FCS
An ADEC Innovation

1125 North Gate Road Project

CEQA Guidelines Section 15183 Exemption and Consistency Checklist

Unincorporated Contra Costa County, California
State Clearinghouse Number 2023090467

PREPARED FOR:

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June 16, 2026

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ACRONYMS AND ABBREVIATIONS

µg/m^3	micrograms per cubic meter
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADA	Americans with Disabilities Act
ADU	accessory dwelling unit
AERMOD	American Meteorological Society/EPA Regulatory Model
AFY	acre-feet per year
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
APN	Assessor's Parcel Number
AQP	Air Quality Plan
ARB	California Air Resources Board
BART	Bay Area Rapid Transport
Bay Area Air District	Bay Area Air Quality Management District
BERD	California Built Environment Resource Directory
BMP	Best Management Practice
BRR	Biological Resources Report
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
CAP	Climate Action Plan
CBC	California Building Standards Code
CBPP	Contra Costa Countywide Bicycle and Pedestrian Plan
CC&R	Conditions, Covenants, and Restrictions
CCA	Community Choice Aggregate
CCAA	California Clean Air Act
CCCFPD	Contra Costa County Fire Protection District

CCHMP	Contra Costa Hazardous Materials Program
CCTA	Contra Costa Transportation Authority
CCWD	Contra Costa Water District
CCCWP	Contra Costa Clean Water Program
Central San	Central Contra Costa Sanitary District
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CGS	California Geological Survey
CIP	Capital Improvement Program
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CNPS Inventory	CNPS Inventory of Rare Plants
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
CVP	Central Valley Project
CWPP	Community Wildfire Protection Plan
dBA	decibel
DMP	Demand Management Program
DOF	California Department of Finance
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EBMUD	East Bay Municipal Utility District
EBRPD	East Bay Regional Park District
EFZ	Earthquake Fault Zone
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
EV	electric vehicle
FC District	Contra Costa County Flood Control and Water Conservation District
FCS	FirstCarbon Solutions
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map

FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
HAA	Housing Accountability Act
HCP	Habitat Conservation Plan
HMBP	Hazardous Materials Business Plan
HMTA	Hazardous Materials Transportation Act
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
ITE	Institute of Transportation Engineers
LCFS	Low Carbon Fuel Standard
LCI	California Governor's Office of Land Use and Climate Innovation
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MCE	Marin Clean Energy
MDUSD	Mt. Diablo Unified School District
MEI	Maximally Exposed Individual
MEIR	Maximally Exposed Individual Resident
MEIW	Maximally Exposed Individual Worker
mgd	million gallons per day
MM	Mitigation Measure
MTC	Metropolitan Transportation Commission
mph	miles per hour
MRP	Municipal Regional Permit
MRZ	Mineral Resource Zone
MWELO	Model Water Efficient Landscape Ordinance
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plans
NFHL	National Flood Hazard Layer
NHPA	National Historic Preservation Act
NOI	Notice of Intent

NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OEHHA	California Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OSHA	Occupational Safety and Health Administration
PG&E	Pacific Gas and Electric Company
Phase I ESA	Phase I Environmental Site Assessment
ppd	pounds per day
PPV	peak particle velocity
PQS	Professional Qualification Standards
PRC	Public Resources Code
PV	photovoltaic
RCRA	Resource Conservation and Recovery Act
RCTS	Recycling Center & Transfer Station
REC	Recognized Environmental Condition
RHNA	Regional Housing Needs Allocation
RPS	Renewable Portfolio Standard
RVL	Single-family Residential – Very Low Density
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCH	State Clearinghouse
SFBAAB	San Francisco Bay Area Air Basin
SFHA	Special Flood Hazard Area
SIP	State Implementation Plan
SLF	Sacred Lands File
SMARA	California Surface Mining and Reclamation Act
SRA	State Responsibility Area
SVP	Society of Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention Plan
State Water Board	California State Water Resources Control Board
TAC	toxic air contaminant
TAZ	Traffic Analysis Zone
TCR	Tribal Cultural Resource

T-BACT	Best Available Control Technologies for Toxics
TDM	Transportation Demand Management
TIS	Transportation Impact Study
UCMP	University of California Museum of Paleontology
ULL	Urban Limit Line
USDA	United States Department of Agriculture
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
WEAP	Worker Environmental Awareness Program
WSA	Water Supply Assessment
WUI	wildland urban interface

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1 - INTRODUCTION

This Consistency Checklist and attached supporting documents have been prepared to determine whether the proposed 1125 North Gate Road Project (proposed project) has peculiar project-specific significant effects not previously addressed in the Contra Costa County 2045 General Plan and Climate Action Plan Environmental Impact Report (prior FEIR) (State Clearinghouse [SCH] No. 2023090467), including all appendices attached thereto, certified by the Contra Costa County Board of Supervisors on November 5, 2024, that require additional environmental review under the California Environmental Quality Act (Public Resources Code [PRC], § 21000, *et seq.*) and the CEQA Guidelines (Tit. 14, Div. 6, Ch. 3 of the California Code of Regulations [CCR]) (collectively, CEQA).

1.1 - CEQA Assessment

The following Consistency Checklist has been prepared pursuant to CEQA Section 21083.3 and CEQA Guidelines Section 15183 (Projects Consistent with a Community Plan or Zoning) to determine whether the proposed project requires additional environmental review.

CEQA Section 21083.3 and CEQA Guidelines Section 15183 provide a statutory exemption that mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which a Final Environmental Impact Report was certified (in this case, the prior FEIR) shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site such that the prior FEIR is not adequate for purposes of the subject proposal.

1.2 - Summary of Results

As illustrated by the following Consistency Checklist, the proposed project is found to be in conformance with the analysis and conclusions of the prior FEIR. This determination supports the approval of the proposed project pursuant to an exemption pursuant to CEQA Section 21083.3 and Section 15183 and is based on the following criteria:

1. There are no new significant effects peculiar to the proposed project or its site;
2. There are no new significant effects that were not previously evaluated in the prior FEIR;
3. There are no new significant off-site or cumulative impacts that were not analyzed in the prior FEIR, and
4. There are no adverse impacts that are more severe than those previously identified in the prior FEIR.

This evaluation concludes that the proposed project is consistent with the development density established in the 2045 General Plan and is within the scope of the prior FEIR and that no further CEQA review or documentation is required pursuant to CEQA Section 21083.3 and CEQA Guidelines Section 15183. The proposed project is exempt from CEQA, and further environmental analysis of the proposed project is not required because:

- No significant impacts peculiar to the proposed project or its site have been identified. With (1) adherence to applicable 2045 General Plan goals, policies and actions, along with (2) adherence to all other applicable federal, State, regional, and local laws and regulations, (3) incorporation of identified project design features, (4) implementation of all relevant mitigation measures from the prior FEIR, and (5) implementation of other uniformly applied development standards, the proposed project's impacts would be consistent with the impact conclusions set forth in the prior FEIR.
- There are no potentially significant impacts that were not analyzed as significant in the certified prior FEIR.
- There are no potentially significant off-site and/or cumulative impacts that were not discussed by the certified prior FEIR.
- None of the previously identified significant effects in the certified prior FEIR have been determined to have a more severe adverse impact as a result of substantial new information which was not known at the time of the prior FEIR was certified.

The prior FEIR (including all appendices attached thereto) is available at:

County of Contra Costa
Department of Conservation and Development
30 Muir Road
Martinez, CA 94553

The foregoing documents are also available electronically at the California Governor's Office of Land Use and Climate Innovation's (LCI's) website:

Website: https://ceqanet.lci.ca.gov/2023090467/2

2 - PROJECT DESCRIPTION

2.1 - Project Location and Setting

2.1.1 - Project Location

Regional Location

The project site is located in unincorporated Contra Costa County (County), which is one of nine counties in the San Francisco Bay Area Region within California (Exhibit 1) with a population of approximately 1,158,225 persons.[1] The County is located in the eastern portion of the San Francisco Bay Area Region and is bounded by the Suisun Bay and Solano County to the north, San Joaquin County to the east, and Alameda County to the south and west. Portions of the San Francisco Bay and San Pablo Bay border the County along the northwest. The County contains 19 cities and multiple unincorporated communities.

Major roadway networks, including Interstate 680 (I-680), I-80, I-580, State Route (SR) 4, and SR-24, provide regional access to the County. I-680 lies approximately 3.3 miles west of the project site, traversing in a north to south direction, providing access to Alameda and Santa Clara Counties in the south and Solano County in the north. SR-24 lies approximately 4.1 miles west of the project site at the I-680 and SR-24 interchange in Walnut Creek, traversing in an east to west direction, providing access to Alameda County and the San Francisco Bay.

Local Vicinity

The project site is located south of the City of Walnut Creek within an unincorporated area of the County, which falls within the County's Urban Limit Line (ULL).[2] The ULL contains the urbanized areas of the County, including incorporated cities and unincorporated communities, and limits the areas where urban development can occur. This area of unincorporated Walnut Creek consists primarily of suburban residential developments, agricultural space, and open space. Additional uses include public institutions (including Northgate High School), substantial medical uses (including the John Muir hospital campus and related medical office uses), and Contra Costa County Fire Protection District (CCCFPD) Station 7.

Areas and existing uses surrounding the project site include low-density residential uses as well as the Diablo Mountain Foothills and Mt. Diablo State Park to the south and southwest, the City of Walnut Creek to the north and west, and agricultural uses to the east.

[1] California Department of Finance. 2025. Table 2: E-5 City/County Population and Housing Estimates, 1/1/2025. January 1.

[2] Contra Costa County. 2024. Contra Costa County 2045 General Plan. November 5.

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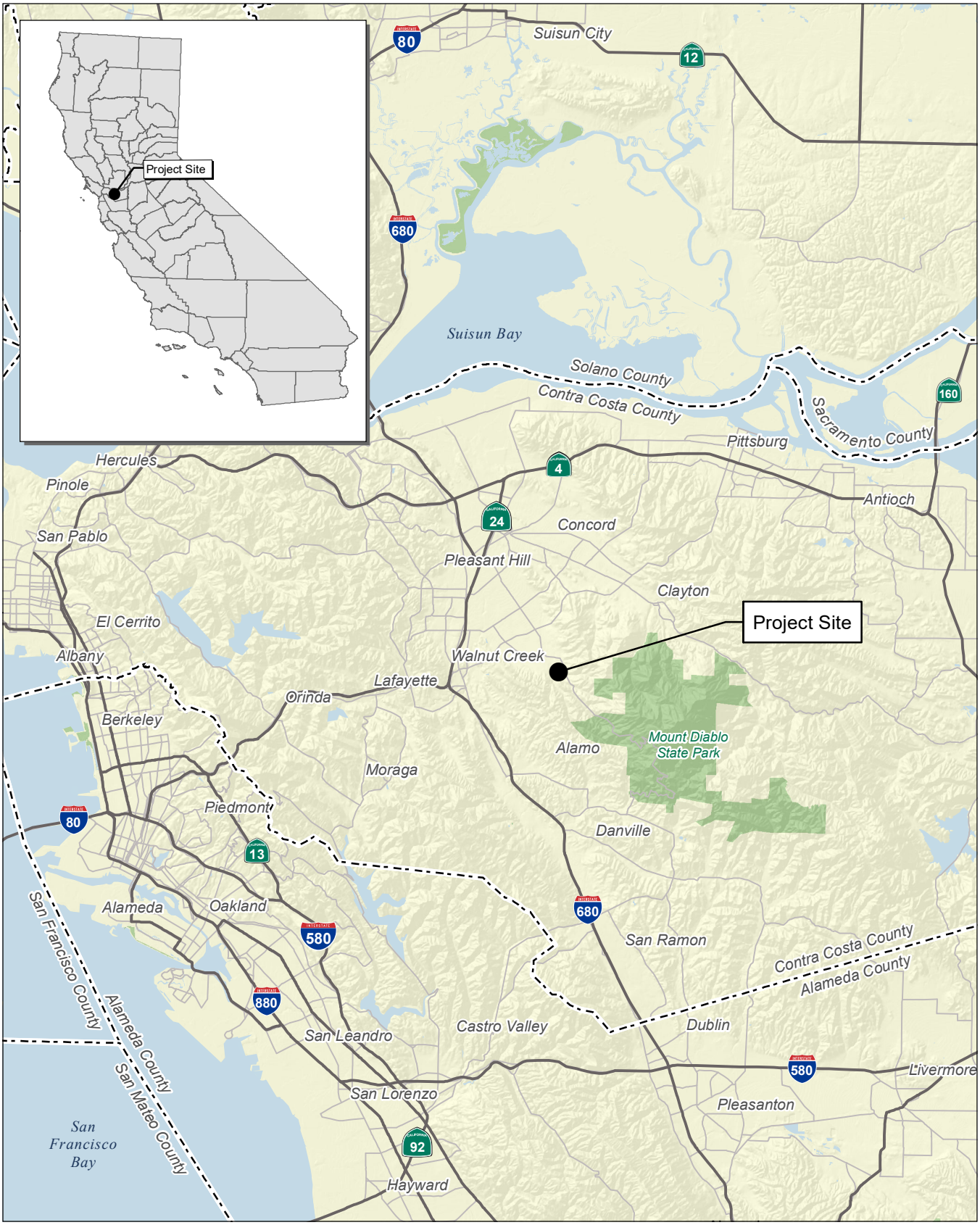

Source: Census 2000 Data , The California Spatial Information Library (CaSIL).

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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Recreational uses surrounding the project site include the Boundary Oaks Golf Course and Arbolado Park north of the project site and equestrian facilities at Bright Future Farms east of the project site. Local access is provided by North Gate Road via Oak Grove Road or Walnut Avenue via Ygnacio Valley Road and I-680.

Project Site

The project site is located at 1125 North Gate Road (Exhibit 2). It is located on an approximately 9.83-acre parcel in the North Gate area of unincorporated Contra Costa County, directly south of the City of Walnut Creek. The project site is associated with Assessor's Parcel Number (APN) 138-180-002 and is located within the existing service areas of Contra Costa Water District (CCWD) and Central Contra Costa Sanitary District (Central San).

The project site is mostly undeveloped with an existing single-family residential unit and an accessory structure on the southeast corner. According to the Modified Phase I Environmental Site Assessment (Phase I ESA) (Appendix E) prepared for the proposed project, the currently occupied single-family residential unit was constructed in the 1980s. The accessory structure is currently vacant and is in substantial disrepair.

Access to the project site is provided from North Gate Road by an unpaved roadway. The project site is relatively flat in terrain with a maximum elevation of approximately 313 feet above mean sea level (AMSL) from the southeastern portion of the project site sloping downward to the north toward Walker Creek with an elevation of approximately 250 feet AMSL. The project site has been historically used for agricultural purposes, with orchards present from at least 1939 to 1981.[3] The project site includes existing vegetation, including Non-native Grassland with native and herbaceous species intermixed. Other vegetation types on the project site include Coast Live Oak Woodland and Forest to the north within an approximately 0.73-acre riparian woodland along Walker Creek that traverses in an east to west direction. Planted Woodland comprised of remnant orchard species, and Developed/Ruderal habitat around the southern portion of the project site.[4] The project site is rural and underutilized and is considered slightly disturbed.

The project site is located within the *Clayton, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map (Township 1 North, Range 1 West, Section 29) (Latitude 37° 54' 20.06 " North, Longitude -121° 59' 51.27" West).

[3] ENGEO Incorporated. 2024. 1125 North Gate Road Contra Costa County, California, Geotechnical Report Update. November 26.

[4] Mosaic Associates and Coast Range Biological, LLC. 2024. Biological Resources Report for the Subdivision and Development of 1125 Northgate Road Project, Walnut Creek, California.

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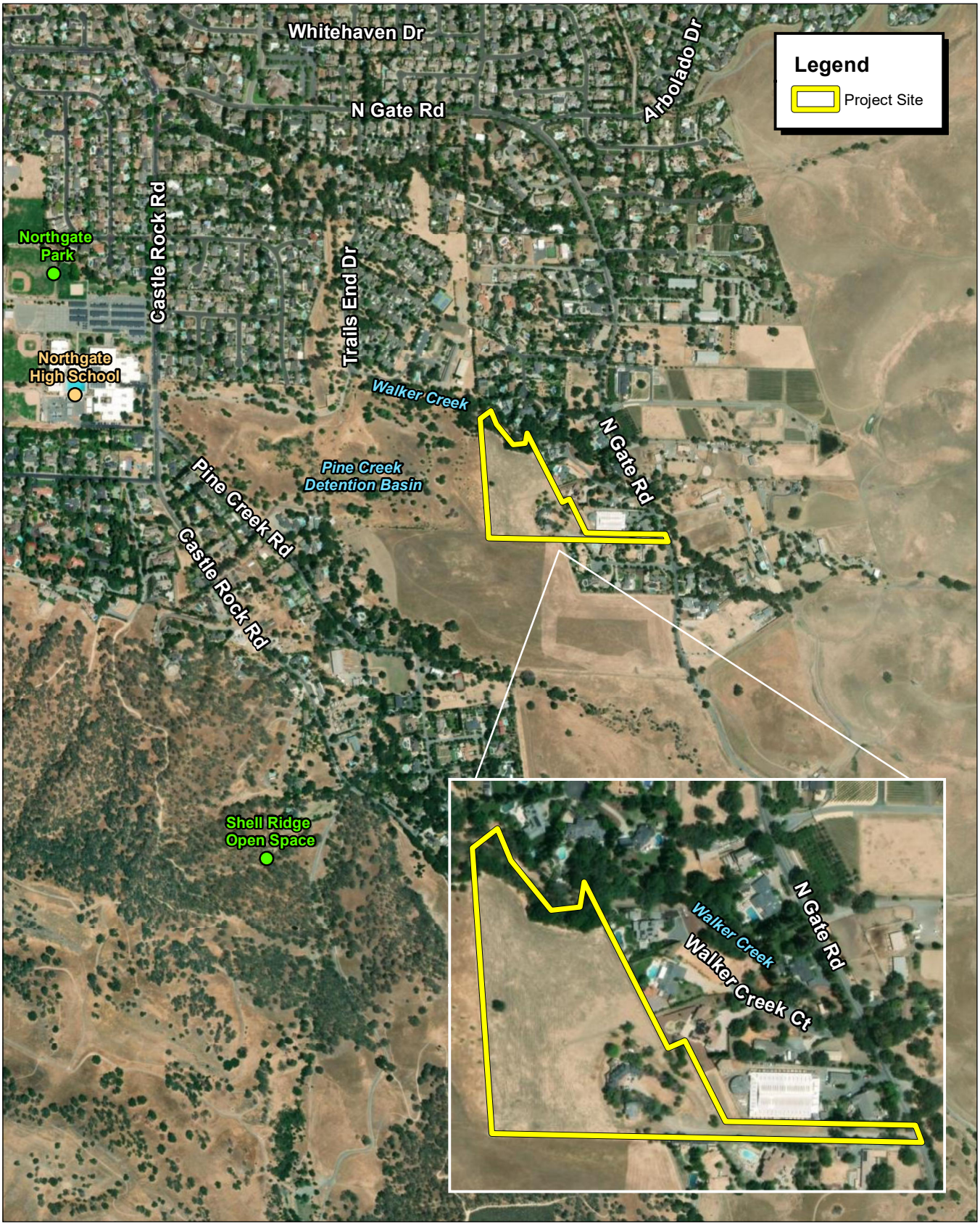

Source: ESRI Aerial Imagery. dk Engineering, 07/31/2025.

1,000 500 0 1,000 Feet

Exhibit 2
Local Vicinity Map

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The project site is not identified on a list compiled pursuant to Section 65962.5 of the Government Code (Cortese List).[5] According to the Federal Emergency Management Agency (FEMA), the project site is not located in a Special Flood Hazard Area (SFHA) but is delineated as Flood Hazard Zone X classified as an area of minimal flood hazard.[6,7] The southeastern portion of the project site is located within a California Geologic Survey Alquist-Priolo Earthquake Fault Zone (EFZ).[8] Additionally, the California Department of Forestry and Fire Protection (CAL FIRE) has designated the project site as being located in a High Fire Hazard Severity Zone (FHSZ) within a Local Responsibility Area (LRA).[9]

2.1.2 - Existing Development and Land Use Activities

The project site is directly adjacent to a mixture of low-density residential areas and undeveloped areas consisting of open space. Immediately north of the project site is Walker Canyon Creek, which contains an approximately 0.73-acre riparian woodland that traverses across the project site in an east to west direction. Further north of the project site, there are single-family residences, Shadowbrook Winery, Arbolado Park, and Boundary Oaks Golf Course.

The project site is adjacent to single-family residences to the east. Further east of the project site there are agricultural uses comprised of viticulture, equestrian, and grazing uses, including Bright Future Farms and Bryerly Farms. Multiple open space and recreational parks are located southwest of the project site, including Shell Ridge Open Space, maintained by the Walnut Creek Open Space Division, and Castle Rock Recreational Area and Diablo Foothills Regional Park, maintained by the East Bay Regional Park District (EBRPD). Arroyo Cerro Del and the Pine Creek Detention Basin, managed by the Contra Costa County Flood Control and Water Conservation District (FC District), are located west of the project site on undeveloped land. A primarily residential area of the City of Walnut Creek exists approximately 1,000 feet further west from the project site. The project site is also adjacent to undeveloped land to the south.

[5] California Environmental Protection Agency (Cal/EPA). 2025. Cortese List Data Resources. Website: https://calepa.ca.gov/sitecleanup/corteselist/. Accessed October 29, 2025.

[6] Federal Emergency Management Agency (FEMA). 2025. National Flood Hazard Layer Viewer. Website: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed October 29, 2025.

[7] According to FEMA, a Special Flood Hazard Area (SFHA) is an area having special flood, mudflow, or flood-related erosion hazards, and a Flood Hazard Zone X is an area determined to be outside the 500-year flood limit and is protected by a levee from 100-year floods. Website: https://www.fema.gov/about/glossary. Accessed October 29, 2025.

[8] California Geologic Survey (CGS). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed October 29, 2025.

[9] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zone Viewer. Website: https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0#data_s=id%3AdataSource_2-1952abff28e-layer-60-19538d1e994-layer-11%3A1003. Accessed October 28, 2025.

In addition, the North Gate entrance to Mt. Diablo State Park is located approximately 0.3 mile south of the project site on North Gate Road. This park entrance provides access to the mountain peak, along with over 20,000 acres of open space, recreational uses, and panoramic views.[10]

2.1.3 - General Plan and Zoning Designations

General Plan Land Use Designation

The project site is designated as Residential–Very Low Density (RVL) (Exhibit 3). This designation typically includes detached single-family units and small-scale agricultural activities on lots greater than 1 acre in size that serve as transitional areas between urban development and agricultural/rural areas. It is also appropriate for constrained sites where reduced densities are justified.[11] The RVL designation requires a density of less than or equal to 1 dwelling unit per acre (du/acre) and typically includes single-family units on lots 1 acre or larger.

North Gate Specific Plan

The project site is located within the North Gate Specific Plan area that is intended to support large lots to preserve natural features and to allow for single-family residential, equestrian, recreational and public operated parks, agricultural, and open space land uses. The North Gate Specific Plan delineates the project site to be within the Single-family Residential–Very Low Density land use category of the Specific Plan area (Exhibit 4). The Single-family Residential–Very Low Density land use category is intended to accommodate minimum lot sizes of 40,000 square feet on slopes less than 15 percent in grade with a density range of 0 to 0.9 dwelling units per net acre and a building height limit of 25 feet.[12]

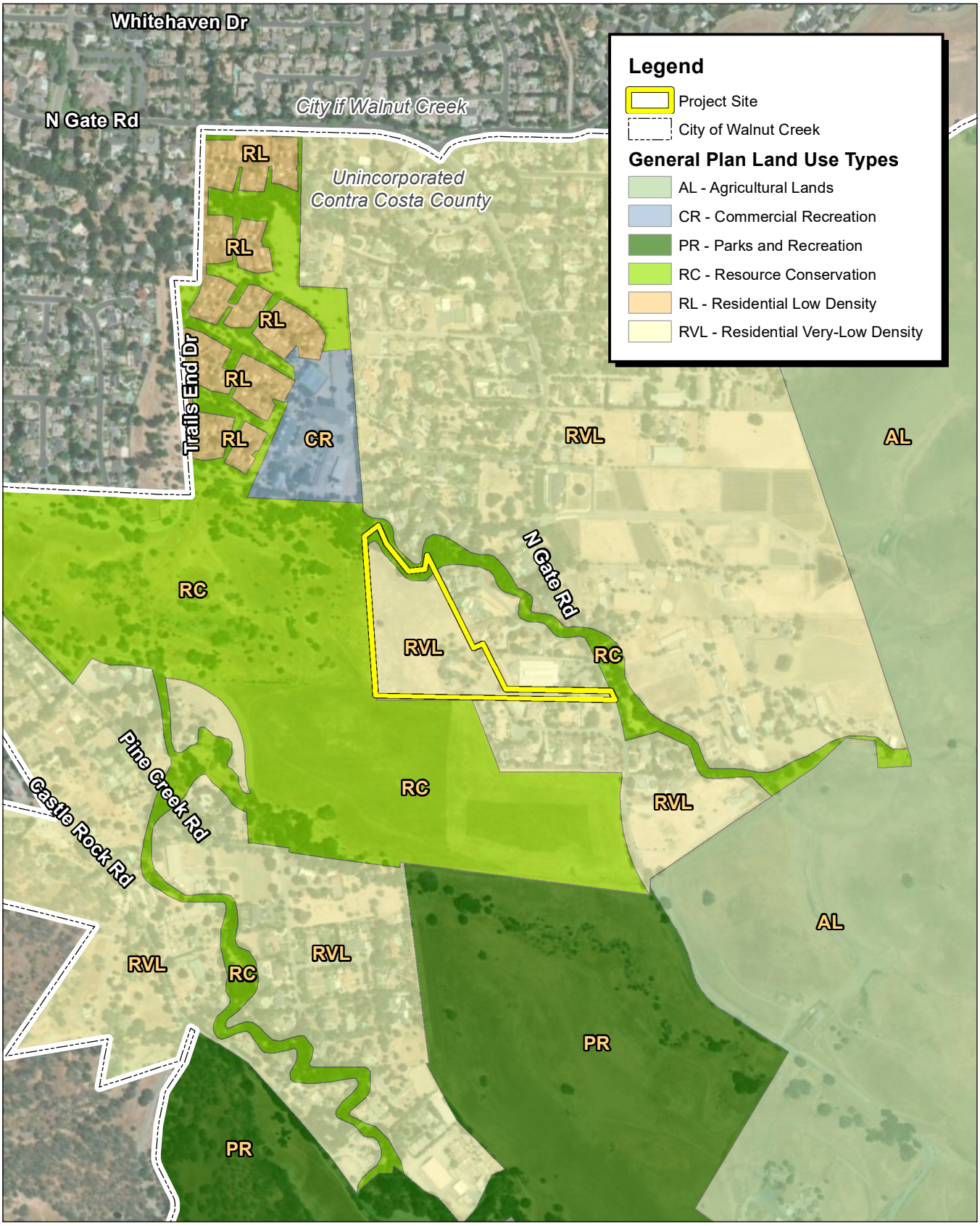
Zoning

The project site is zoned as Single-family Residential District (R-40) (Exhibit 5). All land within a R-40 single-family residential district may be used for any of the uses identified in Chapter 84-16 of the County Ordinance Code, under the regulations set forth therein. (Ord. Code § 84-16.202).

[10] California State Parks. 2018. Mount Diablo State Park. Website: https://www.parks.ca.gov/pages/517/files/MountDiabloFinalWebLayout2018.pdf. Accessed October 29, 2025.

[11] Contra Costa County. 2024. Contra Costa County 2045 General Plan. November 5.

[12] City of Walnut Creek and Contra Costa County. 1991. North Gate Specific Plan. September 10.



Source: ESRI Aerial Imagery. County of Contra Costa. dk Engineering, 07/31/2025.

750 375 0 750
Feet

Exhibit 3
General Plan Land Use Designation Map

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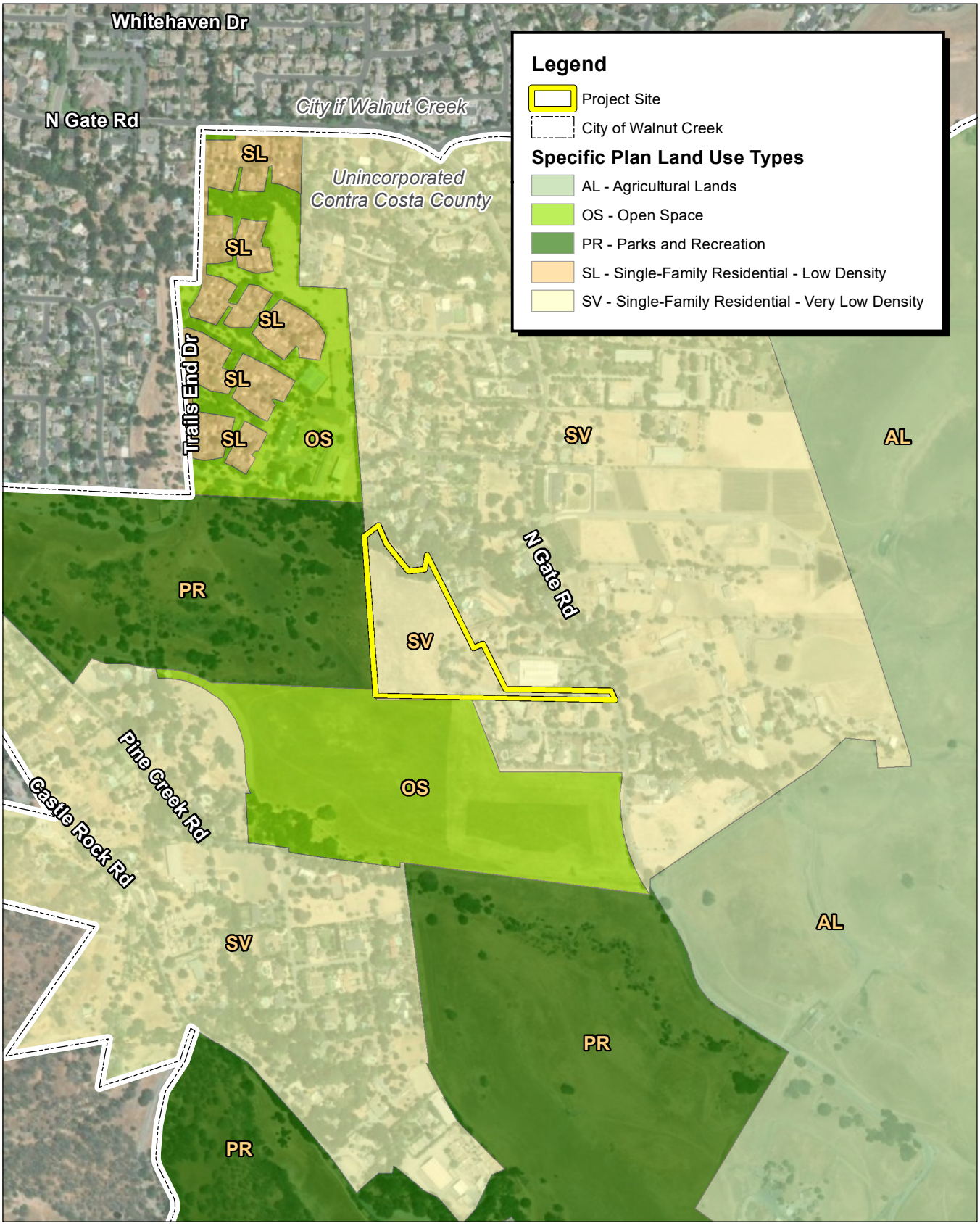

Source: ESRI Aerial Imagery. County of Contra Costa. dk Engineering, 07/31/2025.

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Exhibit 4
Specific Plan Land Use Designation Map

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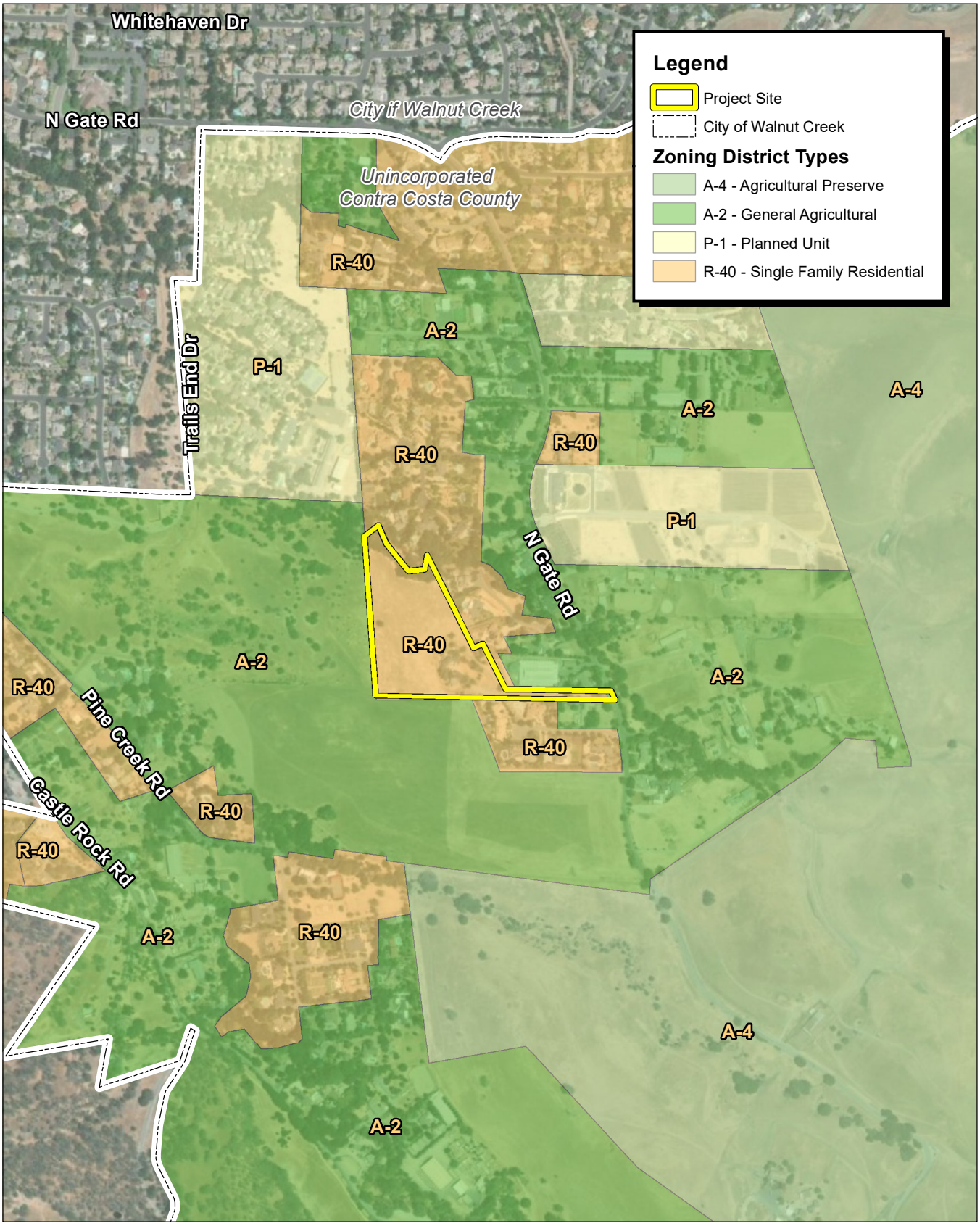

Source: ESRI Aerial Imagery. County of Contra Costa. dk Engineering, 07/31/2025.

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Feet

Exhibit 5
Zoning District Map

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Other permitted uses include, but are not limited to, agricultural uses, associated structures, and publicly owned parks and playgrounds in accordance with Contra Costa Municipal Code Sections 84-16.402 and 84-14.402. The R-40 zoning district establishes development standards for single-family dwellings including a height limit of 2.5 stories or 35 feet, an average lot width of 140 feet, a minimum side yard setback of 20 feet, a minimum front yard setback of 25 feet, and a minimum rear yard setback of 15 feet. All single-family dwellings are also required to include a minimum of two off-street covered or open surfaced area parking spaces.[13]

2.2 - Project Background and Previous Environmental Review

2.2.1 - General Plan

The County prepared and adopted the Contra Costa County 2045 General Plan (2045 General Plan) on November 5, 2024, which is an update from its 2005–2020 General Plan.[14] The 2045 General Plan is intended to guide long-term planning for future development projects in the unincorporated areas of the County to achieve the County's long-term vision for physical development, address twenty-first century challenges including climate change and housing, and enhance the quality of life for County residents over a 20-year period. The 2045 General Plan establishes eight elements that contain a variety of goals, policies, and implementation actions. Development projects must be consistent with applicable 2045 General Plan goals and policies.[15]

2.2.2 - General Plan Environmental Impact Report

The County certified the prior FEIR (on November 5, 2024) to evaluate the environmental effects of adopting and implementing the 2045 General Plan. The prior FEIR provides baseline environmental information and evaluates the potential environmental impacts for foreseeable future development that may occur with implementation of the 2045 General Plan based on a maximum reasonable development scenario. As provided for under CEQA, the County will rely on the prior FEIR when making decisions that implement the development contemplated in the 2045 General Plan, subject to the preparation of any additional environmental review to the extent required under CEQA.

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[13] Municode Codification. 2025. Contra Costa County – Ordinance Code Chapter 84-16 – R-40 Single-family Residential District. Website: https://library.municode.com/ca/contra_costa_county/codes/ordinance_code?nodeId=TIT8ZO_DIV84LAUSDI_CH84-16R-SIMIREDI. Accessed August 7, 2025.

[14] The project site was designated under the 2005–2020 Contra Costa County General Plan as Single-family Residential – Very Low Density (SV), which allows a range of 0.2–0.9 single-family units per acre.

[15] The applicant filed a Preliminary Application pursuant to Senate Bill (SB) 330 on October 31, 2024, with all the information required by Government Code Section 65941.1 and paid the applicable permit processing fee prior to the County's adoption of the 2045 General Plan. Thus, as of October 31, 2024, the applicant obtained vested rights to develop the proposed project in accordance with the "ordinances, policies, and standards" in effect at the time of its Preliminary Application was submitted.

2.3 - Project Description

2.3.1 - Development Summary

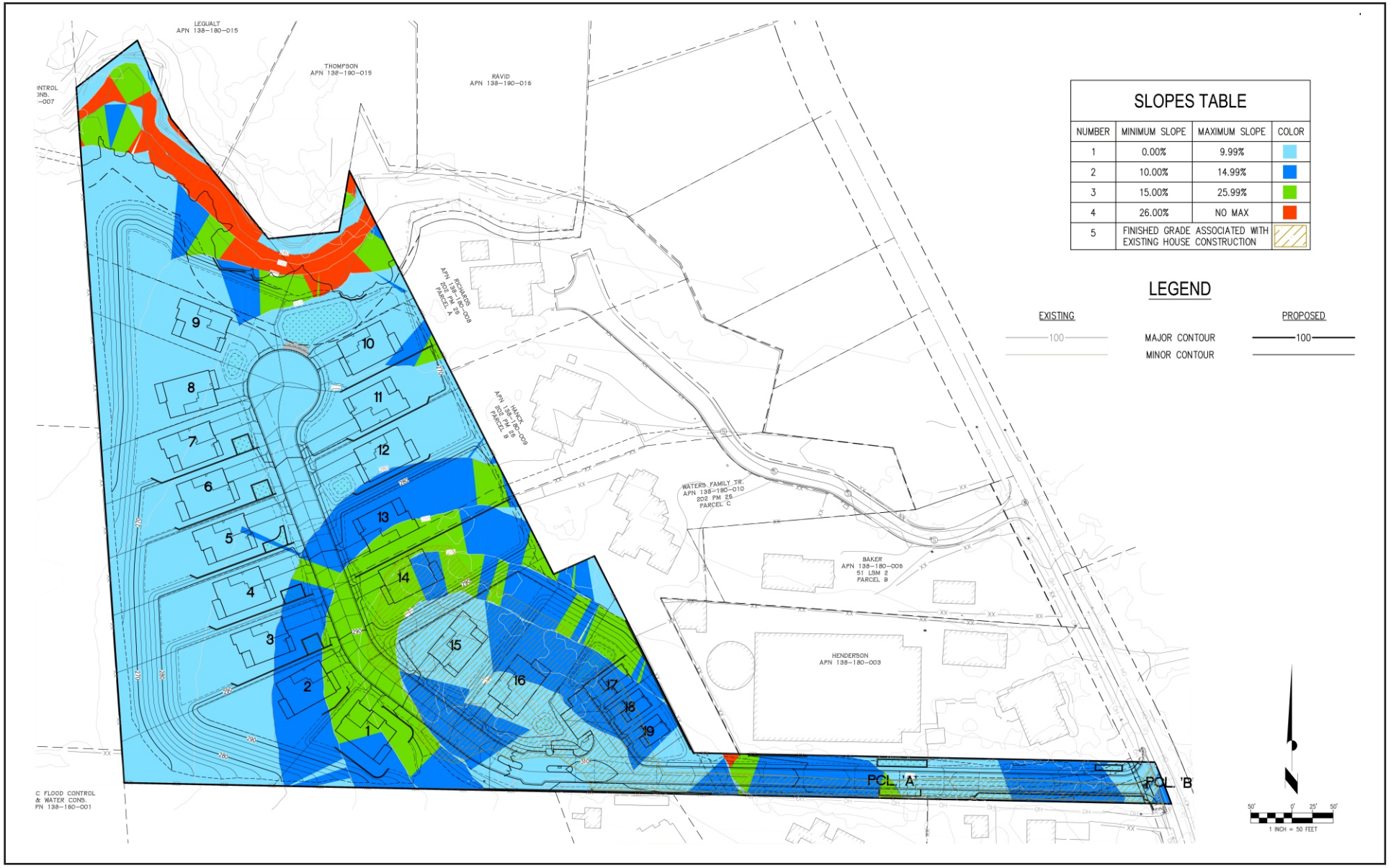
Calibr Ventures (project applicant or applicant) proposes to demolish the existing occupied single-family home and accessory structure, along with other on-site improvements, and subdivide an existing legal parcel into 19 lots to accommodate 19 single-family residential units, including 16 market rate for-sale single-family residential units and three affordable for-sale single-family residential units (comprised of three very low-income, deed-restricted residential units) on an approximately 9.83-acre project site (Exhibit 6).

The market rate for-sale single-family residential units would be constructed on lots 1 through 16, while the three affordable for-sale units would be constructed on lots 17 through 19 toward the entrance at the southern portion of the project site. Lots 1 through 9 are directly adjacent to open space along the south and west sides of the project site. Based on the application materials, it is anticipated that the 19 single-family residential units would be developed as part of an overall cohesive site plan but would include four different floor plans ranging from approximately 1,215 to 4,595 square feet with one- to three-car garages comprised of the following four different building styles: Farmhouse, Modern, Craftsman, and Traditional (Exhibit 7a and 7b). The proposed building floor plans and styles are identified in Table 1 below.

Table 1: Single-family Residential Building Summary

Building Floor Plan	Bedrooms	Bathrooms	Square footage (approx.)	Number of Parking Spaces	Building Styles
Plan 1 (inclusionary housing units)	4	2	1,215	1	Farmhouse, Traditional
Plan 2	4	3.5	3,981	3	Farmhouse, Craftsman, Traditional
Plan 3	5	4.5	4,595	3	Farmhouse, Craftsman, Modern
Plan 4	5	4.5	4,567	2	Farmhouse

Notes:
All values are approximate.
Source: Calibr Ventures. October 2024.



Source: dk Engineering, November 27, 2024.

Exhibit 6
Overall Site Plan

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Elevation A - Farmhouse
Color Scheme 2

Elevation C - Traditional
Color Scheme 6

Elevation B - Craftsman
Color Scheme 4

Source: WHA. CALIBR Ventures. December 02, 2024.

Exhibit 7a
Architectural Elevations Option a

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Elevation A - Farmhouse
w/ Open Deck
Color Scheme 1

Elevation D - Modern
w/ Covered Deck
Color Scheme 7

PLAN 3
Front Elevations

Elevation B - Craftsman
w/ Covered Deck
Color Scheme 3

Source: WHA. CALIBR Ventures. December 02, 2024.

Exhibit 7b
Architectural Elevations Option b

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The proposed project would install an unobtrusive, low-profile "farm-style" vehicle access gate. Lots 1 through 16 would be reached through the vehicular access gate, while lots 17 through 19 would be situated along the approach to the gate. Pedestrian access throughout the project site would remain open to all project residents, visitors, and guests.

The proposed project would also include bioretention basins, two underground stormwater vaults, and ornamental landscaping located throughout the project site, designed in accordance with all applicable standards and other requirements. The proposed project would also preserve approximately 18 existing trees at the project site, of which 13 are protected under the County Code's tree preservation provisions.

Discretionary Approvals

The proposed project requires the following discretionary approvals from the Contra Costa County.[16]

- Vesting Tentative Subdivision Map
- Tree Permit
- Grading Permit

Inclusionary Housing, Density Bonus, and the Housing Accountability Act

As noted above, the proposed project would allocate three of the 19 single-family residential units as for-sale very low-income units, meeting the County's 15 percent inclusionary housing requirement under Division 822–Affordable Housing of the County Ordinance Code. Pursuant to applicable State law, the affordable units provided to satisfy the County's inclusionary housing requirements shall also count toward satisfying density bonus requirements under State Density Bonus Law. As such, the applicant is able to secure a 50 percent density bonus under Government Code Section 65915(f)(2). Additionally, as the proposed project is allocating three units to very low-income households, the proposed project would be eligible for an additional 38.75 percent density bonus under Assembly Bill (AB) 1287. Furthermore, the applicant would be entitled to four incentives or concessions that result in identifiable and actual cost reductions to construct the affordable housing units under Government Code Section 65915(d) and an unlimited number of waivers or reduction of development standards that would otherwise physically preclude the construction of the proposed project at the densities or with the incentives or concessions permitted under Government Code Section 65915(e).[17]

[16] In addition, for informational purposes, the following is noted. The applicant has voluntarily agreed to enter into a Community Benefit Agreement with the County, wherein the applicant would contribute a specified amount of funding, subject to the terms set forth therein, which the County, in its discretion, could utilize to help fund the design, permitting, construction, and maintenance of planned trail improvements described in the Specific Plan. Any such County public improvements are not components of the proposed project for purposes of CEQA. Further, (1) any such potential future trail improvements are not part of or otherwise triggered by the proposed project; (2) they reflect previously planned improvements considered and approved as part of the North Gate Specific Plan; and (3) the ultimate timing, scope, and design of any such potential future improvements are currently unknown and entirely within the County's control.

