Initial Study and Environmental Checklist

California Environmental Quality Act

Housing Element Update (2014-2022) Project

CITY OF CONCORD

1950 Parkside Drive, MS/53
Concord, CA 94519

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The proposed Housing Element Update (2014-2022) is a project under the California Environmental Quality Act (CEQA). This Initial Study was prepared by PlaceWorks for the City of Concord (City), Community and Economic Development Department, Planning Division. This Initial Study was prepared pursuant to the CEQA (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations).

1.	Project Title:	**Housing Element Update (2014-2022) Project**
2.	Lead Agency Name and Address:	**City of Concord**
3.	Contact Person and Phone Number:	**Joan Ryan, AICP, Senior Planner** **Senior Planner** **(925) 671-3370**
4.	Project Location:	**Concord, CA**
5.	Project Sponsor's Name and Address:	**City of Concord** **Community and Economic Development Department** **Planning Division** **1950 Parkside Drive, MS/53** **Concord, CA 94519**
6.	General Plan Land Use Designation:	**Citywide (various designations)**
7.	Zoning:	**Citywide (various districts)**
8.	Surrounding Land Uses and Setting:	**See page 6 of this Initial Study**
9.	Description of Project:	**See page 7 of this Initial Study**
10.	Other Required Approvals:	**The Project and environmental review will be adopted and approved by the City of Concord. Following City approval, the State Department of Housing and Community Development (HCD) will be asked to certify the City's Housing Element.**

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a Potentially Significant Impact, as indicated by the checklist on the following pages.

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

Determination:
On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature _____ Date 9/10/14

Joan Ryan, AICP — Senior Planner
Printed Name — Title

A. OVERVIEW AND BACKGROUND

This Initial Study was prepared to assess the potential environmental effects of the proposed Housing Element Update (2014-2022), herein referred to as "proposed Project." This Initial Study consists of an overview of the proposed Project, a depiction of the existing environmental setting, as well as the project description, followed by an analysis of various environmental effects that may result from the proposed Project. A detailed project description and environmental setting discussion are provided below.

B. LOCATION

The City of Concord is located 29 miles east of San Francisco in the north-central region of Contra Costa County. Concord encompasses approximately 19,840 acres, or 31 square miles, of which approximately 8 square miles consist of the inland portion of the Concord Naval Weapons Station.[1] The city limits extend to Mallard Reservoir in the north and beyond Ygnacio Valley Road to the City of Walnut Creek in the south. Interstate 680 (I-680) borders the City to the west, and the eastern boundary is defined by the extent of the former Concord Naval Weapons Station and the City of Clayton. Figure 1 shows Concord's regional location.

Figure 2 shows the Concord city limits and Sphere of Influence (SOI). The Concord SOI includes incorporated City lands and those areas which may be considered for future annexation by the City. The Concord SOI is regulated by the Contra Costa Local Agency Formation Commission (LAFCo), which determines the unincorporated communities that would be best and most likely served by City agencies and hence, represents areas with the greater potential for annexation by the City. Once property is annexed into the City, future development is subject to the standards prescribed by the City's General Plan, Development Code, and other City regulations.

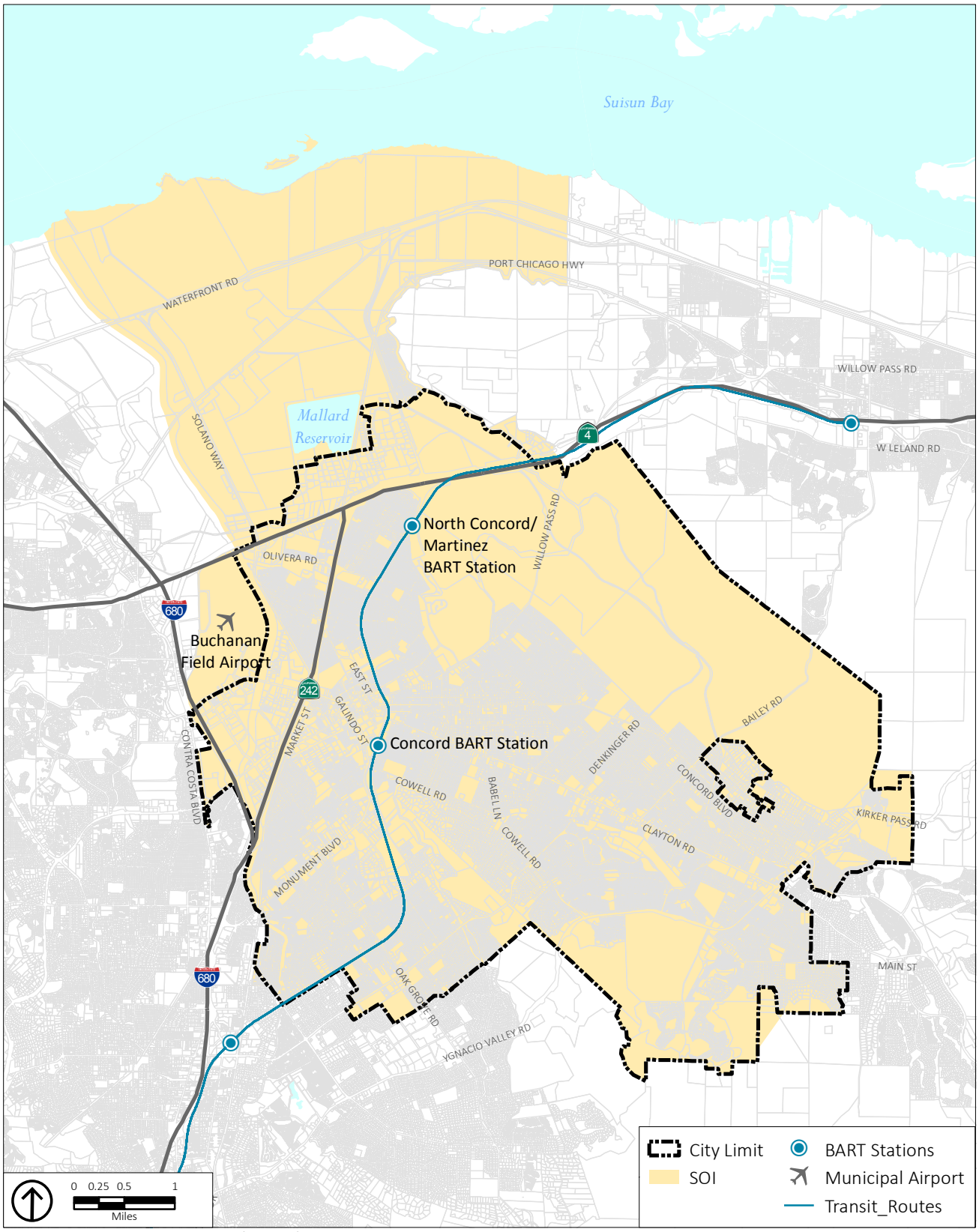
The SOI designation for the City includes part of the Naval Weapon Station Tidal Area, which is approximately 7,630 acres of land. The potential future development under the proposed Project does not include any area outside the city limits; however, for the purposes of this environmental review, the City's SOI defines the Study Area boundaries.

I-680 provides access to Solano County to the north and San Jose to the south. State Highways 4 and 242 provide access to San Francisco and East Bay to the west and the Cities of Pittsburg and Antioch to the east. There are also two Bay Area Rapid Transit (BART) stations within the city limit connecting Concord to other East Bay Cities and San Francisco: North Concord/Martinez Station and Downtown Concord Station. Also, the Buchanan Field Airport, one of two Contra Costa County airports, is located just outside of the northwest corner of the city limit.

[1] The concord Naval Weapon Station is consisted of two different areas: inland and tidal. The inland area is located within the Concord City Limits and the Tidal area is located within the Concord's SOI, the Carquinez Strait.

Source: Contra Costa County, 2012; PlaceWorks, 2014.

Figure 1
Regional Location



Source: Contra Costa County, 2012; PlaceWorks, 2014.

Figure 2
Local Context

C. EXISTING SETTING

The proposed Project includes an update to the current Housing Element. The Housing Element is one of seven State-mandated elements of the City's General Plan. Housing Element law requires local jurisdictions to plan for and allow the construction of a share of the region's projected housing needs. This share is called the Regional Housing Needs Allocation (RHNA). State law mandates that each jurisdiction provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community, so as to meet or exceed the RHNA. The Association of Bay Area Governments (ABAG), as the regional planning agency, calculates the RHNA for individual jurisdictions within Contra Costa County, including Concord.

In November 2010, the City of Concord adopted its Housing Element through the 2014 planning period and the environmental review pursuant to CEQA for the City of Concord Housing Element Update. The State Housing and Community Development Department (HCD) certified the Housing Element on January 5, 2011.

