



2600 Moraga Road Self Storage Project

Initial Study – Mitigated Negative Declaration

prepared by

City of San Pablo

1000 Gateway Avenue

San Pablo, California 94806

Contact: Sandra Marquez, Associate Planner

prepared with the assistance of

Rincon Consultants, Inc.

449 15th Street, Suite 303

Oakland, California 94612

March 2021



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Appendices

Appendix AQ	CalEEMod Outputs
Appendix CSP	Construction Site Plans
Appendix CUL	Cultural Resources Study
Appendix GEO	Geotechnical Investigation and Geological Hazards Study
Appendix HAZ	Phase I Environmental Site Assessment
Appendix NOI	Road Construction Noise Model Output
Appendix TRA	Transportation Analysis and Parking Study

Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ALUCP	Airport Land Use Compatability Plan
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
CALFIRE	California Department of Forestry and Fire Protection
Cal OES	California Office of Emergency Services
CalRecycle	California Department of Resources Recycling and Recovery
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCFPD	Contra Costa County Fire Protection District
CCTA	Contra Costa Transportation Authority
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CGS	California Geological Survey
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CRHR	California Register of Historical Resources
CWA	Clean Water Act
dB	Decibels
dBA	A-weighted sound pressure level
DNL	Day-Night Average Level
DOC	California Department of Conservation
DOF	California Department of Finance
DOT	U.S. Department of Transportation

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DPM	Diesel Particulate Matter
DTSC	Californian Department of Toxic Substances Control
EBMUD	East Bay Municipal Utility District
EDR	Environmental Data Resources, Inc.
ESA	Environmental Site Assessment
FTA	Federal Transit Administration
GHG	Greenhouse gas
HVAC	Heating, ventilation, and air conditioning
H _z	Hertz
ITE	Institute of Transportation Engineers
L _{eq}	Equivalent continuous sound level
L _{max}	The highest value measured by a sound level meter over a given period of time
L _{min}	The lowest value measured by a sound level meter over a given period of time
LID	Low Impact Development
LOS	Level of Service
MCE	Marin Clean Energy
mgd	million gallons per day
MLD	Most-likely descendant
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System Permit
MT	Metric Tons
NO _x	Nitrogen Oxide
NPDES	National Pollutant Discharge Elimination System
NSR	New Source Review
O ₃	Ozone
NAHC	Native American Heritage Commission
NRHP	National Register of Historical Places
NWIC	Northwest Information Center
OPR	State Office of Planning and Research
OS	Open Space
PG&E	Pacific Gas and Electric Company
PM _{2.5}	Particulate matter (2.5 microns or smaller)
PM ₁₀	Particulate matter (10 microns or smaller)

PPV [in/sec]	Particle velocity in inches per second
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCP	Stormwater Control Plan
SFBAAB	San Francisco Bay Area Air Basin
SHMA	Seismic Hazards Mapping Act
SIP	State Implementation Plan
SLF	Sacred Lands File
SPD	San Pablo Police Department
SPMC	San Pablo Municipal Code
SWPPP	Stormwater Pollution Protection Plan
SWRCB	California State Water Resources Control Board
TAC	Toxic Air Contaminants
TMDLs	Total Maximum Daily Loads
TPA	Transportation Priority Area
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VdB	Vibration decibels
VMT	Vehicle Miles Travelled
WCCUSD	West Contra Costa Unified School District
WCW	West County Wastewater District
WQRRP	Water Quality and Resource Recovery Plant

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Initial Study

1. Project Title

2600 Moraga Road Self Storage Project

2. Lead Agency Name and Address

City of San Pablo
1000 Gateway Avenue
San Pablo, California 94806

3. Contact Person and Phone Number

Sandra Marquez, Associate Planner
City of San Pablo
1000 Gateway Avenue
San Pablo, California 94806
(510) 215-3058
SandraM@sanpabloca.gov

4. Project Sponsor's Name and Address

American Recess, LLC
85 Keystone Avenue, Suite E
Reno, Nevada 89503
(775) 357-9206

5. Project Location

The project site is a 4.1-acre portion of an approximately 9-acre parcel at 2600 Moraga Road within the City of San Pablo in Contra Costa County, California. The site is located on the east side of Moraga Road, east of its intersection with Castro Road. Regional access is available from Interstate 80, approximately 0.8 east of the site, and San Pablo Avenue (State Route 23), approximately 0.3 mile west of the site. Local access is available from Moraga Road which directly abuts the project site to the west.

6. Surrounding Land Uses and Setting

The project site is located east of Moraga Road, and is bordered by single-family residences to the east, a daycare center and commercial uses to the south, and a U.S. Army Reserve Center to the west across Moraga Road. To the north is an abandoned school facility which is the planned future relocation site of the El Portal Soccer Fields.

Topography on the site is generally flat and elevation ranges between 57 and 67 feet above mean sea level. The project site currently contains a soccer field consisting of mowed grass bordered by landscaped trees and shrubs with paved areas at the northeast and northwest corners and a small patch of ruderal vegetation next to the paved area at the northeast corner. San Pablo Creek runs 0.3 miles to the south and an intermittent drainage is located 180 feet to the northwest of the project site. There are traces of the Hayward Fault that intercept the site diagonally through the center of the site and diagonally along the northeastern edge of the site.

Figure 1 shows the regional location of the project site, and Figure 2 provides an aerial image of the project site in its neighborhood context.

7. General Plan Designation

The project site's General Plan land use designation is Parks/Recreation, which allows for improved and unimproved park facilities.

8. Zoning

Approximately 3 acres in the southern portion of the project site are zoned Open Space (OS) and the remaining 1-acre in the northern portion is zoned Institutional (I). According to Section 17.36.030 of the City of San Pablo Municipal Code, the OS District permits uses such as outdoor passive recreation or parks and playgrounds. The I District permits uses such as parks, government administrative offices, schools and school playgrounds, hospitals, convalescent homes, fire stations, public utility stations, post offices, and various types of state and federal facilities. Other types of complementary uses are allowed with a use permit. Personal storage would be allowed with a use permit in the I zone. Figure 3 shows the project's existing zoning designations.

Figure 1 Regional Location



★ Project Location

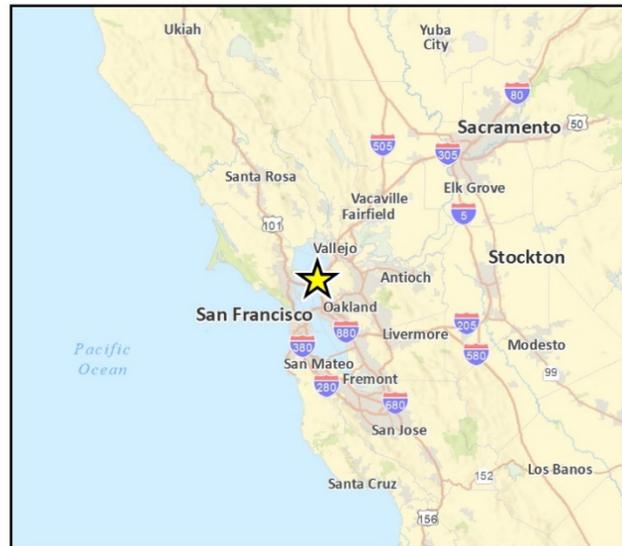


Fig 1 Regional Location

Figure 2 Project Site in its Neighborhood Context



Figure 3 Project Site's Existing Zoning Designations



Fig 4 Current Project Site Zoning

9. Project Description

The proposed project would involve the construction of a 124,620 square-foot self-storage facility comprised of personal storage units and a rental office within three single-story structures and one three-story structure. The three-story structure would have a maximum height of 35 feet.

Exterior finish materials would consist of a mixture of horizontal and vertical decorative metal sliding, exposed concrete masonry unit block, and exterior stucco/fiber cement board siding. Display storage doors would be visible behind large windows.

Parking would include 16 on-site parking spaces and three bicycle parking spaces. The project applicant has applied for an adjustment to reduce the required 127 parking spaces (1 per 1,000 square feet + 1 per employee) and seven bicycle parking spaces on site pursuant to San Pablo Municipal Code Section 17.54.030.

Table 1 summarizes information about the project and Figure 4 shows the proposed site plan.