[17] The specific density bonus requests are detailed more fully in project application materials.

Under the Density Bonus Law, the applicant is requesting the following incentives/concessions and waivers/reductions to development standards:[18]

- The applicant is requesting a waiver/reduction to the R-40 Zoning District minimum parcel size of 40,000 square feet.
- The applicant is requesting a waiver/reduction to the R-40 Zoning District requirement for side yard setbacks which requires an aggregate side yard width at least 40 feet and no side yard less than 20 feet wide.
- The applicant is requesting a waiver/reduction to the R-40 Zoning District requirement for front yard setbacks which requires a 25-foot front yard for the inclusionary housing units.
- The applicant is requesting a waiver/reduction to the R-40 Zoning District requirement for rear yard setbacks which requires a 15-foot rear yard for the inclusionary housing units.
- The applicant is requesting a waiver/reduction to the R-40 Zoning District requirement for average lot width of 140 feet.
- The applicant is requesting a waiver/reduction to the R-40 Zoning District requirement for lot depth of 140 feet in depth.
- The applicant is requesting a waiver/reduction to the R-40 Zoning District requirement for setbacks for retaining walls over 3 feet.
- The applicant is requesting a waiver/reduction to the Inclusionary Housing Ordinance, County Code Section 822-4.412(a), (b), and (c) (relating to certain unit standards).
- The applicant is requesting an incentive/concession to utilize gross acreage to determine the density of the project site.
- The applicant is requesting a waiver/reduction to the development standards within the North Gate Specific Plan for the following:
  - Building height
  - Lot size minimum
  - Maximum density
  - Lot area calculation
  - Setbacks

2.3.2 - Design and Appearance

Building Design

It is anticipated that the proposed single-family residential units would be designed under four different floor plans and exterior building styles. The Farmhouse building style would be used for floor

[18] Distinct from the legal basis under State Density Bonus Law upon which certain of the waiver/reduction requests are being made, there is a separate legal basis under the Housing Accountability Act that prevents the County from imposing subjective standards on the proposed project that applies here as well.

plans 1 through 4, the Traditional building style for floor plans 1 and 2, the Craftsman building style for floor plans 2 and 3, and the Modern building style would only be used for floor plan 3. Each exterior building style would incorporate similar building materials that would differ slightly in some areas for purposes of adding further architectural interest. Building materials across all exterior building styles would consist of a modern aesthetic with concrete slate tile roofing, stucco, fiber cement lap siding, fiber cement trim around the insulated vinyl windows, and masonry comprised of manufactured stone and/or brick. Each exterior building style would be coated with two different color schemes, ranging from black to brown for the concrete slate tile roofing, along with whites, grays, tans, and browns for the stucco, fiber cement lap siding, and trims. Different masonry profiles with light and dark textures would be constructed into each exterior building style. Additionally, each exterior building style would have distinct exterior lighting and sectional roll-up garage door(s).

Building Height

Pursuant to applicable provisions of State Density Bonus Law, which enables the applicant to seek either waivers or reductions of certain standards, as well as the Housing Accountability Act, which prohibits local agencies from imposing subjective standards on State-protected housing developments, the single-family residential units would be constructed at different building heights depending on the building floor plan and exterior building style. Specifically, the proposed project seeks a waiver or reduction to the development standards within the North Gate Specific Plan for building height, which limits 2-story buildings to 25 feet or less in height and homes fronting North Gate Road to no higher than 20 feet. Building heights under the proposed project would range from approximately 25 feet up to 33 feet 2 inches (from proposed building pad).

Building Setbacks

Pursuant to applicable provisions of State Density Bonus Law, which enables the applicant to either seek waiver/reduction of certain standards, as well as the Housing Accountability Act (which prohibits local agencies from imposing subjective standards on State-protected housing developments), lots one through 16 would be developed with side yard setbacks ranging from 5 to 10 feet, depending on the lot configuration. Consistent with applicable R-40 zoning standards, each lot would provide a minimum 25-foot front yard setback and a minimum 15-foot rear yard setback. However, the homes would generally have rear yards that exceed the required minimum setback. In addition, single-family residences on lots 2 through 9 would maintain setbacks of at least 60 feet from the adjacent open space, consistent with the North Gate Specific Plan. Along the western boundary of the project site, a 40-foot setback would be established by recorded deed restriction, limiting structures to a maximum height of 30 feet within this area. Lots 17 through 19 would provide reduced setbacks, consisting of 5 feet for side yards, 13 feet for front yards, and 14 feet for rear yards.

Creek Setbacks

A segment of Walker Creek is located on the northern boundary of the project site. Therefore, the proposed project would be subject to a 50-foot creek setback, as required by County Ordinance Code Section 914-14. The proposed project has been designed to significantly exceed this minimum setback requirement. Specifically, it would range from approximately 71 feet (measured from the flow

line) to 126 feet measuring from the closest proposed structures, e.g., Units 9 and 10, which would be located on the northern portion of the project site and would be set back approximately 112 and 126 feet from the creek, respectively. This setback would reduce habitat degradation and fragmentation in the riparian corridor. The proposed project would not include any earthwork or other development below the Walker Creek top of bank or within the riparian area surrounding Walker Creek.

Lot Sizes

The project site's 2045 General Plan land use of RVL allows for a density of less than or equal to 1 du/acre.[19] However, the North Gate Specific Plan designates the project site as Single-family Residential–Very Low Density. This designation is intended to accommodate minimum lot sizes of 65,000 square feet on slopes greater than 15 percent but less than 26 percent in grade with a density range of 0 to 0.9 dwelling units per net acre.

Therefore, while the proposed project's density of approximately 1.9 dwelling units per gross acre exceeds the base density otherwise specified under the 2045 General Plan and North Gate Specific Plan, the project is required to be permitted at this density pursuant to State Density Bonus Law (Government Code § 65915 *et seq*.).

Under State law, a qualifying housing development that includes the requisite percentage of very low-income units is entitled to a density bonus, incentives, concessions, and waivers of development standards necessary to accommodate the proposed project at the resulting density. Importantly, Government Code Section 65915(f)(5) provides that the granting of a density bonus "shall not be interpreted, in and of itself, to require a general plan amendment, zoning change, or other discretionary approval." Accordingly, a project that exceeds base density due to the application of State Density Bonus Law is deemed consistent with the applicable General Plan and zoning for purposes of CEQA Guidelines Section 15183. In addition, the 2045 General Plan expressly incorporates and implements State housing production laws, including the Density Bonus Law, as a mechanism to increase housing supply and affordability. As such, the density achieved by the proposed project is within the scope of development anticipated and analyzed in the prior FEIR, including development enabled by State law.

Therefore, when properly accounting for State Density Bonus Law and applicable Housing Accountability Act (HAA) protections, the proposed project is consistent with the development density established by the General Plan and zoning for purposes of CEQA Guidelines Section 15183 (*see* subsection (d)(1)(B) for additional discussion).

The State Density Bonus Law and the Housing Accountability Act (which prohibits local agencies from imposing subjective standards on State-protected housing developments) enables the applicant to either seek waiver/reduction of certain standards. Moreover, the proposed project has a base density of approximately 10 units. In addition to these 10 base units, the proposed project would construct two very low-income affordable units, which would maximize the available density bonus under

[19] Contra Costa County. 2024. Contra Costa County 2045 General Plan Land Use Element. November 5.

Section 65915(f)(2), and thus equate to the maximum bonus of 50 percent, or five units. (Government Code §§ 65915(f)(2) and 65915(v)(1)(B)). Also, the proposed project would construct one additional very low-income unit, which, under AB 1287, would allow the proposed project to qualify for an additional bonus of 38.75 percent, which rounds to four additional units. Therefore, with the 10 base units, five density bonus units, and four double density bonus units, the proposed project would total 19 units. (*See* Government Code § 65915(v)(2)). Proposed lot sizes would range from approximately 3,597 to 63,670 square feet. Average lot widths would range from approximately 46 to 152.3 feet.

2.3.3 - Landscaping

A total of approximately 52 trees currently exist on the project site. Of the approximately 52 trees, approximately 34 (all of which are considered code protected) would be removed while approximately 18 would be preserved. Of the 18 trees to be preserved, 13 are considered code protected, which necessitates a tree permit for any construction activities within the dripline. All trees to be removed are mostly located around the existing single-family residential unit and entrance to the project site. The proposed project would preserve the approximately 18 existing trees at the northern boundary of the project site within the creek structure setback and the proposed Walker Creek riparian corridor setback. In addition, the proposed project would strategically plant native oak trees and typical suburban trees along the western and southern boundary of the project site where undeveloped and open space areas are present to prevent degradation in the quality of views in these spaces. Therefore, the proposed project's compliance with this ordinance would further minimize the proposed project's impact on scenic resources. Furthermore, the proposed project would strategically plant native oak trees along the western boundary of the project site to screen proposed residential land uses from public vantage points within the Pine Creek Park and Greenway.

The proposed project would include approximately 293,272 square feet of landscaping, consistent with the County's applicable landscaping requirements. Pursuant to the County Water Efficient Landscapes Ordinance's landscaping requirements, a diverse range of drought-tolerant and low maintenance street and accent trees, shrubs, and groundcovers would be planted throughout the project site to enhance the architectural landscape of the surrounding neighborhood. The proposed irrigation system would consist of weather-based controllers and drip irrigation methods, drip irrigation bubblers for trees, and drip emitters for shrubs and groundcovers that would deliver water directly to the root zone, ensuring water conservation and favorable plant growth.

The proposed project's preliminary landscaping plan, which would be finalized as part of the building permit process pursuant to the final approved landscape plan and in accordance with conditions of approval, reflects landscaping in accordance with all applicable County requirements and includes street and accent trees such as, for example, native species such as coast live oak (*Quercus agrifolia*), valley live oak (*Quercus lobata*), and California sycamore (*Platanus racemosa*), and non-native Japanese maple (*Acer palmatum*), crape myrtle (*Lagerstroemia indica L.),* and Brisbane box (*Tristania conferta*). Coast live oaks and valley oaks would be planted along the southwest and west boundary of the project site that abuts the public open space areas. The front yards of the single-family residential units would include a diverse range of native and non-native accent trees, shrubs, and groundcovers, such as Berkeley sedge (*Carex tumulicola*), lilac hibiscus (*Alyogne huegelii*),

lantana (*Lantana montevidensis*), and manzanita (*Arctostaphylos*). Furthermore, bioretention areas (installed and maintained pursuant to all applicable standards and requirements) would be located throughout the project site and covered with low growing shrubs and herbaceous vegetation. These bioretention areas would be located in the front yards of lots 3 through 9 and 12, at the end of the proposed roadway to the north, to the north of the access gate entrance, and to the north of the very low-income single-family residential units.

The proposed project would incorporate three fencing types throughout the project site. Side yards for each lot would be bound by a 6-foot-tall wood fence that would transition to a 6-foot-tall open view wire fence surrounding the rear yards. Thirty-six-inch corral fences would be established along the bioretention area at the end of the proposed roadway and for the northern side of the bioretention area to the north of the access gate entrance.

2.3.4 - Circulation

Vehicular Circulation

Access to the project site would be provided by a new two-lane east–west private driveway (access road) beginning at North Gate Road forming a T-intersection. The egress of the access road would be stop-controlled with a paved stop bar, while North Gate Road would have the continuing right-of-way. The access road would be approximately 22 feet wide with no parking on either side, traversing along the southern boundary of the project site prior to diverging into two different roadways before the access gate, a primary roadway and a secondary roadway. The primary roadway would be a continuation of the original two-lane access road that would widen to 36 feet in width with a small median strip just before the access gate entrance. The access gate entrance would consist of two vehicle double-swing gates and a gate entry system on the small median strip, providing access to lots 1 through 16. The access gate would be accessible by the Fire District. The primary roadway after the access gate entrance would include 8-foot-long parking lanes on both sides and would proceed westbound, turning gradually northbound. It would terminate with a 90-foot diameter cul-de-sac prior to reaching the northern bioretention area and Walker Creek setback. The secondary roadway would deviate to the northwest prior to the access gate to serve lots 17 through 19 and would include four on-street guest parking spaces owned by lots 17 through 19.

Pedestrian Access

No pedestrian facilities currently exist on the project site or along the North Gate Road segment in direct proximity to the project site. The proposed project would construct sidewalk facilities along the proposed access road, primary roadway, and secondary roadway, which would be open and accessible to all project residents, visitors, and guests. Specifically, the proposed project would construct a 5-foot-wide sidewalk along the westbound side of the proposed access road and would span from the proposed access road entrance and North Gate Road T-intersection and terminate at the cul-de-sac to the northwest on the primary roadway. A paved crosswalk would be located perpendicular to the secondary roadway to link the sidewalk from the proposed access road to the beginning of the primary roadway. In addition, the project would be connected to an existing Class 1

bike lane that begins on the northbound side of North Gate Road, approximately 0.15 mile north of the proposed access road entrance.

2.3.5 - Parking

On-site parking would vary for the lots depending on the constructed floor plan. Lots 17 through 19 would each have a one-car garage and four dedicated guest parking spaces, only to be used by residents and guests of Lots 17 through 19, which would be located directly west of the inclusionary units, north of the private access easement. Lots 1 through 16 would vary from two-car to three-car tandem garages. Each single-family residential unit would include a driveway providing additional on-site parking, as well as street parking.

2.3.6 - Utilities

Water

Potable water services would be provided by the CCWD. The proposed project would connect to an already existing underground water main along North Gate Road. The new water main connecting to the existing one would be 6 inches in diameter and would be installed beneath the proposed private driveway (access road) before diverting into two water mains that would continue to follow the two roadways to serve all proposed residential units.

Wastewater

Central San would provide wastewater services to the proposed project. The proposed project would require a mainline extension and would connect to an already existing underground sewer main located on-site (lot 13) between the project site and Walker Creek Court to the east. The new sewer main connecting to the existing one would be 8 inches in diameter and would be located in a west–east trending easement between lots 13 and 14 prior to traversing beneath the on-site roadways to serve all proposed residential units.

Storm Drainage

The proposed project would develop new stormwater facilities on the project site that would be designed and built in accordance with all applicable standards and other requirements. Thirteen bioretention basins, ranging from approximately 192 to 2,766 square feet, are proposed throughout the project site. Stormwater from the primary roadway would convey into bioretention basins that would detain and treat stormwater prior to release from constructed culverts along the hillside to the west conveying treated stormwater into the Pine Creek Detention Basin. The rest of the proposed bioretention basins on the project site would connect to an existing underground stormwater system located on the project site. Two underground stormwater vaults are proposed within the project site. Both stormwater vaults would release stormwater gradually into an 18-inch underground storm drain system that would be connected to existing stormwater infrastructure. The proposed project's storm drain system would be private in nature and maintained pursuant to recorded Conditions, Covenants and Restrictions (CC&Rs).

Solid Waste and Recycling Collection

Republic Services, Inc. (Republic Services) would provide both solid waste and recycling services to the proposed project. Solid waste and recycling services would be provided on a weekly basis. Each lot would have designated accessible containers of sufficient size to contain all solid waste without exceeding capacity between collection dates.

Electricity, Natural Gas, and Telecommunications

Electricity for the proposed project would be provided by Marin Clean Energy (MCE), the Community Choice Aggregate (CCA) that serves as the default electricity generation provider in the project area, in conjunction with Pacific Gas and Electric Company (PG&E), which would continue to own, operate, and maintain the transmission and distribution infrastructure and provide billing services. PG&E would also provide natural gas service to the project site. The proposed project would connect to existing natural gas and electricity infrastructure available in the project area, through a 10-foot PG&E utility easement along the private driveway (access road) and proposed roadways through joint trenching.

The proposed residential units would include electric vehicle (EV) charging infrastructure, as well as solar photovoltaic (PV) systems which are required by the California Building Code (including Building Energy Efficiency Standards as well as California Green Building Standards Code (CALGreen) standards).

Telecommunication services would be provided by various service providers such as Comcast, Astound and AT&T.

2.3.7 - Construction

Construction of the proposed project is anticipated to begin in March 2027 and would occur in a single phase. Construction is estimated to last for approximately 15 months, concluding in mid-2028. Construction activities would consist of demolition, site preparation, grading, excavations, street paving, building construction, and landscaping.

Grading and Excavations

The project site slopes to the northwest toward Walker Creek and the Pine Creek Detention Basin with the highest portions of the project site around the southwest approximately 310 feet AMSL to about 250 feet AMSL to the northwest. The majority of the project site has a grade between approximately zero to 10 percent slope with steeper sections along the primary roadway after the access gate ranging from 10 to 26 percent slope. The proposed project would cut and fill approximately 34,700 cubic yards of soil on-site to flatten out the proposed lots (the project site would be balanced and would not result in import or export of material). The access road would slope to the east ranging between approximately 3.2 percent to approximately 6 percent in grade while the primary roadway would slope to the northwest varying from approximately 5.3 percent to approximately 9.5 percent in grade.

3 - CEQA GUIDELINES SECTION 15183: PROJECTS CONSISTENT WITH A GENERAL PLAN OR ZONING

CEQA Guidelines Section 15183 mandate that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which a FEIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

Proposed Project Does Not Require Further Environmental Review under CEQA Guidelines Section 15183

CEQA Section 15183 applies to the proposed project because it meets the following criteria in subsections (d)(1)(B), (d)(2)(C), and (d)(2).

(d)(1)(B) The project is consistent with a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development.

A project is consistent with a zoning action that zoned or designated the parcel on which the project would be located to accommodate a particular density if the project is the same or less than the standard contemplated for the involved parcel(s) in the general plan for which a FEIR has been certified, and the project complies with the applicable density standards contained in that plan (CEQA Guidelines § 15183(i)(2)). Density standards are expressed in various ways, including based on the number of dwelling units per acre, the number of people in a given area, FAR, and other measures of building intensity, building height, and size limitations and use restrictions. In addition, as is the case here, density also takes into account applicable provisions of State housing production laws.

The proposed project is a State-protected residential housing development project, as defined in the HAA (Government Code § 65589.5(h)(2)). As described further below, because of the proposed on-site affordable units, the proposed project also is able to secure benefits from and is protected by State Density Bonus Law.

The 2045 General Plan land use designation for the project site is RVL, which is permitted for transitions between urban development and agricultural/rural areas. This designation typically includes detached single-family units on lots one acre or larger and small-scale agricultural activities. The project site is zoned R-40 with a lot size of 9.83 acres. Permitted uses under R-40 zoning include

single-family residences, accessory dwelling units (ADUs), clustered or planned unit developments, mobile homes, manufactured housing, and compatible community-serving uses such as day care centers and residential care facilities.

Further, the project site is located within the North Gate Specific Plan,[20] which designates the project sites as Single-family Residential–Very Low Density. This is intended to accommodate minimum lot sizes of 40,000 square feet on slopes less than 15 percent in grade with a density range of 0 to 0.9 dwelling units per net acre and a building height limit of 25 feet.[21]

Lot sizes under the proposed project would range from approximately 3,597 to 63,670 square feet, and average lot widths would range from approximately 46 to 152 feet. Without taking into account benefits that the County must grant under the State Density Bonus Law, allowable density under the project site's RVL land use designation is a maximum of up to 1 du/acre.[22] Further, allowable density under the Northgate Specific Plan based on the project site's designation of Single-family Residential–Very Low Density would be up to 0.9 dwelling units per net acre.

The proposed project is subject to the protections and benefits of the HAA and State Density Bonus Law. Assuming the density set forth in the 2045 General Plan,[23] the proposed project has a base density of 10 units (9.10*.99=9.009, which rounds[24] to 10 units). The applicant would seek and agree to construct 15 percent on-site very low-income affordable units, or 1.5 units which rounds to 2. In so doing, this would maximize the available density bonus under Section 65915(f)(2) and thus equate to the maximum bonus of 50 percent, or five units. (Government Code §§ 65915(f)(2); 65915(v)(1)(B)).

The proposed project involves the construction of an additional 10 percent very low-income units; using the 10-unit base density, this would equate to one additional unit being affordable to very low-income households. By constructing this additional affordable unit, the proposed project would qualify for an additional bonus of 38.75 percent under AB 1287. This additional density bonus would equate to 3.8 units which rounds to 4. In total, the proposed project would be allowed to construct 10 base

[20] The North Gate Specific Plan serves as a planning document for lands that fall within its boundaries, but does not serve as a regulatory document governing zoning; instead, as discussed above, the County Zoning Code sets forth the applicable zoning designation for the project site.

[21] City of Walnut Creek and Contra Costa County. 1991. North Gate Specific Plan. October 29, 2025.

[22] Contra Costa County. 2024. Contra Costa County 2045 General Plan Land Use Element. November 5.

[23] The 2045 General Plan designated a small portion of the project site (approximately 0.73 acre) as RCL. Assuming this acreage is subtracted from the project site's total acreage, this would equate to approximately 9.10 acres (9.83 – 0.73 = 9.10). However, the applicant filed a Preliminary Application pursuant to Senate Bill (SB) 330 on October 31, 2024, with all the information required by Government Code Section 65941.1 and paid the applicable permit processing fee prior to the County's adoption of the 2045 General Plan. Thus, as of October 31, 2024, the applicant obtained vested rights to develop the proposed project in accordance with the "ordinances, policies, and standards" in effect at the time its Preliminary Application was submitted. Pursuant to the foregoing, the prior General Plan did not include the RCL designation on the project site.

[24] Pursuant to Government Code section 65915(q): "Each component of any density calculation, including base density and bonus density, resulting in fractional units shall be separately rounded up to the next whole number. The Legislature finds and declares that this provision is declaratory of existing law."

units, five density bonus units, and four double density bonus units, totaling 19 units. (See Government Code § 65915(v)(2)). In addition to the density bonus for which the proposed project qualifies, under AB 1287, it would also qualify for additional benefits under State Density Bonus Law. Specifically, because the proposed project involves at least 16 percent of its total units being reserved for very low-income households in an ownership project, then the proposed project is eligible for a total of four incentives/concessions. (See Government Code § 65915(d)(2)(F)).

Taking into account the benefits under State Density Bonus Law to which the County is mandated to grant, the proposed project's 19 units are consistent with the development density established by the 2045 General Plan and existing zoning for which the prior FEIR was certified. Thus, the criterion in subsection (d)(1)(B) has been met.

(d)(1)(C) The project is consistent with the 2045 General Plan.

The project site has a General Plan land use designation of RVL and is zoned as R-40,[25] and the prior FEIR anticipates residential development on the project site under General Plan buildout. The RVL designation requires a density of less than or equal to 1 du/acre and typically includes single-family units on lots one acre or larger. It is intended to provide a transition between urban development and agricultural/rural areas. The R-40 designation allows for a minimum lot size of 40,000 square feet.

The proposed project qualifies for a density bonus (discussed in Section 4.11, Land Use and Planning) and would have a density of 1.9 dwelling units per gross acre, as explained in more detail above.

The 2045 General Plan expressly incorporates the protections of State housing production laws, such as the State Density Bonus Law, by emphasizing the County's commitment to implement the density bonus program to permit projects to exceed the maximum allowable density set by 2045 General Plan and zoning maximum if the project includes units set aside for occupancy by very low-, low-, and moderate-income households as provided for in State Density Bonus Law. (*See* Housing Element, HE-P2.1.)

The same approach is taken in the County's zoning ordinance. The Contra Costa County Density Bonus Ordinance (Chapter 822-2) is an implementing component of the County's zoning regulations; therefore, a project that provides qualifying affordable housing units, receives a density bonus, and otherwise complies with applicable zoning and development standards is considered consistent with the density anticipated under the applicable zoning designation. The County's Density Bonus regulations state in Section 822-2.208, that the County's Density Bonus chapter is deferential to the

[25] As noted in the Project Description, the proposed project vested into the prior General Plan and zoning from an entitlement standpoint pursuant to the filing of its SB 330 Preliminary Application. The project site was designated under the 2005-2020 Contra Costa County General Plan (General Plan) as Single-family Residential–Very Low Density (SV), which allows a range of 0.2-0.9 single-family units per acre. That said, the project site's General Plan land use designation under both the prior General Plan and the 2045 General Plan are substantially similar.

provisions of State law. The County's Density Bonus regulations expressly provide that the approval of a density bonus, concessions, or incentives shall not, in and of itself, be interpreted to require a General Plan amendment, zoning change, or other discretionary land use approval beyond those otherwise required for the project. This approach is consistent with State Density Bonus Law, which specifies that the granting of a density bonus "shall not require, or be interpreted, in and of itself, to require a general plan amendment, local coastal program amendment, zoning change, or other discretionary approval." (Government Code § 65915(f)(5)).

Consistent with the foregoing, residential projects that include affordable housing units and utilize the Density Bonus program are consistent with the relevant goals and policies of the 2045 General Plan. For example, the Housing Element of the 2045 General Plan identifies the Density Bonus program as a key implementation mechanism to facilitate the production of housing affordable to very low-, low-, and moderate-income households by allowing eligible projects to exceed otherwise applicable maximum density limits. The use of a density bonus directly advances Housing Element policies that promote housing affordability, increase overall housing supply, and support the County's compliance with State-mandated housing obligations. Accordingly, a project that utilizes the Density Bonus program remains consistent with the 2045 General Plan and qualifies for reliance on the existing General Plan EIR pursuant to CEQA Guidelines Section 15183.

As such and taking into account the protections and benefits under State law, the proposed project is consistent with the General Plan considered in the prior FEIR, and thus is subject to the mandatory CEQA streamlining requirements under CEQA Guidelines Section 15183(d). Thus, the criterion in subsection (d)(1)(C) has been met.

d)(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

As discussed above, the proposed project is consistent with the density established under the 2045 General Plan and the zoning for the project site. The prior FEIR, which was prepared for the 2045 General Plan, was certified by the Contra Costa County Board of Supervisors on November 5, 2024. Thus, the criterion in subsection (d)(2) has been met.

4 - ENVIRONMENTAL CHECKLIST

CEQA Guidelines Section 15183(b) states that:

> (b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
>
> (1) Are peculiar to the project or the parcel on which the project would be located;
>
> (2) Were not analyzed as significant effects in a prior FEIR on the zoning action, general plan, or community plan, with which the project is consistent;
>
> (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior FEIR prepared for the general plan, community plan or zoning action; or
>
> (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the prior FEIR was certified, are determined to have a more severe adverse impact than discussed in the prior FEIR.

The following pages of this document contain an Environmental Checklist that examines the proposed project's potential environmental effects within the parameters outlined at CEQA Guidelines Section 15183(b). The "prior FEIR" used for comparison is the Contra Costa County 2045 General Plan and Climate Action Plan Environmental Impact Report certified by the Contra Costa County Board of Supervisors on November 5, 2024, including all impact determinations and significance thresholds utilized therein.[26]

[26] In some instances, the significance thresholds utilized in the General Plan FEIR differ from thresholds included in CEQA Guidelines Appendix G. Appendix G does not prevent public agencies from adopting their own significance thresholds (PRC § 21099(e)).

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.1 Aesthetics *Except as provided in Public Resources Code Section 21099, would the project*					
a) Have a substantial adverse effect on a scenic vista?	Less than significant impact	No	No	No	No
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	No
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	No
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	No

The proposed project does not meet the California Public Resources Code Section 21099(d) criteria, as it is not located within a transit priority area. Therefore, analysis of the potential impacts of the proposed project on aesthetics is required.

a) Scenic Vista

Would the project: Have a substantial adverse effect on a scenic vista?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR identifies various scenic resources in Contra Costa County, such as open spaces, estuaries, rolling hills, and water features. It recognizes that development could affect these resources by converting natural lands to urban uses. However, the prior FEIR notes that developments must comply with County regulations such as preserving trees and landscapes on hillsides (Chapter 814-2), limiting urban expansion with the 65/35 Land Preservation Plan (Chapter 82-1), and protecting designated trees (Chapter 816-6). Additional policies require project redesigns to protect viewsheds, regulate construction near scenic ridges, and restrict unnecessary grading. With these regulations and policies in place, the prior FEIR concludes that potential impacts on scenic resources would be less than significant.

Proposed Project Analysis and Conclusion

Scenic vistas provide distant views of natural or urban landscapes that provide high value for the public. Common vistas are rivers, mountains, open spaces, landmarks, and city skylines, which is consistent with the characterization of scenic vistas discussed in the prior FEIR. In addition, Chapter 816-6 of the Contra Costa County Ordinance Code acknowledges the preservation of Protected Trees on undeveloped property to preserve scenic beauty.

The project site is mostly undeveloped with a single-family residential unit and an abandoned accessory structure, with nearby existing suburban single-family residential uses. The project site is rural and underutilized and is therefore considered slightly disturbed. Walker Creek, and its associated riparian woodland, traverses across the project site in an east to west direction.

Scenic resources in the vicinity of the project site (as identified by the County's definition) include open spaces that encompass natural vistas and water resources, along with designated scenic ridges that contribute to the scenic quality of the surrounding urban environment.[27] Specifically, the project site is in proximity to open space lands to the south and west and Pine Creek is situated approximately 0.25-mile west at the Pine Creek Detention Basin. Further, located approximately 0.5 mile from the project site are scenic ridges within areas such as Shell Ridge Open Space, Lime Ridge Open Space, Diablo Foothills Regional Park, and Mount Diablo State Park that are part of the overall scenic viewshed. In addition, the proposed project is located along North Gate Road, which is a County-designated scenic route, as shown in Figure COS-12 of the General Plan. The proposed

[27] Contra Costa County. 2024. Contra Costa County 2045 General Plan. November 5.

project would meet all applicable General Plan policies that require project redesigns to protect important viewsheds, and thus, would result in a less than significant impact on scenic resources.

However, while numerous scenic resources are in the project vicinity generally, the project site is not located within any of the above-referenced scenic ridgelines. To the contrary, the project site is within the ULL and is located at a relatively low elevation in an area that has a significant amount of existing suburban development, including nearby similar single-family residential uses.

Consistent with the analysis in the prior FEIR, and as described more fully in Section 2.3, Project Description, the proposed project would develop single-family residential units constructed within the lower elevated areas of the North Gate suburban residential community currently developed with similar uses as well as small-scale agricultural activities. Homes would be low-density, two-story single-family detached units, with design and architectural elements incorporated to help ensure compatibility with the nearby uses. The proposed project's design is intended to be compatible with the surrounding single-family and public land uses and to avoid adverse visual impacts from alteration of the project site. While the proposed project would alter views in the North Gate Community, the overall aesthetic of the community would remain the same. This would reduce potential impacts related to viewsheds along North Gate Road, a County-designated scenic route.

Thus, the proposed project would not have a substantial adverse impact on scenic resources in the project vicinity. The proposed project would remove approximately 34 Protected Trees; however, the proposed project would be required to comply with Chapter 816-6 of the Costa County Ordinance Code by applying for a tree permit subject to review and approval by the County. In addition, approximately 18 existing trees would be preserved (13 of which are considered code protected) and the proposed project would also plant new trees, such as coast live oak, valley live oak, and California sycamore, as well as other appropriate landscaping components. In addition, the proposed project would strategically plant native oak trees and typical suburban trees along the western and southern boundary of the project site where undeveloped and open space areas are present to prevent degradation in quality of views in these spaces. Therefore, the proposed project's compliance with this ordinance would further minimize the proposed project's impact on scenic resources. Furthermore, the proposed project would strategically plant native oak trees along the western boundary of the project site to screen proposed residential land uses from public vantage points within the Pine Creek Park and Greenway. The planting of native oak trees is consistent with General Plan Policy LU-P4.4 that requires design solutions to minimize conflicts between different land uses. Moreover, also consistent with the analysis in the prior FEIR, the proposed project would be required to comply with all applicable County laws and regulations, all of which help further ensure protection of scenic vistas and restrict unnecessary grading.

As such, a less than significant would occur to scenic vistas, consistent with the impact conclusions of the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Therefore, no additional environmental review is required.

b) State Scenic Highways

Would the project: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR found that Contra Costa County contains scenic resources such as designated scenic highways (e.g., SR-24) and eligible routes (e.g., SR-4), scenic ridges, and rural corridors. Future development under the 2045 General Plan could potentially affect scenic resources within a State Scenic Highway. However, the General Plan includes policies that protect scenic resources, scenic routes, and State Scenic Highways, such as supporting preservation and enhancement of natural and human-made features along designated scenic routes (Policy COS-P12.7), and requiring visual impact analyses for projects along designated scenic routes (Policy COS-P12.8). Additionally, Action COS-A12-2 calls for the adoption of design policies within designated scenic routes. The prior FEIR concluded that impacts related to scenic resources within a State Scenic Highway related to implementation of the 2045 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

The California Department of Transportation (Caltrans) designates and manages the State Scenic Highways Program. State designated scenic highways are classified as providing predominant scenic views and are adjacent to scenic resources consisting of both built and natural features including complex topography and vegetation. The closest State Scenic Highway is I-680, which traverses in a north–south direction approximately 3.4 miles west of the project site.[28] The project site is not visible from I-680 due to intervening vegetation, development, and topography. In addition, the proposed project is located along North Gate Road, which is a County-designated scenic route, as shown in Figure COS-12 of the General Plan. However, the proposed project would be consistent with the overall nature of development in the project vicinity. Homes would be low-density, two-story single-family detached units, with design and architectural elements incorporated to help ensure compatibility with the nearby uses.

The proposed project would remove approximately 34 Protected Trees and would preserve approximately 18 existing trees (13 of which are code protected) and would be required to comply with Chapter 816-6 of the Costa County Ordinance Code by obtaining a County-approved tree permit. New trees—including coast live oak, valley live oak, California sycamore, and other appropriate landscaping—would be planted. Native oak and suburban trees would be strategically planted along the western and southern project boundaries adjacent to open space to maintain view quality and minimize land use conflicts, consistent with General Plan Policy LU-P4.4. Additional native oak

[28] California Department of Transportation (Caltrans). 2025. California State Scenic Highways. Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed August 16, 2025.

planting along the western boundary would screen proposed residential uses from public vantage points within Pine Creek Park and Greenway, further reducing impacts on scenic resources.

As such, consistent with the impact conclusions in the prior FEIR, the proposed project would have no impact on scenic resources within view of a State Scenic Highway. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Visual Character

Would the project: 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).

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that while new development may alter the visual appearance of the County, most growth would occur within the ULL where urban and suburban uses already exist. As the prior FEIR discusses visual character and quality, the analysis provided in the prior FEIR was for impacts to non-urbanized areas. The 2045 General Plan supports design compatibility through policies requiring smooth transitions between new and existing development (Policy LU-P4.3), setbacks and screening (Policy LU-P4.4), and clustering to reduce development footprints (Policy LU-P2.6). All development must comply with applicable County design standards, including those for hillside development and landscaping. Because the General Plan focuses growth in already developed areas and includes policies to preserve visual character, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

CEQA Guidelines Section 15191(m) defines an urbanized area as an incorporated or unincorporated area that is surrounded by one or more incorporated cities having a combined population of 100,000 or more residents and a population density that is greater than surrounding cities. The North Gate Community, in which the project site is located, is in unincorporated Contra Costa County and is bounded by the City of Walnut Creek, California with a population of 69,433 residents with surrounding land uses consisting of detached single-family units and small-scale agricultural activities such as viticulture, equestrian, and grazing. As the project site does not meet the definition of an urbanized area, the proposed project's impact on visual character is analyzed as a non-urbanized area and thus the threshold evaluates whether the proposed project would substantially degrade the existing visual character or quality of public views of the project site and its surroundings.

Scenic resources in the vicinity of the project site (as identified by the County's definition) include open spaces that encompass natural vistas and water resources, along with designated scenic ridges that contribute to the scenic quality of the surrounding urban environment. Specifically, the project site is in proximity to open space lands to the south and west and Pine Creek is situated approximately

0.25-mile west at the Pine Creek Detention Basin. Further, located approximately 0.5 mile from the project site are scenic ridges within areas such as Shell Ridge Open Space, Lime Ridge Open Space, Diablo Foothills Regional Park, and Mount Diablo State Park that are part of the overall scenic viewshed. In addition, the proposed project is located along North Gate Road, which is a County-designated scenic route, as shown in Figure COS-12 of the General Plan. Three panoramic views are located along Castle Rock Road, North Gate Road, and Ygnacio Valley Road where the project site could be visible.[29] Furthermore, the Pine Creek Park and Greenway, located approximately 0.3 mile west of the project site, provide undeveloped park land and trail connections with views consisting of native oak trees, herbaceous and low growing vegetation, and riparian habitat. Walker Creek, and its associated riparian woodland, traverses across the project site in an east to west direction.

The foregoing is consistent with the analysis in the prior FEIR, which disclosed that new development under the 2045 General Plan, including residential uses on the project site, may alter the visual appearance of the project site and vicinity. As noted, however in the prior FEIR, the proposed project is infill in nature and would occur within the ULL where urban and suburban uses already exist. Furthermore, the proposed project has been designed to be consistent with relevant 2045 General Plan goals and policies addressed in the prior FEIR relating to considerations such as design compatibility through policies requiring smooth transitions between new and existing development (Policy LU-P4.3), setbacks and screening (Policy LU-P4.4), and clustering to reduce development footprints (Policy LU-P2.6). In addition, the proposed project would be required to comply with applicable County design standards, including those relating to tree removal, grading and landscaping.

For example, the proposed project would be located on lower elevation areas, not involving any scenic ridgelines. It has been designed to be compatible with the adjacent single-family residential uses to facilitate a “smooth transition.” Specifically, the proposed project would construct 19 two-story single-family residential units with landscaping that would be substantially similar to and compatible with existing, adjacent conditions comprised of low-density single-family residential neighborhoods intermixed with ornamental landscaping. Therefore, the proposed project would be visually consistent with surrounding uses and, because there are no scenic resources on-site, would not substantially degrade the character or quality of public views.

In addition, the proposed project would strategically plant native oak trees and typical suburban trees along the western and southern boundary of the project site where undeveloped and open space areas are present to prevent degradation in quality of views in these spaces. Furthermore, the proposed project would strategically plant native oak trees along the western boundary of the project site to screen proposed residential land uses from public vantage points within the Pine Creek Park and Greenway. The planting of native oak trees is consistent with General Plan Policy LU-P4.4 that requires design solutions to minimize conflicts between different land uses. The proposed project would also construct a 6-foot-tall fence along parcel boundaries, which would help reduce negative impacts to the quality of views and delineate the project site. The proposed project is also

[29] City of Walnut Creek. 2025. General Plan 2025. July 15.

incorporating a green buffer/setback from the riparian creek area that is significantly larger than required, further helping to protect the visual quality of the area.

Since the proposed project would be consistent with surrounding residential development, would plant native oak trees along the western boundary to preserve public views from the Pine Creek Park and Greenway, would avoid developing on scenic ridgelines, and has been designed to be consistent with relevant General Plan goals and policies protecting visual character and all other applicable development standards, the proposed project would not substantially degrade the existing visual character or public views of the project site, and its surroundings, and impacts would be less than significant, consistent with the impact conclusions set forth in the prior FEIR.

Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Light or Glare

Would the project: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR identifies existing stationery and mobile sources of light and glare in the County. Existing stationary light sources include exterior and interior lighting from buildings, sign illumination, sports fields and large community parks, streetlights, and parking lots, while mobile sources of light and glare are generated from vehicular traffic along roadways. The prior FEIR found that future development could introduce new sources of light and glare, especially in undeveloped areas. However, compliance with County Ordinance Code Section 76-4.612 (Public Nuisance Lighting) and California Green Building Standards Code (CALGreen) standards (Section 5.106.8) would minimize light pollution. Landscaping and site design features would further reduce spillover effects. The County's building permit process enforces these standards. As a result, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

Unshielded, excessive, and incorrectly directed lighting sources can reduce nighttime views by impairing the ability to see the night sky and stars. Reflective surfaces (i.e., polished metal, glass, white surfaces) can cause glare, impacting daytime views. Impacts associated with glare can range from simple nuisances to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists). Existing stationary and mobile sources of light and glare within the project site are nominal given that it is primarily undeveloped; these consist generally of intermittent vehicle headlights. Since the project site is near existing urban and suburban development, these contribute additional minor sources of existing light and glare, including attached light fixtures, windows, and windshields and

metal from parked and mobile vehicles along roadways and driveways. Additionally, parked cars in the guest parking spaces may contribute to new sources of light.

Consistent with the analysis in the prior FEIR, as new development on a primarily undeveloped lot, the proposed project would introduce similar sources of light and glare, thereby adding a new source of light and glare in the project vicinity. Specifically, the proposed project would involve exterior light fixtures on the homes, interior lighting through windows on the residential units, and mobile source lighting and glare from cars entering and existing the project site.

However, consistent with the analysis in the prior FEIR, the proposed project would be developed in a manner similar to existing development in the County and would comply with all applicable requirements and standards to minimize light pollution. For example, the proposed project would be required to meet the applicable outdoor lighting standards in the California Energy Code that provides single-family residential indoor and outdoor lighting requirements. Specifically, these standards require reduced wattage of five watts or less for navigation lighting, such as step lights and night lights, and timers or motion sensors utilized for outdoor lighting to minimize continuous light emittance.

Further, Section 76-4.612 of the Contra Costa County Ordinance Code (Public Nuisance Lighting) requires light fixtures to be installed, controlled, and directed where generated light will not create a nuisance to surrounding land uses. In addition, the proposed project would strategically plant native oak trees and typical suburban trees along the western and southern boundaries of the project site where undeveloped and open space areas are present to prevent spillover light. Further, the proposed building materials for the proposed project would primarily consist of concrete slate tile roofing, stucco, fiber cement lap siding, fiber cement trim around the insulated vinyl windows, and masonry comprised of manufactured sone and/or brick. As such, no inordinately reflective materials that produce glare would be utilized for the homes on the project site. The County’s building permit process would enforce these standards.

Lastly, any impacts from stationery and mobile sources of light and glare from vehicles would be minimal and temporary as vehicular light and glare depends on where the vehicle is parked along with the time of day and season, and substantially similar to nearby existing uses. Accordingly, the proposed project would have a less than significant impact on light and glare, consistent with the impact conclusions in the prior FEIR.

Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Aesthetics, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.2 Agriculture and Forestry Resources *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:*					
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?	Significant and unavoidable impact	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	Less than significant impact	No	No	No	No
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	No impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
Timberland Production (as defined by Government Code Section 51104(g))?					
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Significant and unavoidable impact	No	No	No	No
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?	Less than significant impact	No	No	No	No

a) Conversion of Important Farmland

Would the project: 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?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that Contra Costa County contains approximately 254,500 acres of agricultural land, primarily in unincorporated areas. The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) categorizes this land into Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. Additionally, the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) maps Class I and II soils, which are considered prime productive agricultural soils, are mostly located in East County. In consideration of the County's Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, the 2045 General Plan includes policies to protect these farmlands through denial of projects that would fragment or convert the listed farmlands to urban use and encourage participation in the Williamson Act to maintain agricultural production.

Although the 2045 General Plan includes policies that would minimize the conversion of farmland, the proposed land use plan designates approximately 13,816 acres of Important Farmland in the EIR Study Area for nonagricultural uses. While the majority of this land is not intended for urban development and will likely be preserved for agricultural use, but prior FEIR analysis conservatively determined that farmland could be converted as a result of the proposed General Plan, resulting in a potentially significant impact. Because of the programmatic nature of analysis, the prior FEIR concluded that no feasible mitigation exists and that impacts would be addressed on a project-level as future development is proposed. Therefore, the prior FEIR concluded that impacts would be significant and unavoidable.

Proposed Project Analysis and Conclusion

The project site is not on land that is considered Prime Farmland, Unique Farmland, or Farmland of Statewide importance as categorized by The California Department of Conservation's Farmland and Mapping Program.[30] Rather, the project site is categorized as Urban and Built-Up land, with a portion of the western side of the project site identified as Grazing Land. Further, based on a review of the USDA and Conservation Web Soil Survey, the project site consists of Capay Clay soils that have not been previously irrigated.[31] There is no evidence of Class I and II soils, indicating that the project site does not sit on prime productive agricultural soils. Therefore, no impacts would occur, and the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Agricultural Zoning and Williamson Act Contracts

Would the project: Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that Contra Costa County supports agricultural zoning through designations such as Agricultural Core and Agricultural Lands, which prioritize agricultural production. Further, the Agricultural Land Conservation Ordinance enforces the Williamson Act, ensuring preservation of agricultural and open space land through tax incentive programs that promote the maintenance of agricultural use. Therefore, the prior FEIR concluded that impacts would be less than significant.

[30] California Department of Conservation. 2025. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed October 29, 2025.

[31] United States Department of Agriculture. 2019. Web Soil Survey. Website: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed March 20, 2026.

Proposed Project Analysis and Conclusion

The project site has been used historically for certain agricultural activities, and as shown in Figure 5.2-3 of the General Plan EIR, parcels 16-69 and 11-73 to the east of North Gate Road are listed as agriculture preserve sites with active Williamson Act Contracts. However, the project site is within the ULL and is not currently used or zoned for agricultural use. Therefore, a less than significant impact would occur, and the proposed project would not have any significant project-specific effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Forest Zoning

Would the project: Conflict with existing zoning for forest land (as defined in Public Resources Code Section 12220(g)) or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that Contra Costa County does not contain significant forest land as defined in Public Resources Code Section 12220(g) or timberland resources as defined by Government Code Section 51104(g). The prior FEIR does not designate any lands for timber production, and no timberland production zones exist. Therefore, the prior FEIR concluded that there would be no impact.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, the project site does not contain any forestland or timberland resources, and also does not contain any areas zoned for forest land, timberland, or timberland production. Therefore, no impacts would occur, and the proposed project would not have any significant project-specific effects which are peculiar to the project or its site. Therefore, the proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Conversion of Forest Land

Would the project: Result in the loss of forest land or conversion of forest land to non-forest use?

Summary of Analysis in 2045 General Plan FEIR

There is a total of 63,806 acres of forest land within County. As such, implementation of the 2045 General Plan could result in the conversion of forested areas and other upland habitats for future development. Chapter 816-6, Tree Protection and Preservation, of the County Ordinance Code enhances protection of specified Protected Trees and establishes requirements for tree removal. As stated in Section 816-6.8002, Permit Requirement, individuals must apply for a tree permit prior to any removal or alteration of Protected Trees. Therefore, although future development could result in

the loss of forest land or conversion of forest land to non-forest use, there are regulations in place that would consider an array of factors before the removal or alternation of these habitats.