The current Housing Element demonstrated that the City had adequate capacity to meet the RHNA requirements for the 2007-2014 planning period, which was a total of 3,043 units. The City made significant achievements in improving the quality and standards of housing in Concord and implementing programs to facilitate residential development affordable to households at a range of income levels to ease development looking to the future. Major achievements include:

- Initiation and completion of the planning process for the Downtown Specific Plan, which will facilitate residential development of approximately 600 acres surrounding the Downtown Concord BART Station. Plan adoption occurred on June 24, 2014.
- A comprehensive revision of the City's Development Code with changes that allow for increased densities, provide enhanced guidance on permitted uses including standards for a range of housing types, and facilitate and incentivize residential and mixed-use development.
- As part of the revision of the City's Development Code, adoption of the Affordable Housing Incentive Program provides significant incentives to projects in which at least 40 percent of units are affordable. Incentives include increased height and lot coverage limits as well as decreased minimum lot size, setback, and parking requirements. Additionally, projects eligible for the program are waived from use permit requirements.
- Approval of several small-lot subdivisions which would provide homes to low- and moderate-income homebuyers.
- Provision of grants and low-interest loans to support the rehabilitation of homes in need of repair or lead abatement.
- Implementation of the City's multi-family rental housing inspection program.
- Disbursement of 17 first-time homebuyer loans.
- Amendments to the City's Development code to allow transitional and supportive housing by right in residential districts, subject to the same requirements as other uses in those districts.
- Amendments to the City's Development Code to allow emergency shelters by right in the IBX, OBP, and IMX districts.
- Adoption of Green Building Standards effective January 2011.

The next Housing Element cycle is for the planning period 2014-2022. The City of Concord's allocation for the 2014-2022 planning period is 3,478 dwelling units. The Housing Element for the 2014-2022 planning period is required to be adopted by January 31, 2015. Local governments that adopt their Housing Element on time will not have to adopt another housing element for eight years, instead of every four years.

D. PROJECT DESCRIPTION

The proposed Project supports the goals and policies of the City's current Housing Element (2007-2014) and provides policies and implementing programs to further the City's housing goals. The proposed Project updates the City's current Housing Element (2007-2014) in compliance with Government Code Section 65580 *et seq*. The policies and housing programs that are intended to guide the City's housing efforts through the 2014-2022 RHNA planning period have been updated as part of the proposed Project, and the following are the goals in the Housing Element, which the policies and programs help to implement:

- **Goal H-1:** Promote a balanced supply of housing types, densities, and prices to meet the needs of all income groups residing or who wish to reside in Concord.
- **Goal H-2:** Preserve and enhance Concord's residential neighborhoods and improve the quality of life for all residents.
- **Goal H-3:** Promote the expansion of housing opportunities for all special needs groups, including seniors, female-headed households, persons with disabilities, first-time homebuyers, large families, and homeless individuals and families.
- **Goal H-4:** Strive for equal housing opportunity and access for all people regardless of race, religion, gender, marital status, age, ancestry, national origin, color, sexual orientation, familial status, source of income, or disability.
- **Goal H-5:** Protect the environment and lower the cost of energy through energy conservation policies.

California cities are required to provide a wide range of housing options for all income levels. The ABAG, as a regional agency, develops a RHNA based on demographic projection to distribute the regional share of the statewide housing need at different income levels to the cities and counties within the Bay Area. Concord's RHNA has been determined to be a total of 3,478 units, and Table 1 shows Concord's allocation distributed among different income levels:

TABLE 1 ***CONCORD'S REGIONAL HOUSING NEEDS ALLOCATION (RHNA)***

Income Level	Units
Very Low	798
Low	444
Moderate	559
Above Moderate	1,677
TOTAL	*3,478*

A comprehensive update to the current Housing Element site inventory was conducted to determine the capacity necessary to accommodate the number of units assigned for the planning period 2014-2022. Most of the current housing opportunity sites were retained, and 29 new sites were added after reviewing the 2014 County Assessor Data. The comprehensive update to the site inventory resulted in a total capacity of 4,523 units on the 187 opportunity sites, which is an increase of 334 units from the current opportunity site inventory. Table 2 shows the housing opportunity sites by type that are appropriate for residential development.

TABLE 2 ***CHARACTERISTICS OF CONCORD'S HOUSING OPPORTUNITY SITES***

Type of Site	Number of Sites	Acres	Number of Units
Committed Development Projects	12	21.4	517
Low Density Sites (less than 30 units/acre)[1]	93	100.7	282
Vacant	*59*	*45.7*	*109*
Underutilized	*34*	*55.0*	*173*
High Density Sites (more than 30 units/acre)	75	94.2	3,551
Vacant, with housing required in new development[2]	*5*	*9.5*	*290*
Underutilized, with housing required in new development	*16*	*14.1*	*433*
Vacant, with housing permitted in new development[3]	*14*	*14.7*	*752*
Underutilized, with housing permitted in new development	*40*	*55.9*	*2,076*
Sites with Potential Live-Work Units	7	18.4	173
TOTAL	*187*	*234.7*	*4,523*
REMAINING ADJUSTED RHNA	--	--	*-1,045*

Source: 2014-2022 City of Concord Draft Housing Element, page 63, August 1, 2014.
Notes:
[1] Generally includes the RS and RR zoning districts. Includes a few sites that are zoned RM, which allows 32 units per acre. However, because these sites are located in low density neighborhoods their presumed density is significantly lower and they have been assigned to the low density category.
[2] Generally includes the RH and RM zoning districts. See note above about select projects in the RM zone.
[3] Generally includes the CMX, DMX, and DP zoning districts.
[4] Generally includes the IMX zoning district. Live work development is also permitted in commercial districts.

The proposed Project also identified other sites that are likely to come on line during the 2014-2022 planning period, but are not quantified because they are still in the planning stages or are not yet zoned for residential development. The following sites, however, may provide supplemental housing opportunities:

- Concord Reuse Project
- Coast Guard Housing
- BART Parking Lots

E. POTENTIAL PHYSICAL CHANGES

Altogether, the proposed Project does not include actions that could directly or indirectly result in substantial physical changes to the environment. The proposed Project would enable the City of Concord to meet its housing needs, including the facilitation of future development to meet the needs of at-risk populations by providing housing types designed for these groups.

Environmental factors, such as topography, soils, landslides and seismic hazards, and noise, as well as the lack of infrastructure, such as roads, water, and sewer lines, are potential constraints to housing development in the City. However, most of the housing sites identified by the City are not affected by such constraints. The 2030 General Plan has taken these factors into account in establishing policies and land use designations for residential and mixed use development. Where development is planned, any site constraints that remain can be mitigated through appropriate design and environmental planning.

The potential future housing permitted under the proposed Project would not increase development potential in Concord. As described in Section C, Existing Settings, the City completed a major revision to its Development Code during the 2007-2014 planning period and does not require any additional rezoning to accommodate the RHNA requirement for the 2014-2022 planning period.

The General Plan Housing Element is a policy-level regulatory document that establishes goals and policies that guide development. It does not include any site-specific designs or proposals nor does it grant any entitlements for development; therefore, the proposed Project does not directly result in development in and of itself. When specific implementing programs and development projects are identified, the program and/or development applications for such individual projects, as required, would be submitted separately to the City for review. All such development is required to be analyzed for conformance with the General Plan, Development Code, and other applicable federal, State, and local requirements; comply with the applicable requirements of CEQA; and obtain all necessary clearances and permits.

F. ENVIRONMENTAL CHECKLIST

I. AESTHETICS Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a State scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Potential future development permitted under the proposed Project would have the potential to affect scenic vistas and/or scenic corridors if new or intensified development blocked views of areas that provide or contribute to such vistas. Potential effects could include blocking views of a scenic vista/corridor from specific publicly accessible vantage points or the alteration of the overall scenic vista/corridor itself. Such alterations could be positive or negative, depending on the characteristics of individual future developments and the subjective perception of observers.

Scenic corridors are considered an enclosed area of landscape, viewed as a single entity that includes the total field of vision visible from a specific point, or series of points along a linear transportation route. Public view corridors are areas in which short-range, medium-range, and long-range views are available from publicly accessible viewpoints, such as from city streets. However, scenic vistas are generally interpreted as long-range views of a specific scenic feature (e.g. open space lands, mountain ridges, bay, or ocean views).

Concord's visual character is partially defined by its location within two flat river valleys (Ygnacio Valley and Clayton Valley, with Lime Ridge separating the two), bordered by the rolling Los Medanos Hills to the east, Mount Diablo to the southeast, and Suisun Bay to the north. From the flatland areas of Concord, views of the surrounding hills are prominent. Some of the residential neighborhoods within Concord have views of the Suisun Bay and San Francisco Bay Delta to the north of the City. Mount Diablo State Park, located to the southwest, is visible from many locations throughout the City. In addition to these scenic vistas, Concord is traversed by several creek corridors with dense vegetation and mature trees that contribute to the city's aesthetic quality. Visual connections to Suisun Bay are limited due to the historical development of military and industrial uses. Large-scale industrial and port-related facilities line the bayfront north of State Route-4, while wetlands and the tidal area of the Concord Naval Weapons Stations lie to the east. Views of the hills to the east and south create a sense of identity for city residents, local businesses, and visitors. No state scenic highways traverse the City.[2]

[2] Caltrans, California Scenic Highway Mapping Program, Contra Costa County, http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed on July 15, 2014.