Table 1 Project Summary

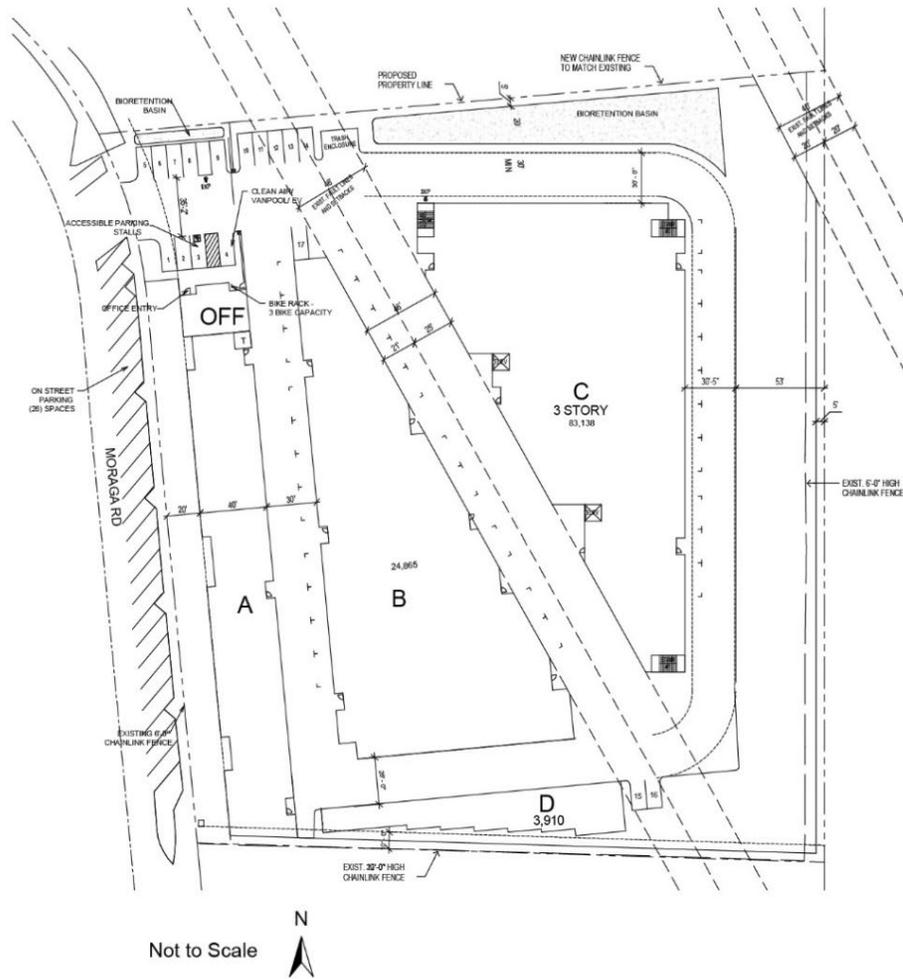
Building Area	
Building A (1 story)	11,607 square feet
Building B (1 story)	24,865 square feet
Building C (3 story)	83,138 square feet
Building D (1 story)	3,910 square feet
Office	1,100 square feet
Total	124,620 square feet
Landscape	
Landscape Area	37,186 square feet
Vehicle Parking	
Standard	14 stalls
Accessible	1 stall
Clean Air/Vanpool/EV	1 stall
Total	16 stalls
Bicycle Parking	
Exterior stalls	3 stalls

Source: Appendix CSP

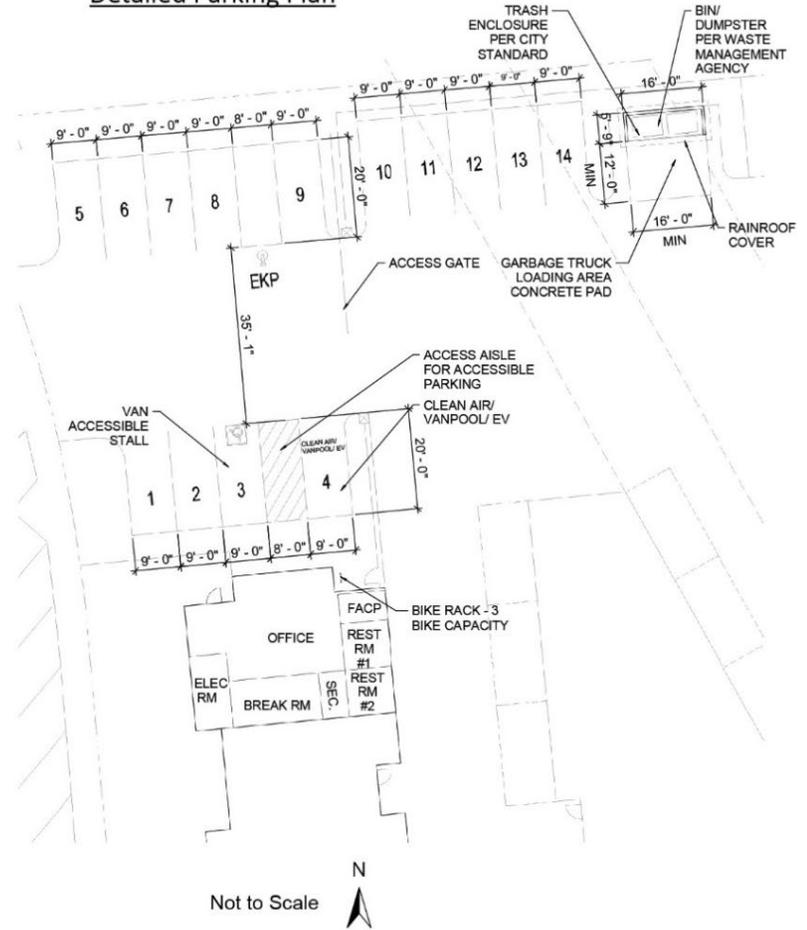
The storage facility would be constructed on an approximately 4.1-acre parcel that would be created as part of a lot split. The City proposes to develop a new community park facility on the remaining (northern) portion of the parcel and is conducting CEQA review concurrently with this Initial Study. Potential environmental impacts from the proposed park are not included in this Initial Study.

Figure 4 Proposed Site Plan

Site Plan



Detailed Parking Plan



The project would also involve a General Plan Amendment to change the project site's land use designation from Parks/Recreation to Public/Institutional and a rezoning from Open Space District to Institutional District to allow the proposed use.

Access and Circulation

Access to the storage facility would be from an existing driveway on Moraga Road. A vinyl coated six-foot chain link sliding gate and a passcode-enabled gate entry keypad would be constructed to provide secure access, with administrative approval. Loading docks for self-storage units would generally be sited along the perimeter of storage structures. An internal road would provide vehicular access to self-storage unit entrances. Fire apparatus access would be maintained per Contra Costa Fire Protection District requirements along all buildings.

Landscaping

The proposed project would comply with the City of San Pablo's Water Efficient Landscape Ordinance. Landscaping on the site would total approximately 37,190 square feet and would consist of native California and horticulturally appropriate trees, shrubs, and groundcover. The proposed project would include approximately 5,480 square feet of stormwater bioretention swales to assist with groundwater recharge. Tall-growing drought-resistant grasses would be planted within proposed bioretention swales in the northern and northwestern portions of the site. In addition, the bioretention swale located in the northern portion of the site would be equipped with a meter release that would release stormwater from the area at the pre-development rate. Existing mature trees and vegetation along the eastern property line would be maintained. The project would include the removal of 19 trees, including four Eucalyptus trees in the northwestern portion of the site and 15 Hackberry trees along Moraga Road. Landscaping would also include the removal of existing vegetation from the northwestern portion of the project site. The 19 trees removed would be replaced consistent with the City's Tree Ordinance and landscaping requirements.

Hours of Operation

The proposed project would have differing operating hours for the office and for customer access (Appendix CSP). Office hours would be Monday through Friday from 7:00 am to 7:00 pm and on Saturday and Sunday from 8:00 am to 8:00 pm and would be staffed by two employees during office hours. Customers would be allowed to access the project site using a unique passcode between the hours of 6:00 am and 10:00 pm, Monday through Sunday. Customer passcodes would be disabled during non-operating hours to prevent entrance into the gated area and the buildings.

Construction

Project construction is estimated to occur over a 13-month period and would include typical construction phases such as site preparation and grading, building construction, paving, and architectural coating. The project would include the removal and decommissioning of an on-site well used for irrigation.

During project construction, equipment anticipated to be used includes backhoes, dozers, pavers, concrete mixers, trucks, air compressors, saws, and hammers. Trucks providing deliveries and hauling to and from the project site would access the site from Moraga Road.

10. Other Public Agencies Whose Approval is Required

The City of San Pablo is the lead agency with responsibility for approving the proposed project. The following approvals would be required for the project:

- General Plan Amendment to change the existing land use designation from Parks/Recreation to Public/Institutional
- Rezoning request to change the zoning designation from Open Space to Institutional District
- Conditional Use Permit to allow a self-storage facility in an Institutional District, a parking adjustment for reduced parking, and a height above 27 feet
- Major Design Review of a new commercial building
- Lot split of the subject 4.1 acre portion of a larger 9-acre parcel
- Contra Costa County permit for well removal

11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

The City of San Pablo has not received any requests from California Native American tribes to be notified of proposed projects, pursuant to Public Resources Code (PRC) Section 21080.3.1.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Determination

Based on this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a “potentially significant impact” or “less than significant with mitigation incorporated” 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.

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- I find that although the proposed project could have a significant effect on the environment, because all potential 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

March 25, 2021

Date

Elizabeth Tyler

Printed Name

Planning Manager

Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The project site is currently developed with playing fields. The site is characterized by an expanse of turf with a perimeter of trees. The project site is not located near an eligible or officially designated State Scenic Highway (California Department of Transportation [Caltrans] 2019). There are distant views of hillsides in and around Wildcat Regional Park and Hilltop Lake Park; however, there are no listed scenic vistas within the City of San Pablo (City of San Pablo 2011).

Regulatory Setting

City of San Pablo General Plan

- LU-I-7: Require design review of all new construction and visible exterior alterations of large non-residential buildings.

- LU-I-11: Enhance the City’s unique identity and image by adopting a consistent palette of landscaping, street trees, lighting, and signage within the public-right-of-way for neighborhood and street improvements.

Impact Analysis

- a. *Would the project have a substantial adverse effect on a scenic vista?*

A scenic vista is usually defined as a panoramic view from an elevated position or a long-range view from a public vantage point. This can include views of natural features or of the built environment, when architecture and landscaped boulevards offer high-value views of an area considered important to the sense of place. The proposed project would replace playing fields with self-storage buildings and an office. The project site is topographically flat and there are no scenic vistas visible from or through the site. The project would not have a substantial adverse effect on a scenic vista and there would be no impact.

NO IMPACT

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

The nearest eligible state scenic highway to the project site is a portion of Interstate 680 (I-680) where the interstate meets State Route 24 in Walnut Creek, approximately 15.4 miles southwest of the project site (Caltrans 2019). The project site is not visible from I-680, and therefore the proposed project would not damage scenic resources within view of a state scenic highway. No impact would occur.

NO IMPACT

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

The project site is in an urbanized area. Development of the project would require a general plan amendment and zone change to the Institutional (I) District for the site. Approval of the general plan amendment and zone change would be subject to the Planning Commission and City Council to ensure compliance with applicable general plan goals and policies and applicable zoning standards and guidelines. In addition, approval of the general plan amendment would be subject to the finding within San Pablo Municipal Code (SPMC) 17.22.050 that the project would have a substantial public benefit to be derived from such amendment and that the proposed amendment furthers the goals of the general plan. Approval of the zoning change would be subject to the findings within SPMC 17.22.040 which would require that the zoning amendment be consistent with general plan goals, policies, and implementation programs.

