL-1: Prior to the start of ground-disturbing activities, a qualified Archaeologist shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeologist	Notes on construction plans; Site inspection; Submittal of documentation (including verification of completed sensitivity training and Archaeological Resources Data Recovery and Treatment Plan if necessary)	Archaeological Evaluation: During subsurface activities Sensitivity Training: Prior to the start of ground-disturbing activities Archaeological Resources Data Recovery and Treatment Plan: After a significant prehistoric or historic resource is encountered during subsurface activities and preservation in place is determined to be infeasible	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. In compliance with Public Resources Code Section 21083.2, preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If a significant prehistoric or historic resource is encountered during subsurface activities and preservation in place is determined to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery and Treatment Plan shall be prepared and implemented by the qualified Archaeologist that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The appropriate Native American tribal representatives shall be consulted in determining any treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resources, beyond those that are scientifically important, are considered. The plan shall include provisions for the final disposition of the recovered resources, which may include on-site reburial, curation at a public, non-profit institution, or donation to a local Native American Tribe, school, or historical society.					
MM CUL-4: If human remains are encountered during earth-disturbing activities, all work within 100 feet of the find shall stop immediately and the Contra Costa County Coroner's office shall be notified. If the Coroner determines the remains are Native American in origin, the Native American Heritage	Notes on construction plans; Site inspections; Submittal of documentation (if necessary)	Evaluation for Human Remains: During earth-disturbing activities NAHC Notification: 24	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
Commission (NAHC) shall be notified and, in turn, shall notify the person determined to be the Most Likely Descendant (MLD). The MLD will provide recommendations for treatment of the remains (CEQA Guidelines § 15064.5; Health and Safety Code § 7050.5; Public Resources Code [PRC] § 5097.94 and 5097.98).		hours after remains found at the project site are determined to be of Native American descent			
VII. Geology, Seismicity, and Soils					
MM CUL-3: Prior to initiation of deep excavation procedures at depths greater than 10 feet, a qualified paleontological monitor will be retained to conduct an on-site monitoring program to ensure protection of previously unknown paleontological specimens. In the event a fossil is discovered during construction of the proposed project when the paleontological monitor is not present, excavation within 100 feet of the find shall be temporarily halted until the discovery is examined by a qualified paleontologist, in accordance with Society of Vertebrate Paleontology standards. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall notify the City and project applicant of the procedures that must be followed before construction is allowed to resume at the location of the find. If the find is determined to be significant and the City determines that avoidance is not feasible, the paleontologist shall design and carry out a data recovery plan consistent with the Society of Vertebrate Paleontology standards. The plan shall be submitted to the City for review and approval. Upon approval, the plan shall be incorporated into the project.	Notes on construction plans; Site inspection; Submittal of documentation (if necessary)	Paleontological Monitoring: Prior to initiation of deep excavation procedures at depths greater than 10 feet Plan Incorporation: Upon approval	City of San Ramon		
MM GEO-1b: Prior to issuance of building permits for new construction on any property within the Specific Plan, the project applicant shall submit a design-level geotechnical study and building plans to the City of San Ramon for review and approval. The building plans shall demonstrate that they	Approval of study	Prior to issuance of building permits for new construction on any property within the Specific Plan	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
incorporate all applicable recommendations of the design-level geotechnical study and comply with all applicable requirements of the most recent version of the California Building Standards Code. A licensed professional engineer shall prepare the plans, including those that pertain to soil engineering and structural foundations. The approved plans shall be incorporated into the proposed project. All on-site soil engineering activities shall be conducted under the supervision of a licensed Geotechnical Engineer or Certified Engineering Geologist.					
MM HYD-1a: Prior to the issuance of grading permits for areas larger than 1 acre within the Specific Plan area, the project applicant shall prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) and Grading Plan to the City of San Ramon that identify specific actions and Best Management Practices (BMPs) to prevent stormwater pollution from construction sources. The plans shall identify a practical sequence for site restoration, BMP implementation, contingency measures, responsible parties, and agency contacts. The applicant shall include conditions in construction contracts requiring the plans to be implemented and shall have the ability to enforce the requirement through fines and other penalties. The plans shall incorporate control measures in the following categories: • Soil stabilization practices • Dewatering practices (if necessary) • Sediment and runoff control practices • Monitoring protocols • Waste management and disposal control practices Once approved by the City, the applicant's contractor shall be responsible throughout the duration of the project for	Approval of SWPPP; Notes on construction plans; Site inspection	SWPP Preparation: Prior to the issuance of grading permits for areas larger than 1 acre Control Measures: During construction	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
installing, constructing, inspecting, and maintaining the control measures included in the SWPPP and Grading Plan.					