Additionally, the General Plan Conservation, Open Space, and Working Lands Element includes policies that aim to preserve forested areas. These include Policies COS-P6.1 and COS P6.2, which call on the County to preserve natural woodlands and native species, and to encourage planting of native trees throughout the County. However, the prior FEIR determined that despite implementation of applicable General Plan policies and tree protection provisions of the County Ordinance Code, woodland habitat would likely be impacted by future development. Therefore, the prior FEIR determine that impacts to forest land under the proposed General Plan would be significant and unavoidable.

Proposed Project Analysis and Conclusion

Although there is forest land within the County, the project site is not zoned as forest land and no such forest land exists on the project site. Therefore, no impacts would occur. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Pressures to Convert Farmland or Forest Land

Would the project: 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?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that the County's policies and zoning regulations are designed to prevent conversion of farmland, while protecting soil conservation, water efficiency, and pest management. Regulations include buffer requirements for urban development adjacent to agricultural lands, deed disclosures for residential development near farms, and prioritization of agricultural viability in land use conflicts. Based on the foregoing, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed above, the project site does not contain Farmland designated by the FMMP or land designated or zoned by the County for agricultural uses. Therefore, project implementation would not result in conversion of Farmland to nonagricultural uses. Further, no forest land exists on the project site. Therefore, no impacts would occur, and the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Agricultural and Forestry Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.3 Air Quality *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:*					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant impact	No	No	No	No
b) Result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under applicable federal or State ambient air quality standards during construction?	Significant and unavoidable impact	No	No	No	No
c) Result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under applicable federal or State Ambient Air Quality Standards during operation?	Significant and unavoidable impact	No	No	No	No
d) Expose sensitive receptors to substantial pollutant concentrations during construction activities?	Less than significant with mitigation incorporated	No	No	No	No
e) Expose sensitive receptors to substantial pollutant concentrations during operational activities?	Significant and unavoidable impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
f) 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	No

Environmental Setting

The project site is located in unincorporated Contra Costa County and within the San Francisco Bay Area Air Basin (SFBAAB) which covers Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, and parts of Solano and Sonoma counties and is under the Bay Area Air Quality Management District's (Bay Area Air District's) jurisdiction. The SFBAAB is bordered by the Pacific Ocean to the west and surrounded by coastal and inland mountain ranges that influence local airflow and pollutant dispersion.

The region has a Mediterranean climate with mild, wet winters and warm, dry summers. Prevailing westerly and northwesterly winds, driven by marine influences, generally help disperse pollutants inland. In summer and early fall, high temperatures and sunlight promote ozone formation, and occasional inversions can trap this pollution near the surface, particularly in inland valleys. In winter, strong temperature inversions are more frequent, limiting vertical air mixing and allowing fine particulate matter ($PM_{2.5}$) from wood-burning, traffic, and other sources to accumulate. Topography and seasonal weather create distinct microclimates; coastal areas benefit from stronger ventilation, while sheltered interior areas are more prone to pollutant buildup.

Existing Air Quality

The United States Environmental Protection Agency (EPA) administers national air quality programs under the authority of the federal Clean Air Act (CAA), which mandates the establishment of National Ambient Air Quality Standards (NAAQS) for the six criteria pollutants: ozone, CO, NO_2, SO_2, particulate matter (PM_{10} and $PM_{2.5}$), and lead. To meet and maintain these standards, each state is required to develop a State Implementation Plan (SIP), which is updated periodically to reflect current emissions inventories, planning strategies, and regulatory developments reported by local air quality agencies.

Criteria pollutant emissions primarily stem from combustion sources and have been linked to serious respiratory and cardiovascular conditions, especially in vulnerable populations. Another classification

of pollutants includes toxic air contaminants (TACs), such as diesel particulate matter and benzene, which pose additional health risks including cancer and neurological damage, and are managed through targeted controls rather than ambient air quality standards.

In California, the California Air Resources Board (ARB) oversees State and regional air pollution control efforts and enforces the California Clean Air Act (CCAA). Under the CCAA, ARB sets California Ambient Air Quality Standards (CAAQS), which include the federal criteria pollutants and additional contaminants such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulate matter. CAAQS are typically more stringent than NAAQS, reflecting California's commitment to enhanced air quality protection.

To assess air pollution levels and overall air quality in the SFBAAB, the Bay Area Air District operates an extensive network of ambient air quality monitoring stations distributed across the nine-county region. The monitoring network plays a critical role in measuring ambient air pollutant levels and tracking trends. These data support the development of air quality management strategies.

Data from these stations are collected, validated, and reported on an ongoing basis to provide a comprehensive understanding of air quality. The network employs standardized measurement techniques and adheres to protocols set by the ARB and the EPA to ensure accuracy and comparability of data. Because of periodic exceedances of ozone and particulate matter standards, the SFBAAB is designated as a nonattainment area under both California and federal CAA requirements.

a) Air Quality Plan Conflict

Would the project: Conflict with or obstruct implementation of the applicable air quality plan?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR analyzed the consistency of the 2045 General Plan with the assumptions and objectives of the 2017 Bay Area Clean Air Plan (the regional air quality management plan) to determine whether implementation of the 2045 General Plan would interfere with the region's ability to comply with federal and State air quality standards. To demonstrate consistency with the 2017 Clean Air Plan, the Bay Area Air District recommends satisfying the following questions: (1) does the project support the primary goals of the Air Quality Plan (AQP) (2) does the project include applicable control measures from the AQP, and (3) does the project disrupt or hinder implementation of any AQP control measures?

According to the analysis in the prior FEIR, the 2045 General Plan would support the goals of the AQP because the General Plan population projections would be consistent with regional projections and emissions from future development would be included in Bay Area Air District projections. The 2045 General Plan would implement applicable Bay Area Air District control measures as applicable General Plan policies. Finally, the 2045 General Plan would not conflict with or obstruct implementation of the applicable AQP because VMT associated with the 2045 General Plan would be less than or equal to

the projected population increase from the General Plan. Therefore, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The current Bay Area Air District attainment plan is the 2017 Clean Air Plan and as the regional AQP for the SFBAAB for attaining NAAQS. A project would be found to conflict with or obstruct the 2017 Clean Air Plan implementation if it would result in substantial new regional emissions not foreseen in the air quality planning process.

The Bay Area Air District's 2022 CEQA Guidelines outlines the following criteria that should be used for determining a project's consistency with the AQP.

- **Criterion 1:** Does the project support the primary goals of the AQP?
- **Criterion 2:** Does the project include applicable control measures from the AQP?
- **Criterion 3:** Does the project disrupt or hinder implementation of any AQP control measures?

Criterion 1: Primary Goals of the Air Quality Plan

The primary goals of the 2017 Clean Air Plan are to attain air quality standards, reduce population exposure to unhealthy air and protect the public health in the Bay Area, and reduce greenhouse gas (GHG) emissions and protect the climate.

The proposed project represents a typical residential development consistent with the land use designation and density anticipated in the General Plan. As discussed under impact AIR-2 below, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant during project construction or operation and, therefore, would not impede the 2017 Clean Air Plan's goal to attain air quality standards. Therefore, the proposed project supports the 2017 Clean Air Plan's goal to attain air quality standards.

As discussed under impact AIR-3 below, project implementation would not expose sensitive populations to unhealthy air during project construction or operation, and therefore, the proposed project supports the 2017 Clean Air Plan's goal to reduce population exposure to unhealthy air and protect public health in the Bay Area.

Finally, the proposed project would incorporate a number of attributes that would reduce air emissions as well as GHG emissions and therefore would support the protection of the climate. It would incorporate drought-tolerant landscaping throughout the project site and would be required to comply with the applicable building standards and ordinances for energy and building efficiency (which are often viewed as the most stringent in the nation). Finally, the proposed project would have a less than significant impact related to Vehicle Miles Traveled (VMT) (according to the analysis prepared by W-Trans (Appendix G), which would translate into fewer GHG emissions as well. Therefore, the proposed project supports the 2017 Clean Air Plan's goal to reduce GHG emissions and protect the climate.

The proposed project supports the goals of the 2017 Clean Air Plan and would be consistent with Criterion 1.

Criterion 2: Applicable Control Measures

The 2017 Clean Air Plan contains 85 control measures that describe specific actions to reduce air pollutants and GHG emissions at the local, regional, and global levels. To establish compliance with the Clean Air Plan, the proposed project would be required to comply with all applicable Clean Air Plan control measures, listed below:[32]

- **BL1:** Green Buildings
- **BL2:** Decarbonize Buildings
- **BL4:** Urban Heat Island Migration
- **EN1:** Decarbonize Electricity Generation
- **EN2:** Decrease Electricity Demand
- **NW2:** Urban Tree Planting
- **WA3:** Green Waste Diversion
- **WA4:** Recycling and Waste Reduction
- **SS36:** Particulate Matter from Trackout
- **TR9:** Bicycle and Pedestrian Access and Facilities

The proposed project would comply with the above control measures as specified below:

- For consistency with Clean Air Plan Measures BL1, BL2, EN1, and EN2, the proposed project would be required to comply with the latest adopted energy efficiency standards (including the current California Title 24 Energy Code). Electricity for the proposed project would be provided by MCE, the Community Choice Aggregate (CCA) that serves as the default electricity generation provider in the project area, in conjunction with PG&E, which would continue to own, operate, and maintain the transmission and distribution infrastructure and provide billing services. Under this arrangement, MCE is responsible for procuring the electricity supply, while PG&E delivers the electricity over its existing power grid to end users. As a CCA, MCE procures electricity with a higher renewable and zero-carbon content than the minimum requirements of the State's Renewable Portfolio Standard (RPS). Accordingly, the energy use and associated indirect greenhouse gas emissions from the proposed project's electricity consumption would reflect a greater reliance on renewable and zero-carbon energy resources than is currently required under State law. Therefore, the proposed project would be consistent with applicable clean energy and energy efficiency policies and would not conflict with State or local plans adopted for the purpose of reducing energy use or greenhouse gas emissions.

[32] Bay Area Air Quality Management District (Bay Area Air District). 2017. Final 2017 Clean Air Plan. Website: https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans#:~:text=The%202017%20Plan%20includes%20a,climate%20pollutants%20in%20the%20near%2D. Accessed October 22, 2025.

- For consistency with Clean Air Plan Measures BL4 and NW2, the proposed project would implement drought-friendly and low water use landscaping including trees, groundcover and shrubs pursuant to the County Water Efficient Landscapes Ordinance (Code Chapter 82-26).
- For consistency with Clean Air Plan Measures WA3 and WA4, the proposed project would implement waste management practices and utilize a waste service provider that complies with applicable State solid waste diversion requirements. During construction, the project would comply with Senate Bill (SB) 1374, which requires diversion of construction and demolition debris through implementation of a Construction Waste Management Plan and recycling of eligible materials in accordance with local ordinances adopted to meet State diversion goals. During operation, the project would comply with SB 1383 – Statewide Organics Recycling Law which requires separation of waste into multiple streams including recycling, organic waste and trash, which would also support jurisdictional compliance with AB 939, the California Integrated Waste Management Act of 1989, which establishes a statewide requirement to divert at least 50 percent of solid waste from landfill disposal through source reduction, recycling, and composting. Through implementation of these construction- and operation-phase waste diversion measures, the proposed project would be consistent with applicable waste reduction policies and would not conflict with State or local plans adopted to reduce solid waste disposal and associated GHG emissions.
- For consistency with Clean Air Plan Measure SS36, the proposed project would implement the Bay Area Air District's Best Management Practices (BMPs) for fugitive dust control during construction.
- For consistency with Clean Air Plan Measure TR9, the proposed project construct sidewalk facilities along the proposed access road, primary roadway and secondary roadway (as discussed in the Project Description and shown in Exhibit 6). In addition, the project would be connected to an existing Class 1 bike lane which begins on the northbound side of North Gate Road approximately 0.15 mile north of the proposed access road entrance[33] and is approximately 980 feet from the Trails End Path multiuse trail. Given its relatively close proximity, the proposed project would facilitate non-vehicular modes of transport and accessibility.

Accordingly, the proposed project would not conflict with any applicable measures under the 2017 Clean Air Plan with adherence to applicable laws and regulations; therefore, the proposed project would be consistent with Criterion 2.

[33] Under California Streets and Highways Code Section 890.4 and the Caltrans Highway Design Manual, a Class I bikeway is defined as a facility that provides a completely separated right-of-way designated for the exclusive use of bicycles and pedestrians, with crossflows by motor vehicles minimized. Class I facilities are physically separated from roadways and motor vehicle traffic, except at limited crossing points such as intersections or driveways.

Criterion 3: Hindrance of Implementation of AQP Control Measures

The proposed project, which would involve the construction of 19 residential units and related improvements, would not preclude extension of a transit line or bike path, propose excessive parking beyond parking requirements, or otherwise create an impediment or disruption to implementing any AQP control measures, as discussed above. The proposed project would not disrupt or hinder the implementation of any AQP control measures and would be consistent with Criterion 3. To the contrary, the proposed project would be designed such that it would facilitate compliance with relevant AQP control measures, as described further above.

Overall, the proposed project would be consistent with all three criteria as outlined by the Bay Area Air District for demonstrating that the proposed project would not conflict with or obstruct implementation of the applicable AQP, and impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Air Quality Standard, Criteria Pollutants–Construction

Would the project: Result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under applicable federal or State ambient air quality standards from short-term construction activities?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR analyzed the potential impacts related to air quality that could occur from development under the 2045 General Plan in combination with the regional growth in the SFBAAB. Construction activities would temporarily increase criteria air pollutant emissions within the SFBAAB, and potential future development projects accommodated under the 2045 General Plan (individually or cumulatively) could still exceed the Bay Area Air District significance thresholds for construction. The prior FEIR identified Mitigation Measure (MM) AQ-1 which requires that future development involving construction on 1 acre or more to prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to Contra Costa County for review and approval. The evaluation shall be prepared in conformance with the Bay Area Air District methodology for assessing air quality impacts identified in their 2022 CEQA Air Quality Guidelines. If the results of the evaluation show that construction-related criteria air pollutants have the potential to exceed the construction screening criteria and thresholds of significance contained within the Bay Area Air District's 2022 CEQA Guidelines, Contra Costa County shall require feasible mitigation measures to reduce air quality emissions. While MM AQ-1 would have the potential to reduce emissions, potential future development projects accommodated under the General Plan (individually or cumulatively) could still exceed the Bay Area Air District significance thresholds for construction. Therefore, the prior FEIR concluded that impacts would remain significant and unavoidable after incorporation of mitigation.

Proposed Project Analysis and Conclusion

The prior FEIR identified MM AQ-1, which applies to future development projects subject to CEQA review and requires preparation of a project-specific construction air quality assessment for review by Contra Costa County. The proposed project is statutorily exempt from CEQA and, therefore, is not required to implement mitigation measures that contain express language limiting application of said measures to nonexempt development projects only. Nevertheless, for the purpose of demonstrating consistency with the prior FEIR and to address potential air quality considerations, the proposed project has voluntarily prepared and submitted an air quality assessment consistent with the intent of prior FEIR MM AQ-1. A technical assessment evaluating potential project construction-related air quality impacts was conducted for the proposed project and is provided herein. The evaluation follows Bay Area Air District methodology for assessing air quality impacts and utilizes the thresholds of significance identified in their 2022 CEQA Air Quality Guidelines. According to the Bay Area Air District, the thresholds of significance represent the allowable emissions each project can generate without causing a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the Bay Area Air District thresholds of significance on an individual project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction emissions are discussed below.

Construction

Fugitive Dust Emissions

Construction-related activities, such as soil disturbance, grading, and material hauling result in fugitive dust emissions (e.g., $PM_{2.5}$ and PM_{10}). PM_{10}/$PM_{2.5}$ (fugitive dust) is recognized to impact local communities. The Bay Area Air District does not have a numerical threshold of significance for fugitive dust particulate matter emissions. Instead, the Bay Area Air District bases the determination of significance for fugitive dust on implementing feasible and effective control measures. For a project to have a less than significant impact related to construction-related fugitive dust emissions, it must implement all of the Bay Area Air District's BMPs; the proposed project would implement BMPs to control fugitive dust and would, therefore, demonstrate a less than significant impact related to short-term construction fugitive dust emissions.[34]

Exhaust Emissions

Construction emissions were quantified and estimated using CalEEMod Version 2022.1.1 for a typical construction scenario for a land use project of this size. The following project characteristics and assumptions were utilized in the analysis:

- The emissions modeling assumed the proposed project would begin in March 2027 and occur over approximately 15 months. Although it does not form the basis of the evaluation or

[34] Bay Area Air Quality Management District (Bay Area Air District). 2022. Bay Area Air District CEQA Guidelines. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en. Accessed October 22, 2025.

conclusion in this document, it is reasonable to assume that future improvements in technology would be incorporated into regulatory requirements related to equipment and fuels, which would result in lower emissions. The modeling assumed a specific construction start date, but if the construction schedule moves to months or years beyond what was modeled or takes longer than assumed, construction emissions would be expected to decrease because of mandatory compliance with improvements in technology and more stringent regulatory requirements that would affect future construction equipment and fuels. Therefore, this analysis represents a reasonable worst-case, conservative approach.

- Demolition of the existing single-family home (approx. 4,424 square feet) and related accessory structure and associated hardscape (approx. 2,581 square feet) equaling approximately 398 tons of construction debris.
- Site grading, preparation, and construction of 19 single-family homes and an internal private road and related improvements.

Additional details on the assumptions and inputs are included in the CalEEMod output reports (Appendix A).

Table 2 shows the proposed project's total emissions and the average daily emissions from construction. All estimated emissions are well below the established thresholds of significance for construction exhaust. In addition, as stated above, the proposed project would implement BMPs to ensure a less than significant impact with respect to PM_{10}/$PM_{2.5}$ dust emissions.

Table 2: Project Construction Exhaust Emissions

Construction Year	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
2027 (tons/year)	0.14	1.28	0.05	0.04
2028 (tons/year)	0.14	1.28	0.05	0.04
Average Daily Emissions (lbs/day)[1]	4.35	10.24	0.38	0.35
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
lbs = pounds
NO_X = oxides of nitrogen
PM_{10} = particulate matter less than 10 microns in diameter (includes only exhaust-related emissions)
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter (includes only exhaust-related emissions)
ROG = reactive organic gases
[1] Average daily emissions are the total project emissions divided by 320 working days.
Source: Attachment A.

Therefore, construction of the proposed project would not have a significant impact on air quality with respect to criteria pollutants and precursors (as compared to the significant and unavoidable impact identified in the prior FEIR). The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Air Quality Standard, Criteria Pollutants–Operation

Would the project: **Result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under applicable federal or State Air Quality Management Plans during operation?**

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR analyzed potential impacts related to air quality that could occur from development associated with the 2045 General Plan in combination with the regional growth in the SFBAAB. The prior FEIR concluded that implementation of the proposed General Plan would exceed the Bay Area Air District's plan-level significance threshold (no net increase) for operation. The prior FEIR identified MM AQ-2 which requires future development projects subject to CEQA review (i.e., nonexempt projects) to prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to Contra Costa County for review and approval. The evaluation shall be prepared in conformance with Bay Area Air District methodology in assessing air quality impacts identified in their CEQA Air Quality Guidelines. If the evaluation concludes that operation-related air pollutants would exceed the Bay Area Air District–adopted operational screening criteria and thresholds of significance, Contra Costa County shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. While MM AQ-2 would have the potential to reduce emissions, potential future development projects accommodated under the proposed General Plan (individually or cumulatively) could still exceed the Bay Area Air District's significance thresholds for operation. Therefore, the prior FEIR concluded that impacts associated with implementation of the General Plan would remain significant and unavoidable after incorporation of mitigation.

Proposed Project Analysis and Conclusion

The prior FEIR identified MM AQ-2, which applies to future development projects subject to CEQA review and requires preparation of a project-specific operational air quality assessment for review by Contra Costa County. The proposed project is statutorily exempt from CEQA and, therefore, is not required to implement mitigation measures that include express language limiting application of said measures to nonexempt development projects only. Nevertheless, for the purpose of demonstrating consistency with the prior FEIR and to address potential air quality considerations, the proposed project has voluntarily prepared and submitted an air quality assessment consistent with the intent of prior FEIR MM AQ-2. Accordingly, a technical assessment evaluating potential project operational-related air quality impacts is provided below.

Operational-related impacts associated with the proposed project were evaluated following Bay Area Air District methodology for assessing air quality impacts.

The Bay Area Air District developed screening criteria for criteria air pollutants and precursors. These screening criteria provide lead agencies with a conservative indication of whether implementing a project could result in potentially significant criteria air pollutants and precursors impacts. If all screening criteria for criteria air pollutants and precursors are met by a project, then the lead agency would not need to perform a detailed assessment of the project's criteria air pollutant and precursor emissions.

The proposed project meets the screening criteria detailed in the Bay Area Air District's 2022 CEQA Guidelines as discussed below: [35]

- The operational criteria pollutant screening size for "Single-family Home" is 421 dwelling units as shown in Table 4-1 of the Bay Area Air District's 2022 CEQA Air Quality Guidelines. The proposed project includes the development of 19 single-family homes which is well below the applicable criteria pollutant and precursor screening size.
- Operational activities would not include stationary sources or industrial sources subject to Bay Area Air District rules and regulations.
- Operational activities would not overlap with construction-related activities since the proposed project would be constructed in a single phase.

Therefore, operational-related impacts from criteria air pollutant emissions would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required,

d) Sensitive Receptors

Would the project: Expose sensitive receptors to substantial pollutant concentrations during construction?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that implementation of the 2045 General Plan could cause or contribute significantly to elevated pollutant concentration levels such that it would expose sensitive receptors to elevated pollutant concentrations. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects. To reduce impacts, the prior FEIR identified MM AQ-3 which would require

[35] Bay Area Air Quality Management District (Bay Area Air District) CEQA Guidelines. 2022. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en. Accessed October 10, 2025.

that prior to discretionary approval by the County for development projects subject to CEQA review (i.e., nonexempt projects), future development involving construction on 1 acre or more and within 1,000 feet of residential and other sensitive land uses (e.g., hospitals, nursing homes, schools, and day care centers) in the unincorporated County, shall submit a Health Risk Assessment (HRA) to the County Department of Conservation and Development for review and approval.

The HRA shall be prepared in accordance with policies and procedures of the California Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds the respective thresholds established by the Bay Area Air District then the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks below the respective threshold, including appropriate enforcement mechanisms. The prior FEIR concluded that impacts would be less than significant after incorporation of MM AQ-3 and therefore, the 2045 General Plan would not expose sensitive receptors to substantial pollutant concentrations.

Proposed Project Analysis and Conclusion

The prior FEIR identified MM AQ-3, which applies to future development projects subject to CEQA review and requires preparation of a project-specific HRA for review by Contra Costa County. The proposed project is statutorily exempt from CEQA and, therefore, is not required to implement mitigation measures that include express language limiting application of said measures to non-exempt development projects only. Nevertheless, for the purpose of demonstrating consistency with the prior FEIR and to address potential air quality considerations, the proposed project has voluntarily prepared and submitted an HRA consistent with the intent of prior FEIR MM AQ-3. Accordingly, an HRA evaluating potential project construction-related health risks to nearby sensitive receptors was conducted for the proposed project and is provided herein. Details on the assumptions and inputs are included in Appendix A. The HRA follows Bay Area Air District methodology and OEHHA for assessing potential impacts and utilizes the thresholds of significance identified in their 2022 CEQA Air Quality Guidelines. The proposed project is not located in a Bay Area Air District Overburdened Community (defined by Bay Area Air District Regulation 2-1-243 as an area that is located within a census tract identified by CalEnviroScreen as having an overall score at or above the 70th percentile statewide, or within 1,000 feet of such a census tract) and therefore utilizes the 10 in a million threshold per the Air District's guidance.

In addition, the proposed project is located within approximately 1,000 feet of sensitive receptors, including residences bordering the eastern and northern boundaries of the project site, as well as worker receptors at the Shadowbrook Winery approximately 800 feet to the northwest. There are no schools or youth parks within 1,000 feet of the project site. The Bay Area Air District recommends analyzing the potential health risks from TAC emissions–including from construction–to sensitive receptors located within 1,000 feet of a source of TAC emissions. The County, as lead agency, has elected in its discretion to adhere to the Bay Area Air District's guidance in this regard. Therefore, because the proposed project would result in TAC emissions from construction activities and because there are sensitive

receptors within 1,000 feet of the project site boundaries,an HRA was conducted for the proposed project.

The principal TAC analyzed in this assessment was diesel particulate matter (DPM) from off-road equipment and diesel-powered vehicles during construction-related activities. DPM has been identified by ARB as a carcinogenic substance. For purposes of this analysis, DPM is represented as exhaust emissions of PM_{10}. PM_{10} is often used as a proxy for DPM because DPM consists of suspended particulate emissions from diesel combustion and is commonly represented within particulate matter size fractions in available emission factors and air quality models, allowing PM_{10} to serve as a conservative surrogate where direct DPM measurements are not available. In addition, the emissions estimates assume the use of diesel fuel.

In addition, the HRA evaluates $PM_{2.5}$ concentrations in accordance with Bay Area Air District guidance. OEHHA's recommendations for estimating cancer risks consider the increased sensitivity of infants and adults to toxic air contaminant emissions, including different breathing rates, and time spent at home. This was applied in estimating cancer risks associated with the proposed project. To assess impacts to nearby sensitive receptors, DPM and $PM_{2.5}$ emissions rates from the proposed project's construction activities were estimated, and the American Meteorological Society/EPA Regulatory Model (AERMOD) air dispersion model was used to estimate the concentrations from PM_{10} exhaust and $PM_{2.5}$ emissions at nearby sensitive receptors. The Hotspots Analysis and Reporting Program (HARP2) software was used to calculate the health risks associated with DPM generated during construction activities.

The HRA evaluates health impacts at the Maximally Exposed Individual (MEI), defined as the receptor expected to experience the highest potential health effects from project construction. In this case, the MEI is a residential receptor, which represents a more conservative exposure scenario than nearby worker receptors due to closer proximity to construction activities, longer daily exposure durations, and the inclusion of sensitive age groups. Worker receptors at the Shadowbrook Winery are located at a greater distance from the construction footprint and are assumed to consist of adult populations (age 16 and older), which are not subject to the early-life cancer sensitivity factors applied to residential receptors. Accordingly, potential health risks at worker receptors would be lower than those estimated for the residential MEI.

Table 3 summarizes the proposed project's construction-related cancer risk, chronic non-cancer hazard, and predicted annual $PM_{2.5}$ concentration impacts at the MEI. Because the MEI represents the reasonable worst-case exposure scenario, impacts to all other receptors, including worker receptors, would be less than those presented.

Table 3: Summary of the Health Impacts at the Maximally Exposed Individual Resident During Project Construction

Project Construction Impacts	Maximally Exposed Individual Resident Risks		
Receptors	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Project Construction Impacts at MEIR	7.8	0.01	0.11
Bay Area Air District Single Source Threshold of Significance	**10**	**1**	**0.3**
Threshold Exceeded?	**No**	**No**	**No**

Notes:
$\mu g/m^3$ = micrograms per cubic meter
HI = Hazard Index
MEIR = Maximally Exposed Individual Resident
MEIW = Maximally Exposed Individual Worker
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
The MEIR was found to be a residence located approximately 250 feet to the east of the project site.
Source: Attachment A

The Bay Area Air District also recommends assessing the cumulative impacts of the proposed project's construction-related health risks and $PM_{2.5}$ concentrations in combination with existing sources of TACs and $PM_{2.5}$ concentrations within 1,000 feet of the project site at the most impacted nearby receptors. However, there are no permitted stationary sources or mobiles sources (such as freeways, major roadways or rail lines) within 1,000 feet of the project site, and therefore Table 3 only shows the proposed project's contribution to health risks from construction. As shown in Table 3, the potential health risks are below the Bay Area Air District's thresholds of significance. Therefore, construction of the proposed project would not expose sensitive receptors to substantial pollutant concentrations, and construction-related impacts would be less than significant. Based on the results of this analysis, no additional action under MM AQ-3 would be necessary. Via this document, the HRA and the accompanying analysis, the requirements of MM AQ-3 will have been fulfilled (although technically not applicable). Accordingly, no additional environmental review is required,

The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required,

e) Sensitive Receptors

Would the project: Expose sensitive receptors to substantial pollutant concentrations during operation?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that implementation of the 2045 General Plan would cause or contribute significantly to elevated pollutant concentration levels such that it would expose sensitive receptors to elevated pollutant concentrations. Types of land uses that typically generate substantial quantities of TACs and $PM_{2.5}$ include industrial and manufacturing (stationary sources) and warehousing land uses that have the potential to generate DPM from on-site equipment and mobile sources (trucks).The 2045 General Plan includes several policies to address operational-related sources of TACs and/or $PM_{2.5}$, including Policy HS-P1.5 which requires new sources of air pollution that will generate significant new air quality impacts or expose sensitive receptors to substantial increases in harmful emissions of TACs to prepare an HRA that identifies appropriate mitigation consistent with Bay Area Air District CEQA Air Quality Guidelines. Additionally, Policy HS-P2.1 requires that when evaluating health risk impacts of projects in Impacted Communities (also referred to by the Bay Area Air District as Overburdened Communities)thresholds for finding that the project could cause a cumulatively considerable contribution and a significant impact should be an excess cancer risk of 6.0 per million and a non-cancer (acute and chronic) hazard index greater than 1.0. Furthermore, Policy HS-P1.8 requires new or expanded commercial and industrial projects exceeding 25,000 square feet of gross floor area to be near zero-emissions operations, including the facilities themselves and the associated fleets. In Contra Costa County, overburdened communities, as defined by the Bay Area Air District, are census tracts identified using CalEnviroScreen as having high cumulative pollution burdens and population vulnerability, or areas located within 1,000 feet of such tracts. These communities are primarily concentrated in the western and northern portions of the County near major industrial facilities, freight corridors, and heavily traveled roadways. Based on the Bay Area Air District Overburdened Communities Map, the proposed project is not identified as an overburdened community and is not subject to the additional regulatory requirements that apply to projects in those areas.

To reduce impacts from industrial facilities (or projects with the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units), the prior FEIR identified MM AQ-4. MM AQ-4 would require the preparation and submittal of an HRA to ensure that cumulative and project-level incremental cancer risk, non-cancer hazard index, and/or $PM_{2.5}$ do not exceed the respective thresholds as established by Bay Area Air District.

The prior FEIR also determined that development allowed by the 2045 General Plan could result in new sources of TACs or $PM_{2.5}$ near existing or planned sensitive receptors. Review of development projects by the Bay Area Air District for permitted sources of air toxics in addition to 2045 General Plan policies and actions would ensure that health risks are minimized. Additionally, MM AQ-4 would ensure mobile sources of TACs not covered under Bay Area Air District permits are considered during

subsequent project-level review by Contra Costa County. However, development projects pursued under the 2045 General Plan could contribute to significant cumulative risk in the Bay Area that could affect sensitive populations. As a result, the prior FEIR concluded that impacts would remain significant and unavoidable after incorporation of mitigation.

Proposed Project Analysis and Conclusion

As the proposed project, which entails the construction of 19 residential units, does not constitute a new industrial or warehousing development, nor is it expected to result in 100 or more daily diesel truck trips or involve 40 or more trucks equipped with diesel-powered transport refrigeration units, and given that it is not located within an Impacted Community, prior FEIR MM AQ-4 would not apply to the proposed project.

The proposed residential development is not expected to generate substantive DPM or TAC emissions during operational activity because ongoing emissions would primarily involve passenger vehicle use associated with relatively few residential units with no significant heavy-duty truck activity, resulting in minimal localized air pollutant contributions. The proposed project would not have stationary sources or on-site sources of TACs during operation. Traffic generated by the proposed project would consist mostly of light-duty gasoline-powered vehicles (as discussed more fully in Section 4.17, Transportation), which are not a significant source of TAC and air pollutant emissions. Thus, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation, and operational-related impacts would be less than significant (as compared to the significant and unavoidable impact identified in the prior FEIR) and would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

f) Odors

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that odors associated with construction projects could occur with approval of the 2045 General Plan. It also concluded that such odors typically are short-term and disperse rapidly and generally occur at levels that would not affect substantial numbers of people. Therefore, the prior FEIR concluded that construction-related odor impacts would be less than significant.

Industrial land uses could generate objectionable odors during operation; however, these types of projects would be subject to Bay Area Air District review and regulations. Residential and other land uses could result in the generation of odors such as exhaust or cooking. Unlike industrial land uses, residential and other uses are not considered potential generators of odors that could affect a substantial number of people. In addition, future development under the 2045 General Plan would be required to comply with applicable laws and regulations and relevant General Plan policies to ensure

odors would not affect a substantial number of people. The prior FEIR concluded that operational-related odor impacts would be less than significant.

Proposed Project Analysis and Conclusion

Similar to the impacts evaluated and disclosed in the prior FEIR, construction and operation of the proposed project, which entails the development of 19 residential units and related improvements, would not create objectionable odors.

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of DPM exhaust, nearby receptors would not be significantly affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Thus, the proposed project would not introduce a new odor source affecting a substantial number of people during construction, consistent with the impact conclusions in the prior FEIR.

During operation, the proposed project could include activities that might lead to odors typical of this type of small residential community from associated vehicle exhaust 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. Furthermore, the proposed project consists of residential uses which are not considered odor-generating uses according to the prior FEIR, as noted above. Therefore, impacts associated with construction-generated and operational-generated odors would be considered less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Air Quality, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation would be required.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.4 Biological Resources *Would the project:*					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	Less than significant impact	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	Less than significant impact with mitigation incorporated	No	No	No	No
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	No
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?	Less than significant impact	No	No	No	No

a) Special-status Species

Would the project: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?

Summary of Analysis in 2045 General Plan FEIR

Implementation of the proposed prior FEIR could lead to potential impacts on special-status plant and wildlife species within unincorporated County areas where development would occur under the General Plan. The County contains special-status plant and wildlife species, many of which are concentrated in the rural eastern portion of the County where undeveloped habitats remain intact.

These areas, including protected lands such as Mount Diablo State Park and Los Vaqueros Reservoir, offer critical refuge for sensitive species. The 2045 General Plan acknowledges that development could result in the direct loss of special-status species through habitat degradation and fragmentation and through indirect effects such as increased runoff, erosion, and pesticide use. However, most new development is expected to occur within the ULL (where the project site is located), which helps reduce pressure on ecologically sensitive areas. To further reduce impacts, the General Plan includes a comprehensive set of conservation policies and actions. These include COS-P4.3, COS-P4.6, and COS-P5.3, which require biological resource assessments, floristic surveys for plant habitats, and wetland protection measures. Additional goals focus on preserving upland habitats, riparian corridors, and the Delta estuary system. General Plan Policies COS-9.3 and COS-A4.1 also direct the County to oppose water diversion projects that could harm fisheries and water quality and maintain an inventory of ecologically significant areas.

Land use policies promote infill development, limit expansion beyond the ULL, and preserve open space to balance growth with environmental protection. When combined with existing federal and State laws and regulations such as the federal Endangered Species Act, Migratory Bird Treaty Act (MBTA), California Endangered Species Act (CESA), California Fish and Game Code, and the East Contra Costa County Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) these measures are expected to reduce the General Plan's impact on special-status species to a less than significant level.

Proposed Project Analysis and Conclusion

Habitat Assessment

Reconnaissance-level surveys of the project site were conducted by Wetland Scientist and Botanist Tom Mahony of Coast Range Biological on May 2, 2024, and Biologist Judy Bendix of Mosaic Associates (Mosaic) on March 25, 2024. The surveys included identification and mapping of vegetation community and land cover types and evaluation of potential habitat for sensitive species. Mosaic prepared a Biological Resources Report (BRR) (Appendix B) detailing the findings of these surveys, the results of which are summarized below.

The project site contains a single-family residence and an accessory structure along with related improvements on its southeastern corner. Additionally, Walker Creek (a small creek system that runs through Contra Costa County) is located at the northern edge of the project site. The project site has a history of anthropogenic disturbance. Habitat located within the project site primarily consists of Non-native Grassland, Coast Live Oak Woodland and Forest, planted woodland, and developed/ruderal habitat. These are described in greater detail below:

Non-native Grassland

Non-native Grassland, composed of the *Avena* spp.–*Bromus* spp. Herbaceous Semi-Natural Alliance1, covers approximately 7.15 acres on the project site. Non-native Grassland consists primarily of non-native grasses and forbs adapted to disturbance, including slender wild oat (*Avena barbata*), soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), barley (*Hordeum*

murinum subsp*. leporinum*), Mediterranean barley (*Hordeum marinum* subsp*. gussoneanum*), Italian ryegrass (*Festuca perennis*), bristly ox-tongue (*Helminthotheca echioides*), yellow star-thistle (*Centaurea solstitialis*), purple star-thistle (*Centaurea calcitrapa*), Italian thistle (*Carduus pycnocephalus*), artichoke thistle (*Cynara cardunculus*), prickly sow thistle (*Sonchus asper* subsp. *asper*), summer mustard (*Hirschfeldia incana*), mustard (*Brassica* spp.), bur clover (*Medicago polymorpha*), field bindweed (*Convolvulus arvensis*), field hedge-parsley (*Torilis arvensis*), common dandelion (*Taraxacum officinale*), rose clover (*Trifolium hirtum*), and cutleaf geranium (*Geranium dissectum*). Native shrubs and herbaceous species are widely scattered throughout the Grassland, including coyote brush (*Baccharis pilularis*), fiddleneck (*Amsinckia menziesii*), and goose grass (*Galium aparine*).

Coast Live Oak Woodland and Forest

Coast Live Oak Woodland and Forest, composed primarily of the *Quercus agrifolia* Forest and Woodland Alliance, covers approximately 0.73 acre on the project site and forms a riparian woodland along Walker Creek. Coast Live Oak Woodland and Forest are dominated by a canopy of coast live oak and occasional valley oak, with a subcanopy of California buckeye (*Aesculus californica*), blue elderberry (*Sambucus nigra*), sweet almond (*Prunus dulcis*), and walnut (*Juglans* sp.). The understory consists of shrubs and herbaceous species, including native species such as coyote brush, goose grass, poison oak (*Toxicodendron diversilobum*), soap plant (*Chlorogalum pomeridianum*), blue dicks (*Dipterostemon capitatus*), blue wildrye (*Elymus glaucus*), Pacific sanicle (*Sanicula crassicaulis*), and hedge nettle (*Stachys* sp.). Non-native herbaceous species include field hedge-parsley, Italian ryegrass, Italian thistle, and vetch (*Vicia sativa*). Herbaceous hydrophytic species are scattered along the Walker Creek channel, including water cress (*Nasturtium officinale*), tall flatsedge (*Cyperus eragrostis*), seep monkeyflower (*Erythranthe guttata*), and spiny-fruit buttercup (*Ranunculus muricatus*).

Planted Woodland

Planted woodland, conforming to no recognized vegetation classification system, covers approximately 0.55 acre in and around Developed/Ruderal habitat in the southern portion of the project site. Planted woodland consists of remnant orchard species such as walnut and sweet almond, tree species native to the region but not the project site, such as redwood (*Sequoia sempervirens*), native planted or remnant naturally occurring species such as coast live oak, and planted ornamental species such as deodar cedar (*Cedrus deodara*), pepper tree (*Schinus molle*), and olive (*Olea* sp.).

Developed/Ruderal

Developed/Ruderal habitat, conforming to no recognized vegetation classification system, covers approximately 1.40 acres on the southern portion of the project site. Developed/Ruderal habitat consists of developed areas (including the existing residence and outbuildings, gravel driveway, and associated infrastructure) along with ornamental landscaping. In addition, this habitat includes ruderal areas consisting of bare ground or non-native grasses and forbs adapted to disturbance, including those described above for Non-native Grassland, along with mallow (*Malva* sp.), stinkwort (*Dittrichia graveolens*), Bermuda buttercup (*Oxalis pes-caprae*), and periwinkle (*Vinca major*).

Arborist Report

A Preliminary Arborist Report was prepared for the proposed project by HortScience | Bartlett Consulting in July 2024 and updated in October 2024 (Appendix B). The report assessed the health, structure, and suitability for preservation and the protected status of trees within the project site. Impacts to trees based on project site plans and guidelines for tree preservation were also included within the report. The report included all trees within the project site with at least one trunk over 9 inches in diameter at 54 inches above grade. Fifty-two trees were therefore assessed within the project site, representing 14 species with California black walnut (*Juglans californica*), coast live oak, and valley oak as the most frequently assessed species. Additional species identified during the survey include coast redwood, Chinese elm (*Ulmus parvifolia*), California pepper tree, and paradox walnut (*Juglans × parado*).

Literature Review

Mosaic compiled a list of threatened, endangered, and otherwise special-status species previously recorded within the project and surrounding areas based on a search of the United States Fish and Wildlife Service (USFWS) list of threatened or endangered species, the California Natural Diversity Database (CNDDB), and the California Native Plant Society (CNPS) Inventory of Rare Plants (CNPS Inventory) for the *Clayton*, *California* USGS 7.5-minute Topographic Quadrangle Maps and the eight surrounding quadrangles.

Fifty-six special-status plant species and 68 special-status wildlife species have been documented within the *Clayton*, *California* USGS 7.5-minute Topographic Quadrangle Map and the eight surrounding quadrangles. Mosaic evaluated each of these species' potential to occur on the project site with the findings detailed in attached Appendix B. This evaluation includes each species' status, required habitat, and a summary analysis of the potential for each of these species to occur within the project site. Because of the slightly disturbed state of most of the project site and the lack of suitable habitat, many of the species evaluated do not have potential to occur. Special-status species that have potential to occur on-site are discussed below.

Special-status Plants

In connection with a previous development proposal for residential uses on the project site, rare plant surveys were carried out in 2006, timed to coincide with the blooming periods of all species that could potentially be present, with no rare plants observed.[36] Subsequent to the 2006 surveys, additional surveys were conducted, as detailed in Mosaic's BRR, where no rare plant species were detected

[36] Biological surveys for the project site have been conducted by qualified professionals over multiple years. Rare plant surveys were completed on April 27, 2006, and August 3, 2006, by qualified Botanists and covered the blooming periods of all special-status plant species with potential to occur on the site, with no rare plants observed. A California red-legged frog habitat assessment was conducted by Mark R. Jennings, PhD (Rana Resources) on April 27 and August 17, 2006, concluding that no suitable habitat was present, and focused daytime and nighttime surveys in 2009 by Dr. Jennings again detected no California red-legged frogs. The project site was subsequently revisited through reconnaissance-level surveys in 2024, conducted by Judy Bendix (Mosaic Associates) on March 25, 2024, and Tom Mahony (Coast Range Biological, LLC) on May 2, 2024, which confirmed that on-site conditions remained slightly disturbed from earlier survey periods and that no rare plants or special-status wildlife were present.

and no additional rare species with different blooming periods were identified since (e.g., during surveys conducted on May 2, 2024, and March 25, 2024). As a result, Mosaic concludes that rare plants are absent from the project site, and no further botanical surveys are considered necessary (see Appendix B for further detail).

Special-status Wildlife

According to Mosaic's BRR, there are 13 special-status wildlife species with the potential to be present within the project site, including white-tailed kites (*Elanus leucurus*), Cooper's hawks (*Accipiter cooperii*), sharp-shinned hawks (*Accipiter striatus*), ferruginous hawks (*Buteo regalis*), northern harriers (*Circus hudsonius*), hoary bats (*Lasiurus cinereus*), western red bats (*Lasiurus frantzii*), pallid bats (*Antrozous pallidus*), Nuttall's woodpecker (*Dryobates nuttallii*), and Townsend's western big-eared bats (*Corynorhinus townsendii*). Potential presence of these species is based on recorded occurrences and the presence of suitable habitat, as described in Appendix B. However, the project site is slightly disturbed due to anthropogenic disturbances such as mowing and no nests or roosts or any of the above-referenced species were observed during any historic or recent field surveys.

Findings Regarding Special-status Wildlife

As discussed in more detail in Mosaic's BRR and consistent with the analysis in the prior FEIR, given the potential for presence, project construction activities could result in the loss of foraging habitat for a range of sensitive wildlife, including white-tailed kites, Cooper's hawks, sharp-shinned hawks, ferruginous hawks, northern harriers, Nuttall's woodpecker, hoary bats, western red bats, pallid bats, and Townsend's western big-eared bats. This could result in both direct and indirect impacts to these species, as detailed below.

Although no nests were observed during field surveys, construction activities and vegetation removal could directly affect individual birds such as white-tailed kites, Cooper's hawks, sharp-shinned hawks, ferruginous hawks, California horned larks, and other nesting migratory species. These impacts may include nest disturbance or abandonment, harassment, or temporary avoidance of critical habitat during sensitive life stages. Indirect effects, such as altered foraging behavior, exposure to noise and light pollution, or roost abandonment, may also occur.

Similarly, although no roosts were observed during field surveys, construction activities and vegetation removal may cause direct harm to individual hoary bats, pallid bats, western red bats, and Townsend's big-eared bats. These impacts include potential mortality, injury, and the loss of critical roosting habitat such as mature trees with hollows, bole cavities, and exfoliating bark within coast live oak woodlands and forested areas. Indirect effects may also occur, including temporary habitat loss, avoidance of roost sites, altered foraging behavior, and exposure to noise or light pollution.

However, consistent with the conclusions set forth in the prior FEIR, these potential impacts would be less than significant with adherence to applicable federal, State, and local policies, laws and regulations. The proposed project would be developed on an infill site within the ULL, which helps reduce pressure on ecologically sensitive areas. In addition, the proposed project would be required

to adhere to all applicable laws and regulations, including, among others, the federal Endangered Species Act, MBTA, CESA, California Fish and Game Code and the East Contra Costa County HCP/NCCP. Furthermore, as reflected in this CEQA analysis (including Appendix B), the proposed project has been designed to adhere to relevant General Plan, such as COS-P4.3 and COS-P4.6, which require biological resource assessments and floristic surveys for plant habitats, and wetland protection measures. The proposed project also has incorporated a riparian corridor setback from the riparian area that significantly exceeds the required 50-foot setback, further protecting this riparian corridor and minimizing habitat degradation and fragmentation. In addition, the proposed project would be required to adhere to all other applicable requirements, such as lighting standards, which further reduce impacts associated with potential light pollution in sensitive areas. Based on the foregoing, and consistent with the impact conclusions of the prior FEIR, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior EIR. Accordingly, no additional environmental review is required.

b) Riparian Habitat and Sensitive Natural Communities

Would the project: 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 Wildlife or United States Fish and Wildlife Service?