Development of the project site would also be subject to Major Design Review pursuant to San Pablo Municipal Code 17.20.030 which would ensure the project design is consistent with the vision set forth within the City’s General Plan. Major Design Review would require that the Planning Commission find that the location and project design consider privacy, views, and sunlight on adjoining properties; and that architectural design of structures and their colors and materials are

harmonious with surrounding development, landforms, and vegetation. As part of a conditional use permit, the project would also require consideration of an additional 8 feet of height beyond the allowable 27 feet within the Institutional district (SPMC Section 17.36.040).

Prior to project approval, the Planning Commission and the City Council would review the project's development plans to ensure that the above findings could be made, including that proposed design would be harmonious with surrounding development. In addition, the project's proposed height would not obstruct distant views of hillsides nor a scenic view within the City. Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project site is in an urbanized area with moderate levels of existing light typical of institutional areas. The surrounding institutional uses generate light and glare along the northern, western, and southern portions of the project site and low lighting typical residential areas generate light and glare along the eastern boundary of the project site. Lighting within the project site is typical of playing fields generally illuminated after sunset, within operating hours. Primary sources of light adjacent to the project site include interior and exterior lighting associated with the existing residential and institutional structures, vehicle headlights, and streetlights. The primary source of glare adjacent to the project site is the sun's reflection from metallic, glass, and light-colored surfaces on buildings and on vehicles parked on Moraga Road and in adjacent parking areas.

The proposed project would introduce additional sources of lighting and glare. The proposed project would not include new streetlights on roadways, but it would involve installation of exterior lighting to illuminate driveways, building entrances/exits, and surface parking areas. Additional sources of light and glare would be from headlights from vehicles entering and exiting the project driveway on Moraga Road. Parking lot lighting for the project would be subject to SPMC Chapter 17.56 which outlines parking lot lighting standards including shielding and directing all lighting downward to prevent glare, light trespass, and light pollution.

Additional new sources of light would also be from project signage that would be required to be reviewed for approval and permitted. Project signage would be required to comply with SPMC Chapter 18.04 which would regulate the size, type, location, and physical design of the proposed signage. Furthermore, SPMC Section 18.04.050(9) and 18.04.050(10) prohibit the use of digital signs and displays and permanent signs containing fluorescent or day-glow colors and signs illuminated by exposed light globes. Compliance with these regulations would ensure that proposed project signage would not create a substantial new source of substantial light or glare.

Sources of glare associated with the project would include the project's exterior windows and vehicles parked in the parking lot. These sources of light and glare would be similar to existing sources surrounding the site, including the institutional uses to the south, and would therefore be consistent with the surrounding uses in the area. No highly reflective glass or metallic elements are proposed as part of the project. Compliance with the SPMC would ensure that the project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank.

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The project site is located within an urban area of San Pablo. The site is currently developed as a park and is zoned as Open Space.

The California Department of Conservation (DOC) manages the Farmland Mapping and Monitoring Program to assess and record suitability of land for agricultural purposes. In each county, the land is analyzed for soil and irrigation quality and the highest quality land is designated as Prime Farmland. The project site and vicinity are designated as Urban and Built-Up Land and the site does not have any identified agricultural or forest land (DOC 2016).

Impact Analysis

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

The project site and surrounding area are located entirely in the Urban and Built-Up Land area (DOC 2016). Project implementation would only modify the project site; therefore, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by the project and no impact would occur.

NO IMPACT

- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

The project site and surrounding areas are not subject to Williamson Act contracts (DOC 2016). The project would only involve construction and modification at the project site; therefore, no Williamson Act contracts would be affected by project implementation and no impact would occur.

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

The project site and surrounding areas are not zoned or used for agriculture or forestry; therefore, no conflicts with agricultural or forest land zoning would occur. While some vegetation and mature trees are present on the project site, the site itself is not forest or timberland. The project site does not provide forest and timber resources. As such, the project would not convert agricultural, forest or timberland uses to other uses, and no impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Air Quality Standards and Attainment

The project site is located within the San Francisco Bay Area Air Basin (the Basin), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). As the local air quality management agency, BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the U.S. EPA classifies specific geographic areas as “attainment area” or “nonattainment area” for each pollutant. Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. BAAQMD is in nonattainment for the state and federal ozone standards, the state and federal PM_{2.5} (particulate matter 2.5 microns in size or less) standards and the state PM₁₀ (particulate matter 10 microns in size or less) standards and is required to prepare a plan for improvement (BAAQMD 2017a).

The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 2.

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ¹
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ^a

¹ More detailed discussion on the health effects associated with exposure to suspended particulate matter can be found in the following documents: United States Environmental Protection Agency, Air Quality Criteria for Particulate Matter, October 2004.
 Source: USEPA 2018

Air Quality Management

The Bay Area 2017 Clean Air Plan (the 2017 Plan) provides a plan to improve Bay Area air quality and protect public health as well as the climate. The legal impetus for the 2017 Plan is to update the most recent ozone plan, - the 2010 Clean Air Plan - to comply with state air quality planning requirements as codified in the California Health & Safety Code. Although steady progress in reducing ozone levels in the Basin has been made, the region continues to be designated as non-attainment for both the 1-hour and 8-hour state ozone standards. In addition, emissions of ozone precursors in the Bay Area contribute to air quality problems in neighboring air basins. Under these circumstances, state law requires the 2017 Plan to include all feasible measures to reduce emissions of ozone precursors (BAAQMD 2017b).

In 2006, the U.S. Environmental Protection Agency (USEPA) reduced the national 24-hour PM_{2.5} standard regarding short-term exposure to fine particulate matter from 65 micrograms per cubic meter (µg/m³) to 35 µg/m³. Based on air quality monitoring data for the 2006-2008 cycle showing that the region was slightly above the standard, in December 2008 the USEPA designated the Basin as non-attainment for the 24-hour national standard. This triggered the requirement for the BAAQMD to prepare a State Implementation Plan (SIP) to demonstrate how the region would meet the standard. However, data for both the 2008-2010 and the 2009-2011 cycles showed that PM_{2.5} levels in the Basin currently meet the standard. On October 29, 2012, the USEPA issued a proposed rule-making to determine that the Basin now meets the 24-hour PM_{2.5} national standard. The Basin will continue to be designated as nonattainment for the federal 24-hour PM_{2.5} standard until such time as the BAAQMD elects to submit a “redesignation request” and a “maintenance plan” to the USEPA, and the USEPA approves the proposed redesignation.

BAAQMD Significance Thresholds

The BAAQMD recommends that lead agencies determine appropriate air quality emissions thresholds of significance based on substantial evidence in the record. The BAAQMD’s significance

thresholds in the updated May 2017 CEQA Air Quality Guidelines for land use development projects within the San Francisco Bay Area Air Basin (SFBAAB) are the most appropriate thresholds for use in determining air quality impacts of the proposed project (BAAQMD 2017c). The BAAQMD significance thresholds for criteria air pollutants, shown in Table 3, were used to evaluate the project’s potential air quality impacts. Projects that would result in criteria air pollutant emissions below these significance thresholds would not result in a cumulatively considerable net increase in criteria air pollutants for which the SFBAAB is in non-attainment under applicable federal or state ambient air quality standards.

Table 3 Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

Source: BAAQMD 2017c

BAAQMD also provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed CO thresholds. If the following criteria are met, a project would result in a less than significant impact related to local CO concentrations:

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

The BAAQMD has also established screening criteria applicable to projects that would introduce new stationary sources of toxic air contaminants (TAC) emissions. A project would result in significant impacts if TAC emissions would result in an increased cancer risk level of more than 10 in one million, or a non-cancer (i.e., chronic or acute) hazard index greater than 1.0.

Methodology

The project’s construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. CalEEMod uses project-specific information including the project’s land use, square footage, and location, to model a project’s construction and operational emissions. Calculations are included in Appendix AQ.

Construction emissions modeled include emissions generated by construction equipment used on site and emissions generated by vehicle trips associated with construction, such as workers and

vendor trips. Project construction was analyzed based on the applicant-provided information regarding the construction schedule. Standardized assumptions were used where project-specific information was unknown. It is assumed that all construction equipment used would be diesel-powered. This analysis also includes all applicable regulatory standards the project is required to comply with. In particular, the project would be required to comply with the 2019 Building Energy Efficiency Standards (Energy Code), CalGreen, the City of San Pablo's General Plan, and BAAQMD's rules and regulations. Specifically, the project would be required to comply with BAAQMD Regulation 8, Rule 3, which restricts the VOC content of flat coatings to 100 grams per liter and non-flat coatings to 150 grams per liter.

Operational emissions modeled include mobile source emissions (i.e., vehicle emissions), energy emissions, and area source emissions. Mobile source emissions are generated by vehicle trips to and from the project site. The project's trip generation rates were determined using the Institute of Transportation Engineers (ITE), *Trip Generation Manual, 10th Edition* and can be found in Appendix TRA. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings.

Impact Analysis

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

The California Clean Air Act requires that air districts create a Clean Air Plan that describes how the jurisdiction will meet air quality standards. The most recently adopted applicable air quality plan is the BAAQMD's 2017 Plan. As described in the *Air Quality Management* Section, the 2017 Plan updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan. Pursuant to air quality planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of O₃ precursors – ROG and NO_x. The 2017 Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes measures related to specific emissions sectors.