MM HYD-1b: The City shall ensure that SWPPPs for projects within the Specific Plan area identify pollutant sources that could affect the quality of stormwater discharges from the construction site. Control practices shall include those that effectively treat target pollutants in stormwater discharges anticipated from project construction sites. To protect receiving water quality, the SWPPP shall include but not be limited to the following elements: • Temporary erosion control measures (such as fiber rolls, staked straw bales, detention basins, temporary inlet protection, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) shall be employed for disturbed areas. • No disturbed surfaces will be left without erosion control measures in place during • Sediment shall be retained on-site by a system of sediment basins, traps, or other appropriate measures. Of critical importance is the protection of existing catch basins that drain to San Ramon Creek. • The construction contractor shall prepare Standard Operating Procedures for the handling of hazardous materials on the construction site to eliminate or reduce discharge of materials to storm drains. • BMP performance and effectiveness shall be determined either by visual means where applicable (i.e., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination (inadvertent petroleum release), is required by the RWQCB to determine adequacy of the measure. • In the event of significant construction delays or delays in final landscape installation, native grasses or other	Notes on construction plans; Site inspection	During construction	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
appropriate vegetative cover shall be established on the construction site as soon as possible after disturbance, as an interim erosion control measure throughout the wet season.					
X. Hydrology and Water Quality					
See MM HYD-1a under VII. Geology, Seismicity, and Soils					
See MM HYD-1b under VII. Geology, Seismicity, and Soils					
XIII. Noise					
MM NOI-1a: All construction contractors shall adhere to the following noise attenuation requirements: - Construction activities shall be restricted from occurring Monday through Friday between the hours of 6:00 p.m. and 7:30 a.m. or on Saturday and Sunday between the hours of 6:00 p.m. and 9:00 a.m. or anytime on federal holidays. The City of San Ramon shall have the discretion to permit construction activities to occur outside of allowable hours if compelling circumstances warrant such an exception (e.g., weather conditions necessary to pour concrete). - Construction activities shall not exceed Occupational Safety and Health Administration (OSHA) noise standards of 90 decibel (dB) over 8 continuous hours or 105 dB over 1 continuous hour at any nearby office or residential use. - All construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. The analysis summarized above satisfies the requirements of MM NOI-2. No further analysis or mitigation is required.	Notes on construction plans; Site inspection	During construction	City of San Ramon		
MM NOI-1b: An acoustical analysis shall be prepared for any development that includes residential uses within the Specific Plan area. The acoustical analysis shall analyze potential exterior noise impacts to any ground level yards or patios	Approval of analysis	Prior to issuance of building permits for residential uses within the project site.	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
(upper level balconies shall be exempt from exterior noise standards) in order to determine compliance with the City's 60-dBA CNEL exterior noise standard. The acoustical analysis shall also analyze potential interior noise impacts to any habitable rooms in order to determine compliance with the City's 45-dBA CNEL interior noise standard. If the analysis determines an exceedance of noise standards will occur, then the analysis shall develop mitigation to reduce noise levels to within the standards. The noise analysis for the proposed project by FirstCarbon Solutions (FCS) contained within the Addendum satisfies the requirements of MM NOI-1b. No further analysis or mitigation is required. Conditions of Approval In compliance with the requirements of MM NOI-1b of the previously certified EIR, the following condition of approval (COA) shall be required to ensure that traffic noise impacts to the proposed project would be reduced to less than significant. COA NOI-1: a. All proposed residential private outdoor yard spaces that are located within 340 feet of Crow Canyon Road, or within 240 feet of Alcosta Boulevard, and that have a direct line of sight to either roadway (i.e., not shielded by an intervening structure) would be required to include a minimum 6-foot high solid fence that completely blocks the line of sight from the yard to either roadway. The fence shall be constructed to have a minimum surface weight of 4 pounds per square foot and shall have no vertical or horizontal gaps. The Applicant may implement alternative sound attenuation features that a noise study prepared by a qualified acoustical professional demonstrates to the City's reasonable satisfaction					

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
will reduce outdoor noise levels to meet the conditionally applicable outdoor noise standard. b. All wall assemblies of all façades with a direct line of sight of and located within 120 feet of the edge of the nearest travel lane of Crow Canyon Road, or within 60 feet of the edge of the nearest travel lane of Alcosta Boulevard shall be required to be constructed to meet a minimum sound transmission class (STC) rating of 35. All windows and doors in these impacted façades must also have a minimum STC rating of 35. These wall assembly STC rating requirements shall be clearly marked on the final construction documents. The verification of the STC rating of the final design of these wall assemblies shall be verified by a qualified acoustical professional prior to issuance of building permits. The Applicant may implement alternative sound attenuation features that a noise study prepared by a qualified acoustical professional demonstrates to the City's reasonable satisfaction will reduce indoor noise levels to meet the applicable interior 45 dBA CNEL noise standard.					