Summary of Analysis in 2045 General Plan FEIR

Implementation of the proposed prior FEIR could potentially affect riparian habitats and other sensitive natural communities within unincorporated County areas where development would proceed under the 2045 General Plan. Creeks and streams in the area support limited riparian vegetation and many drainages are ephemeral or intermittent. Beyond riparian zones, the County contains nine sensitive natural communities, primarily aquatic, concentrated near the Delta and San Francisco Bay. Notably, upland communities, such as valley needlegrass grassland and serpentine bunchgrass, are found in the eastern portion of the County and along the Contra Costa–Alameda County boundary.

Construction activities under the General Plan could directly or indirectly impact riparian habitats and other sensitive natural communities. However, because most development is expected to occur within the ULL (where the project site is located), any such potential impacts would be reduced through implementation of General Plan Conservation Policies. These policies, referenced in Goals COS-1, COS-4, COS-5, COS-6, COS-8, COS-9, and LU-2 and Policies COS-P1.3, COS-P4.6, COS-P5.2, COS-P5.3, COS-P6.1, COS-P9.4, and LU-P2.1 through LU-P2.6, promote permanent open space protection, ecological resource avoidance and mitigation, preservation of natural watercourses and floodplains, and conservation of native woodlands and shoreline ecosystems. Implementation of the comprehensive set of General Plan goals, policies, and actions, including, without limitation, conditions associated with Streambed Alteration Agreements and waste discharge requirements, would ensure that the potential impacts of the proposed General Plan on riparian corridors and other sensitive natural communities would be less than significant.

Proposed Project Analysis and Conclusion

Sensitive natural communities are considered rare, ecologically important, or legally protected under State and federal laws and regulations such as the Clean Water Act, the California Fish and Game Code, the Porter-Cologne Act, and California Fish and Game Code Section 1602, which regulates activities that may substantially divert or obstruct the natural flow of, or substantially alter the bed, channel, or bank of a stream or riparian corridor. The CNDDB identifies and prioritizes these communities for conservation. Under CEQA, impacts to such communities are typically considered significant. At the local level, avoidance of impacts to riparian habitat is required by the Contra Costa County General Plan Conservation Element, including Policies 8-78 and 8-79 (protection and preservation of natural waterways), Policy 8-86 (preservation of existing native riparian habitat), Policy 8-89 (minimum 100-foot creek setback, measured as 50 feet from each side of the creek centerline in areas planned for urbanization), and Policy 8-91 (minimization of grading and construction impacts near watercourses). These requirements are implemented through the Contra Costa County Code, Title 8 (Zoning Code), Chapter 82-2 (Creek Setback Ordinance), which prohibits structure placement, grading, and vegetation removal within required creek setback areas except where expressly approved, and through the North Gate Specific Plan, which requires preservation of creeks and riparian vegetation and limits development within creek corridors.

With respect to the proposed project, according to Mosaic's BRR, no sensitive natural communities have been identified within the project site. The Walker Creek riparian corridor is adjacent to the project site; however, the proposed site plan would exceed the required 50-foot setback from the creek and its corridor in accordance with County Code 82-2 and the setback requirements identified within the Northgate Specific Plan by providing a setback of approximately 71 to 126 feet from Walker Creek. Proposed construction activities avoid any direct impacts to riparian habitat in the Coast Live Oak Woodland and Forest surrounding Walker Creek.

Consistent with the above-referenced regulatory and policy requirements, the proposed project has been designed to avoid all development, grading, and structure placement within the Walker Creek riparian corridor and applicable creek setback area. As documented in Mosaic Associates' BRR, no direct impacts to riparian habitat would occur as a result of the project design and incorporated setbacks to Walker Creek. Accordingly, compliance with applicable federal and State laws and regulations, County Code requirements, and General Plan policies ensures avoidance of sensitive natural communities, and the proposed project would not result in any peculiar effects or a new or more severe adverse biological impact beyond those identified in the prior FEIR.

Based on the foregoing and consistent with the impact conclusions in the prior FEIR, the proposed project would not result in significant impacts to riparian habitat or sensitive natural communities. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Federally Protected Wetlands

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

Summary of Analysis in 2045 General Plan FEIR

Implementation of the 2045 General Plan could result in direct and indirect impacts on State and federally protected wetlands within the unincorporated County where development would occur under the 2045 General Plan, which includes jurisdictional waters of the United States. While construction activities pose risks to these sensitive areas, the concentration of development within the ULL (where the project site is located), and the application of targeted mitigation measures are expected to reduce those impacts. The General Plan includes a suite of conservation-focused goals and policies, such as Goal COS-5 for protecting riparian corridors and wetlands and Goal COS-8 for maintaining water quality, alongside specific policies like COS-P5.1 through COS-P5.5, which address wetland restoration, setbacks, and runoff prevention. Additional land use policies, including LU-P2.3, LU-P2.5, and LU-P2.6, promote infill development and minimize the footprint of new construction, further protecting sensitive habitats.

To ensure environmental safeguards, project-specific analyses and mitigation measures are required, along with compliance with federal permitting processes, such as Section 404 permits and Section 401 water quality certifications. These layers of regulation and planning would ensure that potential impacts on wetlands under the General Plan are less than significant.

Proposed Project Analysis and Conclusion

Potential wetlands are identified based on the presence of all three United States Army Corps of Engineers (USACE) wetland indicators: hydrophytic vegetation cover, hydric soil indicators, and presence of hydrology. With respect to the proposed project, based on the above-referenced criteria, a qualified Biologist conducted a site-specific review of the project site. As documented in the Mosaic BRR (Appendix B), there are no federally or State-protected wetlands within the development footprint of the project site and accordingly, there would be no project impacts to federally or State-protected wetlands. Therefore, consistent with the impact conclusions in the prior FEIR, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Fish or Wildlife Movement

Would the project: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that implementation of the General Plan could interfere with the movement of native and migratory wildlife species, disrupt established corridors, or impede access to nursery sites within the unincorporated County where development would occur under the 2045 General Plan. Key ecological linkages, such as the East Bay Hills–Diablo Range and Mount Diablo–Diablo Range serve as vital connections between large natural landscape blocks. The East Contra Costa County HCP/NCCP further identifies four critical wildlife movement routes: Round Valley, Briones Valley, Deer Valley, and Horse and Lone Tree Valleys, linking the Los Vaqueros Watershed to Black Diamond Mines Regional Preserve.

Natural communities also play an essential role in species movement. Baylands along the western and northern boundaries of unincorporated Contra Costa County where development would occur under the 2045 General Plan support anadromous fish like green sturgeon (*Acipenser medirostris*) and steelhead (*Oncorhynchus mykiss*). Riparian woodlands facilitate movement for both fish and terrestrial wildlife, while grasslands provide corridors for species such as the American badger (*Taxidea taxus*), Alameda whipsnake (*Masticophis lateralis euryxanthus*), and San Joaquin kit fox (*Vulpes macrotis mutica*). These grasslands connect to neighboring counties, enabling genetic exchange and broader habitat access. Aquatic habitats like streams and ponds offer breeding grounds for California red-legged frogs (*Rana draytonii*) and California tiger salamanders (*Ambystoma californiense*), with surrounding upland grasslands supporting dispersal.

Development under the General Plan could fragment these habitats, reducing connectivity and increasing vulnerability to environmental stressors. Although most development is expected within the ULL, impacts may still occur. The General Plan includes numerous goals and policies to mitigate these risks, including Goals COS-1, COS-4, COS-5, COS-6, COS-9, and LU-2 and Policies COS-P1.1, COS-P1.3, COS-P1.4, COS-P4.1, COS-P4.4, COS-P4.5, COS-P5.1 through COS-P5.4, COS-P6.1, and LU-P2.1 through LU-P2.6. These provisions promote open space protection, buffer zones, habitat connectivity, and restrictions on fencing and development that could harm wildlife movement. Supporting actions such as COS-A1.1, COS-A4.2, and COS-A5.2 further strengthen conservation efforts through interagency coordination, ordinance updates, and design standards. Despite these measures and existing federal and State laws and regulations, impacts on wildlife corridors and nursery sites may not be fully mitigated without project-specific analysis. Accordingly, the prior FEIR includes MM BIO-1, which requires a habitat connectivity and wildlife corridor evaluation before building permits for projects not exempt from CEQA are issued. With the implementation of MM BIO-1 the potential impacts on wildlife movement and habitat connectivity resulting from the implementation of the General Plan would be less than significant.

Proposed Project Analysis and Conclusion

The prior FEIR identified MM BIO-1, which requires that a habitat connectivity and wildlife corridor evaluation be conducted prior to the issuance of building permits for projects not exempt from CEQA. The proposed project is statutorily exempt from CEQA and, therefore, is not required to implement MM BIO-1 since it contains express language limiting application of this measure to nonexempt development projects only. Nevertheless, for the purpose of demonstrating consistency with the prior FEIR and to address potential biological resource considerations, the proposed project has voluntarily prepared and submitted a habitat connectivity and wildlife corridor evaluation consistent with the requirements of MM BIO-1. As detailed more fully in Appendix B, the project site is situated within a landscape of low-density development and diverse natural habitats, including oak woodlands, riparian areas, grasslands, and scrub. Walker Creek and its riparian corridor act as a wildlife movement corridor.

However, consistent with the regulatory and policy requirements relied upon in the prior FEIR, the proposed project, which would be located on an infill site within the ULL, has been designed to avoid all development, grading, and structure placement within the Walker Creek riparian corridor and applicable creek setback area. As discussed more fully in the Mosaic's BRR, the proposed project's relatively small development footprint would not significantly expand developed areas or disrupt existing wildlife movement corridors, specifically Walker Creek and its riparian zone (where a setback of 71 to 126 feet, which exceeds the required 50-foot setback, would be maintained). Because of the installation of an expanded riparian setback zone, native species would continue to move freely between habitats and can avoid the project site during construction. As a result, the proposed project is not expected to cause significant impacts to the movement of native wildlife or fish, and no mitigation measures are required. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Conflict with Local Policies or Ordinances

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

Summary of Analysis in 2045 General Plan FEIR

Implementation of the General Plan could potentially conflict with local policies or ordinances protecting biological resources in unincorporated County areas where development under the 2045 General Plan would occur. However, the General Plan is designed to align with and expand upon existing laws and regulations, including Measure C-1990s 65/35 Land Preservation Standard and the ULL, codified in County Ordinance Chapter 82-1. These standards restrict urban development to no more than 35 percent of the County's land area, preserving the remaining 65 percent for agriculture, open space, and other non-urban uses. Policies such as LU-P2.1 through LU-P2.3 reinforce these protections by focusing development within the ULL and limiting expansion.

The General Plan also supports County Ordinance Chapter 816-6, which governs tree protection and preservation. Policies COS-P6.1 and COS-P6.3, along with Actions COS-A6.1 and COS-A6.2, promote the conservation of native woodlands and significant trees, including the development of an Oak Woodland Conservation Program. Implementation of proposed General Plan goals, policies, and actions, as well as conditions associated with County Ordinance Code Chapters 82-1 and 816-6, would ensure that the potential impacts of the proposed General Plan related to local policies or ordinances for the protection of biological resources or an adopted HCP, NCCP, or other approved local, regional, or State HCP would be less than significant. With these safeguards in place, potential conflicts with biological resource protections would be less than significant.

Proposed Project Analysis and Conclusion

As explained in more detail in the BRR prepared for the proposed project, the proposed project aligns with the Natural Resource Goals of the Contra Costa County General Plan, County Ordinance Code Chapters 82-1 and 816-6, and applicable provisions of the North Gate Specific Plan. The proposed project adheres to these Goals and Ordinances by promoting land conservation and discouraging development in conservation areas, requiring biological assessments (which were voluntarily fulfilled through Mosaics' BRR), and protecting migration corridors through implementation of riparian setback zones.

The proposed project has been carefully designed to minimize impacts on sensitive natural communities and to comply with County General Plan policies, such as COS-P4.3 and COS-P4.7, which protect special-status species during construction. This is achieved by exceeding the required 50-foot setback from the creek and its corridor (under County Code 82-2 and the Specific Plan) by maintaining a setback approximately 71 to 126 feet from Walker Creek.

The proposed project also has been designed to avoid any significant impacts to habitat for rare and endangered wildlife within riparian habitat in the Coast Live Oak Woodland and Forest surrounding Walker Creek. maintenance of an expanded setback (approximately 71 to 126 feet from Walker Creek, rather than the required 50 feet) from the creek and its corridor. Therefore, the proposed project would not hinder terrestrial wildlife movement. The foregoing help to ensure the proposed project does not conflict with any local policies or ordinances protecting biological resources.

Additionally, based on a site-specific tree survey (as documented in the Arborist Report, Appendix B) a total of approximately 52 trees are present within the project site and approximately 34 are proposed for removal to accommodate development. The 34 trees proposed to be removed are classified as Protected Trees under Contra Costa County's Tree Protection and Preservation Ordinance, including three valley live oaks, nine California black walnuts, and eight coast live oaks. Approximately 18 trees would be preserved, 13 of which are Protected Trees under the County's Protection Ordinance. Work within the driplines of the preserved trees may occur, including grading and trenching. The proposed project would be required to adhere to Contra Costa County Title 8 Section 816-6.6004 concerning the removal of any Protected Trees within the project site. Compliance requires, for example, the proposed project to obtain tree removal permits prior to development. This also includes maintaining standards for construction near Protected Trees and

obtaining additional tree removal permits if grading and trenching would otherwise result in the death of a tree.

Based on the foregoing, the proposed project would not conflict with any local biological resource policies or ordinances, and thus impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

f) Habitat Conservation Plan/Natural Community Conservation Plan

Would the project: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?

Summary of Analysis in 2045 General Plan FEIR

Implementation of the General Plan could potentially conflict with an adopted HCP, NCP, or other approved local, regional, or State HCP. However, the General Plan incorporates policies that align with and support the East Contra Costa County HCP/NCCP. These include County Ordinance Code Chapters 82-1 and 816-6, which include measures to promote land conservation and discourage development in designated conservation areas (COS-P4.2), require biological resource assessments for projects that may impact sensitive species (COS-P4.3), protect wildlife migration corridors (COS-P4.4), mandate vegetation surveys in habitats suitable for rare plants (COS-P4.6), and enhance aquatic and wetland ecosystems such as creeks, marshes, and tidelands (COS-P5.1). Together, these policies reinforce regional habitat conservation goals and ensure development is ecologically responsible.

Implementation of proposed General Plan goals, policies, and actions, as well as conditions associated with County Ordinance Code Chapters 82-1 and 816-6, would ensure that the potential impacts of the General Plan related to provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP would be less than significant.

Proposed Project Analysis and Conclusion

The project site is outside the East Contra Costa County HCP/NCCP. No local, regional, or statewide HCP/NCCP has been adopted for the area in which the proposed project is located; therefore, the proposed project would not conflict with the provisions of any HCP or NCCP and impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Biological Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.5 Cultural and Tribal Cultural Resources *Would the project:*					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Significant and Unavoidable impact	No	No	No	No
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	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant impact	No	No	No	No
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:					
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	Less than significant impact with mitigation incorporated	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
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 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	Less than significant impact with mitigation incorporated	No	No	No	No

a) Historical Resources

Would the project: Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

Summary of 2045 General Plan FEIR

The prior FEIR determined that implementation of the General Plan could potentially result in impacts on historical resources in unincorporated County areas where development would occur under the General Plan. Specifically, direct impacts could occur if buildings determined to be historic are demolished or significantly altered as a result of implementation of the 2045 General Plan. However, there are a number of federal and State laws and regulations in place to protect historical resources within the prior FEIR study area. Currently known or future historic sites or resources listed in the National or California Registers or the Contra Costa County Historic Resources Inventory would be protected through State and federal laws and regulations restricting alteration, relocation, and demolition of historical resources. Compliance with the State and federal laws and regulations is intended to ensure that development would not result in adverse impacts to identified historic and cultural resources. Historical resources are protected under the laws and regulations of the National

Historic Preservation Act (NHPA) when projects involve federal agencies. In addition, the General Plan policies take a comprehensive approach to the protection of historical resources. The Conservation, Open Space, and Working Lands Element of the General Plan includes policies and actions that would mitigate potential impacts on historical resources, including through the policies and actions under Goal COS-10, which aims to identify and preserve historic resources.

The prior FEIR determined that implementation of the General Plan would not substantially alter any policies regarding the significance of impacts on historical resources, alter the significance of impacts on historical resources compared to existing conditions, modify the procedures or policies regarding how historical resources are identified or evaluated for historical significance, or change how impacts on historical resources are assessed or mitigated. As the prior FEIR provides a programmatic analysis, it is not possible to determine whether individual future projects would be able to conform with the Secretary of Interior's Standards. However, CEQA would require that future projects with the potential to significantly impact historic resources be subject to project-level CEQA review wherein the project's potential to affect the significance of a surrounding historic resource would be evaluated and mitigated to the extent feasible. The requirement for subsequent CEQA review would minimize the potential for new development to indirectly affect the significance of historic resources to the maximum extent practicable. Even with implementation of the proposed General Plan goals, policies, and actions, as well as adherence with the applicable laws and regulations, the prior FEIR concluded that this would not fully reduce potential impacts on historic resources and further determined that no feasible mitigation measures were available to reduce impacts to less than significant. Policies and actions in the proposed 2045 General Plan, in addition to State laws and regulations, would reduce impacts to the extent feasible, and additional project-specific mitigation measures would need to be incorporated pursuant to future project-specific review. Based on the foregoing, the prior FEIR determined this impact to be significant and unavoidable.

Proposed Project Analysis and Conclusion

Consistent with the analysis set forth in the prior FEIR, a Phase I Cultural Resources Assessment (Phase I CRA) (Confidential Appendix C) was prepared for the proposed project by FirstCarbon Solutions (FCS) on October 29, 2025. In order to determine the presence or absence of historic and archaeological resources within the project site, a records search and literature review were conducted for the project site and a 0.5-mile radius on August 20, 2025, at the Northwest Information Center (NWIC), located at Sonoma State University in Rohnert Park, California. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, and historic maps and to evaluate whether any previously documented pre-contact or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the project site.

To identify whether such historic properties or resources exist on-site or within the 0.5-mile radius, the records search included the current inventories of National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historical Landmarks list, the California Points of Historical Interest list, and the California Built Environment Resource Directory (BERD) for Contra Costa County. The results of the records search indicated that three historic era

built environment resources have been recorded within a 0.5-mile radius of the project site; however, none of these resources are located within the project site. In addition, 20 area-specific survey reports are on file with the NWIC for the project site and its 0.5-mile search radius; two studies partially address the project site. This indicates that the project site has been previously partially surveyed for cultural resources. The record search results and analysis can be found in the Phase I CRA (Confidential Appendix C).[37]

A pedestrian survey for unrecorded cultural (including potential historic) resources was conducted by FCS on August 28, 2025. The survey noted the presence of a single-family residence and an accessory structure located on the southeastern border of the project site that are over 50 years in age and had not been previously evaluated for significance as a potential historic resource at the local, State, or national level. FCS recorded the one residential unit and one related accessory structure and assessed them for potential significance. Based on the assessment, neither building meets the criteria for listing on the CRHR or the NRHP due to a lack of historic or architectural significance. Additionally, neither building appears to exhibit sufficient artistic value nor historical association to qualify under local standards for historical importance. The evaluation also concluded that the buildings lack integrity in key aspects, including setting, design, materials, workmanship, feeling, and association. Furthermore, no pre-contact archaeological materials or additional historic era-built environment resources were identified during the pedestrian survey. Therefore, the proposed project would not have the potential to cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5 (as compared to the significant and unavoidable impact disclosed in the prior FEIR). Thus, the proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Archaeological Resources

Would the project: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that archaeological resources are known to be present in unincorporated County areas where development would occur under the General Plan and that implementation of the General Plan could potentially result in direct or indirect impacts on both pre-contact and historic archaeological resources. If archaeological resources are present in the areas where development is planned, they could be damaged by earth-disturbing construction activities, such as those associated with excavating foundations, placing fill, trenching for utility systems, or grading the site for roads and staging areas. In particular, construction activities may disturb resources by exposing them to potential vandalism or causing them to be displaced from the original context. This could result in a significant impact on archaeological resources. As detailed in the General Plan FEIR, there are a

[37] Pursuant to Public Resources Code Section 21082.3(c)(2), the Phase I CRA remains confidential due to the inclusion of sensitive cultural resources information.

number of federal and State laws and regulations in place to protect archaeological resources within unincorporated County areas where development would occur under the General Plan. Compliance with the State and federal laws and regulations is intended to ensure that development would not result in significant adverse impacts to identified archaeological resources. In addition, General Plan policies take a comprehensive approach to the protection of archaeological resources, including Conservation, Open Space, and Working Lands Element policies and actions under Goal COS-10, which aims to identify and preserve archaeological resources. For example, Action COS-A10.2 requires the evaluation and implementation of one or more measures to protect and preserve historic and cultural resources, such as a historic and cultural resources ordinance, overlay district, and/or design guidelines.

As noted above, the 2045 General Plan includes multiple policies intended to mitigate impacts on archaeological resources through preservation and evaluation. The General Plan also includes policies and actions that attempt to provide better documentation and improve the review of archaeological resources to protect known and as-yet unknown historic resources. This includes Policy COS-P10.6, which establishes procedures for the inadvertent discovery of cultural resources. Specifically, Policy COS-P10.6 requires ground-disturbing activities to halt within a 50-foot radius of the find upon discovery of significant historic or prehistoric archaeological artifacts or fossils during project construction until its significance can be determined by a qualified historian, Archaeologist, or Paleontologist and appropriate protection and preservation measures developed. Overall, the goals, policies, and actions in the General Plan, in combination with existing federal and State regulations in place to protect archaeological resources, would help to avoid adverse impacts to archaeological resources; however, development under the 2045 General Plan would require ground-disturbing activities that could potentially impact archaeological resources. Therefore, this is considered a potentially significant impact.

Accordingly, the prior FEIR identifies MM CUL-1, which requires project applicants for future development in the County to retain an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards to conduct a cultural records search prior to initiation of construction activities for discretionary projects not exempt from CEQA and to implement measures recommended by the Archaeologist to protect cultural resources inadvertently discovered on the project site. With implementation of MM CUL-1 along with consistency with relevant goals, policies, and actions in the General Plan and compliance with applicable federal and State laws and regulations, the prior FEIR concluded that implementation of the 2045 General Plan would not alter the significance of impacts on archaeological resources compared to the existing General Plan, nor would it modify the procedures or policies regarding how archaeological resources are identified or evaluated for historical significance or for assessing or mitigating impacts under the General Plan. Therefore, impacts would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project is statutorily exempt from CEQA and, therefore, is not required to implement MM CUL-1 since it contains express language limiting application of this measure to nonexempt development projects only. Nevertheless, for the purpose of demonstrating consistency with the prior

FEIR and to address potential cultural resource considerations, a Phase I CRA (Confidential Appendix C) was prepared for the proposed project by FCS on October 29, 2025.

The results from the NWIC records search indicate that no pre-contact archaeological resources have been recorded within the project site or within a 0.5-mile radius of it. The buried site sensitivity analysis determined that the entire project site is underlain by late Pleistocene-era dissected alluvial fan deposits (Qoa). Additionally, the nearest natural water source lies along the northern border of the project site. This suggests that the likelihood of encountering unanticipated buried cultural resources during construction is considered low to moderate.

No pre-contact cultural resources were identified during the pedestrian survey. While there are no known archaeological resources within the project site, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources. Archaeological resources can include but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Consistent with the analysis in the prior FEIR, damage or destruction of these resources would be a potentially significant impact.

To address the low to moderate potential of encountering previously undiscovered archaeological resources, the proposed project would be required to comply with applicable laws and regulations related thereto as well as General Plan Policy COS- P 10.6, which establishes procedures for the inadvertent discovery of cultural resources, including halt of ground-disturbing activities within a 50-foot radius of the find until its significance can be determined by a qualified archeologist. Compliance with the established regulatory framework would ensure that any potential impacts to archaeological resources would be less than significant, consistent with the impact conclusions in the prior FEIR. The proposed project would not result in any peculiar effects and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Human Remains

Would the project: Disturb any human remains, including those interred outside of formal cemeteries?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that impact to human remains would be less than significant without mitigation. This conclusion was based on the absence of recorded burial sites within a 0.5-mile radius of the project area.

However, the prior FEIR recognized the possibility that inadvertent discovery of previously unknown human remains could occur during development pursued under the General Plan. Therefore, the prior FEIR confirmed the comprehensive set of laws and regulations that would govern in those circumstances. For example, in the event that human remains are discovered during grading or construction activities, compliance with California Health and Safety Code Section 7050.5, which includes specific provisions for the protection of human remains in the event of discovery, would be

required. The treatment of Native American human remains is regulated by Public Resources Code Section 5097.98, as amended by AB 2641, which addresses the disposition of Native American burials, protects remains, and appoints the Native American Heritage Commission (NAHC) to resolve disputes. In addition, California Health and Safety Code Section 7052 makes the willful mutilation, disinterment, or removal of human remains a felony. The Health and Safety Code is applicable to any project where ground disturbance would occur.

Additionally, the General Plan Conservation, Open Space, and Working Lands Element includes policies and actions that would address potential impacts on human remains. Specifically, in the event of the discovery of a burial, human remains, or suspected human remains, Policy COS-P11.11 requires halting of excavation and grading activities immediately, protection of the area surrounding the find, notification of the County Coroner, and compliance with California Health and Safety Code Section 7050.5. Therefore, the prior FEIR concluded that with compliance to applicable federal and State laws and regulations, in addition to 2045 General Plan policies, impacts on human remains would be less than significant.

Proposed Project Analysis and Conclusion

As noted above, results from the NWIC records search and pedestrian survey did not locate or identify any human remains and/or cemeteries in or near the project site. The potential for the disturbance of any human remains is considered low to moderate this is based on the absence of recorded burial sites within a 0.5-mile radius, the negative pedestrian survey, and the project site's geological context indicating low to moderate sensitivity for buried cultural materials.

Consistent with the analysis in the prior FEIR, while the presence of human remains within or near the project site is unlikely, there is always the possibility that subsurface construction activities associated with the proposed project, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains.

Accordingly, should the inadvertent discovery of human remains occur on the project site, the proposed project would be required to adhere to the comprehensive regulatory framework governing these circumstances, as discussed in the prior FEIR. For example, Section 7050.5 of the California Health and Safety Code and Public Resources Code Sections 5097.94 and 5097.98 and General Plan Policy POS-P11.11 would be required to be implemented. Compliance with applicable federal and State laws and regulations, in addition to relevant General Plan policies, would ensure that potential impacts on human remains would be less than significant, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Listed or Eligible Tribal Cultural Resources

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 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)?**

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that Tribal Cultural Resources (TCRs) are known to be present in unincorporated County areas where development would occur under the General Plan and that ground-disturbing activities associated with future development under the General Plan could occur on sites that may have sensitive TCRs. Grading and construction activities of undeveloped areas or redevelopment that require more intensive soil excavation than needed for the existing development could potentially cause disturbance to TCRs by potentially unearthing previously unknown or unrecorded TCRs. Accordingly, implementation of the 2045 General Plan could potentially cause a substantial adverse change in the significance of TCRs.

In compliance with the SB 18 process, as described in Government Code Section 65352.3, and the AB 52 process, as described under CEQA, the County sent letters to Tribal representatives on January 15, 2021, and to the County's AB 52 Tribal Consultation List on October 5, 2023. The Confederated Villages of Lisjan Nation Tribe requested consultation and consulted with the County in November 2021 regarding the draft goals, policies, and actions of the General Plan Update. During this process, the Lisjan Tribe provided comments and edits for the General Plan that were incorporated as new and modified policies and actions. Additionally, the Tribe suggested mitigation measures that were ultimately incorporated into the prior FEIR as MM TCR-1, MM TCR-2, and MM CUL-1.

MM TCR-1 provides that project applicants for discretionary projects that are not exempt from CEQA may need to enter into a cultural resources treatment agreement with the culturally affiliated Tribe prior to permit issuance. TCR-2 requires that project applicants for discretionary projects that are not exempt from CEQA allow Tribal Monitors from the culturally affiliated Tribe to monitor all grading, excavation, and ground-breaking activities, including archaeological surveys, testing, and studies. MM CUL-1 requires project applicants for future development in the County to retain an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards to conduct a cultural records search prior to initiation of construction activities for discretionary projects not exempt from CEQA and to implement measures recommended by the Archaeologist to protect cultural resources inadvertently discovered on the project site. No further consultation was requested from the Lisjan Tribe. The Tribe also responded on October 25, 2023, to the updated consultation invitation,

requesting information about the proposed project, which was sent to the Tribe. No additional consultation was requested.

Based on the foregoing, the prior FEIR determined that compliance with the relevant goals, policies, and actions in the 2045 General Plan and implementation of MM CUL-1, MM TCR-1, and MM TCR-2, in combination with adherence to applicable federal and State laws and regulations in place to protect TCRs, would reduce impacts to a less than significant level.

Proposed Project Analysis and Conclusion

As discussed above, a review of the CRHR, local registers of historic resources, a records search conducted at NWIC, did not identify any pre-contact resources on-site or within a 0.5-mile radius of the project site. However, the site-specific NAHC Sacred Lands File (SLF) search results were positive for TCRs within the project site boundaries, which means the NAHC's confidential database includes records indicating the presence of TCRs in or near the project site. As described above, although not required to do so under AB 52, FCS sent letters to 48 Tribal representatives. The Muwekma Ohlone Tribe of the San Francisco Bay Area responded on October 1, 2025, acknowledging FCS's inquiry and offering Tribal consultation, monitoring, and burial recovery services. On October 21, 2025, the Indian Canyon Band of Costanoan Ohlone informed FCS that the project site may be located within or near a potentially eligible cultural site. No additional responses have been received to date.

The proposed project is statutorily exempt from CEQA and, therefore, is not required to implement MM CUL-1 (which, by its express terms, only applies to discretionary projects that are not exempt from CEQA), which requires project applicants to retain a qualified Archaeologist to conduct a cultural records search for the project site. Nevertheless, for the purpose of demonstrating consistency with the prior FEIR and to address potential cultural resource considerations, a Phase I CRA, which included a cultural resource records search, was prepared for the proposed project. Based on the results of the Phase I CRA, the project site has only low to moderate potential for the discovery of subsurface resources. Accordingly, preparation of a treatment plan or implementation of monitoring is not warranted for the proposed project.

Rather, the proposed project would incorporate Implementation Measure (IM) CUL-1, which furthers General Plan Policy COS-P11.6 to "encourage voluntary landowner efforts to protect Tribal Cultural Resources." To that end, IM CUL-1 would require that all personnel directly involved with project-related ground disturbance attend a Worker Environmental Awareness Program (WEAP) training for TCRs. In addition, the proposed project would be required to adhere to all applicable laws and regulations (as further identified in the prior FEIR). Therefore, with adherence to all applicable laws and regulations, combined with IM CUL-1, the proposed project would have a less than significant impact, consistent with the impact conclusions set forth in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Lead Agency Determined Tribal Cultural Resources

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 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?

Summary of Analysis in 2045 General Plan FEIR

The potential for future development under the prior FEIR to cause a substantial adverse change in the significance of a TCR determined to be significant per Public Resources Code Section 5024.1(c) would be similar as described under Impact "D" of the General Plan FEIR. As such, even with compliance with applicable federal and State laws and regulations, including, among others, AB 52 concerning Native American Tribal consultation and adherence to proposed policies and implementing actions of the 2045 General Plan, future development within the General Plan area could damage or otherwise impact a TCR. Therefore, the impact would be significant. However, implementation of the relevant goals, policies, and actions in the prior FEIR, including COS-P11.10, which requires consultation with culturally affiliated Tribes when developing mitigation measures, and compliance with MM CUL-1 and MM TCR-1 and MM TCR-2, together with adherence to applicable federal and State laws and regulations in place to protect TCRs, would reduce impacts to a less than significant level.

Proposed Project Analysis and Conclusion

As stated above, consistent with the analysis in the prior FEIR, a review of the CRHR, local registers of historic resources, and a records search conducted at NWIC, did not identify any pre-contact resources within a 0.5-mile radius of the project site. However, the NAHC SLF search results were positive for TCRs within the project site boundaries, which means that the NAHC's confidential database includes records indicating the presence of TCRs in or near the project site. As described above, although not required to do so under AB 52, FCS sent letters to 48 Tribal representatives. The Muwekma Ohlone Tribe of the San Francisco Bay Area responded on October 1, 2025, acknowledging FCS's inquiry and offering Tribal consultation, monitoring, and burial recovery services. On October 21, 2025, the Indian Canyon Band of Costanoan Ohlone informed FCS that the project site may be located within or near a potentially eligible cultural site. No additional responses have been received to date.

Consistent with the impact conclusions in the prior FEIR, there is always the potential that TCRs could be inadvertently discovered during proposed project construction. Therefore, to prevent damage to or destruction of any such potential TCRs as a result of this inadvertent discovery, the proposed project would be required to , comply with all applicable federal and State laws and regulations and relevant General Plan goals and policies such as COS- P 10.6, as well as IM CUL-1

provided above. The foregoing would ensure that any such potential impacts would be less than significant. Therefore, upon compliance with the established regulatory framework, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

General Plan Implementation Measures

IM CUL-1 WEAP Training

In accordance with General Plan Policy COS-P11.6, prior to the initiation of construction activities, all construction personnel conducting ground disturbance at the site shall be provided a Worker Environmental Awareness Program (WEAP) cultural resources “tailgate” training. The training shall include visual aids, a discussion of applicable laws and statutes relating to archaeological resources, types of resources that may be found within the project site, and procedures to be followed in the event such resources are encountered. The training shall be conducted by an Archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards (PQS) for archaeology.

Conclusion

With regard to Cultural and Tribal Cultural Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project’s specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.6 Energy *Would the project:*					
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	No
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	Less than significant impact	No	No	No	No
c) Implementation of the proposed project would not require or result in the relocation or construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects.	Less than significant impact	No	No	No	No

a) Energy Use

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that construction- and operational-related impacts associated with implementation of the 2045 General Plan would not result in inefficient, wasteful, or unnecessary fuel consumption. Construction-related electricity and fuel use would be temporary and typical of

development projects, with contractors required to comply with idling limits and other regulations that avoid inefficient use. During operation, although overall energy demand would increase with population and employment growth, per-capita electricity, natural gas, propane, and transportation fuel consumption would decrease due to mandatory compliance with current and future Energy Code and CALGreen standards, SB 100 renewable energy procurement requirements, increased adoption of EVs, and General Plan policies that reduce VMT and support active and alternative transportation. Specifically, Policies TR-P1.4, TR-P4.7, TR-P5.2, TR-P5.7, and TR-P5.10 collectively reduce single-occupant vehicle travel, improve walkability and safe multimodal crossings, encourage walking, biking, and micromobility for short and medium trips, and require ample bicycle/micromobility parking, thereby lowering transportation energy use. As a result, the General Plan would decrease overall per capita energy consumption, reduce reliance on fossil fuels, and increase reliance on renewable energy sources; therefore, energy impacts associated with implementation and operation of land uses accommodated under the proposed 2045 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

As discussed below, energy would be used during both the construction and operational phases of the proposed project. Energy usage during the construction phase would originate from mobile and stationary construction equipment. Construction-related energy usage can vary substantially depending on the level of activity, length of the construction period, specific construction operations, and types of equipment. Operational energy usage would be generated by electricity and natural gas use for the on-site residential units and landscaping at the project site. Energy usage during both the construction and operational phases of the proposed project would be typical for a project of this kind and would not represent a wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, the proposed project would not conflict with or obstruct any State or local plan for renewable energy or energy efficiency.

Consistent with the analysis in the prior FEIR, the proposed project would result in energy use during construction and operation, which are discussed separately below. As discussed in the prior FEIR, there is a robust regulatory framework of adopted laws, regulations, and policies that require energy efficiency standards to which development under the General Plan (including the proposed project) would be subject, including, among others:

- AB 1493: Pavley Fuel Efficiency Standards
- Title 20 California Code of Regulations: Appliance Energy Efficiency Standards
- Title 24, Part 6, California Code of Regulations: Building Energy Efficiency Standards
- Title 24, Part 11, California Code of Regulations: Green Building Standards Code

Consistency with these standards, as well as other applicable federal, State and County laws and regulations, would ensure energy efficiency to the greatest extent feasible during both construction and operation.

Appendix G of the CEQA Guidelines requires consideration of the potentially significant energy implications of a project. CEQA requires mitigation measures to reduce “wasteful, inefficient and

unnecessary" energy usage (PRC § 21100(b)(3)) in the event a significant energy impact is identified. The means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed project would be considered "wasteful, inefficient, and unnecessary" if it were to violate applicable State or federal energy standards and/or otherwise result in significant energy inefficiencies or atypical energy intensiveness of materials; cause significant, unmitigated impacts that would disrupt local and regional energy supplies or generate requirements for additional capacity that could not be efficiently achieved; or conflict or create an inconsistency with applicable energy plan, policy, or regulation that was adopted for purposes of mitigating environmental impacts.

The amount of energy used at the project site would correlate to the energy consumption (including fuel) used by vehicle trips (worker, haul, and vendor) generated during project construction, fuel used by off-road construction vehicles during construction, fuel used by vehicles during project operation, and electricity and natural gas usage during project operation.

Construction

Construction of the proposed project would involve demolition, site preparation, grading, and the construction of roads and building of structures, architectural coating, and paving activities. Project construction would require energy for the manufacture and transportation of building materials, preparation of the project site (e.g., demolition, site clearing, and grading), and the actual construction of the buildings and other site improvements. The foregoing activities would require the use of heavy-duty construction equipment and vehicles and would be associated with worker commute trips and materials delivery. These activities would consume diesel fuel, gasoline, and electricity (for limited on-site uses such as lighting or small tools). Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

Energy use during construction would be temporary in nature, and equipment used would be typical of construction projects in the region. Construction contractors would be required to demonstrate compliance with applicable ARB regulations that restrict the idling of heavy-duty diesel motor vehicles and equipment (both on-road and off-road), along with requirements that equipment be properly maintained; ARB regulations also would govern any required accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Further, the proposed project would be required to comply with applicable CALGreen construction waste management practices to recycle 65 percent of all construction and demolition debris. The proposed project would incorporate the use of electric construction equipment and vehicles to the extent feasible and would comply with all applicable Contra Costa County standard construction Conditions of Approval, ensuring that construction-related emissions and other temporary impacts are minimized and appropriately managed.

The proposed project would be required to comply with relevant and applicable 2045 General Plan policies related to energy use, including 2045 General Plan policies COS-P7.1, COS-P14.7, COS-P14.8, HS-P1.8, and HS-P3.2. These policies promote energy efficiency and conservation through requirements and incentives for high-performance building design, reduced reliance on fossil fuels,

efficient construction practices, and the use of energy-efficient equipment and technologies. The proposed project's compliance with these policies would further reduce overall energy demand and energy consumption associated with construction activities.

The proposed project is anticipated to be built in one phase and is expected to begin construction in March 2027 and last approximately 15 months. As stated above, although it does not form the basis of the evaluation or conclusion in this document, it is reasonable to assume that future improvements in technology would be incorporated into regulatory requirements related to equipment and fuels, which would result in lower emissions. Accordingly, while the modeling assumed a specific construction start date, if the construction schedule would move to months or years beyond what was assumed or takes longer than assumed, construction emissions would be expected to decrease because of mandatory compliance with improvements in technology and more stringent regulatory requirements that would affect future construction equipment and fuels. Therefore, this analysis represents a reasonable worst-case, conservative approach.

It is anticipated that fuel efficiency of the construction vehicle fleet will increase over time due to advancement in technologies and regulations. As such, the amount of fuel consumed during construction would decrease over time if the proposed project's construction were to occur at a later date than anticipated; accordingly, this construction commencement date is considered conservative. In addition, development of the proposed project would not be unusual as compared to the local and regional demand for energy resources. It reflects a typical single-family, detached subdivision on a relatively flat site near existing roadways and other infrastructure. There are no unusual project characteristics indicating construction equipment would be less energy-efficient or more wasteful than at comparable construction sites in the region or State. Additionally, as a practical matter, it is reasonable to assume that the overall construction schedule and process would be designed to be as efficient as feasible in order 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. Therefore, construction-related impacts associated with the proposed project would be less than significant.

Operation

Long-term operation of the proposed project would consume energy as part of building operations (e.g., lighting, appliances, heating, ventilation, and air conditioning [HVAC], cooking, space heating, water heating) and transportation activities. EV parking would be provided in compliance with the County's ordinance, which would require EV charging infrastructure in each residential unit (dedicated 208/240 volt branch circuit), helping to support the transition to electric transportation and reducing greenhouse gas emissions tied to fuel combustion.

The amount of energy used by the proposed project during operation, which is a small, typical low-density residential development, would include the amount of energy used by the project buildings and outdoor lighting, the fuel used by vehicle trips generated during operation, and fuel used by project maintenance activities. All buildings would be designed and constructed to comply with the then-current Building Code standards (including Building Energy Efficiency Standards as well as

CALGreen Code standards), which require solar PV systems on single-family homes and which would reduce energy consumption through enhanced insulation, efficient HVAC systems, lighting, and appliances. Specifically, buildings developed as part of the proposed project would be required to comply with the latest version of the California Building Energy Efficiency Standards (Title 24), which require a high degree of energy efficiency for new buildings. These standards are widely regarded as some of the most advanced and stringent Building Energy Efficiency Standards in the country and include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), and indoor and outdoor lighting.

In addition, as specified in Subchapter 6, Part 6 of the Title 24 standards, the proposed project would be required to design the proposed buildings to structurally accommodate future installation of a rooftop solar system. The proposed project would include water efficient landscaping pursuant to stringent water conservation requirements to reduce energy use associated with landscaping. As such, the design of the proposed project would facilitate the future commitment to renewable energy resources. Therefore, building energy consumption and related maintenance activities would not be considered wasteful, inefficient, or unnecessary.

Additionally, the proposed project would be required to comply with all other applicable statewide and federal measures, including, among others, those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard [LCFS]), which improve vehicle fuel economies, thereby conserving gasoline and diesel fuel for any trips that would be generated by the proposed project. While the proposed project does not directly control implementation of these measures, the comprehensive regulatory framework would apply to all vehicles (including those utilized by the proposed project). These energy savings would continue to accrue over time. Furthermore, the site plan would not impede upon pedestrian and bicycle connectivity (as discussed in Section 4.17, Transportation), thereby indirectly reducing transportation energy efficiencies.

Overall, the proposed project would not violate any State or federal energy standards and/or otherwise result in significant adverse impacts related to project energy requirements, energy efficiencies, atypical energy intensiveness of materials; cause significant, unmitigated impacts that would disrupt local and regional energy supplies or generate requirements for additional capacity that could not be efficiently achieved; or conflict or create an inconsistency with applicable energy plan, policy, or regulation adopted for purposes of mitigating environmental impacts. In summary, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation, and impacts would be less than significant, consistent with the impact conclusions set forth in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Energy Efficiency and Renewable Energy Standards Consistency

Would the project: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR evaluated the General Plan for consistency with California's RPS, which requires utilities such as PG&E and MCE to procure increasing amounts of renewable and carbon-free electricity through 2045. Although RPS requirements apply to utilities rather than individual development projects, the prior FEIR explains that future development under the General Plan would be required to comply with the current Energy Code and CALGreen standards, which improve building energy efficiency and support the State's transition to renewable energy. The General Plan also includes policies that promote efficient development patterns and reduce VMT, including Policies TR-P2.4 and TR-P3.3, complementing statewide renewable energy goals and supporting utility compliance with the RPS. The proposed Climate Action Plan (CAP) would similarly align with and not obstruct State or local renewable energy or energy efficiency plans. Therefore, the prior FEIR concluded that implementation of the 2045 General Plan would not conflict with or obstruct implementation of California's RPS, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

See above analysis for threshold (a), also. The proposed project is evaluated with California's RPS in determining whether it would conflict with or obstruct a State or local plan for renewable energy or energy efficiency. California's RPS Program requires the electricity grid to transition over time to renewable energy. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. RPS requirements include 33 percent renewable energy by 2020 (SB X1-2), 40 percent by 2024 (SB 350), 50 percent by 2026 (SB 100), 60 percent by 2030 (SB 100), and 100 percent by 2045 (SB 100). SB 100 also establishes RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 1020 requires all State agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035. The statewide RPS requirements do not directly apply to individual development projects but to utilities and energy providers such as PG&E.

The County Board of Supervisors voted to select Deep Green 100 percent renewable (i.e., all power which customers buy comes from 100 percent nonpolluting wind and solar power) with MCE for the majority of the County's accounts. Electricity for the proposed project would be provided by MCE, which procures electricity with a higher renewable and zero-carbon content than the minimum requirements of the RPS. Accordingly, the energy use and associated indirect greenhouse gas emissions from the proposed project's electricity consumption would reflect a greater reliance on renewable and zero-carbon energy resources than is currently required under State law. Even if customers in the County were to opt-out of the Deep Green program and therefore receive all their electricity from PG&E, 33 percent of PG&E's electricity has been generated from renewable energy since 2017. By 2030, PG&E is set to meet the State's new 60 percent renewable energy mandate set forth in SB 100. In addition, the proposed project would be required to comply with then-current

applicable Building Energy Efficiency Standards and CALGreen requirements. Therefore, the proposed project would not conflict with or obstruct implementation of California's RPS Program, and impacts would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site and would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Relocation or Construction of New or Expanded Energy Facilities

Would the project: Require or result in the relocation or construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR evaluated if implementation of the 2045 General Plan would accommodate future growth that would require new or expanded energy facilities. The analysis notes that such improvements could include electric transmission lines and other transmission/distribution infrastructure, grid-connected generation resources, and battery energy storage systems, while individual projects could install on-site systems such as rooftop solar and EV-charging infrastructure. These facilities are identified as the types of improvements utilities or individual projects could pursue to meet increased regional energy demand. Implementation of the General Plan would not directly result in the construction of new or expanded energy facilities that would not otherwise be reviewed and mitigated to reduce potentially significant environmental effects, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would include the construction of electrical transmittal infrastructure to connect to the existing electrical grid via an existing 10-foot PG&E utility easement along the proposed driveway. The proposed project would not require the relocation of construction of new or expanded energy facilities to provide its power. As discussed in the Utilities section, Chapter 96-10 of the Contra Costa County Ordinance Code and General Plan Policy PFS-P1.4 requires all new or extended electric and telecommunication lines within residential subdivisions or the public right-of-way to be placed underground to prevent visual impacts on the surrounding area. As indicated, project implementation would not result in any significant energy impacts related to the installation of these new facilities, and impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Energy, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.7 Geology and Soils *Would the project:*					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	Less than significant impact	No	No	No	No
ii) Strong seismic ground shaking?	Less than significant impact	No	No	No	No
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact	No	No	No	No
iv) Landslides, mudslides, or other similar hazards?	Less than significant impact	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than significant impact	No	No	No	No
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	No	No	No	No
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than significant impact	No	No	No	No
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	No

a) Earthquake Hazards

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

i) Fault Rupture

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR indicates that the County is traversed by five major faults: Calaveras (North Central), Concord-Green Valley, Greenville, Hayward, and Mount Diablo, and includes Alquist-Priolo EFZs within unincorporated County lands where development would occur under the 2045 General Plan. The prior FEIR determined these faults could pose seismic risks to future development. However, State laws and regulations, such as the Alquist-Priolo Earthquake Fault Zoning Act and the Seismic Hazards Mapping Act, require fault investigations and site-specific geotechnical reports by licensed professionals before project approval to reduce risks associated with these faults.