Under BAAQMD's methodology, a determination of consistency with the 2017 Plan should demonstrate that a project:

- Supports the primary goals of the air quality plan
- Includes applicable control measures from the air quality plan
- Does not disrupt or hinder implementation of any air quality plan control measures

A project that would not support the 2017 Plan's goals would not be considered consistent with the 2017 Plan. On an individual project basis, consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the clean air plan's goals. In addition, applicable control measures such as green building construction, waste diversion, and water conservation would indicate support for the clean air plan goals on an individual project basis. The project site is currently zoned Open Space (OS) and the General Plan land use designation for the project site is Parks/Recreation. The proposed project would involve the construction of a 124,620 square-foot self-storage facility. As the project would result in development which exceeds the assumptions of the 2017 Plan, it would result in emissions that are not accounted for in the 2017 Plan. However, as shown in the responses to criterion b (see below), the proposed project operational emissions would not result in exceedances of BAAQMD 2017 thresholds for criteria air pollutants and thus would not conflict with the 2017 Plan's goal to attain air quality standards. Therefore, consistent

with the BAAQMD’s CEQA thresholds, the proposed project would not conflict with or obstruct the implementation of the 2017 Clean Air Plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

The proposed project would result in temporary construction emissions and long-term operational emissions. Construction activities such as the operation of construction vehicles and equipment over unpaved areas, grading, trenching, and disturbance of stockpiled soils have the potential to generate fugitive dust (PM₁₀) through the exposure of soil to wind erosion and dust entrainment. Exhaust emissions associated with heavy construction equipment would potentially degrade regional air quality. Long-term emissions associated with operational impacts would include emissions from vehicle trips (mobile sources), electricity use (energy sources), and landscape maintenance equipment, consumer products, and architectural coating associated with on-site development (area sources).

Construction Emissions

Project construction would involve site preparation, rough grading, and paving, all of which have the potential to generate criteria air pollutant emissions. The project’s construction emissions were estimated using CalEEMod, and modeling included emissions generated by construction equipment used on site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. As shown in Table 4, project construction would not exceed BAAQMD thresholds for NO_x emissions. Therefore, construction impacts related to criteria air pollutant emissions would be less than significant.

Table 4 Estimated Daily Construction Emissions

	ROG	NO _x	CO	SO ₂	Fugitive PM ₁₀	Exhaust PM ₁₀	Fugitive PM _{2.5}	Exhaust PM _{2.5}
Average Daily Construction Emissions (lbs/day)	45	41	33	<1	18	2	10	2
BAAQMD Thresholds	54	54	N/A	N/A	N/A	82	N/A	54
Threshold Exceeded?	No	No	N/A	N/A	No	No	No	No

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO and SO₂.

Notes: All emissions modeling was completed using CalEEMod in accordance with applicant-provided information and data. Emissions presented are the highest of the winter and summer modeled emissions. See Appendix AQ for model output results.

FUGITIVE DUST

Site preparation and grading may cause wind-blown dust that could contribute particulate matter into the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMPs)

for fugitive dust control during construction, such as watering exposed surfaces and limiting vehicle speeds to 15 miles per hour, would have a less than significant impact related to fugitive dust emissions. The project does not expressly include implementation of these BMPs; therefore, construction-related fugitive dust emissions would be potentially significant and Mitigation Measure AQ-2 would be required.

Operational Emissions

Operational emissions would include emissions associated with mobile sources (vehicle trips), energy sources (electricity use), and area sources (landscape maintenance equipment, consumer products, and architectural coating associated with on-site operational activities). Vehicle trips were based on the transportation analysis included as Appendix TRA. Table 5 and Table 6 summarize the total estimated daily and annual emissions generated by project operation, respectively. As shown therein, operational emissions generated by the proposed project would not exceed BAAQMD daily and annual thresholds for ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. Therefore, project operation would not result in a cumulatively considerable net increase of ROG, NO_x, exhaust PM₁₀, or exhaust PM_{2.5}, and impacts would be less than significant.

Table 5 Estimated Daily Operational Emissions

Emissions Source	Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	3	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	4	<1	1	<1
Total Emissions	3	1	4	<1	1	<1
BAAQMD Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	No	No	N/A	N/A	No	No

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. BAAQMD has not established recommended quantitative thresholds for CO and SO₂.

Note: All emissions modeling was completed made using the CalEEMod in accordance with applicant-provided information and data. Some numbers may not add up due to rounding. Emissions presented are the highest of the winter and summer modeled emissions. See Appendix AQ for model output results.

Table 6 Estimated Annual Operational Emissions

Emissions Source	Maximum Annual Emissions (tons/yr)					
	ROG	NO _x	CO	SO ₂	Exhaust PM ₁₀	Exhaust PM _{2.5}
Area	1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	<1	1	<1	<1	<1
Total	1	<1	1	<1	<1	<1
BAAQMD Thresholds	10	10	N/A	N/A	15	10
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. BAAQMD has not established recommended quantitative thresholds for CO, SO₂, PM₁₀, and PM_{2.5}.

Note: All emissions modeling was completed made using CalEEMod in accordance with applicant-provided information and data. Some numbers may not add up due to rounding

See Appendix AQ for model output results.

Mitigation Measure

AQ-1 Fugitive Dust Control Best Management Practices (BMPs)

The construction contractor(s) shall implement fugitive dust control BMPs during site preparation and grading activities, as recommended by the BAAQMD:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times daily.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly visible sign with the telephone number and person to contact at the City of San Pablo regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

- The City shall confirm that BMPs are implemented during site preparation and grading activities through spot checks during construction.

Implementation of Mitigation Measure AQ-1 would require compliance with BAAQMD recommendations to implement BMPs for fugitive dust control. With implementation of this measure, impacts related to fugitive dust would be reduced to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

A TAC is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Certain population groups, such as children, older adults, and people with health problems, are particularly sensitive to air pollution. Sensitive receptors are defined as population groups that are more susceptible to exposure to pollutants and examples include health care facilities, retirement homes, school and playground facilities, and residential areas. The nearest sensitive land uses are the residences to the east of the site.

Construction Impacts

Construction-related activities would result in temporary emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998 (CARB 2017).

Generation of DPM from construction projects typically occurs in a single area for a short period. Project construction would occur over approximately 13 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., 13 months) is approximately 2 percent of the total exposure period used for health risk calculation. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (BAAQMD 2017c). Therefore, this analysis qualitatively discusses potential health risks associated with construction-related emissions of TACs, focusing on construction activities most likely to generate substantial TAC emissions and the duration of such activities relative to established, longer-term health risk exposure periods.

PM_{2.5} exhaust emissions are often used as a surrogate for DPM, and all PM_{2.5} exhaust emissions are considered as DPM. The maximum PM_{2.5} exhaust emissions would occur during site preparation activities. These activities would last for approximately one week. PM_{2.5} emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less construction equipment. While the maximum DPM

emissions associated with site preparation and grading activities would only occur for a portion of the overall construction period, these activities represent the maximum exposure condition for the total construction period. The duration of site preparation and grading activities would represent less than one percent of the total exposure period for a 70-year health risk calculation. Therefore, DPM generated by project construction would not create conditions where the probability is greater than 10 in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. This impact would be less than significant.

Operational Impacts

In the Bay Area, a number of urban or industrialized communities exist where the exposure to TACs is relatively high compared to other communities. However, according to the BAAQMD CEQA Guidelines, the project site is not located in an impacted community (BAAQMD 2017b). Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. The project does not include construction of new gas stations, dry cleaners, highways, roadways, or other sources that could be considered new permitted or non-permitted source of TAC or PM_{2.5} in proximity to receptors. In addition, the project would not introduce a new stationary source of emissions and would not result in particulate matter greater than BAAQMD thresholds (see response under criteria (a) and (b)). Therefore, it would not expose nearby sensitive receptors to substantial pollutant concentrations, and a Health Risk Assessment was not required for this project. Impacts would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

BAAQMD's 2017 CEQA Guidelines Table 3-3 provides odor screening distances for land uses that have the potential to generate substantial odor complaints. The odor-generating uses in the table include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants (BAAQMD 2017c). The proposed project involves self-storage uses and does not include any of the uses identified by the BAAQMD as odor-generating uses. Therefore, the proposed project would not generate objectionable odors that would affect a substantial number of people. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Information contained in this section comes from background literature, resource agency database-reviews, and an arborist report (Dryad, LLC 2021).

Setting

The project site is located 0.5-mile northwest of Interstate 80 and 1.9 miles east of the San Francisco Bay. Topography on the site is generally flat and elevation ranges between 57 and 67 feet above mean sea level. The project site currently contains a soccer field consisting of mowed grass bordered by landscaped trees and shrubs with paved areas at the northeast and northwest corners and a small patch of ruderal vegetation next to the paved area at the northeast corner. San Pablo Creek runs 0.3 mile to the south and an intermittent drainage is located 180 feet to the northwest of the project site.

Regulatory Setting

Federal and State

Regulatory authority over biological resources is shared by federal, state, and local agencies under a variety of laws, ordinances, regulations, and statutes. Primary authority for biological resources lies with the land use control and planning authority of local jurisdictions (in this instance, the City of San Pablo).

The California Department of Fish and Wildlife (CDFW) is a trustee agency for biological resources throughout the state under CEQA and has direct jurisdiction under the California Fish and Game Code (CFGF). Under the California Endangered Species Act and the federal Endangered Species Act, the CDFW and the U.S. Fish and Wildlife Service (USFWS), respectively, have direct regulatory authority over species formally listed as threatened or endangered (and listed as rare for CDFW). Native and/or migratory bird species are protected under the CFGF Sections 3503, 3503.5, and 3511.

Statutes in the Clean Water Act (CWA), CFGF, and CCR protect wetlands and riparian habitat. The U.S. Army Corps of Engineers has regulatory authority over wetlands and waters of the U.S. under Section 404 of the CWA. The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) ensure water quality protection in California pursuant to Section 401 of the CWA and Section 13263 of the Porter-Cologne Water Quality Control Act. The CDFW regulates waters of the State under the CFGF Section 1600 et seq.