MM NOI-2a: A vibration analysis shall be prepared for any development that would include construction activities located within 130 feet of an off-site sensitive receptor. The vibration analysis shall utilize industry-accepted methodologies that include the recommended vibration assessment procedure and thresholds provided by public agencies such as the California Department of Transportation (Caltrans) or the Federal Highway Administration (FTA). The analysis contained in the Addendum satisfies the requirements of MM NOI-2a. No further analysis or mitigation is required.	Approval of analysis	Prior to issuance of building permits for any use that would include construction activities located within 130 feet of an off-site sensitive receptor	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
MM NOI-2b: A vibration analysis shall be prepared for any residential development that will be located within 50 feet of any private loading area or truck route. The vibration analysis shall utilize industry-accepted methodologies that include the recommended vibration assessment procedure and thresholds provided by public agencies such as the California Department of Transportation (Caltrans) or the Federal Highway Administration (FTA). The analysis contained in the Addendum above satisfies the requirements of MM NOI-2b. No further analysis or mitigation is required.	Approval of analysis	Prior to issuance of building permits for any residential development that will be located within 50 feet of any private loading area or truck route	City of San Ramon		
XVII. Transportation					
Conditions of Approval The following COA shall be required to ensure that impacts to transportation from the proposed project would be reduced to less than significant. COA TRANS-1: Prior to Site Development Permit issuance, the Applicant shall coordinate with the adjacent property owner, United States Postal Service (USPS), on a Site Plan to reconfigure the USPS parking lot for adequate site circulation and obtain and forward to USPS comments from the Community Development Director and the City Traffic Engineer on recommended adjustments to the Site Plan. The Applicant shall request that USPS include a drive-aisle and a 5-foot. wide landscape area (Zoning Ordinance Section D3-21(A)(7)) adjacent to the screen wall between the project site and the adjacent USPS parking aisles with no dead-end parking aisle designs.	Approval of site plan	Prior to Site Development Permit issuance.	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
XVIII. Utilities and Service Systems					
MM US-4a: Prior to the issuance of demolition and construction permits, project applicants within the Specific Plan area shall submit a recycling plan to the City of San Ramon identifying the procedures by which construction and demolition would be salvaged and recycled to the maximum extent feasible. The plan shall include proof that a construction and demolition debris recycler is under contract to the applicant to perform this work.	Approval of plan; Notes on construction plans	Prior to the issuance of demolition and construction permits	City of San Ramon		
MM US-4b: Prior to the issuance of occupancy permits, project applicants within the Specific Plan area shall submit a Recycling and Waste Reduction Plan to the City of San Ramon identifying practices they and their tenants would implement during project operations that demonstrate at least 50 percent diversion. Operation recycling and waste reduction practices shall include but not be limited to: • Compliance with City of San Ramon’s 50 percent waste diversion ordinance. • Installation of common recycling facilities in all residential uses. These facilities shall be equipped to accept aluminum, cardboard, glass, mixed paper, and plastic materials and contain signage clearly identifying accepted materials. • Periodic notification of residents and commercial tenants about the location of recycling facilities and accepted materials. • Installation of recyclable materials receptacles in public places (along streets in public parks, plazas, and outside of the Transit Center, etc.). Recycling receptacles shall be of high-quality design and shall display signage clearly identifying accepted materials.	Approval of plan; Notes on construction plans	Prior to the issuance of occupancy permits	City of San Ramon		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
Common commercial and residential disposal areas shall be designed with sufficient space to accommodate separate containers for solid waste, recyclables, organics, and—for restaurants—tallow, subject to approval of the franchise waste provider and City of San Ramon. Plans should include adequate and safe access for solid waste and recycling vehicles to access and collect materials.					