Further, the 2045 General Plan Health and Safety Element further strengthens these safeguards with policies, including Policies HS-P11.2 and P11.3, discouraging vulnerable housing and critical facilities in fault zones, and Policy HS-P11.1, mandating geotechnical evaluations and enforcing seismic design standards per the California Building Code. Collectively, these measures ensure that new development adheres to stringent seismic safety protocols, reducing the risk of significant adverse impacts from fault rupture to a less than significant level. Therefore, with abidance to applicable State laws and regulations and applicable General Plan policies, the prior FEIR concluded that future development from the implementation of the General Plan would not result in the direct or indirect risk of loss, injury, or death involving surface rupture, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

The southeastern flank of the project site is within an Alquist-Priolo EFZ of the Concord Fault. The precise location of the recently active and potentially active trace may be anywhere in the EFZ. A USGS geologic map of Contra Costa County (Open File Report 94-622) identifies bedrock faults, but those faults are not classified by activity status (i.e., they are not considered active because they lack proven Holocene displacement). It is pertinent to note that two of the USGS bedrock faults are mapped through the project site but are concealed by the overlying alluvial fan and fluvial deposits that have been deposits upon the bedrock.[38]

[38] United States Geological Survey (USGS). 1998. Quaternary Fault and Fold Database of the United States. August 18.

For informational purposes, the following is noted. In May 2026, the California Department of Conservation notified the County regarding release of preliminary review maps of revised Alquist-Priolo EFZs. As of the preparation of this 15183 Consistency Checklist, the revised preliminary review maps are currently within a 90-day review period, extending through August 19, 2026, after which comments would be considered prior to formal adoption by the State. The revised maps, if adopted, would place the entirety of the proposed project site within an Alquist-Priolo EFZ of the Concord Fault.

In 2007, Joyce Associates performed a fault investigation of the project site for a previous land development application (Appendix G). That investigation included the logging of an exploratory trench. The trench log indicated that the floor and lower portion of the trench wall exposed bedrock, and no evidence of faulting was observed in the bedrock and overlying Holocene deposits. The trench was positioned and oriented to explore the portion of the project site where a portion of a proposed residential lot encroached into the EFZ. The only portion of the project site that was not investigated by the Joyce Associates trench is the narrow right-of-way of the future access road that provides linkage to North Gate Road. This panhandle segment of the project site was not trenched by Joyce Associates because roads are not considered structures for human occupancy and hence are exempt from the investigative requirements of the State law.

When the County received the application for the proposed project in 2024, it was requested that the project applicant prepared an update to the 17-year old Joyce Associates report. Consistent with the analysis in the prior FEIR and pursuant to applicable State laws and regulations as well as relevant General Plan Policy HS-P11.1, ENGEO Incorporated (ENGEO) was retained in 2025 to conduct a Fault Hazard Evaluation Report (Appendix D) for the project site. The Fault Hazard Evaluation Report included geologic analysis of historical aerial photographs, previous fault studies in the site vicinity, and a site reconnaissance to see if there were any subtle features on the ground surface that could be a manifestation of an active fault trace. Additionally, the County reviewed the exploratory borings logged by ENGEO as well as previous on-site borings logged by Jensen-Van Lienden Associates.

Briefly summarized, ENGEO found no evidence of an active fault trace on the project site. Rather, ENGEO inferred that, based on their limited scope of work, the main trace of the Concord Fault is considered to be located approximately 1,000 feet northeast of the project site. Although evidence of fault rupture was observed in bedrock of Upper Cretaceous age present along North Gate Road adjacent to the project site, no evidence of fault displacement was observed in the alluvial deposits of Holocene or Pleistocene-age. Therefore, ENGEO concluded the risk of surface rupture at the project site to be low.[39] Since the primary conclusion of the Fault Hazard Evaluation Report found no evidence of active faulting on the project site, the risk of property damage, injury, or death from surface rupture would be less than significant. Further, the proposed revisions to Alquist-Priolo EFZ maps (if ultimately adopted) would not alter the conclusions of the site-specific Fault Hazard Evaluation Report prepared for the project site, as the location of underlying faults and underlying soil conditions remain unchanged.

[39] ENGEO Incorporated (ENGEO). 2024. Fault Hazard Evaluation Report. November 15.

Furthermore, the proposed project would be required to adhere to all applicable laws and regulations and to relevant General Plan policies with respect to design of the proposed structures to further reduce such seismic risks. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

ii) Ground Shaking

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR found that the County is seismically active, with several major faults crossing the area and others nearby, such as the San Andreas Fault, capable of causing strong earthquakes. Since 1800, six significant earthquakes have affected the County, two originating from local fault lines. The General Plan also maps unincorporated areas at varying risk levels, with the North Gate area classified under the highest hazard threat. Future development must follow building standards in the County Building Code and include site-specific geotechnical reports by certified engineers. Policies in the 2045 General Plan prohibit construction in high-risk seismic zones where hazards cannot be mitigated and require geotechnical assessments when risks are suspected. With these measures and compliance with State laws and regulations, the prior FEIR concludes that future development would result in less than significant impacts with regard to risks of loss, injury, or death due to seismic ground shaking.

Proposed Project Analysis and Conclusion

As disclosed in the prior FEIR, the project site is in a seismically active region consisting of major right-lateral strike-slip faults and other lesser-known faults that are part of the larger San Andreas Fault System. Consistent with the analysis in the prior FEIR and pursuant to applicable State laws and regulations, as well as relevant General Plan Policy HS-P.11.1, a Fault Hazard Evaluation Report was prepared for the proposed project and is included in Appendix D. As part of the Fault Hazard Evaluation Report, ENGEO utilized modeling to evaluate the potential peak ground acceleration at 5 seconds for a 2,475-year return period and determined that the Concord, Calaveras, Franklin, Contra Costa (Larkey), and Clayton faults are capable of producing a maximum event ranging from 6.5 to 7.2 on the moment magnitude scale which would have the potential to affect the project site.[40]

Pursuant to the foregoing requirements, ENGEO also prepared a Geotechnical Report Update (Geotechnical Report) for the proposed project, which is also provided in Appendix D. The Geotechnical Report determined that while conformance with the applicable California Building Standards Code (CBC) cannot guarantee structural damage would not occur, it is reasonable to assume that a well-designed and well-constructed structure would not collapse or cause loss of life in a major earthquake. Accordingly, consistent with the conclusions of the prior FEIR, the proposed project would be required to comply with the CBC standards that are designed to enable structures to (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural

[40] ENGEO Incorporated (ENGEO). 2024. Fault Hazard Evaluation Report. November 15.

damage but with some nonstructural damage, and (3) resist major earthquakes without collapse but with some structural as well as nonstructural damage.

The proposed project would be required to be designed and constructed in compliance with applicable CBC requirements and would incorporate all applicable recommendations for site design provided within the Fault Hazard Evaluation Report and Geotechnical Report prepared for the project site. These measures include compliance with the prevailing seismic design parameters required by the latest adopted version of the CBC in place when the proposed project applies for building permits.

Further, abidance by General Plan Policies HS-P11.2 and HS-P11.3 prohibits development in areas where seismic hazards cannot be mitigated and would ensure that the proposed project would account for reducing the impacts to strong seismic shaking. Since the proposed project would be required to abide by CBC seismic development standards and General Plan policies and would incorporate recommendations provided by the Fault Hazard Evaluation Report and Geotechnical Report, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death from seismic ground shaking.

Therefore, consistent with the impact conclusions in the prior FEIR, impacts related to strong seismic shaking would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

iii) Ground Failure

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR describes liquefaction as a secondary hazard from strong seismic shaking that occurs in areas with subsurface conditions consisting of sandy or silty soils that become saturated and unconsolidated during strong seismic shaking. Liquefaction can result in ground failure, which can cause damage to building foundations and underground infrastructure. Areas mostly susceptible to seismically induced liquefaction in the County are located along the Bay and Delta. As such, the prior FEIR determined that future development from the implementation of the General Plan could be susceptible to seismically induced liquefaction.

However, the 2045 General Plan determined that conformance to CBC standards and policies established in the General Plan, such as Policy HS-P11.1 that requires development projects situated on subsurface conditions with potential seismic hazards to prepare a Geotechnical Report and incorporate mitigation measures into project design, would further reduce risks in this regard. Further, Policy HS-P11.2 prohibits situating structures intended for human occupancy in areas susceptible to liquefaction unless the hazard can be adequately mitigated. Compliance with CBC standards and General Plan policies would be effective in reducing seismically induced liquefaction hazards. Therefore, the prior FEIR concluded that with abidance to the CBC and General Plan policies, future development from the implementation of the General Plan would not result in the direct or indirect risk

of loss, injury, or death from seismically induced liquefaction, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As disclosed in the prior FEIR, Liquefaction is a phenomenon that occurs in loose water-saturated sandy soils with a shallow water table. Seismic waves generated from an earthquake can cause the water table to temporarily rise, pulling aggregates apart turning the soil from a solid into a liquid like state. Damage from strong seismic shaking is typically more severe in areas with subsurface conditions favorable for liquefaction which can cause the subsidence or tilting of structures or may cause underground utility lines to rise to the surface. According to the California Department of Conservation California Geological Survey (CGS), the project site is located within a liquefaction zone of required investigation.[41] As such, and in accordance with applicable provisions of the CBC and General Plan policies, the Geotechnical Report Update prepared by ENGEO (Appendix D) analyzed the liquefaction susceptibility of subsurface material on the project site. The analysis was based on samples retrieved from borings taken during site, in combination with field measurement (i.e., blow count data) and laboratory testing of samples, and utilizing the historical groundwater table data indicating the groundwater depth is 10 feet below the existing ground surface.

Based on these analyses, ENGEO forecasts up to 0.5 to 0.75-inch of seismic-induced settlement may occur on the project site during a Maximum Considered Earthquake. It was concluded that this amount of settlement would be considered minor when accommodated by post-tensioned mat foundations. Nevertheless, this settlement estimate would be required to be provided to the project structural engineer for confirmation. Following compliance with applicable State laws and regulations as well as General Plan policies, along with the incorporation of design recommendations from the Geotechnical Report prepared by ENGEO, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death from seismically induced liquefaction.

Therefore, consistent with the impact conclusions in the prior FEIR, the proposed project would have a less than significant impact pertaining to ground failure. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

iv) Landslides, Mudslides, or Other Similar Hazards

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR explicated that landslides in the County usually occur along relatively steep slopes comprised of weak and weathered bedrock that are influenced by severe storms and can be further

[41] California Department of Conservation. California Geological Survey (CGS). 2021. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e4b825-layer-21%3A1737. Accessed October 10, 2025.

triggered by strong seismic shaking. Additionally, over steepened slopes on the flanks of creeks as well as steeper slopes within the outcrop belt of relatively weak rock and some alluvial fan deposits hillside were found to be vulnerable to seismically induced landslides due to the loss of cohesion of clays as well as deeply weathered or highly sheared rock, and/or rock with unfavorably oriented partings, such as bedding planes or dominant jointing.

The prior FEIR acknowledged that future development from the implementation of the General Plan could be susceptible to seismically induced landslides. However, adherence to CBC design standards and recommendations provided in the mandated site-specific design-level geotechnical report for each development project, along with General Plan policies such as Policies HS-P11.5 and HS-P11.6 that regulate development on steep slopes and landslide hazard areas without adequate mitigation would reduce project susceptibility to seismically induced landslides. Therefore, with the compliance to the CBC and General Plan policies, the prior FEIR concluded that future development from the implementation of the General Plan would not result in the direct or indirect risk of loss, injury or death involving seismically induced landslides, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed in the prior FEIR, landslides are the movement of earth materials down a slope, usually occurring on steeper slopes consisting of weak soil and rock, and is considered a secondary hazard from strong seismic ground shaking. The project site slopes to the northwest at an approximately 8 percent grade and ranges in elevation from approximately 313 feet AMSL to 250 feet AMSL. According to the California Department of Conservation CGS Earthquake Zones of Required Investigation that delineates areas prone to landslides, the project site is not located within a landslide zone of required investigation. The nearest landslide zone of required investigation is located approximately 0.4 mile southwest of the project site.[42]

While not within a Seismic Hazard Zone for earthquake-induced landslides, the northern boundary of the project site coincides with the entrenched channel of Walker Creek. The ENGEO Geotechnical Report Update provided recommendations intended to provide protection for homeowners that would be associated with retreat of the creek bank over the long term. Since the project site is situated on relatively flat terrain which would be further graded to improve slope stability near the creek bank, and because the project site is not located within a Seismic Hazard Zone for earthquake-induced landslides, the proposed project would not expose future occupants to the direct or indirect risk of loss, injury or death from seismically induced landslides. Therefore, consistent with the impact conclusions of the prior FEIR, the proposed project would have a less than significant impact pertaining to seismically induced landslides. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in

[42] California Department of Conservation. California Geological Survey (CGS). 2024. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e56eb9-layer-22%3A39659. Accessed October 10, 2025.

a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Erosion

Would the project: Result in substantial soil erosion or the loss of topsoil?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR acknowledged that construction of future development from the implementation of the General Plan would involve ground-disturbing activities that could result in substantial soil erosion. However, the construction of new development projects that would disturb more than 1 acre of soil would be subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities (Construction General Permit). The NPDES General Permit requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) that would identify and incorporate BMPs intended to reduce project-induced soil erosion.

In addition, local regulations such as Section 716-4.202 of the Contra Costa County Ordinance Code that require the implementation of construction erosion control practices, along with General Plan Policies COS-P12.4, COS-P12.5, and COS-P12.6 mandating grading requirements on complex topography and General Plan Policy COS-P8.4 that requires the establishment of BMPs and the revegetation of disturbed areas, would reduce project-induced soil erosion. Therefore, with the abidance to federal, State, and local laws, rules, and regulations, as well as applicable General Plan policies, the prior FEIR concluded that future development from the implementation of the General Plan would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As disclosed in the prior FEIR, the proposed project would implement construction activities such as site preparation, demolition, excavation, and grading that would disturb existing soils and could result in substantial soil erosion or the loss of topsoil unless steps are taken to avoid such result. Consistent with the analysis in the prior FEIR, as more than 1 acre of land would be disturbed during construction activities, the proposed project would be required to file a Notice of Intent (NOI) for coverage under a Construction General Permit meeting NPDES General Permit requirement. Under coverage of the Construction General Permit, the proposed project would be required to develop a SWPPP and implement temporary site-specific BMPs to minimize soil erosion such as installing silt fences, fiber rolls, and sediment/desilting basins that traps sediment from water erosion prior to removal.

Furthermore, the project applicant would be required to obtain a grading permit under Chapter 716-4 of the Contra Costa County Ordinance Code, where the application for a grading permit would include detailed plans that would display erosion protection devices that would undergo review and approval by the Public Works Department. Lastly, the proposed project would be required to abide by relevant

General Plan policies, including Policy COS-P8.4 that requires projects to implement BMPs to minimize erosion. Since the proposed project would be required to obtain a Construction General Permit and abide by General Plan Policy COS-P8.4 through installing site-specific erosion control BMPs and would exhibit effective erosion control practices in site plans prior to the approval of a grading permit, the proposed project would not result in substantial soil erosion or the loss of topsoil.

Further, as provided in Appendix F, Storm Water Control Plan, the proposed project would introduce approximately 114,701 square feet of net new impervious surfaces to the project site, which could potentially contribute to soil erosion during operation. However, the proposed project would be required to implement BMPs and Low Impact Development (LID) measures, which include on-site infiltration, where feasible, pursuant to applicable standards and requirements. The proposed project would also be subject to adherence with applicable provisions of the Municipal Separate Storm Sewer System (MS4) permit and Contra Costa Clean Water Program (CCCWP) Stormwater C.3 Guidebook, which require site design, source control, stormwater treatment, and hydromodification measures to be submitted and approved by the County. [43] These measures would minimize runoff and maintain the project site's pre-development hydrology through minimizing disturbed areas and then infiltrating, storing, detaining, or biotreating stormwater runoff close to the source. Therefore, consistent with the impact conclusions in the prior FEIR, the proposed project would have a less than significant impact on soil erosion. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Unstable Soils or Geologic Units

Would the project: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction, or collapse?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR acknowledged that future development from the implementation of the General Plan could be situated on areas with unstable subsurface conditions where additional loading from development projects could result in subsurface hazards related to liquefaction, lateral spreading, subsidence, landslides, and collapse. However, the 2045 General Plan identifies that subsurface hazards would be reduced via State laws and regulations and design standards regulated by the CBC that mandates the preparation of a site-specific design-level geotechnical report by a qualified professional geotechnical engineer where recommendations would be required to be incorporated into project design.

[43] Contra Costa Clean Water Program (CCCWP). (2022) Stormwater C.3 Guidebook: Stormwater Quality Requirements for Development Applications. Eighth Edition. Website: https://cccleanwater.org/development-infrastructure/c-3-requirements/c-3-guidebook/. Accessed March 9, 2026.

Furthermore, future subdivision projects would be subject to local laws and regulations and General Plan policies such as Section 94-4.420 of the Contra Costa County Ordinance Code and Policy HS-P.11.1 that require the preparation of a preliminary soil report and geotechnical report; Policy HS-P11.2 prohibiting construction for buildings intended for human occupancy where geologic hazards cannot be mitigated; General Plan Policy HS-P11.4, which states that geotechnical and engineering geologic reports would be subject to review by the County Peer Review Geologist and revised if found to be inadequate; and Policies HS-11.5 and HS-11.6 that prohibit the development on steep slopes to avoid slope instability unless landslide hazards can be mitigated. As such, with the adherence to State and local laws and regulations, along with applicable General Plan policies, the prior FEIR concluded that future development from the implementation of the General Plan would not result in any subsurface hazards, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed above, liquefaction and landslide potential are low for the project site. Consistent with the analysis in the prior FEIR, site-specific construction design and practices, such as grading, trenching, backfilling, and compaction, would be incorporated into the proposed project pursuant to applicable CBC specifications and General Plan Policies HS-P11.2, HS-11.5, and HS-11.6. In compliance with General Plan Policy HS-P11.1, a design-level Geotechnical Report has been prepared for the proposed project (Appendix D) that includes recommendations to reduce settlement from additional loading, such as using post-tensioned mat foundations underlain by a moisture reduction system and a vapor retarder membrane for the residential structures; the installation of a keyway through the liquefiable layer near Walker Creek to reduce the potential for lateral spreading; and sub excavating 2 to 3 feet of the soil beneath the proposed building pads with low-expansive imported engineered fill.[44]

Furthermore, the proposed project would need to comply with General Plan Policy HS-P11.4, where geotechnical and engineering geologic reports would be subject to review by the County Peer Review Geologist and revised if found to be inadequate. The Geotechnical Report for the proposed project identified moderately to highly unstable soil near the surface of the project site. The proposed project's Geotechnical Report described recommendations to address soil conditions on the project site, which includes moisture conditioning during site grading and compaction within specified ranges to reduce adverse effects. As such, with the incorporation of design-level geotechnical recommendations and further review and approval by the County as mandated under the General Plan policies and County Code provisions, the proposed project would not result in significant impacts due to unstable soil conditions from additional loading. In addition, the proposed project would be required to be designed and constructed in accordance with all other applicable standards and requirements under State law.

Therefore, consistent with the impact conclusions of the prior FEIR, the proposed project would have a less than significant impact related to unstable subsurface conditions. The proposed project would

[44] ENGEO Incorporated (ENGEO). 2024. 1125 North Gate Road, Contra Costa County, California, Geotechnical Report Update. November 26.

not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Expansive Soils

Would the project: Be located on expansive soil, creating substantial direct or indirect risks to life or property?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR defines expansive soils as soils with clay and silt textures that fluctuate in size from changes in moisture content and determined much of the soil underlying the County to be expansive. The prior FEIR acknowledged that expansive soils present a geologic hazard to future development projects implemented from the General Plan as the shrink-swell properties can damage building foundations and walls. However, the prior FEIR highlights precautionary measures established by the CBC that require development projects to prepare a site-specific design-level geotechnical report where design recommendations are incorporated into project design. Similarly, Section 94-4.420 and Section 716-2.418 of the Contra Costa County Ordinance Code require evaluation for the potential of expansive soils through conducting a preliminary soil investigation and to prepare a report that recommends corrective action by implementing structural features and improvements into project design to reduce expansive capabilities. Therefore, with the adherence to the CBC and Contra Costa County Ordinance Code, the prior FEIR concluded that future development from the implementation of the General Plan would not create a direct or indirect risk to life or property from being located on expansive soils, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As previously discussed above, subsurface conditions on the project site consist mostly of very stiff fat to lean clay with fine-grained sand and medium to high plasticity. The Geotechnical Report confirmed moderately to highly expansive clays near the surface with variations in moisture content. As such, the proposed project would be located on expansive soil that could potentially create a risk damage to improvements.

However, as discussed above and consistent with the analysis in the prior FEIR, the proposed project would be required to adhere to the Geotechnical Report's recommendations to reduce the shrink and swell potential of expansive soils, including monitoring by the contractor aimed at keeping pad soils moist throughout the period of time between completion of pad grading and extending up to the time of foundation construction. ENGEO recommends use of post-tensioned mat foundations and replacement of near-surface soils with a low-expansion potential and provides detailed specifications

for compacted engineered fill, in combination with the use of low water demand landscape plantings and surface grades that direct water away from structures and pavements.[45]

As such, with the incorporation of design-level geotechnical recommendations as a condition of approval for building permits, which would be subject to review and approval by the County under the Contra Costa County Ordinance Code, along with compliance with all other applicable laws and regulations, the proposed project would not create a substantial direct or indirect risk to life or property due to being located on expansive soil. Therefore, the proposed project would have a less than significant impact pertaining to expansive soils. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Septic Tanks

Would the project: Have soils incapable of supporting the use of septic tanks or other alternative wastewater disposal systems where sewers are not available?

Summary of Analysis in 2045 General Plan FEIR

The 2045 General Plan described that any future development from the implementation of the General Plan that would require the construction of a septic tank or alternative wastewater disposal system would require a permit by the Contra Costa Health Services Environmental Health Division. Any proposed septic tanks or alternative wastewater disposal systems would be required to be designed in accordance with the California State Water Resources Control Board's (State Water Board's) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of On-site Wastewater Treatment Systems and the Contra Costa County Health Office's Regulations for Sewage Control and Disposal, which ensure adequate soils are available for septic tank or alternative wastewater system support prior to construction. As such, with the adherence to permit requirements and State and local laws and regulations, the prior FEIR concluded that future development from the implementation of the General Plan where existing sewer lines are not available would not result in any impacts related to the installment of septic tanks or alternative wastewater disposal systems, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would not require the installation of a septic tank or other alternative wastewater disposal system. Wastewater collection and treatment services would be provided by Central San through installing 8-inch sanitary sewer connecting to existing sanitary sewer lines along Walker Creek Court to the east. Wastewater generated from the proposed project would be conveyed to the Central San Treatment Plant in Martinez, California, for treatment. As sanitary sewers are available to serve the project site, the proposed project would not construct septic tanks or any

[45] ENGEO Incorporated (ENGEO). 2024. 1125 North Gate Road, Contra Costa County, California, Geotechnical Report Update. November 26.

alternative wastewater disposal system. Therefore, no impact would occur. Thus, consistent with the analysis in the prior FEIR, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

f) Destruction of Paleontological Resource or Unique Geologic Feature

Would the project: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR examines the region's geomorphology and geology, noting the County is within California's Coast Range, composed mainly of sedimentary rocks, volcanic intrusions, and alluvial deposits. Key geologic features include Mount Diablo and areas with high paleontological sensitivity due to fossil-rich rock formations from the Pleistocene to the Cretaceous. Although laws, regulations, and policies restrict disturbance of known paleontological resources, ground-disturbing activities could still impact such resources. To address this, MM GEO-1 requires a qualified professional Paleontologist to assess and manage potential impacts on undisturbed lands using established standards. With implementation of General Plan MM GEO-1, the prior FEIR concludes that potential impacts to paleontological resources from implementation of the General Plan would be less than significant.

Proposed Project Analysis and Conclusion

As disclosed in the prior FEIR, fossils are nonrenewable resources subject to protection by federal, State, and local laws, rules, and regulations. The Society of Vertebrate Paleontology (SVP) Standard Procedures classifies significant paleontological resources as identifiable vertebrate fossils or large or small uncommon invertebrate, plant, and trace fossils older than the middle Holocene that provide important scientific information to various disciplines. According to the site-specific Geotechnical Report (Appendix D), near-surface soils approximately 24 inches in depth on the project site have been previously disturbed from historical agricultural activities that would be unfavorable for fossil preservation. Nevertheless, geologic mapping indicates the project site to be situated on older surficial deposits (Qoa), underlain by the Panoche formation (Kp), of late Pleistocene-age that formed from alluvial processes which have the potential to contain paleontological resources.

The University of California Museum of Paleontology (UCMP) Locality Search displays a list of vertebrates, invertebrates, microfossils, and plant localities that have been uncovered and curated at its institution. The UCMP Locality Search was utilized to identify any fossil localities on the project site and surrounding area, along with those uncovered in similar rock units that underlie the project site. A search of Pleistocene-age localities was conducted for Contra Costa County to represent the age of the older surficial deposits (Qoa). Approximately 65 vertebrates, 11 invertebrates, and one locality with invertebrates, microfossils, and plant fossils from rock units of Pleistocene-age were uncovered

in the County. None of the fossil localities have a locality name that indicates discovery on-site or in the project vicinity.[46]

Since no localities have been identified within the project site or in the vicinity and the project site is underlain by previously disturbed soils up to 24 inches in depth, the potential to discover paleontological resources is anticipated to be low. However, sedimentary formations from the late Pleistocene and the Kp that are of the same type that underlay the project site have yielded significant paleontological resources throughout the County. Therefore, consistent with the impact conclusions in the prior FEIR, construction and ground-disturbing activities under the proposed project could have a potentially significant impact in this regard.

Therefore, the proposed project would be subject to General Plan Policies COS-P10.6 and COS-P10.7 (which establish avoidance and preservation measures and procedures in the event of unintentional discovery). Therefore, with adherence to all applicable standards and requirements, such potential impact would be less than significant.

In summary, since no localities have been identified, the project site soil has been previously disturbed, and construction of the proposed project would be consistent with applicable General Plan policies and all other standards and requirements, the proposed project's potential to directly or indirectly damage a unique paleontological resource would be less than significant. Therefore, consistent with the impact conclusions in the prior FEIR, the proposed project would have a less than significant impact on paleontological resources. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Geology and Soils, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.

[46] University of California Museum of Paleontology (UCMP). n.d. UCMP Locality Search. Website: https://ucmpdb.berkeley.edu/loc.html. Accessed October 11, 2025.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. MM GEO-1 from the prior FEIR would be implemented. No additional project-specific mitigation would be required because the proposed project's impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.8 Greenhouse Gas Emissions *Would the project:*					
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	No
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant impact	No	No	No	No

a) Greenhouse Gas Emissions

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that with implementation of the 2045 General Plan and the CAP, the County would achieve the AB 1279 GHG reduction targets for year 2045. With implementation of the CAP, the County would achieve an 85 percent decrease in GHG emissions in the unincorporated areas of the County by 2045 from 1990 levels and would make substantial progress toward the State's carbon neutrality goals.

The CAP includes a comprehensive set of land use, transportation, building energy, renewable energy, and waste reduction strategies that were quantified and demonstrated to collectively achieve the County's long-term GHG reduction targets. These strategies include, but are not limited to, policies promoting compact development patterns, reductions in VMT, electrification of buildings and transportation, increased energy efficiency, expanded use of renewable energy, and ongoing monitoring and reporting to track progress toward adopted targets.

The CAP was adopted concurrently with the 2045 General Plan following environmental review and was designed to meet the requirements of CEQA for a plan for the reduction of GHG emissions. Accordingly, the CAP constitutes a CEQA-qualified GHG reduction plan for purposes of streamlining project-level GHG analysis for projects that are consistent with the General Plan and CAP.

Therefore, the prior FEIR concluded that the 2045 General Plan and the CAP would not result in a substantial increase in the magnitude of GHG emissions and would be consistent with the GHG reduction goals identified under AB 1279, and therefore impacts were less than significant.

Proposed Project Analysis and Conclusion

The proposed project would achieve emission reductions through implementation of State measures and strategies to reduce statewide GHG emissions, such as the LCFS mandate or renewable portfolio requirements, as well as by demonstrating implementation and consistency with the County's CAP policies and actions. As stated above, the CAP is a CEQA-qualified GHG reduction plan, meeting all criteria required under CEQA Guidelines Section 15183.5(b)(1), for purposes of streamlining project-level GHG analysis. Therefore, the proposed project is evaluated for consistency with relevant and applicable measures in the CAP in determining whether the proposed project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

The CAP includes 11 GHG emissions reduction strategies organized into five categories (clean and efficient built environment, waste reduction, water reduction and drought resiliency, clean transportation, and climate equity). Each strategy includes a description as well as the estimated 2030 and 2045 GHG emissions reductions anticipated from implementation of the strategy. It should be noted that not every emission reduction strategy is applicable or relevant to the proposed project (or private development projects in general). Many of the emissions reduction strategies are intended to be implemented by the County or in partnership with another agency. Table 12 of the CAP includes an implementation matrix which includes an applicability designation for each emission reduction strategy so it can be determined whether the strategy is applicable to new development.[47] The GHG emissions reduction strategies that are applicable to the proposed project are listed below, along with an evaluation of the proposed project's consistency with each strategy.

BE-1 Clean and Efficient Build Environment: Homes, workplaces and businesses in unincorporated Contra Costa County run efficiently on clean energy.

The proposed project would be consistent with BE-1 through incorporation of energy-efficient building design and compliance with applicable State and County energy, building and transportation requirements. The proposed project would be designed to meet the California Building Energy Efficiency Standards (Title 24), including, among others, installation of required rooftop solar photovoltaic systems on single-family residential buildings. In addition, the proposed project would comply with the County's EV charging infrastructure ordinance,

[47] Contra Costa County. 2024. Climate Action and Adaptation Plan. November.

supporting reduced transportation-related greenhouse gas emissions, by electrifying the transportation fleet (thereby eliminating tailpipe emissions). Electricity serving the project would be procured from MCE which provides electricity with a substantially higher renewable energy content than standard utility service. Together, these measures support efficient energy use and increased reliance on clean energy sources consistent with the CAP.

BE-3 Increase the amount of electricity used and generated from renewable sources in the County.

The proposed project would be consistent with BE-3 by increasing the use and generation of renewable electricity through required on-site solar photovoltaic systems and procurement of electricity from MCE. MCE's power supply includes a substantially higher proportion of renewable and carbon-free energy compared to conventional utility service, thereby advancing County and State renewable energy goals. By incorporating on-site renewable generation and utilizing a cleaner electricity supply, the proposed project would contribute to increased renewable energy use consistent with the strategies and emissions reduction assumptions relied upon in the CAP.

TR-1 Improve the viability of walking, biking, zero-emission commuting, and using public transit for travel within, to, and from the County.

The proposed project would be consistent by developing an infill site within the ULL, near existing transit infrastructure as well as by constructing sidewalks, crosswalks, and not prohibiting access to nearby transit stops and trails, thereby promoting pedestrian and multimodal connectivity.

TR-2 Increase the use of zero-emissions vehicles. Transition to a zero-emission County fleet by 2035 and a community fleet that is at least 50 percent zero-emission by 2030.

The proposed project would be consistent by including EV-capable charging infrastructure in compliance with the County's ordinance.

NI-5 Minimize heat island effects through the use of cool roofs, green infrastructure, tree canopy, cool paint and pavement, and other emerging strategies.

The proposed project would be consistent by preserving existing trees to the extent feasible and replacing removed trees or trees damaged during construction activities with new ones in accordance with the County's tree protection ordinance, planting drought-tolerant vegetation, and incorporating bioretention areas and cool landscaping strategies throughout the project site.

CE-1 Provide access to affordable, clean, safe and healthy housing and jobs.

The proposed project would be consistent by providing three deed-restricted very low-income housing units, and integrating sustainable design features in accordance with applicable Building Efficiency and CALGreen Code requirements that promote health and affordability.

CE-3 Increase access to parks and open space.

The proposed project would be consistent with CE-3 by incorporating multiple open space buffers and setbacks adjacent to existing public open space and sensitive environmental features that meet County requirements. The proposed project design preserves riparian corridors and provides enhanced separation between development and adjacent open space areas, thereby maintaining visual openness, ecological connectivity, and compatibility with surrounding recreational and natural resources. The proposed project would not restrict or prohibit access to nearby parks, trails, or recreational areas and would maintain existing public access opportunities. Through these design features, the proposed project supports increased access to and enjoyment of parks and open space.

Further, for all the reasons described above related to the CAP, the proposed project would be consistent with General Plan Goal HS-3, which aims to support statewide carbon neutrality goals and GHG reduction targets. As shown, consistent with the analysis and impact conclusions in the prior FEIR, the proposed project would be consistent with applicable GHG emissions reduction strategies contained with the CAP. Therefore, the proposed project would not result in a substantial increase in the magnitude of GHG emissions and would be consistent with the GHG reduction goals identified under AB 1279 (and implemented through the County's CAP), and therefore impacts would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Greenhouse Gases Emissions Reduction Plan Conflict

Would the project: Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR evaluated the 2045 General Plan and CAP for consistency with the applicable plans adopted for the purpose of reducing GHG emissions which included ARB's Scoping Plan and Association of Bay Area Governments (ABAG)/MTC's Plan Bay Area 2050. The prior FEIR concluded that the proposed CAP (which is an integral part of the 2045 General Plan) would be complementary to statewide and regional plans to reduce GHG's and would not interfere with or obstruct the implementation of the ARB Scoping Plan or Plan Bay Area 2050. The CAP would outline strategies and GHG reduction measures to achieve the SB 32 target for the year 2030, as well as the long-range target of AB 1279 for year 2045. Therefore, implementation of the 2045 General Plan and CAP would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As disclosed in the prior FEIR, the ARB Scoping Plan is applicable to State agencies but is not directly applicable to individual projects. However, the Scoping Plan is implemented through statewide regulations and programs such as vehicle efficiency standards, the LCFS, and building and energy efficiency codes that reduce GHG emissions at the local level and are implemented by individual projects.

Local jurisdictions are encouraged to adopt CAPs to align local GHG reductions with State targets. As discussed above, the County's qualifying CAP serves as the primary local mechanism for implementing State climate policies and achieving the GHG reduction targets established under AB 32, SB 32, and AB 1279. The proposed project would be required to comply with applicable State, regional, and local laws and regulations implementing the Scoping Plan, including CALGreen and the Building Energy Efficiency Standards, as well as applicable General Plan and CAP policies. As further described above, the proposed project would be consistent with the County's CAP, which is consistent with the State's GHG reduction targets. Accordingly, the proposed project would not obstruct implementation of the ARB Scoping Plan.

Plan Bay Area 2050 provides guidance to local jurisdictions on how future development can be consistent with the State's GHG and VMT reduction goals, promoting infill development in downtowns and areas in close proximity to jobs and services. The project site is infill in nature, located within the ULL and is located adjacent to existing suburban residential development on an existing road with existing connection to utilities. Therefore, the proposed project would be consistent with the goals of Plan Bay Area 2050, which include concentrating new development in locations where there is existing infrastructure. The proposed project also incorporates provisions of State Density Bonus Law to ensure an efficient, clustered land plan, while still taking into appropriate account nearby less dense single-family uses. In addition, the proposed project would provide three deed-restricted very low-income housing units, which supports State policy recognizing that affordable housing is inherently associated with lower per-household VMT due to lower vehicle ownership rates, reduced discretionary travel, and lower overall trip generation compared to market-rate housing. Therefore, the proposed project would not conflict with the land use concept plan in Plan Bay Area 2050.

Overall, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant, consistent with the impact conclusions of the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Greenhouse Gases, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.9 Hazards and Hazardous Materials *Would the project:*					
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	No
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant impact	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant impact	No	No	No	No
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Less than significant impact	No	No	No	No
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	No	No
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	Less than significant impact	No	No	No	No

a) Routine Transport, Use, or Disposal of Hazardous Materials

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

Summary of Analysis in 2045 General Plan FEIR

As indicated in the prior FEIR, Contra Costa County houses major transportation routes I-580, I-680, SR-4, SR-24, SR-123, and SR-242, which are used for transportation of hazardous materials including flammable liquids, corrosives, gases, and explosives. Further, local rail and pipelines are used to transport these materials, crossing fault zones, unstable slopes, and soft soils. The County has experienced over 200 hazardous materials incidents since 1970. The Contra Costa Hazardous Materials Program (CCHMP), acting as the Certified Unified Program Agency (CUPA), oversees

hazardous materials management, including inspections and emergency response coordination. Laws and regulations under the Hazardous Materials Transportation Act (HMTA)[48] require transporters to use the safest available methods and to avoid Impacted Communities and hazard-prone areas when possible. The County defines “Impacted Communities” as communities that experience the highest levels of pollution and negative health outcomes. Additionally, the prior FEIR acknowledges that construction of future projects would involve the use of substances such as paints, sealants, solvents, greases, adhesives, cleaners, lubricants, and fuels. During construction, these materials would be used in short-term instances and would not be used in large quantities or stored in such a manner that would create significant hazard to the public. Under Occupational Safety and Health Administration (OSHA) Regulation 29 Code of Federal Regulations 1926.62 and California Code of Regulations Title 8, project workers would be trained in safe handling of the products and would maintain equipment and supplies on construction sites for containing and cleaning up spills.[49] If a hazardous materials release could not be safely contained and cleaned up by on-site personnel, the affected project applicant would notify the applicable fire department immediately to ensure prompt expert emergency response pursuant to applicable laws and regulations. Goal HS-9 in the Health and Safety Element of the General Plan ensures communities are protected from hazards associated with use, manufacture, transport, storage, treatment, and disposal of hazardous materials and hazardous waste, The prior FEIR concluded that impacts would be less than significant and no mitigation is required.

Proposed Project Analysis and Conclusion

The project site is not located along any of the County’s major transportation routes where regular transport of potentially hazardous materials occurs. Additionally, neither County rail lines nor gas transmission lines or hazardous liquid pipelines operate or run within proximity to the project site. Further, the CCHMP implements policies and projects that reduce the chance of hazardous material incidents throughout the County.

With respect to the proposed project, consistent with the analysis in the prior FEIR, the proposed residential land use does not involve the routine transport, use, or disposal of hazardous materials or present a reasonably foreseeable risk of release of hazardous materials, except for common residential grade hazardous materials such as oil, gas, and paint, as well as small quantities of cleaning and maintenance chemicals for construction, landscape maintenance, and household use; no other hazardous chemicals would be used or stored on-site.

These small quantities of construction, cleaning, and maintenance materials would not pose a significant threat to the environment, adjacent land uses, or public health and are typical of residential uses throughout the County. Moreover, the Phase I ESA prepared for the project site (Appendix E)

[48] Hazardous Materials Transportation Act (HMTA) (49 USC §§ 5101–5128). Website: https://uscode.house.gov/view.xhtml?path=/prelim@title49/subtitle3/chapter51&edition=prelim. Accessed March 18, 2026.

[49] United Stated Department of Labor Occupational Safety and Health Administration. 1926.62. Website: https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.62. Accessed March 18, 2026.

reviewed several federal and State databases, including the Cortese list, to determine whether the project site appeared on a list of contaminated and historically contaminated areas. The reconnaissance and records research did not find documentation or physical evidence of soil or groundwater impairments associated with the current or past use of the project site that could result in the potential for upset or accident conditions involving the release of hazardous materials. A review of relevant regulatory databases maintained by County, State, and federal agencies found no documentation of hazardous materials violations or discharge on the project site. No documented soil or groundwater contamination associated with abutting properties was found from the records search.

Further, the Phase I ESA did not identify any Recognized Environmental Conditions (RECs) or historical RECs for the project site. In addition, the project applicant would be required to implement a SWPPP during construction activities, which would prevent any contaminated runoff from leaving the project site. In combination with the requirements associated with federal and State laws and regulations and the County Ordinance Code (including, but not limited to, Sections 1014-4.004, 1014-4.006, and 1014-4.008), as noted above, the 2045 General Plan includes policies and actions to minimize the potential for impacts associated with hazardous materials. These policies and actions in the General Plan would ensure that potential hazards are identified on the project site, that development is located in areas where potential exposure to hazards and hazardous materials can be mitigated to an acceptable level, and that business operations comply with federal and State laws and regulations regarding the use, transport, storage, and disposal of hazardous materials.

The General Plan also includes policies and actions to ensure that the County has adequate emergency response plans and measures to respond in the event of an accidental release of a hazardous substance. Project construction and operation that involve the use of hazardous materials would be typical in nature for low-density residential uses and would be required to have any such hazardous material transported, stored, used, and disposed of in compliance with applicable local, State, and federal laws and regulations. The Contra County Department of Environmental Health is the CUPA for Contra Costa County and is responsible for the implementation of statewide programs within the County, including Hazardous Materials Business Plan (HMBP) requirements, among numerous other programs.

Therefore, construction and operation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. Therefore, the proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR.[50] Accordingly, no additional environmental review is required.

[50] United States Department of Labor. Transporting Hazardous Materials. Website: https://www.osha.gov/trucking-industry/transporting-hazardous

b) Risk of Upset

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that industrial activities in Contra Costa County including petroleum refining, chemical processing, and ammonia refrigeration pose risks of hazardous material releases through potential accidents, equipment failure, or natural disasters. These risks include explosions, fires, toxic clouds, and contamination of water bodies. The prior FEIR states that industrial uses and some commercial uses utilize greater amounts of hazardous materials than do other uses such as residential uses and schools. In addition, the General Plan includes policies to reduce potential impacts related to the release of hazardous materials in residential areas. Specifically, Policy LU-P7.4 requires new residential development to be planned, designed, and constructed in a way that promotes health, minimizes hazard exposure for future residents, and mitigates potential adverse effects on natural resources and the environment.

The County enforces strict permitting and operational standards for hazardous waste facilities, including spill containment, structural stability, and cumulative risk assessments. Facilities must avoid sensitive areas such as fault zones, floodplains, and groundwater recharge zones. Periodic permit reviews and community engagement are required to ensure ongoing safety. Specifically, Contra Costa County Ordinance Code Chapter 450-2 requires that any business which handles a specified quantity of a hazardous material establish a business plan for emergency response to a release or threatened release of a hazardous material, which includes an inventory of hazardous materials handled by the business, and report to the administering agency and the State Office of Emergency Services occurrences of specified releases or threatened releases of hazardous materials. The prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

As noted above, the Phase I ESA concluded that there were no RECs or historical RECs on the project site and that the project site did not appear on any relevant federal or State databases, including the Cortese list. Pursuant to General Plan Policy HS-P9.2, Contra Costa Health reviewed the project site for hazardous materials, and did not identify any specific areas for concern, but provided information regarding required permits and processes to ensure consistency with current standards.[51] The proposed project adheres to Policy HS-P9.14, which encourages adequate sites for collection of household hazardous waste, by the inclusion of receptacle bins at each residence. In addition, Policy HS-P9.6 requires transport of hazardous materials via the safest available method for each material, avoiding Impacted Communities. Furthermore, as disclosed in the analysis in the prior FEIR, there is a robust regulatory framework that governs the storage and use of hazardous

materials#:~:text=The%20Hazardous%20Materials%20Transportation%20Act,health%20and%20safety%20or%20property.%22. Accessed October 30,2025.

[51] Kristian Lucas, Director of Environmental Health. Contra Costa Health. Personal Communication. September 4, 2024.

materials, including the Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Act, and the California Health and Safety Code of Regulations; the proposed project would be required to comply with the foregoing, as applicable, during construction and operation.

Furthermore, the proposed project would be required to comply with all applicable policies in the 2045 General Plan and provisions in the County Ordinance Code for ensuring the adequate storage or use of any typical hazardous materials that would be used during construction and operation. The proposed project would not introduce industrial or commercial uses or other uses involving the use of hazardous materials beyond those typically seen in low quantities as part of a typical single-family residential development. As mentioned under Impact 4.9(a), the proposed project would involve minimal use of typical hazardous materials during construction and operation and impacts with regard to accidental release of any such typical hazardous substances would be less than significant, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Exposure of Schools to Hazardous Materials or Emissions

Would the project: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Summary of Analysis in 2045 General Plan FEIR

As disclosed in the prior FEIR, the County regulates hazardous materials facilities to minimize emissions and risks near sensitive receptors, including schools pursuant to the CCHMP and the County Office of Emergency Service (OES), which is responsible for planning, outreach, and training related to disaster management and emergency preparedness in regard to hazardous materials. Furthermore, the proposed Health and Safety Element contains goals, policies, and actions that require local planning and development decisions to consider impacts that contribute to the risk of loss, injury, or death as a result of hazardous materials releases.

General Plan Policies HS-P9.10, HS-P9.11, and HS-P9.12 would also help to ensure that hazardous emissions and the handling of hazardous or acutely hazardous materials, substances, or waste within existing or proposed schools adhere to applicable provisions of federal and State laws and regulations, including, for example, requiring cumulative risk assessments and buffers to protect facilities such as schools and hospitals. Accordingly, hazardous emissions and the use, storage, handling, and transportation of hazardous or acutely hazardous materials, substances, or waste near existing or proposed schools would be subject to applicable federal, State, and County regulations, including cumulative risk assessment and buffer requirements, and would not result in a significant impact. Any hazardous waste facilities near schools are required to demonstrate engineered containment and project-specific mitigation measures, as required. The prior FEIR therefore concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

Northgate High School, which is the nearest school to the project site, is located approximately 0.35-mile west of the project site's western boundary. In addition, Foothill Middle School is located approximately 1.5 miles northwest of the project site, and Walnut Acres Elementary School is located approximately 1.45 miles northwest of the project site. Accordingly, the proposed project would have no impact in this regard, consistent with the analysis in the prior FEIR. For informational purposes only, the following is noted.