Potential future development permitted under the proposed Project would allow for residential development, including special-needs housing, secondary living units, and accessory building/structures in Residential zoning districts where residential uses currently exist and are accounted for in the General Plan. Implementation of the proposed Housing Element does not propose to change existing land use designations or zoning districts, and anticipates that land uses will be consistent with the designations established by the General Plan. Implementation of the Housing Element would not allow for development beyond that identified in the City's General Plan, nor would it change the City's existing Hillside Preservation policies within the Development Code.

Potential future residential and/or emergency shelter facilities permitted under the proposed Project would be subject to the general development standards for the particular zoning district affected by the proposed Project as set forth in the Development Code. Compliance with the general development standards as well as the General Plan goals and policies would address the preservation of scenic vistas and corridors in the city. Accordingly, the proposed Project would not be expected to significantly alter scenic viewsheds in the zoning districts affected by the proposed Project and overall impacts to scenic corridors and vistas within the city would be *less than significant*.

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

The California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), protects scenic State highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways. Caltrans has not designated any state scenic highways that traverse the City;[3] thus, *no impacts* related to scenic highways would occur.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

As discussed in Section I.a above, potential development permitted as a result of the proposed Project would be restricted to the existing built environment. Potential development under the proposed Project would be required to comply with enumerated development standards set forth in the City's Development Code to ensure compatibility with adjoining land uses. Additionally, compliance with General Plan goals and policies would protect the existing visual character or quality of the city and its surroundings. Accordingly, future development permitted under the proposed Project would result in a *less-than-significant* impact to visual character.

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

Substantial light and glare comes mainly from commercial areas, safety lighting, traffic on major arterials and the freeway, and street lights. Future potential development permitted under the proposed Project does not include any land use changes that would redesignate any existing land uses (e.g. residential to commercial, etc.). Light pollution, in most of the city is minimal, and is restricted primarily to street lighting along major arterials streets and to night-time illumination of commercial buildings, shopping centers, and industrial buildings. Light spillage from residential areas, particularly older neighborhoods, is mostly well-screened by trees. Potential special-needs housing and secondary living units permitted under the proposed Project would occur

[3] Caltrans, California Scenic Highway Mapping Program, Contra Costa County, http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed on July 15, 2014.

in already largely built-out residential areas where street and site lighting currently exist and are accounted for in the General Plan.

The goals and policies in the General Plan would ensure that light and glare associated with potential future development under the proposed Project are minimized. Similar to the discussions in Sections I.a and I.c above, potential future development permitted under the proposed Project would be required to comply with enumerated general development standards set forth in the City's Development Code to ensure compatibility with adjoining land uses. These factors contribute to a *less-than-significant* impact with respect to light and glare.

II. AGRICULTURE AND FORESTRY RESOURCES Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
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 non-agricultural use?	☐	☐	☐	☒
b) Conflict with an existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or of conversion of forest land to non-forest use?	☐	☐	☐	☒

a) 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 non-agricultural use?

Maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency categorize land within the city as primarily Urban and Built-Up Land. However, Concord contains two areas classified by the State Department of Conservation as "grazing lands," which include nearly the entire inland portion of the Concord Naval Weapons Stations (CNWS) and the Lime Ridge Open Space. This former CNWS airstrip is also used for cattle grazing. There are no agricultural lands identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the City of Concord. Therefore, there would be *no impact*.[4]

[4] California Department of Conservation, 2012, Contra Costa County Important Farmland 2012, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/, Map published April 2014, accessed on July 15, 2014.

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

The California Land Conservation (Williamson) Act 2010 Status Report identifies land in Contra Costa County that is currently under Williamson Act contract.[5] However, as discussed in response to Section II.a, there is no agricultural land within Concord, and, therefore, implementation of the proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Consequently, there would be *no impact*.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

According to 2003 mapping data from the California Department of Forestry and Fire Protection, the City does not contain any woodland or forest land cover;[6] thus, the City does not contain land zoned for Timberland Production and *no impact* would occur.

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

For the reasons provided in response to Sections II.a through II.c, there would be *no impact* in relation to the conversion of farmland to non-agricultural use or forest land to non-forest use.

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

See Sections II.a through II.d above.

III. AIR QUALITY Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in non-attainment under applicable federal or State ambient air quality standards (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

[5] California Department of Conservation, 2010, California Land Conservation (Williamson) Act 2010 Status Report, page 23, http://www.conservation.ca.gov/dlrp/lca/stats_reports/Documents/2010%20Williamson-%20Act%20Status %20Report.pdf, accessed on July 15, 2014.

[6] California Department of Forestry and Fire Protection Fire and Resource Assessment Program, Land Cover map, http://frap.cdf.ca.gov/webdata/maps/statewide/fvegwhr13_map.pdf, accessed on July 15, 2014.

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

The Bay Area Air Quality Management District (BAAQMD) is the regional air quality agency for the San Francisco Bay Area Air Basin (SFBAAB), which comprises all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties; the southern portion of Sonoma County; and the south-western portion of Solano County. Accordingly, the City is subject to the rules and regulations imposed by the BAAQMD, as well as the California ambient air quality standards adopted by the California Air Resources Board (CARB), and national ambient air quality standards adopted by the United States Environmental Protection Agency (USEPA).

Potential future development permitted under the proposed Project could potentially have significant impacts on air quality through additional automobile trips associated with additional housing units. However, the BAAQMD does not require project specific analysis for projects proposing less than 520 apartments/condominiums or resulting in less than 2,000 vehicle trips per day. If a project does not exceed either of these thresholds, it is typically assumed to have a less than significant impact on air quality. While no projects have been identified or are proposed as part of the proposed Project, it is not anticipated to result in any potential future development that would meet or exceed the current BAAQMD standards for air quality impacts. While the number of units the City is discussing to meet RHNA exceeds these thresholds, the number of housing units does not exceed development anticipated within the City's General Plan.

Residential development in proximity to I-680 and State Highways 4 and 242 could expose sensitive receptors to human health risks associated with toxic air contaminants (TACs). Concentrations of TACs such as diesel particulate matter are much higher near heavily traveled highways and intersections, and prolonged exposure can cause health risks such as cancer, birth defects, and neurological damage. Potential future development permitted under the proposed Project would not increase development potential, but rather would allow for housing units in Residential zoning districts where residential uses currently exist and are accounted for in the General Plan. Residential zoning districts are located throughout the City and in some cases are near major thoroughfares. While no projects have been identified or are proposed as part of the proposed Project, potential future development permitted under the proposed Project, as necessary (i.e. subject to discretionary review), would be subject to separate environmental review as required under CEQA.

Given the proposed Project would not exceed BAAQMD standards of significance for air quality impacts and compliance with applicable and mandatory regulation (i.e. CEQA), potential future development permitted under the proposed Project would have *no impact* with respect to air quality.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

All federal ambient air quality standards except national standards for ozone and state standards for ozone, PM_{10}, and $PM_{2.5}$ are met in the Concord area. However, the state ambient standards of ozone, PM_{10}, and $PM_{2.5}$ are regularly exceeded (CARB, 2011). Municipal Code Chapter 86 Article III (Grading, Erosion, and Sedimentation Control) establishes construction management requirements related to air quality issues as part of the grading permit. Accordingly, existing City standards are adequate to ensure that there would be no significant air quality impact from construction activity. In addition, potential future housing would be required to comply with General Plan policies related to air quality and with Development Code requirements regarding odor, conform to the Bay Area 2005 Ozone Strategy and the 2010 Clean Air Plan, and meet National Ambient Air Quality Standards (NAAQS) and BAAQMD thresholds during both construction and operation activities.

Therefore, the proposed Housing Element would have *less than significant* impacts associated with contributing substantially to an existing or projected air quality violation, increasing criteria pollutants during both construction and operational activities, and exposing sensitive receptors to substantial pollutant concentrations. Also see Section III.a above.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in non-attainment under applicable federal or State ambient air quality standards (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The Bay Area 2010 Clean Air Plan is the current control strategy to reduce ozone, particulate matter (PM), air toxins, and greenhouse gases (GHGs) for the City of Concord. The 2010 Clean Air Plan was based on the ABAG population and employment projections for the San Francisco Bay Area, including growth that would be accommodated under the City's General Plan. The BAAQMD monitors air quality at several locations in the San Francisco Bay Air Basin. Historically, problematic criteria pollutants in urbanized areas include ozone, particulate matter, and carbon monoxide. Combustion of fuels and motor vehicle emissions are a major source of each of these three criteria pollutants. Concord is within the San Francisco Bay Area Air Ozone non-attainment area as delineated by the USEPA.

As discussed in Section III.a above, potential future development permitted under the proposed Project would not increase development potential (no rezoning), but rather would allow for housing units in Residential zoning districts where residential uses currently exist and are accounted for in the General Plan. Therefore, no increase of criteria air pollutants would occur as a result of potential future development permitted under the proposed Project and impacts would be *less than significant*.

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

See Section III.a above.

e) Would the project create objectionable odors affecting a substantial number of people?

Odors are also an important element of local air quality conditions. Specific activities allowed within each land use category can raise concerns related to odors on the part of nearby neighbors. Major sources of odors include restaurants and wastewater treatment plants. While sources that generate objectionable odors must comply with air quality regulations, the public's sensitivity to locally produced odors often exceeds regulatory thresholds.