Special-status species are those plants and animals: 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and the National Marine Fisheries Service (NMFS) under the federal Endangered Species Act; 2) listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act; 3) recognized as California Species of Special Concern by the CDFW; 4) afforded protection under the Migratory Bird Treaty Act (MBTA) or CFGF; and 5) occurring on Lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system.

Local

SPMC Section 17.48.120 provides tree protection requirements applicable to the project. A certified arborist would be required to evaluate protected tree resources on the project site prior to any new development. Protected trees are defined as trees greater than 6 inches in diameter at 36 inches above grade. Removal of trees must be approved by the zoning administrator, or, if four or more trees are planned for removal, design review before the planning commission is required. Trees removed must be replaced pursuant to SPMC Table 17.48-B.

Methods

Literature Review and Desktop Biological Evaluation

Qualified biologists reviewed agency databases, relevant literature, aerial photos, and site photos for baseline information on special status species and other sensitive biological resources occurring or potentially occurring at the project site and in the immediate surrounding area. The following sources were reviewed for background information:

- CDFW California Natural Diversity Data Base (CNDDDB) (CDFW 2021a) and Biogeographic Information and Observation System (BIOS) (CDFW 2021b)
- CDFW Special Animals List (CDFW 2020) and Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2021c)
- CNPS Online Inventory of Rare and Endangered Plants of California (CNPS 2021)
- USFWS Information for Planning and Consultation (IPaC; USFWS 2021a)
- USFWS Critical Habitat Portal (USFWS 2021b)
- USFWS National Wetlands Inventory (NWI; USFWS 2020)
- U.S. Geological Survey (USGS National Hydrography Dataset (NHD, USGS 2019)
- U.S. Department of Agriculture (USDA) Natural Resources Conservation Services (NRCS) Web Soil Survey (USDA 2020)

Rincon Consultants biologists conducted a review of the CNDDDB (CDFW 2020a) for recorded occurrences of special status plant and wildlife taxa in the region prior to conducting the field survey. For this review, the search included all occurrences within the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle encompassing the project site (*Richmond*), and the eight surrounding quadrangles (*Petaluma Point, Mare Island, Benicia, San Quentin, Briones Valley, San Francisco North, Oakland West* and *Oakland East*). Strictly marine, estuarine, and aquatic species were excluded from further analysis given the upland terrestrial nature of the project site. Plant species with specific habitat requirements are not present at the site, such as vernal pools, alkali or serpentine soils, or higher elevation ranges, were also excluded from this analysis.

Rincon Consultants compiled the results of the background literature review into a list of regionally occurring special status plants and animals and evaluated each species for potential to occur based on habitat conditions and proximity to known occurrences. Rincon Consultants also reviewed the NWI (USFWS 2020) and the National Hydrography Datasets (USGS 2019) for potential aquatic resources, including potentially jurisdictional waters of the U.S. or waters of the State.

An arborist report evaluated 61 trees, representing 11 species (Dryad 2021).

Impact Analysis

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

Special Status Plants

Seventy-four (74) special status plant species were identified to have occurrence records within the nine USGS quadrangles containing and surrounding the project site (CDFW 2021a; CNPS 2021; USFWS 2021a). All the reported species have specific habitat requirements (e.g., soil type, elevation, aspect, etc.). Existing conditions (developed and disturbed by regular mowing) and the lack of native vegetation communities or suitable ecological conditions on the site preclude the potential for rare plants to occur within the site, and no special status plant species are expected. Because construction activities are limited to previously disturbed, developed, and landscaped areas with ruderal and ornamental vegetation, impacts to special status plant species would not occur.

Special Status Wildlife

Fifty-four (54) special status animal species were identified with known occurrence records within the nine USGS quadrangles containing and surrounding the project site (CDFW 2021a; CNPS 2021; USFWS 2021a). A Rincon Consultants qualified biologist reviewed this list and refined it according to the potential for species to occur on the project site based on the presence and quality of habitats within the project site. The site is highly disturbed and surrounded by development. The site is primarily covered with landscaped vegetation and ornamental plantings, dominated by a grass soccer field heavily disturbed by mowing. The site does not comprise suitable habitat for federal or state listed species or other special status animals. However, the site could be used by migratory birds as nesting habitat. Migratory birds are protected under CFGC Section 3503 and the MBTA. The nesting season generally extends from February 1 through August 31 in California but can vary based upon annual climatic conditions. Thus, construction activities could result in direct impacts to active nests during vegetation removal or disturbance-related nest abandonment. Impacts to most non-listed bird species through nest destruction or abandonment would not be considered significant under CEQA; however, this would be a violation of CFGC code and the MBTA. Impacts to non-listed special status birds would be significant if those impacts would jeopardize the viability of a local or regional population. Therefore, Mitigation Measure BIO-1 would be required to avoid or reduce the project's potentially significant impacts to special-status wildlife and avoid violation of the CFGC and MBTA.

Mitigation Measure

BIO-1 Nesting Bird Avoidance and Minimization Efforts

- Project construction shall be conducted outside of the nesting season to the extent feasible (September 1 to January 31). If vegetation removal or initial ground-disturbing activities are conducted during the nesting season, a qualified biologist shall conduct a pre-construction nesting bird survey no more than 14 days prior to vegetation removal or initial ground disturbance. Nesting habitat may include grasslands, shrubs, trees, snags and open ground. The survey shall include all potential nesting habitat in the project site and within 300 feet of the

proposed project grading boundaries to identify the location and status of any nests that could potentially be affected by project activities.

- If active nests are found within project impact areas or close enough to these areas to affect breeding success, the biologist shall establish a work exclusion zone around each nest that shall be followed by the contractor. Established exclusion zones shall remain in place until all young in the nest have fledged or the nest otherwise becomes inactive (e.g., due to predation). Appropriate exclusion zone sizes vary dependent upon bird species, nest location, existing visual buffers, ambient sound levels, and other factors; an exclusion zone radius may be as small as 25 feet (for common, disturbance-adapted species) or as large as 300 feet or more for raptors. Exclusion zone size may also be reduced from established levels if supported with nest monitoring by a qualified biologist indicating that work activities outside the reduced radius would not adversely impact the nest.

Implementation of Mitigation Measure BIO-1 would ensure protection of nesting birds that may be on-site during construction activities. These measures would reduce the impact to special-status species to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The review of the resource agency databases for sensitive natural communities within the nine USGS quadrangles containing and surrounding the project site identified six sensitive natural communities: coastal brackish marsh, coastal terrace pine, northern coastal salt marsh, northern maritime chaparral, serpentine bunchgrass and valley needlegrass grassland. None of these sensitive natural communities are present within or adjacent to the project site, nor are any other sensitive natural communities. No adverse effect on sensitive natural communities would occur as a result of project activities.

NO IMPACT

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

Based on a review of information on biological resources within the project region, a qualified biologist determined that no vegetated wetlands or potentially jurisdictional features occur within or adjacent to the project area. No impacts to jurisdictional wetlands or waters would occur.

NO IMPACT

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

The project site consists of developed and disturbed areas with primarily ornamental vegetation. Land use in the vicinity is primarily residential or institutional with no connectivity to natural habitats and is therefore not expected to support wildlife movement. The project site is in an urbanized area and is surrounded by residential developments or paved lots on all sides. Although a

drainage channel with overhanging vegetation occurs to the northwest of the site, the site itself does not contain suitable natural areas that would contribute to a migratory corridor for wildlife. Any function that the drainage channel could serve as a wildlife corridor would not be affected by the project, as the site is over 180 feet away at its closest point. No impacts to wildlife movement corridors would occur as a result of project activities.

NO IMPACT

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

According to the arborist report, 58 of the 61 trees on the site qualify as protected trees under SPMC Section 17.48.120 (Dryad 2021). Of these protected trees, 16 are proposed for removal. Pursuant to SPMC 17.48.060, review of tree removal plans by the Planning Commission would be required as part of design review. Pending approval, trees removed must be replaced with a tree of a specific size, as specified in SPMC Table 17.48-B, Tree Replacement Schedule. Therefore, the project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans that govern activities on the project site. Therefore, the proposed project would not conflict with a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved plan. No impact would occur.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based partially on information provided a confidential cultural resources technical memorandum (Foster and Haas 2021). CEQA requires a lead agency determine whether a project may have a significant effect on historical resources (PRC Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). A historical resource is a resource listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CEQA Guidelines, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Rincon Consultants requested a records search of the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) located at Sonoma State University, which was conducted by NWIC staff on January 4, 2021. The search was performed to identify known cultural resources and known cultural resources studies within the project site and a 0.5-mile radius surrounding it. The NWIC records search included a review of the National Register of Historical Places (NRHP), the CRHR, the California Built Environment Resources Directory, and the Archaeological Determinations of Eligibility.

The NWIC records search indicated that 34 known cultural resources studies have been conducted within a 0.5-mile radius of the project site, two of which included research within portions of the project site (S-049682 and S-049682a). These studies did not identify any cultural resources within

the project site. Report S-049682 shows that the adjacent Colonel Hunter Hall U.S. Army Reserve Facility (P-07- 027753) was determined ineligible for the NRHP on July 16, 2007 and was recommended ineligible for the CRHR. The NWIC records search identified three known cultural resources within a 0.5-mile radius of the project site, none of which are located within the project site.

Additionally, Rincon Consultants conducted an historic aerial imagery review of the project site. Available aerial imagery indicated that a series of structures along Moraga Road within the project site were constructed between 1946 and 1948. By 1958, with redevelopment of the general area, the buildings are no longer present in the aeriels (NETR Online 2021).

Rincon Consultants requested a search of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF) and received positive results on December 29, 2020. Further information regarding formal tribal consultation is discussed in the Tribal Cultural Resources section.

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

The project would involve the development of a self-storage facility on developed land, currently used as soccer fields, and would not affect known historical resources. Therefore, there would be no impact to historical resources.

NO IMPACT

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

No archaeological resources were identified within the project site during the NWIC records search and the site has been previously developed; however, the SLF search returned positive results, which increases the general sensitivity of the area for archaeological resources.