As determined previously, the proposed project would not pose any significant impacts related to the routine use, transport, or disposal of hazardous or acutely hazardous materials. Any potentially hazardous materials used during construction, such as small quantities of oil, gas, paint, or cleaning, and any typical hazardous materials used during operation for maintenance chemicals for household use, would be required to be disposed of properly and in compliance with the County's hazardous material policies and State laws and regulations, such as the California Health and Safety Code and California Code of Regulations Title 8. Specifically, the proposed project would enforce California Code of Regulations, Title 8, Sections 1532.1, which provides regulations and proactive measures for the proper removal, handling, and disposal of lead-containing material, including on-site air monitoring by a certified supervisor in areas where lead-based paints are present. The operation of the proposed residential use would be typical in nature and consistent with existing developments in the project vicinity and would not have the potential to result in hazardous emissions or handling of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Hazardous Materials Sites

Would the project: 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?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR identified numerous hazardous materials sites across the County that are considered active, open, or in need of further review for hazardous material cleanup. Redevelopment of these sites for development under the General Plan could potentially expose future residents and workers to hazards from known hazardous materials releases on and near the sites. However, development would be conducted in accordance with the proposed General Plan and the regulations and policies of the agency assigned to the site (i.e., the California Department of Toxic Substances Control [DTSC], State Water Board, CUPA, or EPA). Specifically, there are many hazardous materials sites in the areas of North Richmond, Bay Point, Crockett, and El Sobrante. The County defines these areas as "Impacted Communities" as they experience the highest levels of pollution and negative health

outcomes. While the County does not directly oversee remediation, Contra Costa considers contamination risks during development review. DTSC and State Water Board coordination is required by County policies. Therefore, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The project site is not located in an area identified as an Impact Community as indicated in the prior FEIR. The project site is largely vacant and contains grassy vegetation types, along with a single-family residence and an associated accessory structure. As discussed under Impact 4.9(b), the project site is not a hazardous materials site and is not on the Cortese list compiled pursuant to Government Code Section 65962.5 or other federal or State hazardous materials databases. Therefore, the proposed project would have no impact in this regard, consistent with the analysis in the prior FEIR, and thus the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Airports

Would the project: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that in the County, Buchanan Field Airport and Byron Airport are the primary public use airports. The County coordinates with the Contra Costa County Airport Land Use Commission (ALUC) to ensure that future development proposals under the 2045 General Plan within airport influence areas comply with safety and noise compatibility criteria. These criteria include restrictions on building heights, population density, and land use types within designated safety zones and noise contours. The 2045 General Plan includes policies to avoid placing structures such as residences, schools, and hospitals within high-noise or safety hazard zones. For example, Policy TR-P7.4 directs the County to protect its airports from encroachment by incompatible uses and to minimize the public's exposure to safety hazards and excessive noise by ensuring that all future development within each Airport Influence Area is consistent with the Contra Costa County Airport Land Use Compatibility Plan (ALUCP). Additionally, Policy TR-P7.5 and TR-P7.6 further reinforce the County's commitment to land use compatibility by directing the County to support existing and planned airport activities consistent with each airport's respective Airport Master Plan, and ALUCP projects within 2 miles of a public airport must demonstrate compliance with ALUC policies and undergo review for potential safety and noise impacts. The prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The project site sits approximately 6.58 miles northwest from Buchanan Field Airport and 30.4 miles from Byron Airport. Because of the distance from the project site to the two airports in Contra Costa County, the project site does not lie within the Airport Influence Area. Given the distance of the project site from local airports and applicable air traffic and safety regulations, no impacts would occur with respect to aviation safety hazards. Therefore, consistent with the analysis in the prior FEIR, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

f) Emergency Response and Evacuation

Would the project: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR found that major evacuation routes for the County include a large network of interstate freeways, State routes, arterial streets, and minor roads that feed into the higher capacity evacuation routes. However, many residential areas have access to only one viable evacuation route. In addition, the prior FEIR determined that future development under the 2045 General Plan would result in construction activities that could temporarily affect roadways as a result of lane closures or narrowing for roadway and/or utility improvements. This could temporarily affect emergency response times or evacuation routes. By increasing the residential and daytime population in unincorporated County lands where development would occur under the 2045 General Plan, traffic congestion may increase in some areas as well in the event an emergency. Therefore, in the event of an accident or natural disaster, evacuation plans and routes could be adversely affected by the increased traffic.

To address such impacts, the County has adopted and continually updates a Local Hazard Mitigation Plan (LHMP). The LHMP reduces injury, loss of life, property damage, and loss of services from natural disasters and provides a comprehensive analysis of the natural and human-caused hazards that threaten the County, with a focus on mitigation. The LHMP outlines the planning process, provides updated community and land use profiles, assesses natural hazard risks and potential impacts, and establishes goals and prioritized actions to reduce those risks. It also defines procedures for monitoring and 5-year updates and includes supporting appendices and jurisdiction-specific annexes detailing local vulnerabilities, mitigation actions, and public engagement. The County also maintains an Emergency Operations Center and its own Emergency Operations Plan (EOP). The EOP establishes the emergency management organization required to respond to significant emergencies and disasters, identifies the roles and responsibilities required to protect Contra Costa County community members, and establishes the operational concepts for different emergencies, the Emergency Operations Center, and recovery processes.

Further, several General Plan Health and Safety Element policies support implementation of the County's LHMP and other emergency planning efforts, including Policy HS-P12.1 and HS-P13.1. These policies require continued implementation of the Contra Costa County LHMP and access to at least two emergency evacuation routes for new developments in High and Very High FHSZ (VHFHSZ), the wildland urban interface (WUI), and 100-year or 200-year floodplains, with an exception for infill sites (such as the subject project site). The prior FEIR concluded that implementation of these proposed General Plan policies would ensure that development under the General Plan would not affect the implementation of emergency response or evacuation plan, resulting in a less than significant impact.

Proposed Project Analysis and Conclusion

The proposed project would be located on an infill site within the ULL and would not impact major roadways utilized for evacuation. Nearby major roadways for evacuation include Ygnacio Valley Road north of the project site, I-680 west of the project site, and SR-24 west of the project site. During construction, temporary partial blockage may occur to North Gate Road, the roadway that provides access to the project site. However, the proposed project's potential temporary closures would be required to adhere to all applicable local policies, standards, and requirements, which would include traffic control to ensure area accessibility. The County OES coordinates emergency preparedness plans throughout the County. Road restrictions during construction would consist of cones or temporary barricades that could easily be removed if evacuation of the area were required. Upon completion, the proposed project would not include any features that would impair emergency response or evacuation.

The proposed project would adhere to fire apparatus access requirements under Division 722 of the Contra Costa County Ordinance Code, which states that plans shall be submitted and a permit is required to install, improve, modify, or remove public or private roadways, driveways, and bridges for which Fire District access is required by the Fire Code. In addition, the proposed project would be designed in accordance with all applicable Building Code provisions (including fire hardening features such as tile roofs and insulated windows) and would be required to incorporate appropriate defensible space and vegetation management, which would further reduce wildfire risk in the first instance. (See Section 4.19, below, for further information in this regard.) Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

g) Wildland Fires

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR evaluates wildfire risk relative to designated FHSZs, particularly in the WUI. Contra Costa County includes areas classified as VHFHSZs, especially in the western and northern hills.

Because of the complex terrain, climate, and flammable vegetation, Contra Costa County in general faces significant wildfire risk. With a history of regular wildfires, the County keeps this as a primary focus through its LHMP, Emergency Response Plan, and General Plan. The 2045 General Plan incorporates Policy HS-P7.5, HS-P7.6, and HS-P7.8, which require defensible space, fire-resistant building materials, and vegetation management to reduce wildfire risk. Emergency access and evacuation routes are also considered in project review. Coordination with the CCCFPD and CAL FIRE ensures that fire safety standards are met. Projects located in or near fire-prone areas must demonstrate compliance with these standards to minimize risk to people and structures. The prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed in Section 4.19, Wildfire, the project site, which is located within the ULL, is located in a High FHSZ within an LRA.

Pursuant to applicable standards and requirements, the proposed project would be required to be designed to incorporate sufficient defensible space, fire-resistant landscaping, and fire-hardened and fire-resistant structures and to otherwise be compliant with CBC fire safe design standards (Chapter 7A), including adequate internal access and fire suppression facilities, as well as applicable provisions under the California Residential Code Section R337, “Materials and Construction Methods for Exterior Wildfire Exposure” along with applicable provisions of the California Fire Code. Consistent therewith, the proposed project would need to be consistent with Policy HS-P4.2, which requires below-market rate housing constructed within a High FHSZ to be hardened or to make use of nature-based solutions to ensure it remains habitable to the greatest extent possible. In addition, pursuant to Policy HS-P7.4, the proposed project would be required to complete a site-specific fire protection plan. The fire protection plan shall include measures for fire-resistant construction materials and modifying fuel loading, as well as a plan to maintain that protection over time. Further, wildfire exposure is minimized through the development clustering reflected in the site plan, which includes substantial setbacks from open space and riparian areas. In summary, the proposed project would be required to remain compliant and up to date with all applicable local, State, and federal laws and regulations, further reducing the risk of wildfires. Therefore, consistent with impact conclusions in the prior FEIR, impacts would be less than significant, and the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Hazards and Hazardous Materials, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.10 Hydrology and Water Quality *Would the project:*					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant impact	No	No	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant impact	No	No	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than significant impact	No	No	No	No
(i) result in substantial erosion or siltation on- or off-site;	Less than significant impact	No	No	No	No
(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	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
(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	No	No	No	No
(iv) impede or redirect flood flows?	Less than significant impact	No	No	No	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than significant impact	No	No	No	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than significant impact	No	No	No	No

a) Water Quality

Would the project: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR found that implementation of the General Plan would involve soil disturbance during the construction phases and changes in land uses during the operational phases that could generate pollutants and affect water quality. Stormwater runoff would discharge into storm drains which ultimately flow into creeks, rivers, and San Francisco Bay, San Pablo Bay, Suisun Bay, and the Delta. However, compliance with and implementation of the relevant General Plan goals, policies, and actions, in conjunction with the CCCWP and MS4 Permit requirements, would ensure that

development pursuant to the proposed General Plan would not violate any water quality standards or waste discharge requirements for both construction and operational phases. The County is within the jurisdiction of two Regional Water Quality Control Boards (RWQCBs): Region 2 (San Francisco Bay) and Region 5 (Central Valley), both of which have adopted Basin Plans that establish water quality objectives and beneficial uses for surface and groundwater bodies. The General Plan includes policies such as Policies COS-P8.1, COS-P8.2, COS-P8.4, that require compliance with these standards and promote BMPs for stormwater management and pollution prevention. These policies are designed to ensure compliance with applicable water quality standards and prevent degradation of water resources. Additionally, future development would be subject to existing federal, State, and local laws and regulations, including, among others, the Clean Water Act and NPDES permits. Therefore, the prior FEIR concluded that impacts to water quality from implementation of the 2045 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, the use of construction equipment and performance of various construction activities at the project site could expose soil to erosion as well as potentially result in the discharge of other construction-related pollutants, which could result in potential pollutants being released into the environment, thereby impacting water quality. However, as the proposed project would disturb more than one acre of land, it would be subject to the State Water Board NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit). As a permittee under the NPDES General Permit, the project applicant would be required to prepare and implement a SWPPP. The SWPPP would include a site map, describe construction activities and potential pollutants, and identify site-specific BMPs that would be implemented to reduce and prevent soil erosion and discharge of other construction-related pollutants (i.e., petroleum products, solvents, paints, and cement) that could contaminate nearby water resources. In addition, project construction would be subject to compliance with other applicable laws and regulations as well as above-referenced General Plan policies. As a result, water quality impacts associated with construction activities would be less than significant, consistent with the impact conclusions in the prior FEIR.

Additionally, during operation, the proposed project would be subject to the applicable requirements of the MS4 Permit issued by the San Francisco Bay RWQCB and the County's stormwater guidebook which reflects the latest MS4 Permit conditions. This is enforced through application of the County's standard conditions of approval for Stormwater Management and Discharge Control. To that end, the proposed project has been designed to include a comprehensive stormwater control strategy with 13 bioretention basins and two underground vaults designed to treat runoff from impervious surfaces. The proposed stormwater management facilities are sized pursuant to applicable provisions in the CCCWP's C.3 Guidebook and are designed to meet hydromodification management (HM) requirements as well as all other applicable standards and requirements. Source control BMPs would include, among others, pest-resistant landscaping, integrated pest management education, and inlet markings to prevent illegal dumping. As indicated in the prior FEIR, adherence to the NPDES General Permit, the MS4 Permit, the SWPPP and related General Plan policies (such as Policies COS-P8.1, COS-P8.2, COS-P8.4), as well as compliance with all other applicable standards and requirements

including those set forth by CCCPWD, would reduce the potential for operational activities to introduce pollutants into the nearby waterways. As such, the potential operational impacts to surface water and groundwater quality would be less than significant, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Groundwater

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that implementation of the 2045 General Plan would result in a significant environmental impact if it would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. New development under the 2045 General Plan could result in an increase in impervious surfaces, thus reducing groundwater recharge. Also, new projects that involve construction dewatering could have a temporary impact on the shallow groundwater aquifer. Contra Costa County contains several groundwater basins, including the East Bay Plain and Livermore Valley basins; however, there is no groundwater withdrawal from these basins for municipal water supply. The General Plan supports sustainable water use and includes policies that encourage water conservation, use of recycled water, and protection of groundwater recharge areas within the Conservation, Land Use, and Public Service Elements. These policies include, among others, COS-P7.1, COS-P7.2, and COS P7.5.

Future development pursuant to the General Plan would be required to implement the water efficient requirements specified in the CALGreen and California Plumbing Codes and the Model Water Efficient Landscape Ordinance (MWELO) requirements for water efficient landscaping. Future projects that meet the criteria under California Water Code Section 10912 would be required to prepare a WSA that demonstrates that project water demands would not exceed water supplies. In addition, residential, commercial, and industrial water usage can be expected to decrease in the future (as compared to historic demand) as a result of the implementation of water conservation practices over the General Plan planning horizon.

Although new projects pursuant to the General Plan would increase the amount of impervious surfaces and could potentially impact groundwater recharge, these projects would be required to implement BMPs and LID measures, which include on-site infiltration, where feasible. Projects would also be subject to the MS4 Permit and CCCWP Stormwater C.3 Guidebook which require site design, source control, stormwater treatment, and hydromodification measures to be submitted and approved by the County. Therefore, the prior FEIR concluded that the implementation of the 2045 General Plan would not substantially decrease groundwater supplies or interfere with groundwater recharge and impacts would be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Potable water would be supplied by the CCWD via existing mains to serve the proposed project, and no groundwater wells are proposed. CCWD's water supply is surface water from the Central Valley Project (CVP) and the CCWD does not use groundwater to meet its demands. Therefore, water use on the project site would not have the potential to reduce groundwater supplies. Because the proposed project is consistent with the existing General Plan land use designation, its water demand was already accounted for in the CCWD Urban Water Management Plan (UWMP). As such, the proposed project would not substantially deplete groundwater supplies.[52]

The proposed project would introduce approximately 114,701 square feet of net new impervious surfaces to the project site. However, the proposed project would comply with applicable General Plan policies, such as Policies COS-P8.1 and COS-P8.4, which require protecting surface water and groundwater resources from contamination sources and using various design measures and construction practices to reduce runoff, erosion, and sediment impacts during construction and operation. Additionally, the proposed project would include bioretention basins, consistent with the NPDES General Permit, and MS4 Permit. These bioretention basins would facilitate on-site infiltration, where feasible. With implementation of bioretention basins and compliance with relevant policies in the General Plan, as well as other applicable provisions of federal and State law, the proposed project would not substantially interfere with groundwater recharge.

As the development associated with the proposed project would not substantially deplete groundwater supplies, nor would it substantially interfere with groundwater recharge, the impact would be less than significant, consistent with the impact conclusions of the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Drainage

Would the project: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that future development under the 2045 General Plan would likely increase impervious surfaces, which could result in an increase in stormwater runoff, higher discharges to storm drainage channels, and increase the potential for erosion. However, all new

[52] No dewatering is anticipated to be necessary in constructing the proposed project.

development pursuant to the General Plan would be required to implement construction-period BMPs as well as post-construction site design, source control, and treatment measures in accordance with the General Plan, MS4 Permit, and CCCWP Stormwater C.3 Guidebook. The prior FEIR determined that following compliance with these regional and local regulatory requirements, potential impacts with regard to erosion and siltation from implementation of the General Plan would be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, there is a possibility that construction activity could result in substantial erosion or siltation and could therefore result in drainage alterations and stormwater quality issues if not appropriately addressed. However, as discussed above, and as evaluated in the prior FEIR, the proposed project would be required to adhere to the San Francisco Bay RWQCB Municipal Regional Permit (MRP) and NPDES General Permit, which would include implementation a SWPPP and associated BMPs (including implementing sediment and erosion control plans, slope stabilization [to minimize exposed soil], and managing construction material and waste on-site by keeping storm drain systems clear) designed to ensure that erosion and siltation are prevented or minimized to the maximum extent feasible during construction. For example, the project site's grading plan includes erosion control measures pursuant to applicable standards and requirements. These measures include incorporation of BMPs, including implementing sediment and erosion control plans, slope stabilization, and managing construction material and waste on-site by keeping storm drain systems clear, and as such, are designed to minimize polluted runoff and flooding during construction.

Also consistent with the analysis in the prior FEIR, operation of the proposed project would introduce approximately 114,701 square feet of net new impervious surfaces on the project site, which could contribute to increased soil erosion and siltation if not appropriately addressed. However, the proposed project would be required to include stormwater control measures, such as bioretention basins, in accordance with the NPDES General Permit and MS4 Permit and other applicable standards and requirements. These bioretention basins would facilitate on-site infiltration, where feasible, and be designed to minimize erosion and siltation to the maximum extent feasible. Operational stormwater would be routed through bioretention basins that filter sediment and pollutants. In addition, the proposed project avoids development within the riparian corridor of Walker Creek and maintains creek setbacks ranging between 30 feet and 40 feet approximately 71 feet and 126 feet. Pursuant to Section 914-14.012 of the Contra Costa County Code, required setbacks vary by creek height: 30 feet for creeks under 20 feet, 35 feet for creeks between 20 and 29.99 feet, and 40 feet for creeks between 30 and 39.99 feet. The proposed project well exceeds these setback requirements in all instances.

Adherence to the NPDES General Permit, MS4 Permit, and SWPPP, as well as compliance with all other applicable laws and regulations, as well as applicable General Plan policies, would reduce the potential for construction activities to increase the rate and amount of erosion, siltation, and runoff. The impact would be less than significant, consistent with the impact conclusions in the prior FEIR.

The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR found that new development and/or redevelopment and changes in land uses could result in increases in impervious surfaces, which in turn could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause nuisance flooding in areas without adequate drainage facilities. However, all potential future development must comply with the requirements of the MS4 Permit and the CCCWP Stormwater C.3 Guidebook. Regulated projects must implement BMPs, including LID BMPs and site design BMPs, which effectively minimize imperviousness, temporarily detain stormwater on-site, decrease surface water flows, and slow runoff rates. Development would be concentrated within the ULL, where stormwater infrastructure is already in place or planned. The County requires new development to incorporate stormwater management systems designed to handle increased runoff, including detention basins and permeable surfaces. The 2045 General Plan policies such as, for example, Policies COS-P5.2 and COS-P8.4, also support minimizing impervious surfaces and preserving natural drainage features. The prior FEIR concluded that impacts to surface runoff from implementation of the 2045 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, the proposed project would create approximately 114,701 square feet of net new impervious surfaces on the project site, which would have the potential to increase surface runoff and flooding if not appropriately addressed. According to the FEMA Flood Insurance Rate Map (FIRM), the project site is located within Flood Zone X, an area determined to be outside the 500-year flood limit and is protected by a levee from 100-year floods. No depths or base flood elevations are shown within these zones.

A Stormwater Control Plan was prepared by DK Engineering for the proposed project and is included in Appendix F. According to the Stormwater Control Plan, existing runoff is collected in the creek at the northern property line for the project site. The project site is within the ULL, located near existing or planned stormwater infrastructure. Furthermore, the proposed project's post-development runoff would be managed through hydromodification vaults and bioretention basins that reduce peak flows to pre-development levels, in accordance with applicable County requirements and other standards. The Stormwater Control Plan included a Bay Area Hydrology Model, which confirmed compliance with flow duration control standards. Further, the proposed project would be required to adhere to the NPDES General Permit, MS4 Permit, and SWPPP and all other applicable laws and regulations. This would involve, for example, implementation of BMPs, including bioretention areas, that would minimize runoff and risk of flooding on the project site as well as off-site. As such, the proposed

project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site and impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

(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;

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR states that an increase in impervious surfaces with new development or redevelopment could result in increases in stormwater runoff, which in turn could exceed the capacity of existing or planned stormwater drainage systems. However, municipalities within the County have storm drain master plans, green infrastructure plans, and Capital Improvement Programs (CIPs) that account for future development and expansion of the storm drain system, as needed. Also, the FC District has detailed Flood Control Zone and Drainage Area maps that are used to evaluate future development plans within each zone or area and determine if the existing storm drainage infrastructure is adequate to accommodate the proposed projects. Thus, the prior FEIR determined that runoff from future development would not exceed the capacity of stormwater systems or introduce substantial polluted runoff. Projects would be required to comply with County stormwater design standards and the Municipal Regional Stormwater Permit, which mandates treatment of runoff before discharge. The 2045 General Plan includes policies such as, for example, Policies COS-P5.8, and COS-P8.2, to ensure that new development does not overwhelm drainage infrastructure and incorporates pollution prevention strategies such as vegetated swales and biofiltration. The prior FEIR concluded that impacts related to runoff capacity of stormwater systems from implementation of the 2045 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would introduce approximately 114,701 square feet of net new impervious surfaces on the project site. Consistent with the analysis in the prior FEIR, construction activities and the addition of impervious surface area at the project site could increase the rate and amount of surface runoff at the project site if not appropriately addressed.

During construction, the proposed project would be required to adhere to the NPDES General Permit, MS4 Permit, and SWPPP, as well as all other applicable laws and regulations and applicable General Plan policies. This would include incorporation of BMPs, including implementing sediment and erosion control plans, slope stabilization, and managing construction material and waste on-site by keeping storm drain systems clear, which are designed to minimize increases in polluted runoff and flooding during construction.

The project site is infill in nature and within the ULL, and near existing or planned stormwater infrastructure that has sufficient capacity to accommodate project demand. As stated in the Stormwater Control Plan (Appendix F) the existing site drains stormwater runoff to Walker Creek, which runs along the northern property line of the project site. To reduce impacts to this riparian area, the proposed project would utilize disconnected impervious areas and landscape features including bioretention to treat and manage stormwater. The location of the bioretention basins would be placed in low points allowing for gravity flow of stormwater runoff. During operation of the proposed project, all impervious areas would be routed to bioretention basins or hydromodification vaults for treatment. These features would be designed to adhere to all applicable standards and requirements, and include overflow structures and underdrains to manage excess flows. Source control BMPs would address potential pollutants from landscaping, pest control, and refuse. The proposed project's stormwater would be conveyed to 13 bioretention basins on the project site, which have been confirmed to have sufficient capacity to accommodate project demand (see Appendix F). Impacts would be less than significant and the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

(iv) impede or redirect flood flows?

Summary of Analysis in 2045 General Plan FEIR

New development and/or redevelopment and changes in land uses could result in increases in impervious surfaces, which in turn could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause nuisance flooding in areas without adequate drainage facilities. However, all potential future development must comply with the requirements of the MS4 Permit and the CCCWP Stormwater C.3 Guidebook. Regulated projects must implement BMPs, including LID BMPs and site design BMPs, which effectively minimize imperviousness, temporarily detain stormwater on-site, decrease surface water flows, and slow runoff rates. Thus, the prior FEIR found that the 2045 General Plan would not impede or redirect flood flows in a way that causes significant impacts. Development in flood-prone areas would be regulated under FEMA floodplain requirements and County flood hazard ordinances. The 2045 General Plan discourages development in areas subject to flooding and promotes flood-resilient design. The prior FEIR concluded that these policies are expected to prevent obstruction or redirection of flood flows and therefore, impacts from implementation of the 2045 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would include approximately 114,701 square feet of net new impervious surfaces on the project site. The project site is located in FEMA Flood Zone X, an area of minimal flood hazard; it has been determined to be outside the 500-year flood limit and is protected by a levee from 100-year floods. With a significant setback (ranging from approximately 71 to 126 feet), the proposed project would avoid encroachment into Walker Creek, which is one of the existing natural

drainage areas on the project site. Additionally, the proposed project would be required to adhere to the NPDES General Permit, MS4 Permit, and SWPPP. This would involve implementation and strategic placement of bioretention areas, in addition to BMPs, that would minimize flood flow impediment and redirection on the project site pursuant to all applicable standards and requirements, and therefore impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Risk of Pollutant Release Due to Inundation

Would the project: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR states that implementation of the 2045 General Plan could involve development of some projects in FEMA 100-year flood zones, and development of some projects in areas that will be inundated by sea level rise and associated coastal flooding. However, future development in these areas would be subject to Contra Costa County's Floodplain Management

Ordinance, and future development under the 2045 General Plan within 100 feet of the San Francisco, San Pablo, or Suisan Bay shoreline would be subject to review and approval by the Bay Conservation and Development Commission. Thus, the prior FEIR determined that the future development under the 2045 General Plan would not result in significant risks of pollutant release due to inundation.

Development would be regulated under FEMA floodplain standards and County ordinances. The 2045 General Plan includes policies to avoid development in flood-prone areas and to incorporate flood resilience measures. Additionally, the prior FEIR found that the release of pollutants due to a tsunami or seiche was less than significant. Because of the infrequent nature of tsunamis and relatively low predicted tsunami wave heights in the area, the County was anticipated to be reasonably safe from tsunami hazard. Seiches are unlikely to occur because tsunamis have frequencies too short to resonate within San Pablo and San Francisco Bay. Thus, the prior FEIR concluded that impacts related to risk release of pollutants due to inundation from implementation of the 2045 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

While the project site is within a seismically active region, the project site is inland (over 30 miles east of the Pacific Ocean) and there are no large bodies of water in proximity to the project site. As such, consistent with the analysis in the prior FEIR, the project site would not be at risk of inundation from a tsunami or seiche. The project site is within FEMA Flood Zone X, classified as an area of minimal flood hazard, which has been determined to be outside the 500-year flood limit and is protected by a

levee from 100-year floods.[53] Therefore, given the low risk of flood hazard, tsunami, or seiches, there is a less than significant risk release of pollutants due to project inundation, consistent with the impact conclusions of the prior FEIR.

For informational purposes, the following is noted. As discussed in Section 4.9 above, construction activity would be expected to involve the transport, use, and disposal of certain relatively small amounts of hazardous materials, such as diesel fuels, aerosols, and paints, which are typical for residential construction projects. While transport, use, and disposal of these hazardous materials increase the risk of accident conditions that could involve the release of hazardous materials into the environment to a certain degree, their use at the project site would be limited to construction of the proposed project and would be governed by a robust regulatory framework.

Further, the proposed project would be required to comply with the NPDES General Permit and MS4 Permit and all other applicable laws and regulations as well as applicable General Plan policies. As discussed above, the NPDES General Permit would require a SWPPP and associated BMPs, which would include measures that would reduce the potential for pollutants to be released into the environment.

Therefore, the project site's location within an area of minimal flood hazard and the low risk of tsunami or seiche, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Water Quality Control or Sustainable Groundwater Management Plans Consistency

Would the project: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that adherence to the Construction General Permit, the MS4 Permit, and the CCCWP Stormwater C.3 Guidebook would ensure that surface and groundwater quality are not adversely impacted during construction and operation of future development pursuant to the proposed General Plan. As a result, site development would not obstruct or conflict with implementation of the San Francisco Bay RWQCB's and the Central Valley RWQCB's Water Quality Control Plans (Basin Plans). Thus the 2045 General Plan would not conflict with water quality or groundwater management plans. The County coordinates with the RWQCBs and local water agencies by implementing the requirements from the Regional Water Quality Control Board and Local Water Agencies. These requirements are then incorporated into the Zoning Code, Building Code, and public works review. The 2045 General Plan supports sustainable water use and watershed

[53] Federal Emergency Management Agency (FEMA). June 16, 2009. FEMA Federal Insurance Rate Map 06013C0315F. Website: https://msc.fema.gov/portal/search?AddressQuery=1125%20north%20gate%20road%20walnut%20creek. Accessed October 30, 2025.

protection, and the CAP includes strategies for water conservation and climate resilience. The prior FEIR concluded that impacts related to water quality control or sustainable groundwater management plan consistency from implementation of the 2045 General Plan would be less than significant. No mitigation measures are required.

Proposed Project Analysis and Conclusion

As discussed above, consistent with the analysis in the prior FEIR, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The proposed project would be required to comply with all applicable laws and regulations, including the San Francisco Bay RWQCB MRP and the NPDES General Permit. Additionally, the proposed project would include bioretention basins, consistent with the Stormwater Control Plan, NPDES General Permit, and MS4 Permit. Therefore, the proposed project would not conflict with a water quality control plan.

Further, as discussed above, potable water would be supplied by the CCWD, whose water supply is surface water from the CVP and does not use groundwater to meet its demands. The proposed project is consistent with the existing General Plan land use designation, and therefore, its water demand was already accounted for in the UWMP. As such, the CCWD would have sufficient water supply to serve the proposed project.

The proposed project would be required to comply with all applicable water quality regulations, including, among others, CALGreen and General Plan Policies such as Policy COS–A7.2, which requires that areas not covered by an adopted Groundwater Sustainability Plan amend the County Ordinance Code to include sustainability indicators. The proposed project would not conflict with or obstruct a water quality management plan or sustainable groundwater management plan. Consistent with the impact conclusions of the prior FEIR, the proposed project's impact would be less than significant. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Hydrology and Water Quality, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.11 Land Use and Planning *Would the project:*					
a) Physically divide an established community?	Less than significant impact	No	No	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant impact	No	No	No	No

a) Division of an Established Community

Would the project: Physically divide an established community?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR evaluates barriers such as roads, infrastructure, or land use changes that could disrupt the physical or social cohesion of existing neighborhoods. General Plan policies such as LU-P1.1, LU-P2.1, LU-P2.3, ensure that growth is focused within the ULL, support environmental justice, and avoid growth inducing infrastructure extensions to emphasize maintaining community integrity and avoiding fragmentation of established residential areas. Projects are reviewed for consistency with community design standards and neighborhood connectivity goals set forth in the General Plan. If a project proposes new development in or near an established community, it must demonstrate that it will not isolate or divide existing residents. The prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

As disclosed in the prior FEIR, the physical division of an established community typically refers to the construction of a physical feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge, that would impair mobility within an existing community or between a community and an outlying area. The proposed project is located on an infill site within the ULL and adjacent to single-family residential community to the north of the project site,

and would demolish an existing single-family residence and accessory structure, and subdivide an existing legal parcel into 19 lots to accommodate the development of 19 single-family residential units. Most of the project site is undeveloped, aside from the single residence and accessory structure and related improvements that would be demolished. The project site does not contain an established community, and the proposed project would be consistent with the designated land uses for the project site as evaluated in the prior FEIR. Further, the proposed project would not introduce a physical feature such as a highway or railroad tracks that would divide an established community. Therefore, consistent with the impact conclusions in the prior FEIR, the proposed project would not physically divide an established community and impacts would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Conflict with Applicable Land Use Plans, Policies, or Regulations

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR includes an evaluation of policies aimed at protecting open space, agricultural lands, and environmentally sensitive areas that were adopted by the County for the purpose of avoiding or mitigating environmental impacts. Specifically, General Plan policies LU-P2.1 and LU-P10.1 implement measures to balance growth and conservation, preserving the environment while enhancing quality of life, and upholding the goal of protecting rural, agricultural, and open space to provide scenic value, ecosystem health, and meet agricultural industry needs. In addition, proposed projects would adhere to Title 8 of the County Ordinance Code, which provides standards for the County's zoning districts. The prior FEIR considered whether development pursued under the 2045 General Plan would cause a significant environmental impact due to a conflict with any such policies. However, the prior FEIR determined impacts would be less than significant in this regard since future development would be required to be consistent with applicable General Plan policies and other applicable land use regulations. The prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The project site is designated as RVL under the 2045 General Plan, which allows for detached single-family units and small-scale agricultural activities on lots greater than one acre in size that serve as a transitional area between urban development and rural areas. As discussed at length in Section 2.1.2 above, the proposed project is consistent with the residential land use designation in the General Plan and zoning and also is consistent with the applicable density standard and other applicable objective development standards. The proposed project is also consistent with General Plan Policy LU-P2.6, which encourages clustering of allowable densities to reduce development footprints. Further, the project site is within the County's ULL, and has therefore been planned for development consistent with the County's 65/35 Land Preservation regulations. In addition, the proposed project is

consistent with the allowed uses and applicable provisions in the North Gate Specific Plan, which allows for single-family dwellings.

The proposed project is located within a High FHSZ within an LRA. Pursuant to applicable standards and requirements, the proposed project would be required to be designed to incorporate sufficient defensible space, fire-resistant landscaping, fire-hardened and fire-resistant structures and otherwise be compliant with CBC fire safe design standards (Chapter 7A) including adequate internal access and fire suppression facilities, and applicable California Residential Code and California Fire Code provisions. Further, wildfire exposure is minimized through the site plan's development cluster, which includes substantial setbacks from open space and riparian areas. The proposed project would be required to remain compliant and up to date with all applicable local, State, and federal laws and regulations, further reducing the risk of wildfires. Section 4.19, *Wildfire* of the Consistency Checklist develops on this topic.

As such, consistent with the impact conclusions of the prior FEIR, impacts would be less than significant. Therefore, the proposed project would not have any project-specific significant impacts which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Land Use and Planning, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.12 Mineral Resources *Would the project:*					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	Significant and unavoidable impact	No	No	No	No
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?	Significant and unavoidable impact	No	No	No	No

Would the project

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR evaluated whether development pursued under the 2045 General Plan would result in a significant impact in connection with the loss of availability of a known mineral resource that would be of value to the region and the State. The prior FEIR references the CGS to determine whether a site is located within a Mineral Resource Zone (MRZ). In Contra Costa County, areas with significant mineral resources, such as sand, gravel, and crushed rock, are generally located in the eastern and northern parts of the County. The prior FEIR considered various General Plan policies such as Policies COS-P13.1 and COS-P13.3 that would serve to protect these resources from incompatible development and to encourage mineral resource conservation. If a project is located within an MRZ-2 area (where mineral deposits are known and of regional significance), it must demonstrate that it will not preclude future extraction or conflict with mineral resource recovery operations. According to the General Plan FEIR, there are no feasible mitigation measures for this impact. The provisions of the California Surface Mining and Reclamation Act (SMARA) would reduce impacts to aggregate mineral resources to the extent possible by requiring site-specific evaluations to discover the presence of

mineral resources. Subsequent review under CEQA for applicable projects would require the incorporation of measures that would reduce impacts as feasible. Therefore, even with the implementation of SMARA provisions and General Plan Policies COS-P13.1 and COS-P13.3, the prior FEIR concluded that impacts would be significant and unavoidable.

Proposed Project Analysis and Conclusion

The project site is designated MRZ-1, which indicates areas where adequate information indicates that no significant mineral resource deposits are present or where there is little likelihood for their presence. The nearest mineral resource area to the project site is the CEMEX Clayton Aggregates Quarry, located approximately 2.25 miles east of the project site. Additionally, the project site does not currently contain any mineral resource recovery sites, and its zoning would not allow mineral resource extraction operations without approval of an allowed land use permit. Therefore, the proposed project would not result in a loss of known mineral resources and no impact would occur. Thus, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR.

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?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development under the 2045 General Plan would result in the loss of availability of a locally important mineral resource recovery site. The prior FEIR concluded that in Contra Costa County, sites that are identified in local planning documents as mineral resource recovery sites are generally mapped in coordination with the CGS and local land use plans. These areas may include sand, gravel, and crushed rock deposits that are important for construction and infrastructure development. The 2045 General Plan contains policies such as Policies COS-P13.1 and COS-P13.3 to protect these resources from incompatible land uses and to ensure that mineral extraction remains feasible where designated. If a project is proposed in or near a locally important mineral recovery site, it must demonstrate that it will not preclude future access to the resource or conflict with long-term conservation goals. According to the prior FEIR, there are no feasible mitigation measures for this impact. The provisions of the SMARA would reduce impacts to aggregate mineral resources to the extent possible by requiring site-specific evaluations to discover the presence of mineral resources. Subsequent review under CEQA for applicable projects would require the incorporation of measures that would reduce impacts as feasible. Therefore, even with the implementation of SMARA provisions, the prior FEIR concluded that impacts would be significant and unavoidable.

Proposed Project Analysis and Conclusion

The project site is not currently known to support any mineral extraction activities and is not identified as a locally important mineral resource recovery site by the General Plan and North Gate Specific Plan. Therefore, the implementation of the proposed project would not result in the loss of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land

use plan. No impact would occur. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Mineral Resources, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.13 Noise *Would the project:*					
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?	Significant and unavoidable impact	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than significant impact with mitigation incorporated	No	No	No	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than significant impact	No	No	No	No

a) Noise Levels in Excess of Adopted Standards

Would the project result in: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR evaluated whether development pursued under the 2045 General Plan would generate a substantial temporary or permanent increase in ambient noise levels that would exceed applicable standards. The prior FEIR found that implementation of the General Plan would result in significant and unavoidable increases in ambient noise levels, primarily due to long-term traffic growth and the placement of sensitive receptors near existing rail corridors. Short-term construction noise was identified as being potentially significant and was addressed through MM N-1 (Construction Noise Reduction), which requires contractors to implement best available noise control techniques, such as improved mufflers, shielding of stationary equipment, use of quieter tools, and strategic placement of stockpiles and generators. The measure also included limiting construction traffic to approved haul routes and posting signage with contact information for complaints. While these measures would reduce construction noise impacts to the extent feasible, the prior FEIR concluded that even with implementation of MM N-1, due to the potential proximity of construction activities to sensitive uses, the number of projects occurring simultaneously, and the duration of construction, short-term noise impacts would remain significant and unavoidable.

Additionally, the prior FEIR identified both stationary and mobile noise sources as contributors to long-term ambient noise increases. Stationary sources include transit infrastructure such as rail yards, bus facilities, and parking structures, which generate consistent noise from mechanical operations and idling vehicles. Mobile sources consist of automobiles, buses, and various types of rail vehicles, including freight and commuter trains. These sources were modeled using Federal Transit Administration methods and were shown to contribute to significant and unavoidable noise impacts, particularly in areas where any new sensitive land uses are placed near existing transit corridors. As such, the prior FEIR underscored the importance of strategic land use planning and feasible mitigation to reduce long-term exposure to transportation-related noise and protect community health. However, the prior FEIR concluded that no individual measure and no set of feasible mitigation measures are available to reduce project-generated traffic noise to less than significant levels in all cases. Thus, the prior FEIR determined that operational noise would remain a significant and unavoidable impact.

Proposed Project Analysis and Conclusion

Short-term Construction Noise Impacts

Consistent with the analysis in the prior FEIR, a significant impact would occur if construction of the proposed project would expose persons working or residing at the project site or in the project vicinity to noise levels in excess of established standards. General Plan policy HS-P14.7 states:

Condition entitlements to limit noise-generating construction activities to the following:

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

While the County has not adopted a quantitative noise level threshold for construction activities, for purposes of a conservative analysis, the County, as lead agency, has elected to use the noise limits established by the Federal Transit Administration (FTA) to identify the potential for impacts due to substantial temporary construction noise, consistent with the methodology utilized in the prior FEIR. The FTA identifies construction noise limits in the Transit Noise and Vibration Impact Assessment Manual.[54] During daytime hours, a significant temporary increase would be an increase in excess of the average daily noise level of 80 dBA $L_{eq(8\text{-}hr)}$ as measured at a receiving residential land use.[55]

Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the project site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings. Impact equipment such as pile drivers are not proposed for construction of the proposed project.

The site preparation phase, which includes demolition of existing structures, tree removal, excavation and grading of the project site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery and compacting equipment, such as bulldozers, draglines, backhoes, front loaders, roller compactors, scrapers, and graders.

The construction phase of the proposed project is expected to require the use of a variety of equipment, including graders, excavators, dozers, front end loaders and backhoes, the loudest of which generate maximum reference noise levels of 85 dBA L_{max} at 50 from the operating construction equipment. A conservative but reasonable assumption is that this equipment would operate simultaneously and continuously over at least a 1-hour period in the vicinity of the closest existing sensitive receptors but would move linearly over the project site as they perform their earthmoving operations, spending a relatively short amount of time adjacent to any one receptor. A characteristic of sound is that each doubling of sound sources with equal strength increases a sound level by 3

[54] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

[55] This threshold applies as measured at the exterior of a receiving residential land use.

dBA. These reasonable worst-case construction noise levels would only occur during the site preparation phase of development.

The closest noise-sensitive receptor to the project site is a single-family residence located south of the project site. This closest noise-sensitive receptor would be located approximately 40 feet from the nearest construction footprint where multiple pieces of heavy construction equipment would operate simultaneously during construction. At this distance, relative worst-case maximum construction noise levels would attenuate to below 73 dBA L_{max}, with relative worst-case hourly average construction noise levels attenuating to below 67 dBA L_{eq} at this receptor. The reasonable worst-case calculated 8-hour noise level would be 63 dBA $L_{eq(8\text{-}hr)}$, as measured at this nearest sensitive receptor. The calculation spreadsheet with the detailed modeling assumptions is included in Appendix G.

The calculated reasonable worst-case construction noise levels do not exceed the FTA's 80 dBA $L_{eq(8\text{-}hr)}$ threshold as measured at the nearest residential receptors. Moreover, the proposed project would be required to adhere to the permitted construction hours consistent with General Plan policy HS-P14.7. Therefore, temporary or periodic noise impacts from construction activities associated with implementation of the proposed project would be less than significant.

Therefore, since this analysis demonstrates that the proposed project would not result in any significant construction noise impacts and would remain below 80 dBA L_{eq}(8-hr) at the nearest sensitive receptor, MM N-1 Construction Noise Reduction from the prior FEIR is not triggered, and no mitigation is required.

Operational/Stationary Source Noise Impacts

Consistent with the analysis in the prior FEIR, a significant impact would occur if operational noise levels generated by stationary noise sources at the project site would result in a substantial permanent increase in ambient noise levels in excess of normally acceptable thresholds for receiving land uses. While the County's Ordinance Code does not establish quantitative noise thresholds for stationary noise source operations, the prior FEIR adopted the County's Ordinance Code noise thresholds for temporary event noise and applied these standards to stationary noise sources. These standards are applied as measured at a receiving noise-sensitive land use. These standards identify acceptable noise levels as ranging up to 60 dBA (L50) average noise levels and up to 80 dBA (L_{max}) maximum noise levels during daytime hours (9:00 a.m. to 8:00 p.m.); and evening (8:00 p.m. to 10:00 p.m.) noise level thresholds of up to 55 dBA (L50) and 75 dBA (L_{max}) as measured at a receiving noise-sensitive land use. Again, these noise thresholds apply to temporary event noise and the ordinance prohibits event noise after 10:00 p.m. However, for purposes of this analysis and to be consistent with the FEIR, these standards are applied to the project as analyzed below.

The primary stationary noise source associated with implementation of the proposed project would be new mechanical ventilation system operations.[56]

Mechanical Equipment Operations

Typical residential grade mechanical ventilation equipment systems range up to approximately 70 dBA L_{eq} at a distance of 3 feet from the operating equipment. Proposed mechanical ventilation systems would be located adjacent to each proposed residential unit.

The nearest sensitive receptor to potential mechanical ventilation system locations is a single-family residence located south of the project site. The façade of this receptor could be located approximately 100 feet from the nearest proposed mechanical ventilation system, based on the site plan. At this distance, noise generated by proposed mechanical ventilation equipment would attenuate to 26 dBA L_{eq}. The calculation spreadsheet is included in Appendix G. These projected noise levels are well below the County's most restrictive threshold for stationary noise sources, which is 55 dBA L_{50} during nighttime hours. In addition, these noise levels would not exceed the documented existing ambient noise levels, which range from 41.8 dBA L_{eq} to 45.9 dBA L_{eq}. The noise monitoring data is included in Appendix G.

Therefore, noise levels from the proposed project's key stationary noise source (i.e., mechanical ventilation equipment operations) would not result in a substantial permanent increase in ambient noise levels in the project vicinity and the impact of noise produced by project-related mechanical ventilation equipment operations to off-site sensitive receptors would be less than significant.

Operational/Mobile Source Noise Impacts

As disclosed in the prior FEIR, a significant impact would occur if implementation of the proposed project would result in a substantial increase in traffic noise levels compared with traffic noise levels existing without the proposed project. For purposes of this analysis and consistent with the methodology utilized in the prior FEIR, a substantial permanent increase would be an increase of 3 dBA in ambient noise levels, which is the lowest change that can be perceptible to the human ear in outdoor environments.

Based on the traffic analysis prepared for the proposed project, it would generate an average of approximately 164 daily vehicle trips. This amount of project trips traveling along North Gate Road adjacent to the project site's access driveway would result in traffic noise levels of up to approximately 44.9 dBA CNEL as measured at 50-feet from the roadway centerline. Traffic noise modeling data is provided in Appendix G.

The documented existing ambient noise level measured at the project driveway adjacent to North Gate Road is 45.9 dBA L_{eq}. The noise monitoring data is included in Appendix G. Therefore, the

[56] Incidental sounds associated with everyday site activity (e.g., occasional landscape maintenance, voices in the parking area, or vehicle door closures) are intermittent and short-duration and are not expected to exceed the mechanical ventilation noise levels at the property line; therefore, they are not evaluated as the controlling stationary source for impact determination.

combination of this additional traffic with the existing ambient noise levels would result in a combined noise level of up to 48.4 dBA L_{eq}, which would represent an approximately 2.5 dBA increase in ambient noise levels. This is less than the 3 dBA increase that would be considered a significant increase. Therefore, project-related traffic noise levels would not result in a substantial permanent increase in ambient noise levels, and the impact would be less than significant.

In summary, consistent with the analysis in the prior FEIR, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site related to excess noise levels. The proposed project would not result in a new or more severe adverse noise impacts that were not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Groundborne Vibration

Would the project result in: Generation of excessive groundborne vibration or groundborne noise levels?