The type of housing and emergency shelter development that would be permitted under the proposed Project is not considered a major source of odor and would not create objectionable odors to surrounding sensitive land uses. Accordingly, there would be *no impact*.

IV. BIOLOGICAL RESOURCES Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on a plant or animal population, or essential habitat, defined as a candidate, sensitive or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

IV. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

Special status plants include those listed as "Endangered," "Threatened," or "Candidate for Listing" by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS), that are included in the California Rare Plant Rank, or that are considered special-status in local or regional plans, policies, or regulations. Special status animals include those listed as "Endangered," "Threatened," or "Candidate for Listing" by the CDFW or the USFWS, that are designated as "Watch List," "Species of Special Concern," or "Fully Protected" by the CDFW, or that are considered "Birds of Conservation Concern" by the USFWS.

The City of Concord is located in the Bay Area Bioregion. This Bioregion is comprised of a variety of natural communities, which range from Salt Marshes to Chaparral to Oak Woodlands. The primary upland habitat types in the Concord Planning Area include Urban, Annual Grassland, Chaparral, Foothill Pine-Blue, and Oak Woodland. Wetland and aquatic habitats include Coastal Brackish Marsh, Riparian, Estuarine, Riverine, and other lacustrine and palustrine habitats including reservoirs and seasonal wetlands. The most prevalent habitat type is Urban, which encompasses the majority of the area within the City limits and is generally continuous to the west and southwest, adjoining Pleasant Hill and Walnut Creek respectively. To the southeast, urban habitat continues into Clayton. Valley Oak Woodland habitat occurs at several locations within the CNWS Inland Area, occupying approximately 60 acres.

A number of special-status plant and animal species can be found or have the potential to be found within the City of Concord Planning Area including Mt. Diablo manzanita, Mt. Diablo fairy lantern, Diablo helianthella, Hall's bush mallow, Alameda whipsnake, Mt. Diablo buckwheat, Mt. Diablo Brewer's western flax, California tiger salamander, California red-legged frog, northwestern pond turtle, San Joaquin Kit Fox,

Roundleaved filaree, California black rail, California clapper rail, Salt-marsh harvest mouse, Suisun song sparrow, Delta tule pea, Mason's lilaeopis, and Soft bird's beak. Other special-status or otherwise protected species potentially located in the area include the western pond turtle, bald eagle, golden eagle, and loggerhead shrike.

Potential future development permitted under the proposed Project would not increase development potential, but rather would allow for housing units in Residential zoning districts where residential uses currently exist and are accounted for in the General Plan. The proposed Housing Element does not propose to change existing land use designations or zoning districts, and anticipates that land uses will be consistent with the designations established by the General Plan. The proposed Housing Element does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment or to adversely affect biological resources. As such, the proposed Housing Element would have no direct impact on biological resources.

Potential impacts from construction of future housing would most likely be related to the removal of trees and other vegetation in these habitats during the nesting season of the migratory birds found in Concord. If future housing projects were to be proposed in areas where biological resources are present, those projects would be required to provide site-specific field studies to search for special-status species and to determine whether suitable habitat for any special-status species occur on or near a study area. At the time such a housing project is proposed, the City would conduct the appropriate level of environmental review pursuant to CEQA prior to taking action to consider the approval of the project.

Furthermore, compliance with federal and State laws, including but not limited to, the Migratory Bird Treaty Act, Clean Water Act, Federal and California Endangered Species Acts, and California Native Plant Protection Act would ensure impacts to special-status species associated with potential future development that could occur through implementation of the proposed Project would be *less than significant*.

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

As described in IV.a above, the recognized sensitive natural communities of Concord include wetland and oak woodlands. While some existing Residential zoning districts are located adjacent to these natural communities, the future construction of residential housing would occur in the existing built environment in areas classified as Urban habitat. Development in these areas would not result in the conversion of sensitive natural communities. In instances of large lots and/or tall trees, vegetation on the residential lots immediately adjacent could provide additional nesting and foraging opportunities for riparian-associated species, particularly birds and bats. Generally, impacts would be limited to removal of vegetation (to trees or bushes) on already developed lots. Protected trees are regulated under the Development Code's (Tree Preservation and Protection Division).

As previously described, potential future development as a result of implementing the proposed Project would occur on lands that are currently developed and would not increase runoff potential that could directly impact the wetlands. Furthermore, wetlands and other waters are protected under the federal Clean Water Act and the State's Porter-Cologne Water Quality Control Act are under the jurisdiction of the U.S. Army Corps of Engineers and the San Francisco Bay Regional Water Quality Control Board. Federal and State regulations require avoidance of impacts to the extent feasible, and compensation for unavoidable losses of jurisdictional wetlands and waters. Compliance with these regulations as well as the General Plan and Devel-

opment Code standards would reduce impacts to sensitive habitats (i.e. wetlands and oak woodlands). These regulations provide a comprehensive approach for addressing and mitigating the direct and indirect impacts of anticipated development on or near wetlands, oak woodlands or other sensitive natural communities. Accordingly, impacts would be *less than significant*.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption or other means?

See Section IV.b above.

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

See Section IV.b above.

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

The Development Code includes policies and standards regarding creek and riparian habitat protection as well as tree preservation and protection. Implementation of the proposed Housing Element would not change these policies and would not change these existing development standards. Therefore, *no impact* would occur.

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

The City of Concord is not within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plan. This condition precludes the possibility of the proposed project conflicting with an adopted conservation plan. Consequently, there would be *no impact*.

V. CULTURAL RESOURCES Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

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

The land on which Concord is located was originally occupied by a group of Chupcan inhabitants, members of the Miwok linguistic division of American Indians. From the excavation of archaeological sites, it is known that the Chupcan were present in the area as early as 200 BC and maintained relatively continuous occupation until AD 900. The most extensive site that was found was then abandoned completely until 1700, after which it was used again as a campsite. By the early 1800s, the numbers of Chupcans were so reduced that they offered little resistance to the arriving Spanish settlers. The remaining Chupcan were ultimately assimilated into the new culture.

A review of the Concord Planning Area conducted in 2003 and 2004 by the Northwest Information Center found 12 recorded Native American archaeological resources and 7 historic-period archaeological resources listed with the State Historical Resources Information System. Many of the historic resources in Concord date back to the days of its founding, and are located near Todos Santos Plaza. The City contains two National Register sites as well as 33 additional sites and structures which are designated local historical landmarks as important local historic resources.

The types of cultural resources that meet the definition of historical resources under CEQA generally consist of districts, sites, buildings, structures, and objects that are significant for their traditional, cultural, and/or historical associations. Commonly, the two main resource types that are subject to impact, and that may be impacted by potential future development allowed under the proposed Project, are historical archaeological deposits and historical architectural resources, as discussed below. Human remains are addressed in Section V.d below.

Cultural resources are protected by federal and State regulations and standards, including, but not limited to, the National Historic Preservation Act, the California Public Resources Code, and CEQA. If the potential future development under the proposed Project or adjacent properties are found to be eligible for listing on the California Register, the development would be required to conform to the current Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, and Restoring Historic Buildings, which require the preservation of character defining features which convey a building's historical significance, and offers guidance about appropriate and compatible alterations to such structures.

Historical and pre-contact archaeological deposits that meet the definition of historical resources under CEQA could be damaged or destroyed by ground-disturbing activities associated with potential future development allowed under the proposed Housing Element. Should this occur, the ability of the deposits to convey their significance, either as containing information important in prehistory or history, or as possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired.

It is highly improbable that archaeological deposits and/or architectural resources associated with the historic period of Concord would be impacted by potential future development as this development would be concentrated in and around a highly urban area, where development will have a lesser impact on historical archeological and/or architectural resources.

Compliance with federal and State laws, would reduce potential impacts to historical resources to a *less-than-significant* level.

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

Archaeological deposits that meet the definition of unique archaeological resources under CEQA could be damaged or destroyed by ground disturbing activities associated with future potential development under the proposed Project.[7] Should this occur, the ability of the deposits to convey their significance, either as containing information important in prehistory or history, or as possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired. In addition to the likely presence of unrecorded Native American archaeological sites, given potential future residential development would occur in the built environment, it is highly improbable that significant archaeological deposits exist in these areas.

However, as described above in Section V.a, compliance with federal and State laws would reduce potential impacts to archaeological deposits to a *less-than-significant* level.

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

Similar to the discussion on archeological resources in Section V.b above geological formations underlying Concord have the potential for containing paleontological resources (i.e. fossils). It is possible that ground-disturbing construction associated with potential future development under the proposed Project could reach significant depths below the ground surface. Should this occur, damage to, or destruction of, paleontological resources could result, which would prevent the realization of their scientific data potential through documentation and analysis.

However, as described above in Section V.a, compliance with federal and State laws would reduce potential impacts to paleontological deposits to a *less-than-significant* level.

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

Human remains associated with pre-contact archaeological deposits could exist in the Study Area, and could be encountered at the time potential future development occurs. The associated ground-disturbing activities, such as site grading and trenching for utilities, have the potential to disturb human remains interred outside of formal cemeteries. Descendant communities may ascribe religious or cultural significance to such remains and may view their disturbance as an unmitigable impact. Disturbance of unknown human remains would be a significant impact.