During Assembly Bill (AB) 52 consultation conducted for the project, a review of geotechnical information (Appendix GEO) indicated the presence of clamshell remains in a dark, clayey soil substrate in the southern portion of the site at a depth of approximately 4 feet.¹ Although noted by the report as likely being associated with a ponding or alluvial event due to the former presence of a seasonal drainage adjacent to the project site, it cannot be conclusively demonstrated that such clamshell remains are not cultural in origin, or that additional cultural deposits lie within the project site at depth. Based on the fact that the proposed excavation does not occur at the site of this clamshell deposit, as well as other factors that indicate that the deposit could be a natural occurrence, construction monitoring was deemed to be an appropriate approach to avoid, or substantially reduce, the potential impact to the deposit or related deposits. Therefore, the project has the potential to affect archaeological resources, and Mitigation Measure CUL-1 would be required.

¹ Additional information about the results of AB 52 consultation may be found in Section 18, *Tribal Cultural Resources*.

Mitigation Measure

CUL-1 Archaeological and Tribal Construction Monitoring

A professionally qualified archaeologist² and tribal representative shall monitor ground-disturbing construction conducted during project implementation. The monitors shall observe ground-disturbing construction to identify potential archaeological deposits and avoid or limit damage to such deposits. The monitors shall have the discretion to reduce the intensity of monitoring, or suspend such monitoring, if field conditions clearly indicate that no potential intact archaeological deposits could be encountered. Should an intact archaeological deposit be identified, the monitors shall be empowered to temporarily halt construction in the vicinity of the find. The archaeologist shall, in consultation with the tribal representative and City, evaluate the eligibility of the deposit for inclusion in the California Register of Historical Resources. If the deposit is so eligible, the project shall attempt to feasibly avoid damage to the deposit (e.g., redesign or capping). If avoidance is not feasible, the archaeologist shall, in consultation with the tribal representative and City, develop and implement a plan to recover the scientifically consequential data represented by the deposit in a manner respectful of tribal concerns. A report of the finds of any resource evaluation and/or data recovery efforts shall be submitted to the Northwest Information Center in Rohnert Park as a condition for access to its archives.

Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources to less than significant through the application of data recovery methods development in coordination with tribal input.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

No human remains are known to exist on the project site, and the records search did not identify any cemeteries or prehistoric burials within the project site or a 0.5-mile radius. While the project site is unlikely to contain human remains, the potential for the recovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance may occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner would notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). The MLD would complete an inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. With adherence to these existing regulations, impacts to human remains would be less than significant.

LESS THAN SIGNIFICANT IMPACT

² The archaeologist must meet the Secretary of the Interior's *Professional Qualifications Standards* for archeology (36 CFR Part 61).

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Energy Supply Setting

Energy use relates directly to environmental quality, since it can adversely affect air quality and can generate GHG emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences and commercial/industrial buildings, heats and cools buildings, and powers vehicles. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

Electricity & Natural Gas

The California Public Utilities Commission and the California Energy Commission (CEC) are constantly assessing population growth, electricity demand, and reliability. The CEC is tasked with conducting assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices (CEC 2019a). The CEC uses these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state’s economy, and protect public health and safety (PRC Section 25301(a)).

In 2019, California used 277,704 gigawatt hours of electricity, of which approximately 31 percent of electricity generated was from renewable resources (CEC 2019a, 2019b). Contra Costa County used 9,639 gigawatt hours of electricity in 2019 (CEC 2019b). The project site would be provided electricity by PG&E.

MARIN CLEAN ENERGY

Marin Clean Energy (MCE) is a Community Choice Aggregation electricity provider that provides the City of San Pablo with affordable green electricity choices in partnership with PG&E. As of 2018, MCE’s energy intensity factor for its base plan (Light Green) consists of 60 percent eligible renewable energy sources (City of San Pablo 2020a). PG&E is one of the nation’s largest electric and gas utility companies, and it maintains 106,681 circuit miles of electric distribution lines and 18,466

circuit miles of interconnected transmission lines (PG&E 2020). According to PG&E's 2018 Integrated Resource Plan, PG&E anticipates meeting a 2030 energy load demand of between 36,922 gigawatt-hours and 37,370 gigawatt-hours (PG&E 2018).

Methodology

Energy consumption is analyzed herein in terms of construction and operational energy. Construction energy demand accounts for anticipated energy consumption during project construction, such as fuel consumed by construction equipment and construction workers' vehicles traveling to and from the project site. Operational energy demand accounts for the anticipated energy consumption during project operation, such as fuel consumed by cars, trucks, and public transit; natural gas consumed for on-site power generation, heating building space, and electricity consumed for building power needs, including, but not limited to lighting, water conveyance, and air conditioning.

The CalEEMod outputs for the air quality and GHG modeling (Appendix AQ) and the Vehicle Miles Traveled (VMT) calculations in the traffic study completed for the project (W-Trans 2021, included as Appendix TRA) were used to estimate energy consumption associated with the remainder of the proposed project. The CalEEMod results provide the average travel distance, vehicle trip numbers, and vehicle fleet mix during project construction and operation. The CalEEMod results also provide the estimated gross electricity and natural gas consumption by land use during project operation.

Impact Analysis

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

Construction

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The proposed project would require site preparation and grading, including hauling soil on-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

As shown in Table 7 below, project construction would require approximately 8,993 gallons of gasoline and 65,714 gallons of diesel fuel. Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, the project would utilize construction contractors who demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Electrical power would be consumed to construct the project, and the demand, to the extent required, would be supplied from existing electrical infrastructure in the area. Overall, construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies or infrastructure. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, pursuant to applicable regulatory requirements, the project would comply with construction waste management practices to divert construction and

demolition debris. These practices would result in efficient use of energy necessary to construct the project. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, project construction would not result in significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Table 7 Proposed Project Construction Energy Usage

Source	Fuel Consumption (Gallons)	
	Gasoline	Diesel
Construction Equipment & Hauling Trips	–	65,714
Construction Worker Vehicle Trips	8,993	–

See Appendix AQ for CalEEMod default values for fleet mix, average distance of travel, and energy calculation sheets. .

Operation

Project operation would require energy use in the form of electricity and gasoline consumption. Electricity would be used for heating and cooling systems, lighting, water use, and the overall operation of the project. Gasoline consumption would be attributed to vehicular travel from customers traveling to and from the project site. Table 8 shows the project’s estimated total annual gasoline and diesel fuel consumption, as well as electricity use.

Table 8 Proposed Project Operational Energy Usage

Source	Energy Consumption	
Vehicle Trips		
Gasoline	24,177 gallons	2,654 MMBtu ¹
Diesel	5,405 gallons	689 MMBtu ¹
Built Environment		
Electricity	0.5 GWh	1,589 MMBtu

¹ CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (CARB 2015).

² U.S. Therm is a unit of measurement for natural gas use over time

MMBtu = one million British thermal units, GWh = gigawatt hours

Source: Appendix AQ

The fuel consumed by the project’s vehicle trips is assumed to be typical of similar self-storage developments in the Bay Area. The project’s operational electricity consumption would be approximately 0.5 GWh of electricity per year (Appendix AQ), which would be less than 0.01 percent of energy used in Contra Costa County’s current electricity demand. The project would comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. CALGreen (as codified in CCR Title 24, Part 11) requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to achieve energy efficient performance. The standards are updated every three years,

and each iteration increases energy efficiency standards. For example, commercial buildings would use about 30 percent less energy than those constructed before these energy performance standards were adopted due mainly to lighting upgrades. In addition, the project would continue to reduce its use of nonrenewable energy resources as the percentage of electricity generated by renewable resources provided by MCE and PG&E continues to increase to comply with state requirements through Senate Bill (SB) 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Project operation would increase energy use on the site compared to existing conditions. However, the proposed project's energy usage would be in conformance with the latest version of CalGreen and the Energy Code. PG&E would have sufficient supplies to serve the project and the proposed project would include energy efficient fixtures and appliances throughout the site that would further offset energy consumption. Therefore, the proposed project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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

As stated under criterion (a), SB 100 mandates 100 percent clean electricity for California by 2045. Because the project would be powered by the existing electricity grid, it would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. Additionally, the project would be subject to California Energy Code.

San Pablo's Climate Action Plan (CAP) was adopted by the San Pablo City Council in 2012. The purpose of the CAP is to outline a course of action for the City to reduce emissions as recommended by AB 32. Table 9 provides energy efficiency goals and policies provided in the City of San Pablo General Plan (City of San Pablo 2011) and the City of San Pablo CAP (City of San Pablo 2012) and describes the project's consistency with these policies.

Table 9 Project Compliance with Energy Efficiency Goals and Policies

Energy Efficiency Goal or Policy	Is the Project Consistent?
City of San Pablo General Plan	
<p>Policy PSCU-I-18. Promote sustainable practices in the design, construction, and renovation of both public and private community-serving facilities.</p>	<p>Consistent. The project would be required to comply with current CalGreen requirements, which encourage sustainable planning and design, material conservation, and drought tolerant landscaping. The project would comply with the current CalGreen requirements and would be given the opportunity to enlist in MCE renewable energy plans.</p>
City of San Pablo Climate Action Plan	
<p>Objective E1. Increase new construction efficiency above Title 24 standards.</p>	<p>Consistent. The project would be required to comply with all city ordinances related to energy and CalGreen requirements.</p>
<p>Strategy SW 2.4. Construction & Demolition Waste Management Ordinance. Expand the City’s Construction & Demolition Waste Ordinances to exceed Cal Green requirements.</p>	<p>Consistent. The project would be required to comply with Construction and Demolition waste diversion goals. The City, compliant with CalGreen, would require 50% diversion and Contra Costa County would require a 65% diversion of construction and demolition waste.</p>

As shown in Table 9, the proposed project would be consistent with applicable energy efficiency goals and policies. Additionally, the project would be required to comply with the Energy Code and would comply with energy efficiency goals as set by the state. Therefore, the project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Much of the analysis in this section is based on a geotechnical investigation and geological hazards study prepared for the proposed project by Alan Kropp & Associates, Inc. in August 2020 and included as Appendix GEO.