Summary of Analysis in 2045 General Plan FEIR

Construction activities associated with future development under the 2045 General Plan could result in excessive groundborne vibration, particularly from pile driving or use of vibratory rollers near sensitive receptors such as residences or historic structures. The prior FEIR considered these impacts that could occur with development under the General Plan, and determined them to be potentially significant. To address this, MM N-2 was applied, which states:

> Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of nonengineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities.

The analysis must demonstrate that vibration levels would not exceed FTA thresholds for structural damage. If thresholds are exceeded, alternative construction methods or monitoring protocols must be implemented to reduce impacts.

In addition, MM N-3 was applied to reduce potential vibration impacts from industrial or other operational uses that could generate substantial vibration near sensitive receptors. It required a project-level noise and vibration analysis during CEQA review, conducted by a qualified consultant, to assess and mitigate potential operational vibration impacts. Therefore, the prior FEIR concluded that, with implementation of MM N-3, vibration impacts would be reduced to less than significant.

Proposed Project Analysis and Conclusion

Short-term Construction Vibration Impacts

A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The County has not adopted criteria for groundborne vibration impacts. Therefore, for purposes of this analysis and consistent with the methodology used in the prior FEIR, the County, as lead agency, has elected to use FTA's vibration impact criteria to evaluate the proposed project's potential vibration impacts. The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment Manual.[57]

Based on the construction equipment list from the air quality modeling, a large vibratory roller is included as part of the anticipated construction equipment mix. Of the variety of equipment, a large vibratory roller would generate the greatest, reasonable worst-case groundborne vibration levels nearest the project site boundaries. Impact equipment such as pile drivers would not be used during construction of the proposed project. A large vibratory roller can produce groundborne vibration levels ranging up to 0.210 inch per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment.

The nearest off-site structure is an accessory structure next to a residential tennis court located approximately directly south of the project site, approximately 30 feet from the nearest point where large vibratory roller equipment would operate on-site during construction of proposed internal roadways. At this distance, groundborne vibration levels would range up to 0.159 in/sec PPV from operation of the types of equipment that would produce the highest vibration levels. This is below the FTA's construction vibration damage criteria of 0.2 in/sec PPV for this type of structure, a building of nonengineered timber and masonry construction. As a result, construction of the proposed project would not expose nearby buildings to groundborne vibration levels in excess of their applicable FTA damage criteria and this impact would be less than significant.

Because the proposed project would not use pile driving and would not use a vibratory roller within 25 feet of any structure and the analysis above demonstrates the construction vibration impacts would be less than significant, the impact conclusions are consistent with those in the prior FEIR and MMs N-2 and N-3 are not applicable to the project.

Operational Vibration Impacts

Consistent with the methodology used in the prior FEIR, operational impacts are typically associated with commercial and industrial uses, which can generate varying levels of groundborne vibration, depending on operational procedures and equipment. Implementation of the proposed residential project would not include any permanent vibration sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any receiving property line. Therefore, project operational groundborne vibration level impacts would be less than

[57] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

significant. Therefore, since this analysis demonstrates that the proposed project would not result in any significant operational vibration impacts, impact conclusions are consistent with those in the prior FEIR and MMs N-2 and N-3 are not applicable to the project.

In summary, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site related to vibration. The proposed project would not result in a new or more severe adverse noise impacts that were not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Airport or Private Airstrip Noise

Would the project result in:	**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?**

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the 2045 General Plan would result in exposing people residing or working in the area to excessive airport noise levels. The prior FEIR concluded that development under the 2045 General Plan would not expose people residing or working in the project area to excessive noise levels from airports or private airstrips with implementation of applicable General Plan airport-noise and safety policies. However, the prior FEIR acknowledged that some future noise-sensitive uses could be located within areas exceeding 60 dBA CNEL. Implementation of the General Plan's airport-related Policies TR-P7.3 and TR-P7.4 (which regulate the siting of airfields and prevent incompatible development near airports), along with Policies HS-P14.1, HS-P14.2, and HS-P14.4 (which require site-specific acoustical analyses and incorporation of noise attenuation measures to meet interior and compatibility standards), would reduce such exposure to a less than significant level. Therefore, this impact was identified to be less than significant, and no mitigation measures were required.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, the project site is not located within 2 miles of a public airport or private airstrip, nor is it located within an area covered by the County's ALUCP. The nearest airport facility is the Buchanan Field Airport, approximately 6 miles northwest of the project site. Thus, the proposed project would not expose people residing or working in the project area to excessive noise levels from either Buchanan Field or a private airstrip and there is no impact, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site related to airport noise. The proposed project would not result in new or more severe adverse noise impacts that were not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

As discussed above, applicable FEIR mitigation measures have been satisfied. No project-specific mitigation required.

Conclusion

With regard to Noise, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. Mitigation measures from the prior FEIR have been satisfied and no project-specific mitigation would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.14 Population and Housing *Would the project:*					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant impact	No	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than significant impact	No	No	No	No

a) Growth Inducement

Would the project: Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered potential growth inducing impacts associated with development pursued under the 2045 General Plan. It found that the 2045 General Plan would accommodate population growth consistent with regional forecasts and housing needs. The General Plan projects the addition of approximately 23,200 new housing units and 65,600 new residents in the unincorporated County by 2045. This growth is expected to occur primarily within the County's ULL, which is designed to concentrate development in areas already served by infrastructure and public services. The General Plan includes policies such as LU-P2.1 and LU-P2.3 that reinforce the 65/35 Land Preservation Standard, limiting urban development to 35 percent of the County's land area and preserving the remaining 65 percent for agriculture, open space, and other non-urban uses. The 2045 General Plan also supports infill development and higher-density housing in community cores, aligning with

regional planning goals and the County's Regional Housing Needs Allocation (RHNA). Letters received from Central Contra Costa Sanitary District and the Contra Costa County Department of Public Works indicate that existing service systems would have sufficient capacity to serve the proposed project. Because the General Plan's projected growth is consistent with regional plans and would occur in areas planned for development, the prior FEIR concluded that implementation of the General Plan would not induce substantial unplanned population growth (either directly or indirectly) and impacts would be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the 2045 General Plan, the proposed project would result in a minor amount of direct population growth through the construction of 19 single-family residential units. The proposed project would result in approximately 54 new residents, based on the County's average household size of 2.84 persons per household.[58, 59] The project site is located in an unincorporated area of County-designated RVL under the 2045 General Plan and zoned as R-40, which allow for low-density residential development. Though the project site is in an unincorporated part of Contra Costa County, it is infill in nature and within the County ULL. The proposed project would be consistent with the existing General Plan land use and zoning for the project site, and further the 2045 General Plan's goals to accommodate housing needs and promote infill development.

Infrastructure improvements, including water, wastewater, and storm drainage connections, would occur within existing service areas, would only involve serving the proposed project, and would not extend urban services into undeveloped areas beyond the project site. The proposed project would not induce substantial unplanned population growth in the County, either through new housing or new businesses, or indirectly through the extension of roads or other infrastructure. Therefore, the proposed project would not induce substantial unplanned growth beyond what is anticipated in the 2045 General Plan and, consistent with the impact conclusions of the prior FEIR, impacts would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Displacement of Persons or Housing

Would the project: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered potential displacement impacts due to development pursued under the General Plan. It noted that the General Plan does not propose large-scale redevelopment or

[58] California Department of Finance (DOF). 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025. Website: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/. Accessed October 12, 2025.

[59] 19 residential units * 2.84 persons/household = 53.96 persons

infrastructure projects that would require demolition of existing residential neighborhoods. Instead, it emphasizes infill development, preservation of existing communities, and the provision of affordable housing. The Housing Element, adopted separately in December 2023, includes policies to support housing rehabilitation, protect existing housing stock, and promote housing stability. Additionally, the 2045 General Plan includes policies (Such as, for example, Policy SC-P6.1 to prevent displacement in Impacted Communities and to ensure equitable access to housing opportunities). The County defines “Impacted Communities” as communities that experience the highest levels of pollution and negative health outcomes. Therefore, the prior FEIR concluded that the construction of replacement housing elsewhere would not be necessary and impacts would be less than significant.

Proposed Project Analysis and Conclusion

The project site currently contains one currently occupied single-family residence, which would be demolished (along with an accessory structure) as part of the proposed project. However, the proposed project would result in a net increase of 18 housing units, including three deed-restricted units designated for very low-income households, thereby contributing to the County’s available housing stock. While the proposed project is a net increase of 18 housing units, future development of each lot may include ADUs which would further increase the housing stock of this area. The proposed housing would be consistent with the County’s long-term housing goals and would not result in the displacement of a substantial number of people or housing units and therefore, consistent with the impact conclusions in the prior FEIR, impacts would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Population and Housing, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project’s specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.15 Public Services *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:*					
a) Fire protection?	Less than significant impact	No	No	No	No
b) Police protection?	Less than significant impact	No	No	No	no
c) Schools?	Less than significant impact	No	No	No	No
d) Parks?	Less than significant impact	No	No	No	No
e) Other public facilities?	Less than significant impact	No	No	No	No

a) Fire Protection

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 fire protection?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered

governmental facilities, the construction of which is necessary in order to maintain acceptable service ratios, response times or other performance objectives. The prior FEIR found that implementation of the General Plan would increase population and development, thereby increasing demand for fire protection services. The CCCFPD and other independent districts currently serve the County with a range of services including emergency medical response, hazardous materials response, and fire prevention. The General Plan includes policies such as Policy HS-P7.5 which requires property owners in High or VHFHSZs to establish and maintain fire breaks and defensible space, vegetation clearance, emergency access roads, water supply and fire flow, signage, and firefighting infrastructure that meets current adopted State, County, or community fire safety standards. Additionally, the County collects fire protection facilities fees and has adopted the California Fire Code, which is implemented on a project-by-project basis. These measures ensure that future development contributes to fire protection infrastructure and services. Therefore, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed at length in the prior FEIR, the CCCFPD is a multi-hazard, all-risk response agency that provides emergency services to the citizens and visitors of the community, seeking to protect life, property, and the environment. The CCCFPD serves the County with 26 fire stations and maintains mutual aid agreements with Kensington Fire Protection District, Moraga-Orinda Fire Protection District, Rodeo-Hercules Fire Protection District, and San Ramon Valley Fire Protection District. The closest fire station to the project site is Station 7, located at 1050 Walnut Avenue, approximately 1.7 miles northwest.

The development of the proposed project would generate a certain amount of increased demand for public services, including fire protection and emergency medical services, through the construction of 19 residential units, resulting in approximately 54 residents as described in Section 4.14, Population and Housing. The proposed project would be consistent with the project site's land use designation, including the development density established thereby. Therefore, the proposed project would be consistent with the population growth and uses assumed and planned for under the 2045 General Plan and evaluated within the environmental impacts evaluated in the prior FEIR.

Within the 2045 General Plan, Policy PFS-P3.1 states that the County shall require development projects to pay applicable development fees financially supporting the CCCFPD; the proposed project would be required to pay said fees. Furthermore, the proposed project would be served by fire protection services in accordance with Division 722 of the Contra Costa Ordinance Code, which amends the 2022 California Fire Code. The private driveway and internal roadways of the proposed project would be designed to meet applicable fire apparatus access requirements, including grading, width, turning radius, and dead-end limitations. In addition, the proposed roadway design was prepared in accordance with recommendations provided by CCCFPD. No new or expanded fire protection facilities would be required as a result of the proposed project to maintain applicable performance objectives. Considering that the proposed project is consistent with the residential uses and development density contemplated under the 2045 General Plan and the proximity of the project site to Station 7, the relatively small amount of demand that would be generated, the fact that the

proposed project would comply with all applicable Fire Code and other applicable County requirements and standards and would pay applicable development impact fees, the proposed project would not result in the need for new or altered services related to fire protection to maintain applicable response times. In addition, pursuant to Action HS-A13.3 of the 2045 General Plan, the proposed project would be required to provide emergency access for fire personnel and would thus enhance response times. Impacts would be less than significant. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Police Protection

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 police protection?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which is necessary in order to maintain acceptable service ratios, response times or other performance objectives for police services. The prior FEIR found that the General Plan would increase demand for police services due to population growth. The Contra Costa County Office of the Sheriff (Office of the Sheriff) provides law enforcement services to unincorporated areas and contract cities. The Office of the Sheriff maintains four bureaus: Administration Services, Custody Services, Field Operations, and Support Services. Over 1,100 sworn professional employees serve over 1,000,000 residents in the 715-square mile County.[60] The General Plan includes policies such as Policy PFS-P3.2, requiring new development to pay its fair share of public service costs and to support safe public spaces through environmental design. The County also levies impact fees for police services, including one-time fees for subdivisions and annual assessments for police services districts. These provisions ensure that law enforcement services can scale with growth. Therefore, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the discussion in the prior FEIR, the Office of the Sheriff provides law enforcement services to unincorporated areas of Contra Costa County, including the project site. The proposed project would introduce new structures and residents into the service boundaries of the Office of the

[60] Contra Costa County Office of the Sheriff. Overview. Website: https://www.cocosheriff.org/about-us/office-of-the-sheriff-overview. Accessed October 11, 2025.

Sheriff, potentially increasing demand for police services to a certain degree; however, the proposed project is consistent with the project site's 2045 General Plan land use designation and development density; therefore, the associated population growth would be consistent with the growth assumed and planned for within the 2045 General Plan. As such, the proposed project would not substantially increase demand for police protection services or require new sworn officers, or new or expanded government facilities beyond that anticipated and planned for. The proposed project would also be required to pay all applicable development fees, which would comply with Policy PFS-P3.2. As such, the proposed project would not inhibit emergency response time, service ratios, or performance objectives in a manner that would trigger the need for new or physically altered policies facilities. Consistent with the impact conclusion of the prior FEIR, impacts would be less than significant. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, on additional environmental review is required.

c) Schools

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 schools?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which is necessary in order to maintain acceptable service ratios, response times or other performance objectives for schools. The prior FEIR found that development under the 2045 General Plan would generate new students, potentially impacting school enrollment capacities and resulting in the need for new or expanded school facilities. The prior FEIR considered enrollment trends and capacity data from 18 school districts and 285 schools within the County, with 20 schools considered to be "critically overcrowded." Pursuant to SB 50 and County Ordinance Code Division 812, all school districts in the County levy a school development impact fee to offset costs associated with increasing school capacity and all future development proposed under the 2045 General Plan would be subject to these fees. Additionally, the 2045 General Plan includes policies such as Policy PFS-P9.1 to coordinate with school districts and ensure adequate school services to serve the buildout population. Therefore, the prior FEIR concluded that impacts related to new or physically altered school facilities would be less than significant.

Proposed Project Analysis and Conclusion

The project site is serviced by the Mt. Diablo Unified School District (MDUSD). During the 2023-2024 school year, MDUSD enrolled approximately 30,010 students in pre-kindergarten through twelfth

grade across approximately 53 schools.[61] The MDUSD schools serving the project site include Walnut Acres Elementary, located at 180 Cerezo Drive approximately 2 miles northwest; Foothill Middle School located at 2775 Cedro Lane approximately 2 miles northwest; and Northgate High School, located at 425 Castle Rock Road approximately 1.5 miles west of the project site.[62]

Consistent with the analysis in the prior FEIR, the proposed project would result in a nominal increase in the MDUSD student population. The proposed project would generate an estimated 6.74 students, representing an approximately 0.341 percent increase from 2020.[6359] The proposed project would be subject to payment of the applicable impact fees to the MDUSD as required by SB 50 and County Ordinance Code Division 812. The fees set forth in the California Government Code Section 65996 constitute the exclusive means of both “considering” and "mitigating" school facilities impacts of projects. With payment of applicable impact fees, operation of the proposed project would result in a less than significant impact, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Parks

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 parks?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which is necessary in order to maintain acceptable service ratios, response times or other performance objectives for parks. The prior FEIR determined that the 2045 General Plan outlines a long-term, coordinated approach to identifying, acquiring, funding, and developing parkland to support projected residential growth. The 2045 General Plan includes policies and actions such as Policy PFS-P3.1, and Action PFS-A3.2 that support the expansion and maintenance of recreational resources, and future development would be subject to park impact fees and coordination with park providers such as EBRPD, California State Parks, and local agencies.

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[61] California Department of Education. District Profile: Mt. Diablo Unified. https://www.cde.ca.gov/sdprofile/details.aspx?cds=07617540000000. Accessed October 24, 2025.

[62] School Site Locator: Mount Diablo Unified School District. Website: https://www.schoolsitelocator.com/apps/mtdiablo/. Accessed October 24, 2025.

[63] Based on the Contra Costa County 2045 General Plan, the number of students generated per unit for MDUSD is 0.3546. 0.3546 x 19 = 6.73 students.

When the projected residential buildout of the 2045 General Plan is added to the County's total population the ratio of parkland per 1,000 residents would decrease from 94.45 to 89 acres of park per 1,000 residents. However, this is a very conservative assumption; it is expected that parks will be acquired, expanded, and/or made publicly accessible as part of private development over the horizon of the proposed General Plan. It should be noted that while the 2045 General Plan supports recreational development, it does not include specific projects that would directly result in adverse environmental effects, instead indicating that future recreational facility development would be subject to CEQA review and County planning processes; therefore, impacts would be less than significant.

Proposed Project Analysis and Conclusion

The closest State park to the project site is Mt. Diablo State Park, with the North Gate entrance being approximately 0.4 mile south of the project site. The closest local public park is Castle Rock Regional Recreational Area, located approximately 0.76 mile south of the project site. Additionally, there is Shell Ridge Open Space approximately 0.57 mile southwest of the project site. However, since road connections are currently not developed on the west or south sides of the project site, these distances increase to approximately 2.9 miles for Castle Rock and 2.2 miles for Shell Ridge by car.

Under the 2045 General Plan, there is a target of four acres per 1,000 residents. The County's Municipal Service Review concludes that additional parks and recreation space are needed within all districts except the Pleasant Hill Regional Park District to meet the existing General Plan's goal of four acres per 1,000 residents. While the proposed project would increase the local population slightly, it would be consistent with the County's General Plan growth assumptions and be subject to applicable dedication and park impact fees, which would offset any increased demand. As such, the proposed project would not result in the need for new or physically altered park facilities, and, with the conclusion of the prior FEIR, impacts would be less than significant. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Other Public Services?

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 other public services?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which is necessary in order to maintain acceptable service ratios, response times or other performance objectives for other public services. The prior FEIR determined that implementation of the 2045 General Plan would result in the potential for increased

demand for library services within the County to the extent that expansion and construction of new facilities could be required. As described previously, the horizon-year projection for the proposed General Plan includes approximately 65,600 new residents in the County. To meet the future demand for library services, the County would implement Policy PFS-P10.3 which requires the County to ensure the County budget has adequate funding for maintaining and improving library services, Additionally, Action PFS-A10.1 directs the County to develop library service and facility standards, while PFS-A10.2 directs the County to adopt a library impact fee to ensure that new development mitigates its impacts on library services. Future development would also generate new tax revenues and funding sources for the Contra Costa Library System consisting of property taxes, State assistance, and revenue from fines, fees, and other miscellaneous revenue. Furthermore, development or expansion of libraries would be subject to the County's policies that protect environmental resources including environmental review and impact mitigation per CEQA. Impacts associated with development of new governmental facilities such as libraries are therefore determined to be less than significant.

Proposed Project Analysis and Conclusion

The closest library to the project site is the Ygnacio Valley Library, located approximately 2 miles northwest of the project site. As described above, the proposed project's population growth has been contemplated under the 2045 General Plan. Consistent with the analysis in the prior FEIR, the proposed project would be consistent with applicable policies to prevent adverse impacts associated with new governmental facilities, such as Policy LU-P5.1 which only allows development where requisite community services, facilities, and infrastructure can be provided, Furthermore, the proposed project would be consistent with other policies and actions such as Policy PFS-P10.3, Actions PFS-A10.1 and PFS-A10.2 that support the expansion and maintenance of libraries through the payment of library impact fees to ensure development contemplated under the 2045 General Plan (including the proposed project) would appropriately fund necessary community facilities, such as library services. As such, the proposed project would not result in the need for new or physically altered governmental facilities, and, similar to the prior FEIR, impacts would be less than significant. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Public Services, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.16 Recreation *Would the project:*					
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	No
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	No

a) Existing Neighborhood and Regional Parks and Recreational Facilities

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?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration would occur or be accelerated. It discussed how a total of 108,393 acres of parks and recreation land are available to residents of the unincorporated County. This acreage includes regional park facilities managed by EBRPD, East Bay Municipal Utility District (EBMUD), and CCWD, as well as State and federal park facilities. Development under the General Plan would introduce new residents which would increase the demand for parks and recreational facilities. The County currently maintains a ratio of approximately 94.45 acres of parks and recreation land per 1,000 residents. Buildout under the General Plan is expected to reduce that ratio to approximately 89 acres of parks

and recreation land per 1,000 residents. However, the prior FEIR determined that parks and recreation land will be acquired, expanded, or made publicly accessible over the horizon of the General Plan. Further, the 2045 General Plan includes Policy PFS-P8.2, to ensure park access within a safe 10-minute distance for all residents in urban communities, prioritization of recreational investments in Impacted Communities, and park dedications or impact fees for new development. The County defines “Impacted Communities” as communities that experience the highest levels of pollution and negative health outcomes. These measures would address the potential impacts from increased use or new facility construction. Therefore, the prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would introduce 19 new single-family homes, including three very low-income units, in a low-density area near Mt. Diablo State Park and other open space amenities such as Shell Ridge Open Space and Castle Rock Recreational Area. While the proposed project does not include new recreational facilities, its proximity to these regional and State parks would facilitate use of these nearby facilities by future project residents for outdoor activities. Moreover, the scale of the proposed project is relatively small, and the County’s General Plan and Park and Recreation policies anticipate incremental growth in residential areas. Furthermore, the project site is consistent with the 2045 General Plan land use designation and development density of RVL. The proposed project would also be subject to applicable impact fees under Policy PFS-P8.5 and Division 920 of the County Ordinance Code, which requires projects subject to the Park Dedication or Park Impact Fee Ordinance to dedicate land or pay an in lieu fee, which in turn would serve to reduce the potential deterioration of existing facilities. The proposed project would not result in a substantial increase in use that would accelerate physical deterioration of existing facilities and similar to the prior FEIR’s conclusions, impacts would be less than significant. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

Would the project: **b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would include new or expanded recreational facilities that might have an adverse environmental impact. The prior FEIR found that implementation of the 2045 General Plan would increase demand for public facilities, including parks and recreational amenities. However, all targets for parks and recreation service standards for both the County’s existing population and future population that includes the projected growth under 2045 General Plan. All new projects must adhere to County Ordinance No. 2007-17 which collects impact fees from new development to fund recreation services. While the County does not have a deficit of regional parks and recreation facilities, additional local facilities are likely needed to meet the existing and future demand of development. The estimated timing or location of new

facilities or the exact nature of these facilities are not known, so project-specific environmental impacts that would occur from their construction and operation cannot be determined at this time. However, depending on the type, size, and location of new parks, the construction of new parks would be subject to environmental review and the mitigating policies and mitigation measures described in the prior FEIR to ensure the impacts from the construction would be less than significant. The construction of development--specific parks and recreational facilities would require permitting and review in accordance with County standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent feasible. Therefore, impacts of recreational facilities having an adverse effect on the environment would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project does not involve the construction or expansion of public recreational facilities. The project site is located near Mt. Diablo State Park and other significant regional recreational lands, which are sized such that they could readily accommodate the approximately 54 residents without triggering the need for an expansion of these facilities. The County's General Plan encourages expanded access to recreation opportunities through Policy PFS-P8, which would be accomplished by the proposed project given its proximity to these nearby recreational facilities. Additionally, the proposed project would not require the construction of new recreational facilities nor would it infringe on existing recreational facilities. Therefore, no adverse physical effects from recreational facility construction are anticipated as a result of the proposed project and, consistent with the conclusions of the prior FEIR, impacts would be less than significant. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Recreation, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.17 Transportation *Would the project:*					
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	No
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Significant and unavoidable impact	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact	No	No	No	No
d) Result in inadequate emergency access?	Less than significant impact	No	No	No	No

a) Congestion Management Plan

Would the project: Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Summary of Analysis in 2045 General Plan FEIR

Roadway

As indicated in the prior FEIR, the Contra Costa Transportation Authority (CCTA) manages several countywide programs aimed at improving circulation on County roadways, including the Congestion Management Program and the Growth Management Program. These initiatives help organize and fund roadway enhancements. Additionally, the County's Transportation Demand Management (TDM) Ordinance (Chapter 82-32 of the County Ordinance Code) supports the implementation of CCTA programs. Under the 2045 General Plan, new developments must comply with applicable TDM requirements and pay applicable transportation impact fees. Additionally, projects will be reviewed under the County's Transportation Analysis Guidelines. The 2045 General Plan includes policies and actions that align with and support CCTA and County roadway programs. For example, Policy TR-P2.4 promotes TDM strategies to reduce single-occupant vehicle use, while Policy TR-P2.6 encourages collaboration with CCTA and Caltrans to improve traffic operations on State highways. Action TR-A2.2 mandates that the County update its TDM guidelines every five years to reflect best practices. Overall, these measures demonstrate the 2045 General Plan's consistency with the goals and intent of the County and CCTA's transportation-related programs, resulting in less than significant impacts.

Transit

There are various transit services provided throughout the County, including buses, Bay Area Rapid Transit (BART), and major freeways with the more rural and agricultural communities within the County served by a network of two-lane highways and roads. The prior FEIR noted that the 2045 General Plan supports high quality transportation options, strengthening transportation connections to the rest of the Bay Area and beyond. The County establishes numerous policies and actions through the General Plan Transportation Element, including TR-P2.8 through TR-P2.10 which require the County to support improvement and expansion of transit and rail services. While the 2045 General Plan recognized that development under the General Plan would increase transit demand, based on the foregoing, the prior FEIR determined that impacts related to providing adequate service for public transit would be less than significant.

Bicycle and Pedestrian Facilities

The prior FEIR considered whether the 2045 General Plan would conflict with a bicycle or pedestrian program plan, ordinance or policy. However, the prior FEIR determined that impacts in this regard would be less than significant for the following reasons. The Contra Costa Countywide Bicycle and Pedestrian Plan (CBPP), adopted by the Contra Costa Transportation Authority in 2018, identifies a network of existing and proposed "low-stress" routes that are most comfortable for pedestrians or bicyclists. CBPP identifies a total of 670 miles of proposed pedestrian and bicycle facilities intended to add routes throughout the County that are safe and accessible and connect residents across the

County. The goals of the CBPP include encouraging more residents to walk and bicycle, increasing safety and security for pedestrians and bicyclists, and creating a safe, connected, and comfortable network of bikeways and walkways. Moreover, policies outlined in the 2045 General Plan, such as TR-P1.2, TR-P4.1, and TR-P5.1 require the prioritization of expanding, designing, and maintaining bicycle and pedestrian infrastructure for all ages and abilities, along with other roadway improvement projects. Further, Policies TR-P4.2 and TR-P4.3 require new multimodal transportation infrastructure to consider existing land uses and to provide connectivity to adjacent jurisdictions and public services. Policy GM-P3.2 would apply County plans and policies toward the review of new development projects to support bicycle and pedestrian access. Additionally, review of development projects must comply with Contra Costa County Ordinance Code Chapter 82-32 that intends to incorporate pedestrian, bicycle, and transit access improvements into development projects. As such, the prior FEIR determined that General Plan implementation would result in a less than significant impact related to providing adequate service for bicycle and pedestrian facilities.

Proposed Project Analysis and Conclusion

The project site is primarily accessed by North Gate Road, a north–south oriented minor arterial as classified by the California Road System Map. North Gate Road has one travel lane in each direction and no sidewalks, shoulders, or bike facilities. Proposed project activities include the construction of a paved roadway that would provide access to North Gate Road with parking lanes and a sidewalk.

Proposed Trip Generation and Distribution

A Transportation Impact Study (TIS) was prepared for the proposed project by W-Trans (Appendix H). The TIS analyzed transportation operations associated with the proposed project, including trip generation estimated using standard rates published by the Institute of Transportation Engineers (ITE) Trip Generation Manual, for “Single-family Detached Housing (ITE Land Use No. 210). Because the project site is currently occupied by one single-family home, the trip generation of this residence was considered. The TIS estimates that the proposed project would generate approximately 173 vehicular trips per day, including 13 AM peak-hour trips and 18 PM peak-hour trips. This represents an increase of approximately 164 daily trips over existing conditions, including 12 AM peak-hour trips and 17 PM peak-hour trips. Given the relatively few trips to be generated, the proposed project was also reviewed by the Transportation Planning Section of the Department of Conservation and Development and the project was determined to not trigger a comprehensive VMT analysis[64] nor a Level of Service (LOS) review.

Moreover, the proposed project would be consistent with the 2045 General Plan land use designation and development density for the project site as evaluated in the prior FEIR. As such, the prior FEIR included an analysis of the increase in traffic associated with the buildout of the project site. Therefore, the proposed project would not conflict with a program plan, ordinance or policy related to

[64] The County Transportation Analysis Guidelines state that projects of 20 units or less do not require a detailed VMT analysis.

a circulation system. Based on the foregoing, impacts would be less than significant in this regard, consistent with the impact conclusions in the prior FEIR.

Transit

As discussed in the prior FEIR, the Central Contra Costa Transportation, or County Connection, is a transit service providing fixed-route and pedestrian bus services throughout the communities of Concord, Pleasant Hill, Martinez, Walnut Creek, Clayton, Lafayette, Orinda, Moraga, Danville, and San Ramon, as well as unincorporated communities in Central Contra Costa County.[65, 66] County Connection operates 125 fully accessible transit buses and 63 paratransit vehicles from 6:00 a.m. to 9:00 p.m. on weekdays and from 9:00 a.m. to 7:00 p.m. on weekends. The bus stops closest to the project site served by County Connection are approximately 2 miles north of the project site in the Shadelands Business Park Specific Plan area at Mitchell Park N Ride in the City of Walnut Creek, where there is an average LOS time of approximately 1 hour. These stops provide transit connections to the Walnut Creek and Pleasant Hill BART Stations, among other locations.

BART is a heavy-rail public transit system that provides regional rail services to five San Francisco Bay Area counties connecting the San Francisco Peninsula with the East Bay and South Bay subregions. BART links numerous land uses together including office, commercial, retail, residential and public service along 131 miles of railroad track and 50 stations. The closest BART Stations to the project site are the Pleasant Hill BART Station approximately 3. 5 miles to the northwest, the Walnut Creek BART Station approximately 3.7 miles to the west, and the Concord BART Station approximately 7.4 miles to the north. As previously indicated, BART Stations are accessible from the Mitchell Park N Ride via County Connection.

The proposed project does not include any changes to the existing nearby transit facilities or the construction of new transit facilities, and would not conflict with existing plans or policies related to transit facilities within the County given the relatively low anticipated demand of approximately 54 new residents. This anticipated increase in residents is expected to generate 173 vehicular trips per day, including 13 AM peak-hour trips and 18 PM peak-hour trips. This represents an increase of approximately 164 daily trips over existing conditions, including 12 AM peak-hour trips and 17 PM peak-hour trips. Future residents on the project site would be able to use existing transit services available in the County, including CCTA bus routes and BART rail lines. Therefore, the proposed project would not conflict with plans, policies, or ordinances related to public transit and would have adequate provision of public transit services, and impacts would be less than significant in this regard, consistent with the impact conclusions in the prior FEIR.

Bicycle and Pedestrian Facilities

The proposed project would provide internal pedestrian access via a network of paved pathways and curb ramps. All pedestrian facilities would be constructed to meet applicable design standards established by the Contra Costa County Public Works Department and the Federal Americans with

[65] County Connection. n.d. About Us. Website: https://countyconnection.com/about/. Accessed October 24. 2025.

[66] Bay Area Rapid Transportation (BART). 2025. About. Website: https://www.bart.gov/about. Accessed October 24, 2025.

Disabilities Act (ADA). There are no pedestrian facilities along adjacent roadways outside the project site that could be impacted by project implementation. No bicycle facilities currently exist on the project site or along the North Gate Road segment in direct proximity to the project site. An existing Class I bike lane[67] begins on the northbound side of North Gate Road approximately 0.15 mile north of the proposed access road entrance at the Shadowbrook Winery but terminates shortly thereafter. Two existing Class II [68] bike lanes begin to the north in the more developed portions of the North Gate neighborhood. Additionally, Trails End Path, an existing multiuse trail, is located approximately 980 feet northwest of the project site. These existing bicycle facilities would not be significantly impacted by project implementation given the relatively small nature of residential units being proposed and the proposed project's related low demand, combined with its proximity to nearby facilities to encourage access, would ensure no conflict with applicable General Plan or CCTA programs and policies or County Ordinance Code provisions relating to the provision of bikeways or pedestrian facilities, consistent with the impact conclusions of the prior FEIR. Moreover, the project applicant has voluntarily agreed to provide funding that may be used by the County in the future in its discretion to facilitate trail connections, consistent with the foregoing policies that encourage pedestrian and bicycle connectivity.

Overall, the proposed project would not have any project-specific significant effects related to circulation plans which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered the potential VMT-related impacts associated with development pursued under the General Plan. The prior FEIR determined that the County's Transportation Analysis Guidelines are designed to align with CEQA Section 15064.3(b), emphasizing a focus on VMT generation. Specifically, the prior FEIR prioritizes reducing single-occupant vehicle trips and VMT through infrastructure investments, policy support, and transit-oriented development. Projects are evaluated for operational deficiencies with a focus on solutions that reduce vehicular trips and collision risks. The prior FEIR stated that the 2045 General Plan will guide long-range development over a broad geographic area; therefore, it is not possible to predict with precision which strategies may be implemented at specific locations and at specific times. Further, VMT analysis did not readily account for many of these measures, particularly those related to site-specific physical improvements, pedestrian and bicycle facilities, and ongoing operational or incentive programs. In addition, because

[67] Class I Bikeway (Shared Use Path): a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.

[68] Class II Bikeway (Bike Lane): special lane markings, pavement legends, and signage, bike lanes provide designated street space for bicyclists.

the feasibility and timing of specific TDM measures for future development projects remain uncertain, and because implementation of a program to fund off-site mitigation may not occur, it cannot be concluded that these strategies would reduce VMT in the future EIR Study Area to 15 percent below the regional average VMT. Therefore, as provided under Impact 5.16-3 of the prior FEIR, because implementation of the 2045 General Plan would result in an exceedance of the countywide average total VMT per service population under both the baseline and cumulative scenarios, impacts are considered significant and unavoidable.

Proposed Project Analysis and Conclusion

CEQA Guidelines Section 15064.3 subdivision (b) discusses the potential impacts of projects for which land uses may directly increase VMT. VMT refers to the amount and distance of automobile travel attributed to a project.

While the County determined that a comprehensive VMT analysis was not triggered here, the TIS conducted the following evaluation for the proposed project, which determined that the countywide home-based average VMT per resident is 16.1 miles, with a significant threshold of 13.7 miles per resident. This threshold was based off guidance provided by both the LCI in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory, CCTA's adopted VMT Methodology and the Contra Costa County Public Works Department Transportation Analysis Guidelines. According to the TIS, the project site, which is infill in nature, is located within Traffic Analysis Zone (TAZ) 20237 of the Contra Costa Travel Demand Model, which has a home-based VMT of 12.2 miles per resident. Because this falls below the significant threshold of 13.7, the project would have a less than significant VMT impact and does not require further VMT analysis. Additionally, the County Transportation Analysis Guidelines state that projects of 20 units or less do not require a detailed VMT analysis. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Roadway Safety Hazards

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR acknowledged that future development projects under the 2045 General Plan could substantially increase hazards due to incorporating a geometric design feature or incompatible uses. However, all future developments pursued under the General Plan would be required to adhere to roadway design standards mandated in Division 98 of the Contra Costa County Ordinance Code that provides minimum distance, intersection, width, grade, vertical and horizonal curve standards. Furthermore, the prior FEIR determined that policies established in the 2045 General Plan, such as Policy TR-P3.2, emphasize careful site planning to increase safety and minimize conflicts between

multiple modes of travel. Additionally, Policy TR-P4.8 implements appropriate roadway design standards to encourage traffic calming and reduced speeds. As such, with Contra Costa County Ordinance Code and General Plan policies implementation, the prior FEIR concluded that future development would not increase hazards through incorporating geometric design features or incompatible uses, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

Access to the project site would be provided by a single full-access driveway extending westward from North Gate Road. This driveway would connect to an internal roadway and a cul-de-sac providing access to the proposed single-family units. The TIS evaluated sight distance for vehicular travel within the project site and determined that sight lines at the proposed driveway are adequate for the posted speed limit of 30 miles per hour (mph) on North Gate Road. Through consistent maintenance of vegetation, signage, or monuments near the entrance driveway, sight lines would remain adequate, and on-site circulation would be expected to operate acceptably. Moreover, given the nearby similar single-family residential uses, the TIS confirmed that no such hazards would occur due to incompatibility of uses (e.g., farm equipment). The proposed project would similarly develop residential uses and would not introduce uses that would be incompatible with existing uses in the surrounding neighborhood. Therefore, impacts would be less than significant in this regard, consistent with the impact conclusions in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Emergency Access

Would the project: result in inadequate emergency access?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether development pursued under the General Plan would result in inadequate emergency access. The prior FEIR determined that future construction consistent with the General Plan may increase delays at intersections and along roadways that could impair emergency response times.

With respect to operations of future developments pursued under the General Plan, the prior FEIR found that future developments would be subject to design standards from the Contra Costa County Ordinance Code including Division 722, which includes requirements for emergency access, outlines building safety and Fire Code review requirements, addresses fire apparatus access roads, and contains other roadway requirements from the California Fire Code. Furthermore, the prior FEIR identified numerous policies intended for future developments to accommodate emergency access, including Policies TR-P4.10, Policy HS-P7.3, and HS-P7.4. These policies ensure that roadway infrastructure accommodates emergency response, requires new developments in VHFHSZ or the WUI to prepare traffic control plans, and proposed subdivisions in High FHSZs to complete a fire protection plan. Therefore, the prior FEIR concluded that future development would not result in inadequate emergency access, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

The TIS prepared for the proposed project considered whether it would result in inadequate emergency access, and determined that emergency response vehicles would be able to access the project site via the network of internal roadways. All proposed roadways would be at least 20 feet wide, thus satisfying applicable California Fire Code regulations, which state, “Fire apparatus access roads shall have an unobstructed width of not less than 20 feet, exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet and 6 inches” and Section D103.5 which states “Where a fire apparatus road consists of a divided roadway, the gate width shall be not less than 12 feet.” The project road and gate design are consistent with these regulations. In addition, the project site includes a cul-de-sac style dead-end fire apparatus access road treatment which complies with Section D103.4 of the California Fire Code for internal roadways longer than 150 feet. In addition, the CCCFPD initially reviewed the proposed project and submitted a letter providing their recommendations for fire apparatus access, to which the project site plans adhere.

The CCCFPD adopted Ordinance 2022-34 which modifies Table D103.4 of the California Fire Code, to allow a cul-de-sac with a minimum diameter of 90 feet. The project site would have a cul-de-sac with a diameter of 90 feet, consistent with the CCCFPD requirements. Further, as the project site is located within a High FHSZ, it would be required to prepare a traffic control plan and fire protection plan, as required by General Plan Policy HS-P7.3 and HS-P7.4 which would be reviewed and approved as part of the building permit process. Therefore, impacts in this regard would be less than significant, consistent with the impact conclusions set forth in the prior FEIR. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Transportation, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project’s specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.18 Utilities and Service Systems *Would the project:*					
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	No
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	No
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	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
provider's existing commitments?					
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than significant impact	No	No	No	No
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	Less than significant impact	No	No	No	No

a) Water, Wastewater, and Stormwater Facilities

Would the project: 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?

Summary of Analysis in 2045 General Plan FEIR

Water

The prior FEIR acknowledged that future development from the implementation of the General Plan would increase the demand for water services resulting in the relocation or construction of new or expanded water facilities. However, the prior FEIR found that the projected population increase from implementation of the General Plan would result in an increase of approximately 65,600 individuals, which is lower than the population growth estimated by the EBMUD which estimated an increase of approximately 79,000 individuals between 2020 and 2040 for water supply planning purposes.

General Plan buildout population would also be lower than CCWD estimated growth of 236,110 individuals between 2020 and 2045 within their service area as calculated in their UWMP. It was determined that future growth as a result of buildout of the General Plan would not result in the relocation or construction of new or expanded water facilities.

CCWD states in the 2020 UWMP that they have sufficient supplies to meet water demands as both a wholesale and retail water provider for normal, single dry, and multiple dry years through 2045. The EBMUD 2020 UWMP shows that water supplies will exceed the demand through 2050 for both normal and single dry years. However, in the third year of a drought, the demand would exceed the supply. Under these conditions, various measures would be implemented to ensure that all of EBMUD's customers have a reliable water supply.

Furthermore, the prior FEIR determined that future developments would be required to abide by Contra Costa County Ordinance Code Chapter 82-26 that requires the installment and proper maintenance of water efficient landscaping following the MWELO. Additionally, projects would be subject to General Plan policies including Policy LU-P5.1 (only allowing development where services can be provided), Policies and Actions LU-P6.2, PFS-A1.3, PFS-P2.3, PFS-P3.1, and PFS-P4.5 (regarding collaborating with applicable stakeholders and service providers to ensure proper planning and services are available while addressing existing regional issues where actions could impact surrounding areas).

The estimated population increase would be lower than those projected in the EBMUD and CCWD UWMPs, and buildout under the General Plan would be required to abide by local laws and regulations and General Plan policies. In addition, other cities and water purveyors within the County have 2020 UWMPs and water master plans that describe the upgrades and expansions of their water distribution and treatment systems to address future increases in population and climate change impacts. Each UWMP also contains a water shortage contingency plan to address potential shortages in future water supplies and implement demand reduction strategies. As such, the prior FEIR concluded that there would be less than significant impacts with respect to the need for new and/or expanded water facilities.

Wastewater

The prior FEIR summarized the estimated increase in wastewater generation from the implementation of the 2045 General Plan within unincorporated Conta Costa County. The prior FEIR found that future developments would generate approximately 3.31 million gallons per day (mgd) including nearly 1.4 mgd from single-family residential projects. As such, the prior FEIR acknowledged that increased demand for wastewater services from future development could result in the need for the relocation or construction of new or expanded wastewater facilities. This could include, for example, development of recycled water infrastructure, and limited decentralized treatment systems, all subject to future project-level CEQA review. However, the 3.31 mgd increase in generated wastewater would be distributed throughout the County and treated by different wastewater facilities. Moreover, General Plan Policy LU-P5.1 states that new development should be focused in areas where infrastructure and services, such as sewer collection and wastewater

treatment, can be provided. As such, the 3.31 mgd increase would be adequately accommodated by the combined total capacity of 99.7 mgd across the County.

Furthermore, many of the wastewater collection providers across the County, including EBMUD and Central San, have CIPs that aim to replace and improve existing collection systems and wastewater facilities. The prior FEIR found that future development would be required to follow applicable State and local laws and regulations, such as, among others, CALGreen and the CAP for water reduction. In addition, the prior FEIR highlighted a number of General Plan policies such as COS-P7.2, COS-P7.9, and PFS -P2.3 which support wastewater reclamation and reuse as well as maintenance of wastewater facilities. Finally, the prior FEIR notes that future development would be required to adhere to all applicable efficiency standards in the Building Code/CALGreen Code, which would help ensure conservation and efficiency in this regard to further reduce demand. Moreover, developers must pay appropriate fees to the Central Sanitary District prior to receiving a building permit. Adherence to the County Ordinance Code requirements, continued water conservation efforts, and implementation of the proposed General Plan policies and actions would reduce wastewater generation rates over time and therefore impacts associated with the sewer collection and wastewater treatment systems would be less than significant.

Stormwater

The prior FEIR acknowledges that future development from General Plan implementation would result in an increase in impervious surfaces that, in turn, would increase surface runoff that could exceed the existing stormwater drainage system capacity and services, and result in the relocation or construction of new or expanded stormwater drainage facilities. However, all future development that disturbs more than one acre of land would be required to obtain a Construction General Permit mandated by the NPDES and would be required to prepare a SWPPP and implement site-specific BMPs. Future development projects that replace 5,000 square feet of impervious surfaces would also be required to incorporate design source control stormwater treatment and runoff infrastructure under review by the County. Furthermore, municipalities in the County along with the FC District contain various plans, CIPs, and drainage area maps that address expansion needs if necessary, and future developments would be subject to the Contra Costa County Drainage Area Fee Ordinance that requires payment of Drainage Area fees for any stormwater drainage improvements needed within the applicable drainage area to compensate for the increased runoff.

With the implementation of these provisions for future development, there would not be significant increases in stormwater runoff that would exceed the existing and planned future capacity of the storm drain infrastructure beyond what is already accounted for in the CIPs of the municipalities within the County and the FC District. The construction of new stormwater facilities through the CIP and storm drain impact fees, implementation of BMPs and on-site stormwater control measures, and preparation of the required documents and review by the County would serve to minimize any potential impacts associated with stormwater.

The 2045 General Plan contains policies and actions that consider impacts to storm drain infrastructure and would minimize potential adverse impacts on stormwater discharge. Compliance

with and implementation of these proposed General Plan policies and actions that ensure adequate infrastructure, combined with the regulatory provisions in the MS4 Permit that limit runoff from new development, would further ensure that the implementation of the proposed General Plan would not result in significant increases in runoff and would therefore not contribute to the construction of new storm drain facilities or expansion of existing facilities that would cause significant environmental impacts. Therefore, impacts with respect to stormwater infrastructure would be less than significant.

Electricity and Telecommunications

The prior FEIR addresses impacts associated with electricity and natural gas infrastructure within General Plan FEIR Section 5.6, Energy. For the purposes of this analysis, a brief summary is included below.

The prior FEIR acknowledged that there are multiple telecommunication providers in Contra Costa County that can provide adequate services for future developments. Additionally, the prior FEIR found that implementation of the General Plan would accommodate growth that would require new or expanded energy facilities. However, these facilities would be reviewed by the California Public Utilities Commission, PG&E, and other stakeholders to identify consistency with local, State, and federal regulatory compliance, as well as addressing potential environmental effects. In addition, Chapter 96-10 of the Contra Costa County Ordinance Code and General Plan Policy PFS-P1.4 require all new or extended electric and telecommunication lines within residential subdivisions or the public right-of-way to be placed underground to prevent operational and environmental impacts to the surrounding area. Therefore, the prior FEIR contains local regulations and General Plan policies that would ensure that the relocation or construction of new or expanded electricity and telecommunication facilities would not result in any significant environmental impacts, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

Water

The project site is infill in nature, near existing infrastructure, and is within the ULL and CCWD's existing service area. Therefore, water services for the proposed project would be provided by the CCWD which provides wholesale and retail treated and untreated water supplies across 140,000 acres within central and northeastern Contra Costa County. The proposed project would connect to already existing water lines within North Gate Road through installation of six-inch internal water lines along the proposed project roadway from the southeast to the northwest that would connect to each single-family residential unit. The CCWD UWMP reports daily water use in its service area as 187 gallons per capita. With an average household size of 2.84 in unincorporated County areas, the proposed project is expected to add about 54 residents, increasing demand by roughly 10.9 acre-feet per year (AFY). This represents only approximately 0.001 percent of CCWD's projected near-term supply of 203,300 AFY (105 mgd).