However, any human remains encountered during ground-disturbing activities are required to be treated in accordance with California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA), which state the mandated procedures of conduct following the discovery of human remains.

[7] If the cultural resource in question is an archaeological site, CEQA Guidelines Section 15064.5(c)(1) requires that the lead agency first determine if the site is a historical resource as defined in CEQA Guidelines Section 15064.5(a). If the site qualifies as a historical resource, potential adverse impacts must be considered through the process that governs the treatment of historical resources. If the archaeological site does not qualify as a historical resource but does qualify as a unique archaeological site, then it is treated in accordance with PRC Section 21083.2 (CEQA Guidelines Section 15064.5(c)(3)). In practice, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource.

According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Contra Costa County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendant (MLD)[8] of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC. Through mandatory regulatory procedures described above impacts to human remains would be *less than significant*.

VI. GEOLOGY AND SOILS Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides, mudslides or other similar hazards?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Section1803.5.3 of the California Building Code, creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒

[8] "Native American Most Likely Descendant' is a term used in an official capacity in *CEQA Guidelines* Section 15064.5(e), and other places, to refer to Native American individuals assigned the responsibility/opportunity by NAHC to review and make recommendations for the treatment of Native American human remains discovered during project implementation. Section 5097.98 of the Public Resources Code and Section 7050.5 of the Health and Safety Code also reference Most Likely Descendants.

a) *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving: i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; ii) strong seismic ground shaking; iii) seismic-related ground failure, including liquefaction; iv) landslides, mudslides, or other similar hazards?*

Concord lies within the physiographic region of California referred to as the Coast Ranges geomorphic province, much of which is composed of marine sedimentary and volcanic rocks that form the Franciscan Assemblage. Bordered by the Carquinez Strait to the north and Mt. Diablo to the east, Concord and its vicinity are characterized by northwestern trending mountain ranges, ridges, and valleys. Elevations range from sea level along Suisun Bay to over 1,400 feet above mean sea level in the Los Medanos Hills in the northeast portion of the former CNWS. Concord is largely underlain by Quaternary-age alluvial fan deposits originating from the Diablo Range and estuarine deposits from Suisun Bay. Upland areas of Concord located along the foothills of Mt. Diablo are underlain by bedrock deposits consisting mainly of sandstone, shale, and mudstone.

The City is located in the seismically active San Francisco Bay Area. Active faults that could affect the City include the Concord Fault, San Andreas Fault, Hayward Fault, West Napa Fault, and the Calaveras, Rodgers Creek, Marsh Creek-Greenville, and Diablo Faults. Specifically, the Concord Fault runs in a northwesterly to southeasterly direction through the City, and the Hayward Fault is located approximately 15 miles to the west.

A majority of the City is located in areas of moderate ground shaking intensity; however, the western portion of Concord is more susceptible to earthquakes than the eastern portion due to underlying soils and seismicity resulting in moderately high to extremely high ground shaking amplification. A "Special Studies Zone" (SSZ) has been designated along the Concord Fault, and there are limitations on construction within this area to protect life and property. Several of the housing sites fall within the SSZ and could be subject to costlier construction codes or open space requirements along this fault line. The areas with the highest ground shaking potential are directly surrounding Pacheco Slough.

Because Concord is underlain with stiff alluvial clay containing lenses of sand and silt deposits, liquefaction and landslide potential are both considered high in some places. The highest potential for future landslides exists in the upland areas along the flanks of Mt. Diablo, at the east and southern edges of the planning area. Pockets of high landslide potential also exist on sloping terrain, such as the intersection of Port Chicago Way and SR-4. Additionally, such soils have expansive properties that could result in significant shrinking or swelling, potentially damaging road surfaces and infrastructure lines.

However, all future residential development would be subject to existing federal, State, and local regulations related to geologic safety to prevent significant damage from ground shaking during seismic events. The 2030 General Plan includes policies that require a thorough evaluation of geologic and soil conditions as part of the development review process and establishes specific requirements for development on hillsides and prohibits development on slopes over 30 percent to reduce hazards associated with building on slopes. Compliance with existing federal, State, and local regulations would ensure that the impacts associated with seismic hazards are minimized to the maximum extent practicable. Consequently, overall, associated seismic hazards impacts would be *less than significant*.

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

Potential future residential development activities could change surface conditions as the result of moving and grading topsoil that could lead to disturbed soils that are more likely to suffer from erosion. All future projects that may be built to implement the proposed Housing Element would be subject to Municipal Code

Chapter 86 Article III (Grading, Erosion, and Sedimentation Control) and California Building Code (CBC) requirements which ensure that projects are developed in a manner that minimizes construction related erosion. Compliance with CBC and Municipal Code requirements would ensure impacts are *less than significant.*

c) 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 landslide, lateral spreading, subsidence, liquefaction or collapse?

Unstable geologic units are known to be present within the Study Area. Future residential housing projects on unstable or expansive soils could create risks to life or property and result in adverse impacts such as on-or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Portions of the City are underlain with stiff alluvial clay, which is a soil unit with expansion potential. Structures and infrastructure in these areas can be at risk if they are not engineered and constructed pursuant to appropriate building codes. All projects that may be constructed to implement the proposed Housing Element would be subject to City engineering and CBC building code requirements which would minimize the potential impacts of expansive soil. Therefore, a *less than significant impact* regarding the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse would occur.

d) Would the project be located on expansive soil, as defined in Section1803.5.3 of the California Building Code, creating substantial risks to life or property?

See VI.c above.

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

The Central Contra Costa Sanitary District provides waste disposal services within the City of Concord. Potential future development under the proposed Project would occur in the existing built environment. Connection to the sewer system is available in these areas; therefore, *no impact* regarding the capacity of the soil in the area to accommodate septic tanks or alternate wastewater disposal systems would occur.

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

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

In 2006, California adopted Assembly Bill 32 (AB 32), the Global Warming Solutions Act of 2006. AB 32 established a statewide GHG emissions reduction goal to reduce statewide GHG emissions levels to 1990 levels by 2020. Assembly Bill 32 established a legislative short-term (2020) mandate for State agencies in order to set the State on a path toward achieving the long-term GHG reduction goal of Executive Order S-03-05 to stabilize carbon dioxide (CO_2) emissions by 2050.

Concord has instituted a number of plans, policies, and programs to aid in the reduction of GHG emissions. Policies in the 2030 General Plan aim to curb GHG emissions and reduce sprawl, in part by supporting land use decisions that reduce reliance on cars and promote compact development. In addition to implementing Plan policies, the City coordinates with regional agencies to ensure its transportation plans, programs, and projects conform to the most recent air quality and GHG reduction requirements. The City's Downtown Specific Plan, adopted on June 24, 2014, supports State and regional GHG reduction goals by planning to accommodate a significant share of future growth in Concord on infill sites near transit. Furthermore, the citywide Climate Action Plan adopted in July 2013 provides a number of strategies for Concord to help the State meet its greenhouse gas reduction targets through land use and transportation strategies, energy and water conservation, and green construction practices.

BAAQMD established thresholds of significance in 2010 for GHG emissions from projects and plans subject to CEQA review similar to those for other regulated air pollutants. However, in March 2012 the Alameda County Superior Court ordered the District to cease use and dissemination of the thresholds until environmental analysis of the thresholds could determine whether they have a significant impact on the environment under CEQA. At the time this environmental document was prepared, that task has not yet been completed.

The Housing Element is a regulatory document that establishes goals and polices that guide development, as well as outlines various districts within the boundaries of the city and restrictions for erecting, constructing, altering, or maintaining certain buildings, identifying certain trades or occupations, and makes certain uses of lands. The proposed Project does not directly result in development in and of itself. Before any development can occur in the city, all such development is required to be analyzed for conformance with the General Plan, Development Code and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

Future development in Concord could contribute to global climate change through direct and indirect emissions of GHG from transportation sources, energy (natural gas and purchased energy), water/wastewater use, waste generation, and other off-road equipment (e.g. landscape equipment, construction activities). Potential future development under the proposed Project would not increase development potential in Concord beyond what was currently accounted for in the General Plan. Consequently, implementation of the proposed Project would result in a *less-than-significant* impact related to contributing to GHG emissions that could have a significant effect on the environment and conflicting with an applicable plan adopted for the purpose of reducing GHG emissions.

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

See Section VII.a above.

VIII. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

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

State-level agencies, in conjunction with the USEPA and Occupational Safety and Health Administration (OSHA) regulate removal, abatement, and transport procedures for asbestos-containing materials. Asbestos-containing materials (ACMs) are materials that contain asbestos, a naturally-occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, State, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACMs, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance will result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore,

only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.

The USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority new electrical equipment starting in 1979, and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act, 15 USC Section 2601 et seq. (TSCA). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline highly specific safety procedures for their disposal. The State of California likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed accordingly. At lower concentrations for non-liquids, regional water quality control boards may exercise discretion over the classification of such wastes.