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Exhibit 4 (Table 1 of 3)						
Remaining RHNA (2023-2031)						
	Very-Low Income	Low Income	Moderate Income	Above Moderate Income	Totals	Notes
2023-2031 RHNA	1,497	862	767	1,985	5,111	
Year	Reported Progress for Projection Period (7/1/2022 to 1/31/2031)					
2022 - ADUs Issued a Building Permit				-6		6 ADUs issued a building permit between 7/1/2022 to 12/31/2022 (part of projection period)
2023 (TBD by April 2024)	TBD (April 2024)	TBD (April 2024)	TBD (April 2024)	TBD (April 2024)		
Project Name (APN)	Projects Approved/Entitled, anticipated to pull building permits or obtain Cert. of Occupancy for Projection Period (7/1/2022 to 1/31/2031)					
The Promenade at the Preserve (Twin Oaks) (208880001)				-162	162	Cert. of Occupancy anticipated in Projection Period
Aspen Wood Senior Apts. (210520031)	-26	-96		-1	123	BP issued 7/14/2022 and Cert. of Occupancy anticipated in Projection Period
ROEM Apts. (208271041)	-13		-7	-149	169	
Chang Residential (208240039)	-2	-4	-12	-43	61	Includes 43 SF and 18 ADUs
TTLT Townhomes (208260054)	-3	-2	-4	-48	57	
Windflower Fields (208250091)	-6	-6	-4	-47	63	Includes 47 SF and 16 ADUs
Deer Creek South (222270058)			-185		185	Cert. of Occupancy anticipated in Projection Period
City Village (Summerhill) (213133048)	-4	-6	-10	-384	404	
City Walk Master Plan - BR 1A:1 (Related Apts.) (21312036)	-29	-28		-324	381	
2481 Deerwood - Trumark Townhomes (208640003)	-3	-2	-4	-52	61	
Marketplace (213701002)				-44	44	Includes 40 SF and 4 ADUs
47 Paddock Ln. - Bierwith Lot Split (209750012)				-1	1	
	Remaining RHNA to Date					
	1,411	718	541	724	3,394	
Project Name (APN)	Proposed Project RHNA					
Iron Horse Village (213020046 and 213020037)	-1	-2	-2	-112	-117	
	Remaining RHNA with Proposed Development					
	1,410	716	539	612	3,277	

Exhibit 4 (Table 2 of 3)						
Remaining Capacity (2023-2031)						
	Very-Low Income	Low Income	Moderate Income	Above Moderate Income	Totals	Notes
Total Site Capacity	1,779	1,001	874	4,951	8,605	
Capacity from ADUs	21	21	21	7	70	
Project Name (APN)	Sites Inventory RHNA from Approved/Entitled or Permitted Project					
The Promenade at the Preserve (Twin Oaks) (208880001)				-162	162	
Aspen Wood Senior Apts. (210520031)	-26	-96		-1	123	
ROEM Apts. (208271041)	-13		-7	-149	169	
Chang Residential (208240039)	-2	-4	-12	-43	61	Includes 43 SF and 18 ADUs
TTLIC Townhomes (208260054)	-3	-2	-4	-48	57	
Windflower Fields (208250091)	-6	-6	-4	-47	63	Includes 47 SF and 16 ADUs
Deer Creek South (222270058)			-185		185	
City Village (Summerhill) (213133048)	-4	-6	-10	-384	404	
City Walk Master Plan - BR 1A:1 (Related Apts.) (21312036)	-29	-29		-323	381	
2481 Deerwood - Trumark Townhomes (208640003)	-3	-2	-4	-52	61	
Marketplace (213701002)				-44	44	Includes 40 SF and 4 ADUs
	Remaining Sites Inventory Capacity To Date					
	1,714	877	669	3,705	6,965	
Project Name (APN)	Sites Inventory Capacity from Proposed Development					
Iron Horse Village (213020046 and 213020037)	-8	-8	-16	-133	165	
	Remaining Sites Inventory Capacity with Proposed Development					
	1,706	869	653	3,572	6,800	

Exhibit 4 (Table 3 of 3)					
No Net Loss Calculation (2023-2031)					
	Very-Low Income	Low Income	Moderate Income	Above Moderate Income	Totals
Remaining Capacity	1,706	869	653	3,572	6,800
Remaining RHNA	1,410	716	539	612	3,277
No Net Loss Calculation	296	153	114	2,960	3,523