While CCWD's supply meets normal and single dry year demands through 2045, multiple dry years could cause shortfalls as detailed in CCWD's UWMP; however, the CCWD has shortage response

measures and a Demand Management Program (DMP), that would be implemented, as needed, to help ensure adequate water supply.

Consistent with the analysis in the prior FEIR, the proposed project would be subject to all applicable laws, regulations and policies governing water conservation and installation of sufficient infrastructure to serve the proposed project pursuant to applicable standards. For example, the proposed project would be required to comply with Chapter 82-26 of the Contra Costa County Ordinance Code where construction projects greater than 500 square feet are required to submit a landscape application to the Department of Conservation and Development outlining a landscape and irrigation design plan and water efficient landscape worksheet that would ensure the proposed project increases water efficiency and does not overexploit water supply from existing CCWD facilities. General Plan Policy LU-P5.1 only allows development in areas where water services can be provided, as is the case here. Since the proposed project falls within the CCWD existing service area, would only represent a nominal increase in water demand, and would be subject to the CCWD shortage response actions and demand management measures during multiple dry years and would be subject to applicable County, Building Code, and CALGreen Code provisions and General Plan policies regarding water use, sufficient water would be available to serve the proposed project and new or expanded supply, treatment and/or conveyance facilities would not be triggered. While there would be an extension of existing infrastructure to connect the proposed project, these impacts are considered throughout this document in the relevant environmental topic areas. The proposed on-site utility improvements and connections to existing infrastructure in the project area have been considered as part of the proposed project, and evaluated throughout sections 4.1 – 4.20 of this document. Therefore, the proposed project's impacts on water facilities would be less than significant, consistent with the impact conclusions in the prior FEIR, and the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

Wastewater

The project site is infill in nature, near existing infrastructure, and is within the ULL and Central San's existing service area. Therefore, wastewater collection and treatment services would be provided by Central San who offers sewage collection and wastewater treatment over a 145 square mile area from San Ramon to the south to the Suisun Bay to the north.[69] The proposed project would connect to existing sanitary sewer lines on Walker Creek Court, collecting wastewater into new eight-inch lines beneath the project roadway and conveying it west. Wastewater would funnel through Central San's existing 1,500 miles of sewer lines before arriving at the Central San Treatment Plant in Martinez to

[69] Central Contra Costa Sanitary District (Central San). n.d. District Boundary/Divisions. Website: https://www.centralsan.org/district-boundarydivisions. Accessed October 25, 2025.

be treated at secondary and tertiary levels. The Central San Treatment Plant treats an average of 34 mgd of wastewater with a treatment capacity of 54 mgd and 240 mgd of wet weather flow.[70]

As previously discussed above, the proposed project would result in an approximate water demand of 10.9 AFY. Excluding additional factors such as the percolation of wet weather flow into Central San's sanitary sewer system or water utilized for irrigation, the proposed project would generate approximately 3,705 gpd, or roughly 0.003 mgd of wastewater.[71] This amount of wastewater would represent only approximately 0.002 percent of the Central San Treatment Plant's total capacity and only approximately 0.005 percent of the treatment plant's remaining capacity. Furthermore, Central San charges new construction projects that require connections or generates added burdens a capacity fee to compensate for the maintenance of existing or construction of new or expanded facilities, which would be imposed on the proposed project in accordance with applicable laws and regulations. Additionally, Central San provided a letter stating that the proposed project would not produce an unmanageable added capacity on the wastewater system.

Consistent with the analysis in the prior FEIR, the proposed project would be subject to all applicable laws, regulations and policies governing conservation and installation of sufficient infrastructure to serve the proposed project pursuant to applicable standards. For example, the proposed project would be subject to new infrastructure requirements mandated by CALGreen that are intended to conserve water, along with General Plan Policies LU-P6.2, PFS-A1.3, PFS-P2.3, and PFS-P3.1 through coordination with Central San and other surrounding stakeholders to ensure that the proposed project would not degrade the existing sanitary sewer system. Since the proposed project would only result in a nominal increase to the Central San Treatment Plant's remaining capacity, would pay capacity fees, and abide by CALGreen development standards and General Plan policies. While there would be an extension of existing infrastructure to connect the proposed project, these impacts are considered throughout this document in the relevant environmental topic areas.

Therefore, given the foregoing, the proposed project would have a less than significant impact on wastewater facilities, consistent with the impact conclusions in the prior FEIR, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

Stormwater

The project site is infill in nature, near existing infrastructure, and is within the ULL and would be served by the County's existing stormwater infrastructure.

[70] Central Contra Costa Sanitary District (Central San). n.d. Treatment Plant. Website: https://www.centralsan.org/treatment-plant. Accessed October 25, 2025.

[71] Based on Contra Costa County 2045 General Plan wastewater generation rate of 195 gallons per day per dwelling unit for a single-family residential development. 195 x 19 = 3,705 GPD. 3,705 / 1,000,000 = 0.003 MGD.

The proposed project would construct 19 single-family residential dwelling units along with associated roadways, sidewalks, and driveways that would result in approximately 114,701 square feet of net new impervious surfaces across the project site.

Consistent with the analysis in the prior FEIR, the proposed project would be subject to all applicable laws, regulations and policies governing conservation and installation of sufficient infrastructure to serve the proposed project pursuant to applicable standards. As the proposed project would disturb more than one acre of land during construction and introduce over 5,000 square feet of impervious surfaces, the proposed project would be subject to a Construction General Permit and Section C.3 of RWQCB Municipal Regional Stormwater NPDES Permit (Order No. R2-2022-0018). Under a Construction General Permit, the proposed project would prepare a SWPPP and implement site-specific source control BMPs including, but not limited to slope drains, streambank stabilization, silt fences, and fiber rolls to reduce construction induced water erosion.

The existing project site drains toward the north at an approximately 10 percent gradient. An existing creek runs roughly along the northern property line and collects stormwater runoff from the subject and neighboring properties. The existing impervious area of the project site is approximately 6,909 square feet and the existing pervious area is approximately 118,374 square feet. During operation, the proposed project would consist of approximately 7,525 square feet of bioretention areas, about 5,634 square feet of underground stormwater vault space, and approximately 293,272 square feet of landscaping to accommodate the net increase in impervious surfaces. Stormwater from the introduced impervious surfaces would be collected through stormwater manholes, field inlets, and catch basins and conveyed into bioretention basins. The proposed bioretention basins would detain and treat stormwater runoff prior to release either into one of the two stormwater vaults or from culverts on the west side of the project site where stormwater runoff would flow down slope toward the Pine Creek Detention Basin managed by the FC District. Treated stormwater detained in the stormwater vaults would be released northeast of the project site through an 18-inch stormwater main into Walker Creek. The proposed bioretention basins and stormwater vaults would detain stormwater and reduce project-induced stormwater runoff similar to previous conditions. Therefore, the existing infrastructure would continue operating as it does under current conditions.

In addition, the proposed project would be required to pay any applicable fees under the Contra Costa County Drainage Area Fee Ordinance prior to the issuance of a building permit. The fees are used to fund the construction of planned stormwater drainage improvements resulting from increase in impervious surfaces within the developments. While there would be an extension of existing infrastructure to connect the proposed project, these impacts are considered throughout this document in the relevant environmental topic areas (see, e.g., Section 4.1 through Section 4.20 of this document).

In summary, since the proposed project would be subject to all applicable laws, regulations and policies, including, among others, NPDES General Permit requirements, would have on-site stormwater facilities, and would pay drainage area fees, the proposed project would have less than significant impacts with respect to new or expanded stormwater drainage facilities, consistent with the

impact conclusions in the prior FEIR. Therefore, the proposed project would not result in impacts pertaining to stormwater drainage facilities and the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

Electricity and Telecommunications

The project site is infill in nature, near existing infrastructure, and is within the ULL and would be served by existing dry utility infrastructure.

Electrical services for the project site would be provided by existing PG&E and telecommunication services could be provided by a range of providers that exist in the project. The proposed project would result in the construction of new electrical and telecommunication facilities to connect to existing facilities to serve the single-family residential units; however, these new electrical and telecommunication lines would be installed in compliance with Chapter 96-10 of the Contra Costa County Ordinance Code that requires electric and telecommunication lines within new subdivisions to be installed underground. Furthermore, General Plan Policy PFS-P1.4 encourages the undergrounding of new utilities whenever possible within the right-of-way to minimize visual, operational, and environmental impacts, and Action PFS-A1.3 requires development applications to request comments from utility service providers.

While there would be an extension of existing infrastructure to connect the proposed project, these impacts are considered throughout this document in the relevant environmental topic areas (see, e.g., Section 4.1 through 4.20 of this document). As the proposed project would be required to install underground utilities and coordinate with providers via applicable local regulations and General Plan policies, the construction of new electrical and telecommunication facilities from the proposed project would not result in any significant environmental impacts, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would have a less than significant impact and would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Water Supply

Would the project: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Summary of Analysis in 2045 General Plan FEIR

As previously discussed under Impact 4.18(a), the EBMUD and CCWD population projections for the General Plan's planning period are higher than the General Plan population estimates. Although the 2045 General Plan estimated that future development from the implementation of the General Plan would result in an approximately 5,117.5 AFY total increase in water demand throughout the County, total surplus for the multiple water purveyors combined is 22,218 AFY which is more than enough

water supply to meet the projected 5,117.5 AFY demand General Plan buildout demand increase. Furthermore, water purveyors would implement their water shortage contingency plans under long-term drought conditions that would mandate water conservation measures on developments throughout its service area.

Future development projects would also be subject to a variety of State, local laws and regulations, and General Plan policies and actions on water conservation such as, among others, California Water Code Section 10912 that requires certain development projects to prepare a Water Supply Assessment (WSA), and Chapter 82-26 of the Contra Costa County Ordinance Code, Policies COS-P7.1, COS-P7.7, COS-P7.8 of the General Plan, and DR-1 in the CAP on installing infrastructure that supports water conservation such as drought-tolerant landscaping and water efficient devices. As population projections within the General Plan are below those estimated in the UWMPs for water purveyors, all water purveyors have enough water supply to meet water demand. Future development would be required to abide by water shortage contingency plans during long-term droughts, and would be subject to local regulations and General Plan policies and actions on installing water conservation measures. Therefore, the prior FEIR concluded that future development from the implementation of the General Plan would have sufficient water supplies to serve future development projects, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

The project site is infill in nature, near existing infrastructure, and is within the ULL and CCWD's existing service area. As discussed in subsection (a) above, the proposed project would increase demand for water on the project site. The CCWD is the applicable potable water service purveyor for the project site and vicinity. Assuming a proposed project population of 54 new residents, the proposed project would result in a water usage of approximately 9,724 gallons per capita per day that equates to roughly 10.9 AFY. This estimated water usage represents only approximately 0.001 percent of the CCWD total water supply.

As discussed in Impact 4.18(a) above, the proposed project would be subject to all applicable laws and regulations, including, among others, under Chapter 82-26 of the Contra Costa County Ordinance Code, and General Plan Policies COS-P7.1, COS-P7.7, and COS-P7.8 that mandate the implementation of water conservation features and actions. Furthermore, in the event of drought conditions, the proposed project would be required to implement the CCWD's shortage response actions and DMP, such as offering efficient landscaping and irrigation rebates and temporary water regulations. Since the proposed project would only represent a nominal increase toward the CCWD's water supply, would be subject to all applicable laws and regulations and General Plan policies, and would abide by the CCWD's shortage response actions and DMP during long-term drought conditions, the CCWD would have sufficient water supplies to serve the proposed project during normal, dry, and multiple dry years. Thus, the proposed project would have a less than significant impact pertaining to water supply, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that

was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Wastewater Treatment Capacity

Would the project: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Summary of Analysis in 2045 General Plan FEIR

As discussed in Section 4.18(a) wastewater, the prior FEIR summarized the estimated increase in wastewater generation from the implementation of the 2045 General Plan within unincorporated Conta Costa County. The total increase would account for a 0.03 percent increase of the combined total capacity of 99.7 mgd across the County. Additionally, the prior FEIR determined that future development would be subject to State and local laws, rules and regulations that would require, among other things, payment of sewer connection and wastewater collection fees that are utilized to upgrade wastewater facilities over time. This would also include incorporating infrastructure that adheres to the applicable requirements set forth in Title 24, Part 11, and providing strategies for water reduction as required under applicable provisions of CALGreen and the CAP. Additionally, future development would be subject to General Plan Policies LU-P6.2, PFS-A1.3, PFS-P2.3, and PFS-P3.1, as described in 4.18 (a) above. Therefore, with the continuation of provider CIPs, abidance to CALGreen and CAP infrastructure regulations, and General Plan policies, the prior FEIR concluded that the General Plan would not result in insufficient capacity determined by the wastewater treatment provider to serve future development, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed under Impact 4.18(a), the proposed project would have a water demand of approximately 9,724 gcpd that is equivalent to roughly 0.01 mgd, or 10.9 AFY. The amount of water demand equates to approximately 3,705 gcpd, or roughly 0.03 mgd of wastewater generation, excluding wet weather flow and irrigation. The amount of wastewater generated from the proposed project would account for only approximately 0.002 percent of the Central San Treatment Plant's 54 mgd of total capacity and only approximately 0.005 percent of the treatment plant's 20 mgd of remaining capacity. As such, there is sufficient wastewater treatment capacity to serve the proposed project in addition to Central San's other existing commitments.[72]

In addition, the proposed project would be required to pay the applicable capacity fee to compensate for the increased use of the existing wastewater facilities, along with constructing of additional facilities if needed. Lastly, the proposed project would be subject to applicable development standards from CALGreen that provides updated and efficient water reduction infrastructure, along with General Plan Policies LU-P6.2, PFS-A1.3, PFS-P2.3, and PFS-P3.1 on coordinating with Central

[72] Central Contra Costa Sanitary District. Personal Communication. August 28, 2024.

San and other stakeholders to ensure existing services remain sufficient. Since the proposed project would only result in a nominal increase to Central San Treatment Plant's remaining capacity, would pay a capacity fee required by Central San, would be construction in compliance with CALGreen and all other applicable standards and requirements, and would coordinate with Central San and other stakeholders to the extent required pursuant to applicable laws and regulations, the proposed project would not result in the wastewater treatment provider determining that it has inadequate capacity to serve the proposed project in addition to Central San's other existing commitments. Thus, the proposed project would have a less than significant impact pertaining to wastewater treatment capacity, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Solid Waste Reduction Goals Consistency

Would the project: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR explained that solid waste generated from future development pursued under the General Plan would be transported to six transfer stations for sorting and processing prior to disposal at the Keller Canyon Landfill. The Keller Canyon Landfill has a maximum permitted throughput of 3,500 tons per day and disposed of an average of approximately 2,591 tons per day in 2022. The 2045 General Plan acknowledged that future development from the implementation of the General Plan could generate solid waste in excess of local infrastructure or regulatory standards. However, the 2045 General Plan calculated that future developments would account for an additional 127 tons of solid waste generated per day, or 46,355 tons annually representing approximately 14 percent of the Keller Canyon Landfill's current capacity. Furthermore, future developments would be subject to State and local laws and regulations during construction such as, among others, Chapter 74-4.006 of the Contra Costa County Ordinance Code that requires a minimum 65 percent of construction and demolition debris to be diverted from the landfill through recycling.

All future development would also be required to abide by relevant General Plan and CAP policies such as PFS-P7.1 that mandates coordination with applicable service providers, PFS-P7.5 and Strategy NW-1 that requires new developments to provide adequate space for disposal, and Policies PFS-P7.2, PFS-P7.4, and PFS-P7.16 that requires the County to ensure compliance with the Integrated Waste Management Act and that landfills and transfer stations have adequate capacity to serve future developments. As the Keller Canyon Landfill would have adequate capacity to serve future development pursued under the General Plan, and all such future developments would be required to comply with State and local laws and regulations related to recycling and otherwise, the prior FEIR concluded that future development from the implementation of the General Plan would not

generate solid waste in excess of regulatory standards or local infrastructure, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, the proposed project would generate construction and demolition debris during the construction phase of the proposed project such as concrete, drywall, wood, and metals from the demolition of the two existing structures on the project site, and trim scraps of construction materials from wood, masonry, and roofing materials from the construction of the single-family residential units. Solid waste would be transported to the Contra Costa Transfer and Recovery Station in Martinez, California or the Recycling Center and Transfer Station in Pittsburg, California for recycling and diversion from local landfills. Any non-recyclable waste would be transferred to either the Keller Canyon Landfill in Pittsburg, California, Acme Landfill in Martinez, California, or the Contra Costa Transfer and Recovery Station. In addition, the Recycling Center & Transfer Station (RCTS) in Pittsburg, California serves the County with all-material recycling drop off services for a fee. As of 2025, the Contra Costa Transfer and Recovery Station has a maximum permitted throughput of 1,900 tons per day;[73] the RCTS has a maximum permitted throughput of 1,750 tons per day (SWIS 07-AC-0043), and the Keller Canyon Landfill has a maximum permitted throughput of 3,500 tons per day and a remaining capacity of 63,408,410 cubic yards;[74] The amount of construction and demolition debris that would be transferred and disposed of gradually throughout the construction of the proposed project represents only a small portion of Contra Costa Transfer and Recovery Station's daily maximum permitted throughput of 1,900 tons per day, RCTS' daily maximum permitted throughput of 1,750 tons per day, and a nominal increase of the remaining capacity for the Keller Canyon Landfill.

Furthermore, the proposed project would be subject to all other applicable laws, regulations and policies, including, among others, subject Section 4.408.2 of the CALGreen Building Standards Code that requires the applicant to submit a Construction Waste Management Plan prior to obtaining a building permit. The Construction Waste Management Plan would identify construction and demolition debris to be diverted from disposal, strategies to reduce the amount of debris generated, and would estimate the total amount of debris generated to ensure that the proposed project would meet the County's 65 percent waste diversion requirement. As such, the Contra Costa Transfer and Recovery Station, RCTS and the Keller Canyon Landfill would have enough capacity to accommodate the construction of the proposed project.

During operation, Republic Services would provide solid waste and recycling services to the project site on a weekly basis. Solid waste would be hauled to the RCTS for sorting and processing prior to disposal at the Keller Canyon Landfill. The proposed project would construct 19 single-family

[73] California Department of Resources Recycling and Recovery (CalRecycle). 2025. SWIS Facility/Site Activity Details, Contra Costa TS and Recovery (07-AA-0027). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4402?siteID=223. Accessed October 25, 2025.

[74] California Department of Resources Recycling and Recovery (CalRecycle). 2025. SWIS Facility/Site Activity Details, Keller Canyon Landfill (07-AA-0032). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4407?siteID=228. Accessed October 25, 2025.

residential units on a mostly undeveloped project site. As such, the proposed project would increase the amount of solid waste generated compared to existing conditions. However, operation of the proposed project would generate only approximately 0.7 tons, or 0.5 cubic yards of solid waste a week.[68] As such, the RCTS and Keller Canyon Landfill would have sufficient capacity to accommodate its nominal demand and more than enough serve the proposed project.

Operation of the proposed project would be required to comply with all applicable standards and requirements, including, among others, Chapter 418-6 of the Contra Costa County Ordinance Code that mandates single-family residential units to subscribe to a collector and have mandatory containers to hold accumulated solid waste that can be collected and disposed of by the collector on a weekly basis. The proposed project would also comply with General Plan Policy PFS-P7.5 that requires new residential projects to provide space for separate trash, recycling, and organics collection. As the RCTS and the Keller Canyon Landfill have adequate capacity to serve the proposed project, and the proposed project would abide all applicable laws and regulations, including the Contra Costa County Ordinance Code and General Plan policies that would ensure the proposed project would be consistent with the County's 65 percent waste diversion requirement, and waste disposal regulations, the proposed project would not generate excess solid waste above regulatory standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Thus, the proposed project would have a less than significant impact with respect to solid waste reduction consistency, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

e) Solid Waste Regulations Consistency

Would the project: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR determined that 2024 disposal rates in the County for residents and employees to be 2.6 pounds per person per day (ppd) and 12.3 ppd respectively which is well below the California Department of Resources Recycling and Recovery (CalRecycle) target disposal rate of 3.9 ppd and 20.1 ppd for the County and is consistent with the Integrated Waste Management Act. Furthermore, future development projects would be subject to CALGreen diversion requirements, as previously discussed. Lastly, General Plan Policy PFS-P7.4 requires the County to ensure that new development complies with the Integrated Waste Management Act. As the County is below the CalRecycle target disposal rate, future developments would be subject to CALGreen requirements, and the County would ensure that future developments comply with the Integrated Waste Management Act, the prior FEIR concluded that future developments from the implementation of the General Plan would comply with all federal, State, and local laws, rules and regulations pertaining to solid waste, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

As previously discussed above, the proposed project would be subject to all applicable standards and requirements as well as General Plan policies, including among others, CALGreen Construction and Demolition Recycling requirements and would be required to submit a Construction Waste Management Plan prior to the issuance of a building permit as required under Section 4.408.2 of the Contra Costa County Ordinance Code. Abidance to Chapter 418-6 of the Contra Costa County Ordinance Code and General Plan Policy PFS-P7.5 would ensure that each residential unit has trash receptables for recycling, composting, and landfill that would be collected by a certified collector under a franchise agreement maintained by the County on a weekly basis. With the adherence to all applicable standards and requirements, including Section 4.408.2 and Chapter 418-6 of the Contra Costa County Ordinance Code, along with Policy PFS-P7.5, the proposed project would comply with all applicable federal, State and local management reduction statutes and regulations related to solid waste, including, without limitation, CALGreen Construction and Demolition Recycling requirements and the Integrated Waste Management Act.

Thus, the proposed project would not conflict with federal, State, and local solid waste regulations and result in less than significant impacts in this regard, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Utilities and Service Systems, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.19 Wildfire *If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:*					
a) If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	No	No
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Significant and unavoidable impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
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?	Less than significant impact	No	No	No	No
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less than significant impact	No	No	No	No

a) Emergency Response/Evacuation Plan Consistency

Would the project: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, substantially impair an adopted emergency response plan or emergency evacuation plan?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR states that the implementation of the 2045 General Plan, any potential development would be required to integrate the countywide Contra Costa County EOP as necessary to continue its facilitation in evacuation for the people in wildfire-prone areas. Furthermore, development located within the State Responsibility Area (SRA), WUI, or VHFHSZ would be required to comply with the SRA and VHFHSZ Fire Safe Regulations, CBC, the California Fire Code, and the Contra Costa

County Ordinance Code (Ordinance Code). The Ordinance Code has maximum requirements for lengths of single access roads, minimum widths of roadways, and vegetation fuel management around roadways, with future development reviewed and approved by the applicable fire protection district prior to project approval. Additionally, there are several 2045 General Plan policies and actions to promote fire safety, including Policy HS-P7.4, which would require projects in a High or VHFHSZ to implement a site-specific fire protection plan. Given the foregoing, the prior FEIR concluded that the implementation of the 2045 General Plan would result in a less than significant impact to emergency response or evacuation plans.

Proposed Project Analysis and Conclusion

The project site is infill in nature and relatively flat, located in a low-density area near existing transportation infrastructure, and is mapped as being located in an LRA in a High FHSZ by CAL FIRE's Fire Hazard Severity Map[69]. The closest VHFHSZ is located in the City of Concord, approximately 2.18 miles away from the project site. Accordingly, because the project site is not located in or near a VHFHSZ or SRA, the proposed project would have no impact in this regard.

However, for informational purposes, the following is noted. Consistent with the analysis in the prior FEIR, the proposed project would be required to be comply with all applicable standards, including those set forth in the SRA and VHFHSZ Fire Safe Regulations, CBC, California Residential Code, the California Fire Code, and the Ordinance Code. Furthermore, since the proposed project is located within a High FHSZ, it would be subject to applicable General Plan policies that relate to fire protection, such as, for example, 2045 General Plan Policy HS-P7.4, which requires projects in a High FHSZ or VHFHSZ to implement a site-specific fire protection plan. For example, pursuant to applicable standards and requirements, the proposed project would be required to be designed to incorporate sufficient defensible space, fire-resistant landscaping, and fire-hardened and fire-resistant structures and to otherwise be compliant with CBC fire safe design standards (Chapter 7A), including adequate internal access and fire suppression facilities, as well as applicable provisions under the California Residential Code Section R337, "Materials and Construction Methods for Exterior Wildfire Exposure" along with applicable provisions of the California Fire Code. Consistent therewith, the proposed project would need to be consistent with Policy HS-P4.2, which requires below-market rate housing constructed within a High FHSZ to be hardened or to make use of nature-based solutions to ensure it remains habitable to the greatest extent possible. In addition, pursuant to Policy HS-P7.4, the proposed project would be required to complete a site-specific fire protection plan. The fire protection plan shall include measures for fire-resistant construction materials and modifying fuel loading, as well as a plan to maintain that protection over time. Further, wildfire exposure is minimized through the development clustering reflected in the site plan, which includes substantial setbacks from open space and riparian areas.

The proposed project is located within a WUI area, where fires are more likely to damage or destroy buildings. As discussed at length in the prior FEIR, certain areas within the County have few access roads, which poses challenges for evacuation and for emergency responders to fight fires and help residents in these areas. However, the area where the proposed project would be located has clear access for emergency vehicles, is infill in nature and within the ULL. Moreover, the CCCFPD provided

a letter stating that the proposed project plans show adequate emergency access and complies with CCCFPD requirements.

The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

b) Expose Project Occupants to Pollutant Concentrations from Wildfire

Would the project: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, 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?

Summary of Analysis in Previous 2045 General Plan FEIR

The prior FEIR found that evacuation constraints are a critical concern in VHFHSZs and WUI areas. Implementation of the 2045 General Plan would not change or affect wind patterns in the County, but wildfire hazards could be spread by prevailing or Diablo Winds. Numerous plans, policies, regulations, and procedures are in place to help reduce wildfire risks, including those on a statewide and regional scale, such as the 2021 California Wildfire and Forest Resilience Action Plan and the Contra Costa County Community Wildfire Protection Plan (CWPP). However, future development proposed under the General Plan in wildfire-prone areas could exacerbate wildfire risks by adding more residents and structures to wildfire-prone areas, thereby exposing people in the County and surrounding jurisdictions to pollutant concentrations from a wildfire. As such, impacts would be significant and unavoidable.

Slope

Under the prior FEIR, all future residential development within the unincorporated County would be required to comply with the CBC, SRA and VHFHSZ Fire Safe Regulations, and Contra Costa County Ordinance Code grading requirements, which include standards to minimize the ignition and spread of wildfire due to slopes. Furthermore, the General Plan Health Safety Element includes several policies and actions that would address potentially significant impacts with regard to development within FHSZs, including Policy HS-P7.1, which would discourage residential subdivisions in High FHSZs unless adequate fire protection services are provided. New residential subdivisions within High FHSZs would be required to implement fire protection plans under Policy HS-P7.4. Despite this, due to vegetation and slope of the Contra Costa County landscape, wildfires and associated smoke could potentially travel up a slope and exacerbate wildfire risks. Therefore, even with existing and proposed laws and regulations, future development under the 2045 General Plan could expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be significant and unavoidable.

Vegetation

Vegetation throughout Contra Costa County has the potential to exacerbate wildfire risks during the summer and fall months. During these periods, vegetation can dry out and therefore become fuel for a wildfire. The Contra Costa County LHMP and CWPP contain several vegetation management and fuel reduction projects to reduce the uncontrolled spread of wildfire due to vegetation. Additionally, all potential future development within wildfire-prone areas in the General Plan area would be required to comply with SRA and VHFHSZ Fire Safe Regulations, Public Resources Code Section 4291, and the California Fire Code. However, even with applicable regulatory requirements, potential future development under the 2045 General Plan could expose people to the uncontrolled spread of wildfire or pollutant concentrations due to other factors, such as vegetation, leading to potentially significant impacts.

The prior FEIR found that, despite numerous policies providing opportunities to reduce wildfire hazards to the extent feasible, the only way to fully avoid the wildfire impacts to a less than significant level from implementation of the 2045 General Plan is to prohibit new development in High FHSZ and VHFHSZs and the WUI. Doing so would constitute a “taking” of property based on US Supreme Court interpretation and conflict with the County’s other responsibilities regarding housing promotion. The 2045 General Plan therefore rejects this approach, meaning there are no feasible mitigation measures. Because of potential unknown impacts from future development under the 2045 General Plan, impacts at the programmatic level would remain significant and unavoidable. This conclusion does not preclude a finding of less than significant impacts at the project level.

Proposed Project Analysis and Conclusion

Consistent with the analysis in the prior FEIR, because the project site is located in a High FHSZ within an LRA, and is located adjacent to a SRA (but not in or near a VHFHSZ), the proposed project would be required to implement fire risk minimization measures via its fire protection plan to ensure impacts are less than significant. While the proposed project is directly adjacent to a SRA, the closest VHFHSZ is located in the City of Concord, approximately 2.18 miles away from the project site. Additionally, the project site is located within a WUI area, which means that it would need to incorporate heightened building standards via the Building Code, as described in detail above. However, the prior FEIR includes Policies HS-P4.3, HS-P4.6, HS-P7.1, HS-P7.2, HS-P7.3, HS-P7.4, andHS-P7.5 to reduce wildfire impacts to less than significant on a project level.

For example, of relevance here, under Policies HS-P7.2 and HS-P7.3, any new developments within a High or Very High FHSZ are required to incorporate fire safe design features and require the preparation of a traffic control plan. Under Policy HS-P7.4, the proposed project would be required to complete a site-specific fire protection plan through work with the appropriate fire protection district to review and revise the fire protection plans. Policy HS-P7.5 requires the County to work with property owners in High or Very High FHSZ to establish and maintain fire breaks and defensible space, vegetation clearance, emergency access roads, water supply, signage, and freighting infrastructure. The fire protection plan shall include measures for fire-resistant construction materials and modifying fuel loading, as well as a plan to maintain that protection over time. With implementation of the

required fire protection plan and compliance with all other applicable standards and requirements, impacts would be less than significant. The proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional review is required.

Slopes

The project site is generally flat but the southeastern portion slopes slightly downward to the north toward Walker Creek with an elevation of approximately 250 feet AMSL. The maximum elevation of the project site is approximately 313 feet AMSL. According to the Natural Slope Density Map by DK Engineering, the average slope measurement of the project site is approximately 11.90 percent with the maximum slope being +26.00 percent and minimum slope being 0 percent.[75] As such, the numerous 2045 General Plan policies pertaining to maintaining slope stability, etc. are not relevant here. Given the relatively flat nature of the project site, the proposed project would not exacerbate wildfire risks, and thus would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, this is a less than significant impact.

Vegetation

The project site includes existing vegetation such as Non-native Grassland with native and herbaceous species intermixed. Other vegetation types on the project site include Coast Live Oak Woodland and Forest to the north within a riparian woodland along Walker Canyon Creek that traverses in an east to west direction, Planted Woodland comprised of remnant orchard species, and Developed/Ruderal habitat around the southern portion of the project site.[76] The proposed project would be required to submit a final landscaping plan to the County for review and approval prior to the issuance and review of any building permits. This would ensure that the landscaping plan complies with all applicable County requirements, including the MWELO Bioretention areas which would be located throughout the project site and covered with low growing shrubs and herbaceous vegetation, as well as consistency with the fire protection plan and other applicable requirements regarding fuel/vegetation management. Additionally, a range of shrubs, groundcovers, and new trees would be planted in addition to the approximately 18 trees being preserved on-site. The project site in its current condition contains mostly Non-native Grassland and is largely undeveloped, and the implementation of risk management measures such as vegetation management, fuel loading modifications, and fire-hardened and ignition-resistant buildings would reduce wildfire risk on the project site and vicinity as compared to existing conditions. Moreover, the proposed project would implement all applicable standards and requirements to address vegetation management and fuel load, which would further ensure that it does not exacerbate wildfire risks, and thus not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

[75] DK Engineering. Civil Plans. Natural Slope Density Map. Nov 27, 2024.

[76] Mosaic Associates and Coast Range Biological, LLC. 2024. Biological Resources Report for the Subdivision and Development of 1125 Northgate Road Project, Walnut Creek, California.

Conclusion

Overall, the proposed project is infill in nature, within the ULL, located on relatively flat topography, has adequate emergency access, and would adhere to all applicable rules, laws and regulations and would be consistent with all applicable General Plan provisions. The proposed project would be required to implement fire risk minimization measures to ensure impacts are less than significant. For example, the proposed project, as required under Policy HS-P7.4, would be required to complete a site-specific fire protection plan through work with the appropriate fire protection district to review and revise the fire protection plans. Furthermore, it would implement fire protection measures (e.g., vegetation management, reduction in fuel loads, etc.) and incorporate stringent building hardening and ignition-resistant features, thereby helping to reduce wildfire risk overall.

As such, while the project site is not located within a VHFHSZ, it is directly adjacent to a SRA. However, for the reasons set forth above, impacts related to exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant. The proposed project would also comply with applicable provisions of the County EOP, LHMP, CWPP, CBC, California Residential Code, and other adopted applicable local, regional, and State plans and regulations addressing wildfire prevention. As such, the proposed project would not result in a new or more severe significant adverse impact that was not previously identified in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

Exposure of occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be significant and unavoidable consistent with the determination in the 2025 General Plan FEIR. However, the proposed project would still comply with applicable provisions of the County EOP, LHMP, CWPP, adopted local, regional, and State plans and regulations addressing wildfire prevention. As such, the proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

c) Infrastructure that Exacerbates Fire Risk

Would the project: **If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, 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?**

Summary of Analysis in 2045 General Plan FEIR

Development under the General Plan would result in additional infrastructure, such as roadways, transmission lines, and other utilities to serve new residential development. For example, the installation and operation of new aboveground power transmission lines would create a higher risk of exacerbating wildfire risks compared to other infrastructure. However, the California Public Utilities Commission (CPUC) requires maintenance of vegetation and the preparation of fire prevention plants for aboveground power lines in high fire-threat districts.

Any residential development in the wildfire-prone parts of the unincorporated County pursuing development under the prior FEIR would also be required to comply with building and design standards in the CBC and California Fire Code, which include provisions for fire-resistant building materials, the clearance of debris, and fire safety requirements during demolition and construction activities. Public Resources Code Section 4291 also requires that vegetation around buildings or structures maintains defensible space within 100 feet of a structure and an ember resistant zone within five feet of a structure. Additionally, SRA and VHFHSZ Fire Safe Regulations would prevent structures from being placed within 30 feet of a roadway, reducing the potential for new roadways to exacerbate wildfire risks. These measures, along with policies and actions in the proposed General Plan Health and Safety Element and Public Facilities and Services element would minimize wildfire risks associated with the installation and maintenance of infrastructure. Such infrastructure and maintenance activities would also be required to comply with the adopted State regulations, County Ordinance Code standards, and the proposed 2045 General Plan policies and actions to mitigate the impact of infrastructure on the environment. Therefore, impacts related to the utility infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment would be less than significant.

Proposed Project Analysis and Conclusion

While the project site is not located within a SRA or VHFHSZ, it is directly adjacent to a SRA. The proposed project includes new infrastructure to serve the proposed project such as underground utilities, bioretention basins, stormwater vaults, and an internal roadway system. PG&E would provide electricity and natural gas services to the project site, with various telecommunication services. All new utility lines, including electricity, natural gas, and telecommunications, would be installed beneath the private driveway (access road), thereby reducing fire ignition risk. Proposed roadways would be installed through joint trenching. The proposed project also includes water services provided by the CCWD and would connect to an existing underground water main along North Gate Road, which would provide sufficient fire flow, as determined by the CCCFPD, and meet all other applicable

California Fire Code requirements; fire hydrants on the project site would be installed pursuant to applicable requirements as well and all roadways would meet applicable Fire Code and other standards. The proposed project would develop new stormwater facilities and bioretention basins, both connecting to existing stormwater infrastructure. Planned landscaping and fencing are designed to minimize fire spread pursuant to applicable standards under the CBC, California Residential Code, California Fire Code, and the proposed project's fire protection plan.

The proposed project would require a mainline extension for wastewater provided by Central San and would connect to an existing underground sewer main located on-site. Republic Services, Inc. (Republic Services) would provide both solid waste and recycling services to the proposed project. All utilities would also be required to comply with applicable building and design standards in the CBC and California Fire Code, which include, for example, provisions for fire-resistant building materials, the clearance of debris, and fire safety requirements during demolition and construction activities. Infrastructure and maintenance activities would also be required to comply with the adopted applicable State laws and regulations, County Ordinance Code standards, and consistency with applicable General Plan policies and actions would also concur, which would further help ensure that project infrastructure does not exacerbate wildlife risk or otherwise cause environmental impacts that are not already addressed in the prior FEIR and this CEQA Consistency Checklist. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, and impacts would be less than significant, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR. Accordingly, no additional environmental review is required.

d) Flooding and Landslide Hazards Due To Post-fire Slope Instability/Drainage Changes

Would the project: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, 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?

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR found that unincorporated Contra Costa County includes areas designated by CAL FIRE as VHFHSZs, particularly in interior regions with steep terrain and dense vegetation. These zones are mapped in Figure HS-10 of the General Plan. The WUI areas, where development meets wildland vegetation, are especially vulnerable to post-fire hazards. Wildfires in these zones can destabilize slopes and alter drainage patterns, increasing the risk of downslope flooding, erosion, and landslides. However, the 2045 General Plan identifies these risks and includes policies to mitigate them, such as HS-P7.1, which would require the denial of applications for new residential subdivisions in VHFHSZs, and Policy HS-P7.1 which requires fire safe design standards for new

development in high-risk areas. These plans must address slope conditions, fuel modification, and runoff management to reduce post-fire hazards.

The prior FEIR concluded that new development complying with State and local regulations would not expose people or structures to significant risks, including downslope landslides or downstream flooding due to post-fire hazards. Furthermore, development under the General Plan must also comply with the County EOP, LHMP, and CWPP. All future development, regardless of the location, is required to comply with adopted local, regional, and State plans and regulations addressing wildfire prevention, which would minimize risks of post-fire hazards. As such, compliance with these policies and regulatory requirements would ensure impacts from post-fire instability would be less than significant.

Proposed Project Analysis and Conclusion

While the project site is not located in a SRA or VHFHSZ, it is located in a High FHSZ within an LRA with slopes from approximately 310 feet to 250 feet AMSL, with some areas reaching up to 26 percent slope.[77] The project site also drains toward Walker Creek and the Pine Creek Detention Basin. The proposed project includes a comprehensive stormwater management system with bioretention basins and underground vaults to treat and detain runoff. The project site is designated as Flood Zone X, an area with minimal flood hazard, and is not located in a FEMA-designated flood zone. However, the northwest corner of the project site lies approximately 300 feet away from Zone A land, meaning it is designated as a 1 percent Annual Chance Flood Hazard[78]. The closest Area AE land designated as Regulatory Floodway lies approximately 1 mile northwest of the site. While the project site is not in a VHFHSZ, wildfires can still destabilize slopes and alter drainage patterns, increasing the risk of downslope flooding, erosion, and landslides.

The proposed project would develop new stormwater facilities on the project site, which would be designed and built in accordance with all applicable standards and other requirements, therefore reducing the risk of post-fire flooding or slope instability. Consistent with the prior FEIR as discussed in Section 4.7 Geology and Soils, the proposed project would be required to file an NOI for coverage under a Construction General Permit meeting NPDES General Permit requirement, as more than one acre of land would be disturbed during construction activities. Additionally, the proposed project would be required to comply with adopted applicable local, regional, and State plans and regulations addressing wildfire prevention, which would minimize risks of post-fire hazards. The proposed project would not expose people or structures to landslides or downslope flooding from post-fire slope instability.

Therefore, the proposed project would have a less than significant impact related to post-fire slope instability, consistent with the impact conclusions in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The

[77] ENGEO Incorporated. 2024. 1125 North Gate Road Contra Costa County, California, Geotechnical Report Update. November 26.

[78] Federal Emergency Management Agency (FEMA). National Flood Hazard Layer (NFHL) Viewer. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd. Accessed October 19, 2025.

proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR and impacts would be less than significant. Accordingly, no additional environmental review is required.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Wildfire, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures from the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.20 Mandatory Findings of Significance					
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	Significant and unavoidable impact	No	No	No	No
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection	Significant and unavoidable impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?					
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	Significant and unavoidable impact	No	No	No	No

a) Potential Degradation to Environment and Examples of California History or Prehistory

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR concluded that impacts related to substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, and threatening to eliminate a plant or animal community from implementation of the General Plan would be less than significant due to the incorporation of environmentally protective policies. These policies are noted in Section 4.4, Biological Resources, of this document. Additionally, the prior FEIR found that impacts related to substantially reducing the number or restricting the range of a rare or endangered plant or animal would be reduced to a less than significant level with incorporation of MM BIO-1 which requires a habitat connectivity and wildlife corridor evaluation before building permits are issued.

The prior FEIR also concluded that implementation of the General Plan would result in a significant and unavoidable impact related to historical resources. However, the 2045 General Plan highlighted the Conservation, Open Space, and Working Lands Element of the proposed General Plan, which includes policies and actions that would mitigate potential impacts on historical resources, including through the policies and actions under Goal COS-10, which aims to identify and preserve historic resources. The prior FEIR included mitigation measures related to cultural resources and TCRs. These measures include MM CUL-1, which requires a cultural records search and necessary follow up measures by an Archaeologist; MM TCR-1, which involves the potential for a cultural resources treatment agreement, if needed, and/or other necessary follow up measures; and MM TCR-2, which allows for Tribal Monitors to monitor all grading, excavation, and ground-breaking activities. However, the prior FEIR found that even with mitigation, the proposed General Plan would result in a significant and unavoidable impact to historical resources.

Proposed Project Analysis and Conclusion

A BRR was prepared for the project site, meeting the requirements of MM BIO-1 from the prior FEIR. Based on the analysis provided in Section 4.4, Biological Resources, above, and as further documented in the BRR, the proposed project would not result in significant impacts related to candidate, sensitive, or special-status species; riparian habitat or sensitive natural communities; federally protected wetlands; fish or wildlife movement; conflicts with local policies or ordinances; or conflicts with HCPs. Based on the analysis in Section 4.5, Cultural and Tribal Cultural Resources, the proposed project would not cause a substantial adverse change in the significance of historical resources as the structures on-site do not meet the criteria for listing on the CRHR or the NRHP due to a lack of historic or architectural significance, nor do they appear to exhibit sufficient artistic value or historical associations to qualify under local standards for historical importance.

In the event that cultural or TCR resources are encountered during proposed project construction, the proposed project would comply with General Plan goals and policies such as COS-P10.6 and COS-P11.11 and established State laws and regulations protecting such resources. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR.

b) Cumulatively Considerable Impacts

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

Summary of Analysis in 2045 General Plan FEIR

The prior FEIR considered whether incremental effects associated with implementation of the General Plan would be cumulatively considerable by utilizing a summary of projections contained in the General Plan to evaluate cumulative conditions. It concluded that, while most individual impacts

from implementation of the General Plan would be less than significant due to the incorporation of environmentally protective policies, certain cumulative impacts would be cumulatively considerable. Specifically, the prior FEIR determined that implementation of the General Plan would result in cumulative impacts related to agriculture and forestry resources, air quality, biological resources, cultural resources, mineral resources, noise, transportation, and wildfire. All other environmental topic areas were found to result in a less than significant cumulative impact.

Proposed Project Analysis and Conclusion

As discussed in Sections 4.1 through 4.19 of this document, the proposed project would be consistent with the County's General Plan land use designation and development density established for the project site, as evaluated in the prior FEIR and associated growth projections. The proposed project would not introduce new or more severe significant impacts than those previously disclosed in the prior FEIR. It would comply with applicable General Plan policies, prior FEIR mitigation measures and regulatory requirements, including those related to air quality, biological resources, cultural resources, noise, transportation, and wildfire.

The cumulative analyses in the prior FEIR were based on countywide horizon-year growth projections and assumed full buildout of land uses permitted under the General Plan. The proposed project is consistent with those land use assumptions and does not exceed or alter the growth levels, development patterns, or infrastructure demands evaluated in the prior FEIR's cumulative impact analyses. As an infill project located within an area planned for urban development, the proposed project would contribute incrementally to cumulative conditions in a manner anticipated by the prior FEIR and would not result in a cumulatively considerable contribution to any impact area beyond those previously identified.

No new information or changed circumstances were identified that would result in cumulatively considerable impacts beyond what was identified in the prior FEIR. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR.

c) Adverse Effects on Human Beings?

Does the project: Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Summary of 2045 General Plan FEIR

The prior FEIR evaluated potential impacts to human health and safety, including exposure to air pollutants, noise emissions, and wildland fires. The prior FEIR concluded that implementation of the General Plan would result in significant and unavoidable impacts related to exposing sensitive receptors to substantial pollutant concentrations, generate substantial traffic noise increase on local roadways, exposing project occupants to pollutant concentrations from a wildfire, and exposing

structures and/or residences to fire dangers. Therefore, the prior FEIR would result in direct or indirect substantial adverse effects on human beings.

Proposed Project Analysis and Conclusion

The above sections of this Consistency Checklist reviewed the proposed project's potential impacts related to air quality, noise, and wildfire, among other environmental issue areas. As concluded in these previous discussions, the proposed project would result in less than significant impacts with adherence to the specified implementation measures pursuant to General Plan policies, and as discussed in the prior FEIR, standard BMPs and other applicable requirements and standards. As such, the proposed project would cause less than significant adverse effects on human beings. Therefore, the proposed project would not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the prior FEIR.

FEIR Mitigation Measures

None required.

Conclusion

With regard to Mandatory Findings of Significance, the Consistency Checklist demonstrates that:

1. No peculiar impacts related to the proposed project or its site that were not analyzed as significant effects in the prior FEIR have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not analyzed in the prior FEIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the prior FEIR.
4. No mitigation measures outside of those included in the prior FEIR would be required because the proposed project's specific impacts would be less than significant.

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