The California Division of Occupational Safety and Health's (Cal OSHA) Lead in Construction Standard is contained in Title 8, Section 1532.1 of the California Code of Regulations. The regulations address all of the following areas: permissible exposure limits (PELs); exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection (MRP); employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Potentially hazardous building materials (i.e. ACM, lead-based paint, PCBs, mercury) may be encountered during the demolition of existing structures, if required under the proposed Project. The removal of these materials (if present) by contractors licensed to remove and handle these materials in accordance with existing federal, State, and local regulations would insure that risks associates with the transport, storage, use, and disposal of such materials would be less than significant.

Common cleaning substances, building maintenance products, paints and solvents, and similar items would likely be stored, and used, at the future housing and emergency shelter developments that could occur under the proposed Project. These potentially hazardous materials, however, would not be of a type or occur in sufficient quantities to pose a significant hazard to public health and safety or the environment. Consequently, associated impacts from implementation of the proposed Project would be *less than significant*.

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

As described in Section VIII.a above, the storage and use of common cleaning substances, building maintenance products, and paints and solvents in the potential development planned for under the proposed Project could likely occur; however, these potentially hazardous substances would not be of a type or occur in sufficient quantities on-site to pose a significant hazard to public health and safety or the environment. Consequently, overall, associated hazardous materials impacts would be *less than significant*.

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

While the majority of schools in Concord are within ¼-mile of a zone affected by the proposed Project, the implementation of the proposed Project allows for new housing units in Residential zoning districts where residential uses currently exist and are accounted for in the General Plan. As such there would be no increase in the risk of hazardous emissions as discussed above in Sections VIII.a and VIII.b above. As a result impacts to schools would be *less than significant*.

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

Records searches of the Envirostor database identify that there are locations within the City that are listed under the Spills, Leaks, Investigation, and Cleanups (SLIC) program and as locations of former Leaking Underground Fuel Tanks (LUFTs).[9] However, because potential future housing units that could be permitted under the proposed Project would occur in locations where existing residential uses currently exist, no significant hazards to the public or the environment are anticipated to occur. Continued compliance with applicable federal, State, and local regulations, (see Section VIII.a) would ensure that associated impacts are reduced to the maximum extent practicable. Therefore, any potential future development that could occur under the proposed Project would not create a significant hazard to the public or the environment by virtue of being identified as a hazardous materials site, and impacts related to existing hazardous material sites would be *less than significant*.

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

Areas within the City are located within the boundaries of the land use compatibility plan for Buchanan Field Airport. However, the Housing Element does not include any policies which would promote incompatible land uses near the airport. Impacts would be *less than significant*.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

There are no private airstrips within the vicinity of the City of Concord. This condition precludes the possibility of the proposed future housing projects from creating aviation safety hazards for people residing or working in the project area. Consequently, *no impact* would occur.

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

This City of Concord A*ll-Hazards Emergency Plan*, revised May 2008, addresses the City of Concord planned response to extraordinary emergency situations associated with natural disasters, technological incidents and nuclear emergency operations. The proposed Project does not include potential land use changes that would impair or physically interfere with the ability to implement the City's *All-Hazards Emergency Plan*. Therefore, compliance with the provisions of the California Fire Code (CFC) and the CBC would ensure that potential future development under the proposed Project would result in a *less-than-significant* impact with respect to interference with an adopted emergency response plan or emergency evacuation plan.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The Study Area is located in a highly urbanized area and is not surrounded by woodlands or vegetation that would provide fuel load for wildfires. According to the California Department of Forestry and Fire Protec-

[9] California Department of Toxic Substances Control Envirostor, City of Concord, https://www.envirostor.dtsc.ca.gov, accessed July 15, 2014.

tion, the City does not contain any land designated as a "Very High Fire Hazard Severity Zone."[10] The proposed housing sites are currently developed, containing limited amounts of vegetation, and are neither located on or directly adjacent to forested areas that could contribute to hazardous fire conditions.

All development in the Study Area would be constructed pursuant to the CBC, CFC, and the Concord Fire Code (Municipal Code Chapter 15.65). As noted above in Section VIII.g, compliance with these regulations would reduce the risk of loss, injury, or death resulting from wildland fire and impacts would be *less than significant*.

IX. HYDROLOGY AND WATER QUALITY Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a significant lowering of the local groundwater table level?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Expose people or structures to a significant risk of inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

a) Would the project violate any water quality standards or waste discharge requirements?

As previously stated in the Project Description, no specific projects have been identified or are proposed as part of the proposed Project. However, potential future development, redevelopment, or modifications

[10] California Department of Forestry and Fire Protection, Contra Costa County Very High Fire Hazard Severity Zones in Local Responsibility Area Map, adopted November 7, 2007.

associated with development permitted by the proposed Project could affect drainage patterns and increase the overall amount of impervious surfaces, thus creating changes to stormwater flows and water quality. Increasing the total area of impervious surfaces can result in a greater potential to introduce pollutants to receiving waters. Urban runoff can carry a variety of pollutants, such as oil and grease, metals, sediments, and pesticide residues from roadways, parking lots, rooftops, and landscaped areas and deposit them into an adjacent waterway via the storm drain system. New construction could also result in the degradation of water quality with the clearing and grading of sites, releasing sediment, oil and greases, and other chemicals to nearby water bodies. However, future development permitted by the proposed Project would be located in the urbanized areas of Concord, all of which have already been developed and currently have a high percentage of impervious surfaces.

Water quality in stormwater runoff is regulated locally by the Contra Costa Stormwater C.3 provisions (water pollution prevention) set by the San Francisco Bay Regional Water Quality Control Board (RWQCB). Adherence to these regulations requires new development or redevelopment projects to incorporate treatment measures, an agreement to maintain them, and other appropriate source control and site design features that reduce pollutants in runoff to the maximum extent practicable. Many of the requirements consider Low Impact Development (LID) practices such as the use of on-site infiltration through landscaping and vegetated swales that reduce pollutant loading. Incorporation of these measures can even improve on existing conditions.

In addition, the potential housing will be required to comply with the National Pollutant Discharge Elimination System (NPDES) Permit and implementation of the construction Storm Water Pollution Prevention Plan (SWPPP) that require the incorporation of Best Management Practices (BMPs) to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Compliance with the provisions of the NPDES and the City's Grading, Erosion, and Sedimentation Control Ordinance would reduce the impacts of future housing projects.

While the proposed Project would permit housing units and emergency shelters to occur in Concord, it does not contain any policies that would directly or indirectly result in violations of water quality standards. Therefore, implementation of the proposed Project would have a *less-than-significant* impact on water quality.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a significant lowering of the local groundwater table level?

Potential future development under the proposed Project would have a significant environmental impact if it would result in a net deficit in aquifer volume or a lowering of the local groundwater table level. Other physical changes that could occur as a result of implementing the proposed Project would occur within the existing built environment in areas where existing development occurs and would not interfere with groundwater recharge. The proposed Project would not result in any new development potential in the city beyond what is currently accounted for in the General Plan and no additional water demand would occur. Consequently, impacts would be *less than significant*.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

The proposed Project would result in a significant environmental impact if it would require modifications to drainage patterns that could lead to substantial erosion of soils, siltation, or flooding. Such drainage pattern changes could be caused by grade changes, the exposure of soils for periods of time during which erosion could occur, or alterations to creekbeds. Potential future development as a result of the proposed Project

would occur within the built environment and would not involve the direct modification of any watercourse. If unforeseen excessive grading or excavation are required, then pursuant to the State Water Quality Control Board (SWQCB) Construction General Permit, a SWPPP would be required to be prepared and implemented for the qualifying projects under the proposed Project, which would ensure that erosion, siltation, and flooding is prevented to the maximum extent practicable during construction. Overall, construction associated with potential future development permitted under the proposed Project would not result in substantial erosion, siltation, or flooding either on- or off-site, and associated impacts would be *less than significant*.

d) 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, in a manner which would result in substantial flooding on- or off-site?

See Section IX.c above.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?

Physical changes that could occur as a result of implementing the proposed Project could increase impervious surfaces that could create or contribute to runoff water that would exceed the City's stormwater drainage systems. However, the type of anticipated development associated with the proposed Project would be restricted to the existing built environment. The impacts related to stormwater drainage runoff would be *less than significant*.

f) Would the project provide otherwise substantially degrade water quality?

A principal source of water pollutants is stormwater runoff containing petrochemicals and heavy metals from parking lots and roadways. Given that the proposed Project would not create such surfaces or increase vehicular use of existing parking lots and roadways, implementation of the proposed Project would not contribute to these types of water pollutants. As discussed under Section IX.c and IX.d, where excessive construction related grading or excavation is required, pursuant to the SWQCB Construction General Permit, a SWPPP would be required to be prepared and implemented for the qualifying projects under the proposed Project, which would reduce polluted runoff to the maximum extent practicable during construction phases. Furthermore, implementation of the proposed Project would be subject to the oversight and review processes and standards outlined in Section IX.a. As such, compliance with these existing regulations would result in *less-than-significant* water quality impacts.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Flood-prone areas in Concord are generally located in low-lying areas and in areas close to shorelines, streams and creeks. According to flood zone maps provided by the Federal Emergency Management Authority (FEMA), the areas north of Mallard Reservoir to Suisun Bay, along Pacheco Creek and near Buchanan Field Airport, lie on a 100-year flood plain. These areas are located north of SR-4 and are currently zoned for Business Park use. Hence, they pose no danger to housing, nor do they affect land where housing might be built in the future. However, there are many creeks in the City near residential areas that could flood after heavy storms. This is especially so if these storms occur during high tides which could reduce the ability of the storm drains to conduct water. Of the potential housing sites identified, only about four percent are within a 100-year flood plain.