Setting

Active faults are defined by the State of California to be faults that have surface displacement within the Holocene time (approximately the last 10,000 years). Potentially active faults as defined by the State of California to be a fault that has shown evidence of surface displacement during the Quaternary (last 1.6 million years). Any fault that is sufficiently active describes a fault that has some evidence of Holocene displacement on one or more of its segments or branches. Associated issues with earthquakes include liquefaction, which is the rapid transformation of sediment to a fluid-like state. It occurs when water-saturated, loose to medium dense, relatively clay-free sands and silts are subjected to earthquake ground motion.

The Bay Area contains both active and potentially active faults. The principal active faults in the region are the Hayward-Rodgers Creek fault, which crosses the project site; the San Andreas Fault, 18.5 miles to the west; and the Calaveras Fault, 20 miles to the southeast. There are three fault traces in the site vicinity. Fault traces are located through the central portion of the project site and near the eastern portion of the site. An additional possible fault trace is shown west of the southwest corner of the project site.

Expansive soils are soils that swell in density and volume as they absorb water and contract as they lose water. Associated problems include cracking and deterioration of roadway surface, as they expand and contract during seasonal wet and dry cycles. The project site is topographically flat and soils in the region are classified as Clear Lake Clay and Tierra Loam (NRCS 2020). Clear Lake Clay is identified as an expansive soil.

Regulatory Setting

Federal and State

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT

Following the 1989 Loma Prieta earthquake, the Seismic Hazards Mapping Act (SHMA) was passed by the California legislature in 1990. The SHMA (PRC Chapter 7.8, Section 2690-2699.6) directs the Department of Conservation, California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides and amplified ground shaking. It also requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the identified hazard is present and the inclusion of appropriate mitigation to reduce earthquake-related hazards.

SEISMIC HAZARDS MAPPING ACT

The Seismic Hazards Mapping Act of 1990 was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under the Alquist-Priolo Act, the State Geologist is responsible for identifying and mapping seismic hazards. CGS Special Publication 117, adopted in 1997 by the State Mining and Geology Board, constitutes guidelines for evaluating seismic hazards other than surface faulting and for recommending mitigation measures as required by PRC Section 2695(a). In accordance with the

mapping criteria, the CGS seismic hazard zone maps identify areas with the potential for a ground shaking event that corresponds to 10 percent probability of exceedance in 50 years.

The purpose of the Seismic Hazards Mapping Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Seismic Hazards Mapping Act requires site-specific geotechnical investigations prior to permitting most urban development projects in seismic hazard zones.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Construction projects which disturb one or more acres of soil or are part of a larger common plan of development that disturbs one or more acres of soil must obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). In order to obtain coverage under the Construction General Permit, a project-specific Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The SWPPP outlines BMPs to reduce stormwater and non-stormwater pollutant discharges, including erosion control, minimizing contact between construction materials and precipitation, and strategies to prevent equipment leakage or spills.

Impact Analysis

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

As discussed above under *Setting*, fault traces are located through the central portion of the project site and near the eastern portion of the site. An additional possible fault trace is shown west of the southwest corner of the project site. Thus, the project site is located within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act (USGS 2020). Fault rupture hazard is the hazard of ground breakage and displacement along fault traces during earthquakes and is considered the greatest geologic hazard at the project site. Because the Hayward-Rodgers Creek fault is a strike-slip fault, the ground displacement would likely be a lateral movement of the ground, where the ground west of the fault moves northward with respect to the ground east of the fault. Such a displacement could cause severe damage or collapse to structures placed across the fault trace, and some degree of vertical upward movement could occur in the area. A seismic event would have the potential to damage structures and result in loss of property and risk to human health and safety (Appendix GEO).

Under the Alquist-Priolo Act, development of a building for human occupancy, such as a commercial or residential building, is restricted near active fault traces. Other facilities, such as non-occupied buildings, roads, utilities, or parking areas, are not subject to this restriction. A structure for human occupancy is defined in the Alquist-Priolo Act as a structure that is occupied a minimum of 2,000 person/hours per year. Based on conditions at the site, the geotechnical investigation recommends that all buildings be set back a minimum of 20 feet from the identified fault locations except the proposed office building, which should be set back a minimum of 50 feet from the western fault trace. The proposed office would be the only structure on the site intended for human occupancy

(during office hours). The office structure would be located in the western portion of the project site, approximately 60 feet west of the Hayward Fault. The self-storage structures would be at least 20 feet from the fault. The project would therefore meet the recommended setbacks for structure siting. Nevertheless, Mitigation Measure GEO-1 would be required to address potential damage to structures and differential settlement of soils through ensuring proper foundation design and to ensure oversight by a geotechnical professional.

Mitigation Measure

GEO-1 Structure Foundations

The project contractor shall construct foundations that consist of reinforced-concrete mat slabs. The bottom of the mats shall be at least 12-inches below the lowest adjacent grade, and the mats shall be at least 18-inches thick. The area for mats shall be cleared of appropriate foundation elements, slabs, and utilities from previous development, and these materials shall be removed from the site. The mats shall be designed in conformance with the geotechnical investigation recommendations for building foundations and a qualified geotechnical professional shall be onsite during foundation construction to oversee design and construction.

Implementation of Mitigation Measure GEO-1 would reduce impacts related to ground rupture of a known earthquake fault to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The San Pablo region has historically experienced strong ground shaking from large-scale earthquakes and will continue to do so in the future (City of San Pablo 2011). The project site would be subject to potentially strong seismic ground shaking associated with seismic activities. However, the structures would be constructed to meet current seismic standards in the 2019 CBC intended to ensure that buildings could withstand the adverse effects of strong ground shaking. The City of San Pablo has adopted the CBC by reference pursuant to SPMC Section 15.04.010. Chapter 38 of the CBC contains specific requirements for structural design, including seismic loads. The CBC requires that structures be designed and constructed to resist seismic hazards, including through foundation design and the completion of soil investigations prior to construction. The City of San Pablo would ensure that the project would be designed and constructed consistent with the current CBC, thereby ensuring that appropriate investigations and design measures have been employed to effectively minimize or avoid potential hazards associated with redevelopment and/or new building construction. Additionally, implementation of Mitigation Measure GEO-1 would reduce impacts of strong seismic ground shaking through foundation requirements and required oversight by a geotechnical engineer. Proper engineering, including compliance with the CBC, would minimize the risk to life and property associated with potential seismic activity in the area. Impacts related to seismic shaking would therefore be less than significant with Mitigation Measure GEO-1.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- a.3. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- a.4. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*
- 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?*

A landslide is a movement of surface material down a slope. Lateral spread and liquefaction are processes in which material flows in a fluid-like movement; lateral spread refers to this movement over a gentle slope during a landslide, and liquefaction refers to water-saturated sediment losing strength due to ground-shaking. Subsidence and collapse refer to the caving in or sinking of land. The project site is generally flat and is not within an area mapped as susceptible to landslides (USGS 2020). Therefore, the project has a low potential for slope instability occurring at the site and impacts would be less than significant.

Liquefaction, which is primarily associated with unconsolidated, saturated materials, is most common in areas of sand and silt or on reclaimed lands. In these areas, ground failure and differential settlement could result from a severe earthquake, damaging paved surfaces and elevated structures. Liquefaction potential is highest in areas underlain by poorly engineered Bay fills, Bay mud, and unconsolidated alluvium. The project site is located in an area of moderate liquefaction potential and severe shrink-swell potential area (City of San Pablo 2011). The ground shaking at the site during a large earthquake on the Hayward-Rodgers Creek fault would be intense enough to induce liquefaction within multiple layers of susceptible soils (Appendix GEO). Liquefiable materials on the site consist of medium-dense, silty sand mixture. This would result in a potentially significant impact, and Mitigation Measures GEO-1 and GEO-2 would be required.

Mitigation Measure

GEO-2 Soil Mat

Prior to issuance of a building permit, the project applicant shall submit plans showing use of relatively stiff foundations and shall conduct ground improvement measures to reduce risk of damage to structures and differential settlements of soils. Building foundations shall be constructed of continuous, reinforced-concrete, mat-slab foundations. A qualified geotechnical professional shall be on site to oversee construction of the soil mat. The applicant's construction contractor(s) shall construct a thick soil mat beneath the site to span across potential fault ruptures and other geologic/geotechnical hazards. The soil mat shall be constructed with geo-grid reinforcing with compacted on-site soil or several lifts of lime-treated on-site soil.

A geo-grid reinforced soil mat shall be constructed underneath structures and span across localized areas of soft/loose soils, and areas of liquefaction-induced settlement. The site shall be over-excavated by approximately 6 feet and recompacted with horizontal sheets of biaxial geo-grid reinforcing. Existing soils on the site shall be mixed with imported or on-site coarse-grained soil. The geo-grid shall extend through the entire developed portion of the site and shall be placed at 6 feet and 3 feet below grade. The soil at the base of the over excavation shall first be scarified by 6 inches and then recompacted prior to the placement of the first geo-grid. The top geo-grid layer shall be placed to allow for utility trenching.

OR

A lime-treated soil mat shall be constructed by chemically treating the onsite clay soils with high-calcium quicklime. The lime treatment shall encompass the entire developed site and extend 10-feet laterally beyond any building footprint and/or pavement. Soil mat construction shall include the treatment of the top 5 five feet of soils with 5 percent (by weight) high-calcium quicklime. The soil and lime mixture shall be combined in 18-inch maximum lifts. Additionally, a detailed treatment program designed by a qualified geotechnical engineer shall be implemented, using site soil samples and laboratory testing to develop optimum lime and moisture contents.