The City has adopted a Flood Management Ordinance and a Stormwater Management and Discharge Control Ordinance to manage storm water runoff. General Plan policies require adequate building setbacks for devel-

opment adjacent to creek banks and engineering standards which protect against flooding. Other policies are also in place to reduce the potential impacts associated with stormwater runoff due to new or increased intensity of urban land uses. The Safety and Noise Element and the Public Facilities and Utilities Element of the General Plan provide details on flood risk reduction policies.

The type of anticipated development associated with the proposed Housing Element would be restricted to the existing built environment in areas where development currently exists. Potential future development under the proposed Project would be required to comply with the City's existing regulations. Consequently, implementation of the proposed Project would result in *less-than-significant* impacts.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

See Section IX.g above.

i) Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

There are no dams or levees upstream of the City of Concord. Consequently, *no impact* would occur.

j) Would the project potentially be inundated by seiche, tsunami, or mudflow?

Although tsunamis can occur and cause tidal surges in San Francisco Bay, these events are extremely rare and would not result in wave run-up capable of causing flood damage within the city. San Francisco Bay greatly attenuates tsunamis that might reach the Golden Gate area. No bodies of water large enough to cause a seiche are present near the project site. As a policy-level document, the Housing Element would have *no direct impact* on inundation by seiche, tsunami, or mudflow.

XI. LAND USE Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a) Would the project physically divide an established community?

Implementation of the proposed Project would not involve any structures, land use designations, or other features (i.e. freeways, railroad tracks) that would physically divide an established community. The type of anticipated development associated with the proposed Project would be restricted to the existing built environment and would not physically divide an established community; thus, *no impact* would occur.

b) Would the project conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The General Plan is the primary planning document for the City of Concord. The proposed Project would enable the City of Concord to meet its housing needs required by State law and facilitate future development to meet the needs of at-risk populations by providing housing types designed for these groups consistent with the City's 2007-2014 General Plan Housing Element. Future potential development permitted under the proposed Project does not include any land use or zoning changes that would re-designate land uses or zoning districts, but would allow for special-needs housing, including emergency shelters for the homeless, and secondary living units in zoning districts where residential uses currently exist and are accounted for in the General Plan. The nature of this type of development would not be of such form, mass, or scale that would be inconsistent with existing residential development patterns. Therefore, impacts regarding conflicts with applicable plans, policies, or regulations would be *less than significant*.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

As discussed above in Section IV.f above, there are no habitat conservation plans or natural community conservation plans within the city limits, therefore implementation of the proposed Project will not conflict with any such plans. Consequently, there would be *no impact*.

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

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

While the proposed Project would permit development in the Study Area, it would not result in the loss of known mineral resources or substantially limit the availability of mineral resources over the long term. Mineral and aggregate resources exist throughout Concord, particularly in developed residential areas east of Clayton Road between Bailey and Kirker Pass, and along the southern city limits. Access to these mineral and aggregate resources is restricted by existing development in residential neighborhoods east of Clayton. Identified resources along the southern city limits are in an undeveloped area. Implementation of the proposed Project would not affect ongoing production at these facilities. Therefore, there would be *no impact* to known mineral resources.

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

See Section XI.a above.

XII. NOISE Would the project result in:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or other applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generate excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or other applicable standards of other agencies?

The type of anticipated development associated with special-needs housing, secondary living units and emergency shelters would be restricted to the existing built environment in areas where residential and non-residential uses are currently permitted. The provisions of the proposed Project would not contravene any aspects of the General Plan, including land use designations, noise limits, or other restrictions that address noise impacts. Though future potential development permitted under the proposed Project may potentially be noise-generating during construction phases, all potential future development pursued under the proposed Project would be subject to the oversight and review processes and standards that are envisioned by the General Plan, established within the City Development Code, and/or otherwise required by the State and federal regulations. Compliance with these existing regulations would ensure that the proposed Project would neither cause new noise impacts nor exacerbate any existing ones. Accordingly, noise impacts associated with implementing the proposed Project would be *less than significant*.

b) Would the project result in exposure of persons to or generate excessive groundborne vibration or groundborne noise levels?

Potential future development associated with the proposed Project would not include any new roads or transportation infrastructure and therefore would not itself result directly in any new transportation-related sources of vibration. The construction of special-needs housing, secondary living units and emergency shelters would not include vibration-generating equipment and would not result in long-term operational vibration impacts. *No impact* related to long-term vibration would occur. Any impacts associated with construction would be temporary and short-term. Methods to reduce vibration during construction would include the use of smaller equipment, use of static rollers instead of vibratory rollers, and drilling piles as opposed to pile driving. Compliance with policies in the Safety and Noise Element together with no long-term vibration impacts would ensure impacts would be *less than significant*.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potential impacts from future residential development would stem mainly from the addition of vehicles along roadways in the city. However, no additional vehicles are anticipated under the proposed Project beyond what was previously analyzed under the current General Plan. The type of development envisioned under the proposed Project would be compatible with nearby residential land uses and are either already developed and/or in close proximity to existing residential and residential-serving development. As discussed above in Section XII.a, because residential uses are not typically associated with high levels of stationary noise generation and would be largely developed and near other residential uses, it is unlikely that any developments subsequent to the future development under the proposed Project would directly contribute to greater increase in ambient noise levels in their surrounding areas. Therefore, the impact would be *less than significant*.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Based on applicable criteria stipulated by the Safety and Noise Element, the development of the future potential development associated with the proposed Project could cause temporary noise impacts during construction at adjacent land uses. Potential future housing could be located in proximity of noise-sensitive residential areas. Construction would be localized and would occur intermittently for varying periods of time. Prior to construction of each future development under the proposed Project, for projects that are not subject to separate environmental review, construction noise impacts would be addressed through compliance with the City's General Plan and Development Code through the City's building permitting process. Several methods can be implemented to reduce noise during construction such as equipment selection, selecting staging areas as far as possible from nearby noise sensitive areas and temporary construction walls. Compliance with the General Plan noise related policies would ensure these impacts would be *less than significant*.

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

Potential noise impacts from Buchanan Field Airport were previously analyzed in the 2030 Concord General Plan EIR and found to be less than significant with implementation of applicable General Plan policies. Additionally, the Concord Development Code includes an Airport Overlay District that requires projects within the Airport Influence Area to comply with the Contra Costa County Airport Land Use Compatibility Plan. Impacts would be *less than significant* as the Housing Element is a policy-level document that does not contain site-specific development plans or authorize entitlements for development to occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

There are no private airstrips within the vicinity of the City of Concord. This condition precludes the possibility of the proposed future housing projects from exposing for people residing or working in the project area to excessive noise levels. Consequently, *no impact* would occur.

XIII. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a) 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)?

The proposed Project would be considered to result in a substantial and unplanned level of growth if estimated buildout exceeded local and regional growth projections (e.g. by proposing new homes or businesses). Implementation of the proposed Project would not result in any additional housing beyond what was considered in the current General Plan and thus would not directly induce substantial population growth. Additionally, the proposed Project would not extend roads or other infrastructure, and thus would not indirectly induce substantial population growth. Thus, a *less-than-significant* impact would occur in relation to population growth.

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

Because the proposed Project in no way increases the restrictiveness of the existing zoning on any of the proposed housing sites, nothing in the proposed Housing Element would serve to displace housing or people. The proposed Project prescribes standards, but does not mandate the exact use of the land. Therefore, market conditions and a variety of other factors will be the primary determinates of the increase or decrease in the number of housing units and residents in Concord. Consequently, impacts with respect to displacing housing units or residents would be *less than significant*.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

See Section XIII.a and XIII.b above.

XIIII. PUBLIC SERVICES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒

XIIII. PUBLIC SERVICES Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically 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:*

The Contra Costa County Fire Protection District provides fire and life safety services within the City of Concord. The Fire District currently has four fire stations throughout the City. The Fire District is comprised of four divisions including emergency operations, information services, support services, and administrative services.

The Concord Police Department provides police protection in the City. The Police Department is headquartered at 1350 Galindo Street in Concord. Currently, the Police Department is comprised of three divisions, field operations, professional standards unit, and investigations and administrative services.

The Mount Diablo Unified School District provides school services for the City. The school district boundaries encompass the entire City. Currently, the district operates 14 elementary schools, four middle schools, and eight high schools.

The primary purpose of a public services impact analysis is to examine the impacts associated with physical improvements to public service facilities required to maintain acceptable service ratios, response times or other performance objectives. Public service facilities need improvements (i.e. construction of new, renovation or expansion of existing) as demand for services increases. Increased demand is typically driven by increases in population. The proposed Project would have a significant environmental impact if it would exceed the ability of public service providers to adequately serve the residents of the city, thereby requiring construction of new facilities or modification of existing facilities. As discussed in Section XII, Population and Housing, above, the proposed Project would not directly or indirectly result in population growth. The proposed Project does not include the construction of any new public service facilities or expansion of existing facilities. The proposed Project would not increase development potential beyond what was considered in the current General Plan. Further, the provisions of the proposed Project would not contravene any aspects of the General Plan, including land use designations and allowed building intensities that could impact demand for City services. Implementation of the proposed Project would therefore neither cause new impacts in regard to provision of City services nor exacerbate any existing ones; thus, *no impact* would occur.

XV. RECREATION	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	☐	☐	☐	☒

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?

The City of Concord Recreation and Parks Department provides parks and recreation services to the Concord community. Recreation and Parks operates and maintains four community parks, two open space areas, 17 neighborhood parks, one skate park, a youth sports complex, and Krueger Fields. The City also operates and maintains the Diablo Creek Golf Course, Sleep Train Pavilion, Centre Concord, and Todos Santos Plaza. Recreation and Parks also organizes and manages sports programs, after-school care, a variety of leisure classes, and Camp Concord. In addition, Parks and Recreation hosts a variety of special events such as the Farmer's Market in Todos Santos Plaza, July 4th Jubilee and Parade, and National Night Out.

Because implementation of the proposed Project would not directly or indirectly result in population growth as discussed in Section XII, Population and Housing, above, it also would not increase the use of existing parks or facilities. Additionally, implementation of the proposed Project does not include nor require the construction or expansion of recreational facilities. Further, the housing described is consistent with the General Plan. For these reasons, implementation of the proposed Project would have *no impact* on recreation.

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

See Section XV.a above.

XVI. TRANSPORTATION/TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit??	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐

XVI. TRANSPORTATION/TRAFFIC Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The proposed Project would have minimal effect on the circulation system of Concord as it would not increase development potential and would not directly or indirectly result in population growth beyond that already considered in the General Plan. As such, implementation of the proposed Project would not conflict with any applicable plan, ordinance, or policy which establishes measures of effectiveness for the performance of the circulation system. Consequently, impacts would be *less than significant*.

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

See Section XVI.a above.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The proposed Project does not include any strategy or measure that would directly or indirectly affect air traffic patterns. Therefore, *no impact* would result.

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

The proposed Project does not include any strategy that would promote the development of hazardous road design features or incompatible uses. Therefore, *no impact* would occur.

e) Would the project result in inadequate emergency access?

No part of the proposed Project would result in the development of uses or facilities that would degrade emergency access. Therefore, there would be *no impact*.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The proposed Project will have no impact on policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. While the proposed Project does include provisions that are dependent on the location of public transit stops, potential future development permitted as a result of the proposed Project will only be reactive to the location of bus stops and will have no effect on the placement of bus stops or any other aspect of the public transportation system. Therefore, *no impact* will occur.

XVII. UTILITIES AND SERVICE SYSTEMS Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant**	**No Impact**
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Central Contra Costa Sanitary District (CCCSD) permits, inspects, and treats wastewater discharged by the businesses and residences of Concord as well as Orinda, Moraga, Lafayette, Alamo, Danville, San Ramon, Pleasant Hill, Pacheco, Clayton, Clyde, and Martinez in Contra Costa County. Wastewater within CCCSD is primarily conveyed to the Central Contra Costa Sanitary District Treatment Plant (CCCSDTP) through pipes by the force of gravity. Where hills prevent natural flow, pumping facilities are used to convey water over these inclines. Currently, there are 18 pump stations within the CCCSD used to collect and convey waste to the CCCSDTP for treatment. Opened in 1948, and upgraded several times in its 64-year history, the CCCSDTP treats an average of approximately 45 million gallons of wastewater per day generated in a 146-square-mile area by approximately 450,000 residents and numerous businesses. Located in Martinez, the plant has a treatment capacity of 55 million gallons per day (mgd) and 240 mgd of wet weather flow. The Plant Operations Building houses the Control Center, a state-of-the-art computerized system that monitors and controls every phase of the treatment process. The facility is staffed 24 hours a day, 365 days a year.

Wastewater moves through CCCSD's 1,500 miles of sewer lines, finally arriving at the plant's headworks to begin treatment. Most of the wastewater is treated to a secondary level, disinfected by ultraviolet light, and then discharged into Suisun Bay. Approximately 600 million gallons per year are treated to a tertiary level through additional filtration and disinfection before being distributed as Recycled Water for landscape irrigation, industrial processes, and plant operations. See XVII.a above.

The proposed Project would not increase development potential beyond what was anticipated in the current General Plan. Therefore, construction and operation resulting from potential future development permitted under the proposed Project would have *no impact* with regard to the wastewater treatment requirements of the San Francisco Bay RWQCB and the capacity of the CCCSDTP to serve the projected General Plan demand in addition to its existing commitments.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

CCWD operates the jointly owned Randall Bold Water Treatment Plant, which provides treated water to Antioch, Diablo Water District (Oakley), and Brentwood as well as CCWD's Treated Water Service Area (which includes the City of Concord). It also owns and operates the Bollman Treatment Plant, which supplies treated water to CCWD's treated water service area. CCWD sells raw water to the cities of Antioch, Martinez, and Pittsburg, and the California Cities Water Company in Bay Point, as well as industrial and irrigation customers. The District's intakes are located at Rock Slough and on Old River, both in eastern Contra Costa County, and Mallard Slough in central Contra Costa County. The backbone of the District's water conveyance system is the 48-mile Contra Costa Canal, which extends from the Rock Slough intake to the Mallard Reservoir in central Contra Costa County. CCWD has a water supply contract, recently renewed to 2045, with the U.S. Bureau of Reclamation, for water from the Central Valley Project that provides up to 195,000 acre per feet per year.

Given the proposed Project would not increase development potential beyond what was anticipated in the current General Plan it would not result in new population that would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; thus*, no impact* would occur.

c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Given the proposed Project would not increase development potential beyond what was anticipated in the current General Plan it would not result in new population that would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; thus, *no impact* would occur.

d) Would the project have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Contra Costa Water District (CCWD) acts as the City's water supplier, providing water service to the City from the Sacramento/ San Joaquin Delta. CCWD serves treated and raw (untreated) water to approximately 510,000 people in a service area covering 137,127 acres in central and eastern Contra Costa County. Its customers also include 10 major industries, 36 smaller industries, and approximately 50 agricultural users. Formed in 1936 to provide water for irrigation and industry, CCWD is now one of the largest urban water districts in California. The CCWD provides treated water to Concord as well as Clayton, Clyde, Pacheco, Port

Costa, and parts of Martinez, Pleasant Hill, and Walnut Creek. In addition, the District sells wholesale treated water to Antioch, the California Cities Water Company in Bay Point, and Brentwood.

The proposed Project would not increase development potential beyond what was anticipated in the current General Plan. Given no additional demand to water supply would occur there would be *no impact* to water supply as a result of implementing the proposed Project.

e) 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?

See Sections XVII.a and XVII.b above.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

The Concord Disposal Service handles the residential and commercial waste stream in the City of Concord, collecting both solid waste and recycled materials. Concord Disposal Service transports waste to the Contra Costa Waste Service Recycling Center and Transfer Station (RCTS) located in Pittsburg. Recycled materials are then transported to the Mount Diablo Recycling Center in Concord, and as of July 8, 2014, all municipal solid waste was redirected to the Keller Canyon Landfill in Pittsburg from the Potrero Hills Landfill in Solano County.[11] The remaining capacity at the Keller Canyon Landfill is approximately 63,400,000 cubic yards, or 85 percent of the landfill's total capacity, and the landfill is not expected to close until 2030.[12]

The proposed Project would not increase development potential beyond what was anticipated in the current General Plan. Given the fact that no additional solid waste generation is anticipated under the proposed Project, *no impact* to the Keller Canyon Landfill as a result of implementing the proposed Project would occur.

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

The proposed Project will have no effect on the solid waste disposal and recycling system of Concord as it will not increase development potential and would not directly or indirectly result in population growth. As such, implementation of the proposed Project would not conflict with any applicable plan, ordinance, or policy which establishes measures of effectiveness for the performance of the solid waste disposal and recycling system. There would be *no impact* to solid waste as a result of implementing the proposed Project.

[11] Email correspondence between Sal Coniglio, Diversion Facility & Operations Manager, Contra Costa Waste Service and Alex Lopez, PlaceWorks, September 8, 2014.

[12] Personal correspondence between Nancy Colon, Concord Disposal Services and Alex Lopez, PlaceWorks, August 27, 2014.

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

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

The provisions of the proposed Housing Element would not contravene any aspects of the General Plan, including land use designations and allowed building intensities, that would lead to increased population or development, impacts to wildlife, cumulative effects, or other substantial adverse effects on human beings. All structures, programs, and projects pursued under the proposed Project would adhere to the vision established within the General Plan and all subsequent land use designations and zoning districts. Furthermore, the proposed Project does not result in any new development potential beyond what was considered in the General Plan. Implementation of the proposed Project would therefore neither cause new impacts in regard to these issues nor would it exacerbate any existing impacts. Therefore, through mandatory regulatory compliance and consistency with General Plan policies, implementation of the proposed Project would have a *less-than-significant* impact with regards to the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory, nor have impacts that are individually limited, but cumulatively considerable, nor does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

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

See Section XVIII above.

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

See Section XVIII above.