Implementation of Mitigation Measures GEO-1 and GEO-2 would reduce impacts related to liquefaction to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

As the proposed project would disturb over one acre of land, the applicant would be required to obtain coverage under the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ or 2009-0009-DWQ General Permit) to comply with CWA NPDES requirements. Compliance with these requirements would include preparation of a SWPPP, which would specify BMPs to quickly contain and clean up accidental spills or leaks. In accordance with SPMC Chapter 8.40 and the Contra Costa Clean Water Program, the project applicant would also be required to prepare and implement an Erosion Control Plan to prevent illicit discharge (Contra Costa Clean Water Program 2021). Appropriate erosion control and permanent site surface drainage elements pursuant to the latest California Building Code would also be implemented. With implementation of the required plans, permits, and BMPs, substantial erosion or the loss of topsoil would not occur at the project site. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

According to the City of San Pablo General Plan, the soil at the project site has a severe shrink-swell potential (City of San Pablo 2011). The geotechnical investigation found that near-surface clayey soils have a moderate to critically expansive potential (Appendix GEO). These soils can shrink or swell and cause heaving and cracking of slabs-on-grade, pavements, and structures founded on shallow foundations, resulting in a potentially significant impact. Therefore, Mitigation Measure GEO-3 would be required.

Mitigation Measure

GEO-3 Fill and Compaction

To reduce risks associated with expansive soils, the project contractor shall place fill materials in a manner that minimizes lenses, pockets, and/or layers of materials that differ substantially in texture or gradation from surrounding fill materials underneath buildings and exterior flatwork. The soils shall be compacted and spread in uniform layers not to exceed 8 to 10 inches in loose thickness prior to compaction. Fill layers shall be constructed such that the surface of each layer is nearly level. General fill material shall be moisture conditioned, as necessary, to between 3 and 5 points over optimum moisture content and compacted in accordance with ASTM D1557-Latest Edition

compaction calculations. Exterior slabs-on-grade shall be supported on a minimum of 18-inch-thick layer of non-expansive fill. To prevent soils from lifting on the outside edge of the slab-on-grade section, where exterior flatwork abuts lawn or landscape areas, a continuous, deepened curb or other vertical moisture cutoff shall be provided at the perimeter of the exterior slabs that extend at least 24 inches below grade. Exterior slabs shall also be structurally separate from foundations. The City shall review and approve the engineered fill plans prior to issuance of grading permits. A qualified geotechnical professional shall be onsite during fill and compaction operations to observe and test fill materials. The geotechnical professional shall observe compliance with the design, specifications, and recommendations of the geotechnical investigation and shall make design changes in the event that subsurface conditions differ from those anticipated prior to the start of construction.

Implementation of Mitigation Measures GEO-1, GEO-2, and GEO-3 would reduce impacts related to expansive soils to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- 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 proposed project would not include components that would require the use of septic tanks. The proposed project would connect to the West County Waste Water District. There would be no impact.

NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The paleontological sensitivities of the geologic units underlying the project site were evaluated to determine if the proposed project could result in significant impacts to paleontological resources. The analysis was based on the results of an online paleontological locality search and review of existing information in the scientific literature concerning known fossils within geologic units mapped within the project site. Fossil collections records from the Paleobiology Database and University of California Museum of Paleontology (UCMP) online database were reviewed for known fossil localities in Contra Costa County (Paleobiology Database 2021; UCMP 2021). Based on the available information contained within existing scientific literature and the UCMP database, paleontological sensitivities were assigned to the geologic units underlying the project site. The potential for impacts to scientifically important paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. The Society of Vertebrate Paleontology (SVP) has developed a system for assessing paleontological sensitivity and describes sedimentary rock units as having high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources (SVP 2010). This system is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present.

The project site is situated within the Coast Ranges Province, which is one of eleven major geomorphic provinces in California (California Geological Survey 2002). A geomorphic province is a region of unique topography and geology that is readily distinguished from other regions based on its landforms and geologic history (Norris and Web 1990). The Coast Ranges extend about 600 miles

from the Oregon border south to the Santa Ynez River in Santa Barbara County. The Coast Ranges are composed of a complex assemblage of geologic units, including Mesozoic metasedimentary and metavolcanic rock of the Franciscan Complex, marine and nonmarine sedimentary rock of the Cretaceous Great Valley Complex, and Cenozoic marine and nonmarine shale, sandstone, and conglomerate (Norris and Webb 1990). The surface geology of the project site is entirely mapped as Quaternary young (late to middle Holocene) alluvium (Qa), consisting of unconsolidated, poorly to moderately sorted alluvial gravel, sand, and clay of valley areas (Dibblee and Minch 2005).

Late to middle Holocene alluvial sediments within the project site (e.g., Qa) are typically too young (i.e., less than 5,000 years old) to preserve paleontological resources and are determined to have a low paleontological sensitivity at the surface (SVP 2010). However, exposures of older deposits/formations in the project site and the stratigraphic setting in the vicinity are indicative that Pleistocene (e.g., Quaternary old alluvium [Qoa]) and Miocene (Orinda Formation [Tor]) units underlie the late to middle Holocene unit mapped at the surface, at unknown, but potentially shallow depths (Dibblee and Minch 2005). Quaternary old (early Holocene to Pleistocene) alluvium (Qoa), mapped at the surface less than two miles southeast of the project site, consists of dissected, weakly-indurated, reddish-brown alluvial gravel and sand. Miocene Orinda Formation, mapped at the surface less than a mile north of the project site, consists of terrestrial pebble conglomerate interbedded with gray to greenish gray sandstone and claystone (Dibblee and Minch 2005).

Accurately assessing the boundaries between late to middle Holocene sedimentary units (i.e., Qa) and Pleistocene (i.e., Qoa) or Miocene (i.e., Tor) units is generally not possible without site-specific stratigraphic data, some form of radiometric dating, or fossil analysis. According to the geotechnical evaluation prepared for the project, the subsurface explorations reached up to a maximum depth of 52 feet below ground surface. The observed lithology consists of young alluvial deposits with varying compositions, including layered clays and some intermittent layers of clayey and silty sands. Older deposits/bedrock were not encountered during these subsurface activities (Appendix GEO).

Quaternary old (early Holocene to late Pleistocene) alluvial sediments (e.g., Qoa) have a well-documented record of abundant and diverse vertebrate fauna throughout California, including Contra Costa County. Localities have produced fossil specimens of mammoth (*Mammuthus columbi*), horse (*Equus*), camel (*Camelops*), and bison (*Bison*), as well as various birds, rodents, and reptiles (Merriam 1911; Paleobiology Database 2021; Savage 1951; UCMP 2021). A review of the museum records maintained in the UCMP online collections database identified 37 vertebrate fossil localities from Miocene Orinda Formation in unspecified locations within Contra Costa County. Reported fossil specimens include gar (*Lepisosteus*), shrew (*Sorex*), lagomorph (*Hypolagus*), large predatory cat (*Barbourofelis*), proboscidean (*Gomphotherium*, *Mammutidae*), camelid (*Camelidae*), oreodont (*Ticholeptus*), horse (*Hipparion*), camel (*Procamelus*), and rhinoceros (*Aphelops*) (UCMP 2021). Therefore, Quaternary old (early Holocene to late Pleistocene) alluvium (Qoa) and Miocene Orinda Formation (Tor) are assigned a high paleontological sensitivity.

Based on the results of the online paleontological locality searches and literature review, the mapped geologic units in the project site were determined to have paleontological sensitivities ranging from low to high, increasing with depth (Paleobiology Database 2021; UCMP 2021; SVP 2010). Project ground disturbance would reach a maximum depth of approximately 6 feet below ground surface for excavations associated with the proposed development. Given the nature of the proposed improvements, existing site conditions, and findings of the geotechnical investigation, project-related ground disturbance (i.e., excavations) is not anticipated to include ground disturbance greater than 6 feet, and is thus unlikely to impact fossiliferous deposits (Appendix GEO). Although project implementation is not expected to uncover paleontological resources, a remote

possibility for such resources to be uncovered exists, and therefore impacts would be potentially significant.

Mitigation Measure GEO-4 would be required to avoid impacts to paleontological resources in the case of unanticipated fossil discoveries. This measure would apply to all phases of project construction and would reduce the potential for impacts to unanticipated fossils present on site by providing for the recovery, identification, and curation of paleontological resources.

Mitigation Measure

GEO-4 Unanticipated Discovery of Paleontological Resources

In the event an unanticipated fossil discovery is made during the course of project development, construction activity shall be halted within 50 feet of the fossil, and a qualified professional paleontologist shall be notified and retained to evaluate the discovery, determine its significance, and determine if additional mitigation or treatment is warranted. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work. Any significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist.

Implementation of Mitigation Measure GEO-4 would reduce impacts to paleontological resources to less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Overview of Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth’s atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of GHGs. GHGs contribute to the “greenhouse effect,” which is a natural occurrence that helps regulate the temperature of the planet. Most radiation from the sun hits the Earth’s surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60 degrees Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth’s temperature.

Project implementation would generate GHG emissions through the burning of fossil fuels or other emissions of GHGs, thus potentially contributing to cumulative impacts related to climate change. In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented AB 32, the “California Global Warming Solutions Act of 2006.” AB 32 codifies the statewide goal of reducing emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels) and the adoption of regulations to require reporting and verification of statewide GHG emissions. Furthermore, on September 8, 2016, the governor signed SB 32 into law, which requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 modifies the California Global Warming Solutions Act of 2006, directing CARB to ensure that GHGs are reduced to 40 percent below the 1990 level by 2030.

On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with a statewide per capita goal of 6 metric tons (MT) CO₂e by 2030 and 2 MT CO₂e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these

goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional levels), but not for specific individual projects because they include all emissions sectors in the State.

Individual projects do not generate enough GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

BAAQMD Significance Thresholds

In the 2017 BAAQMD CEQA Air Quality Guidelines, the BAAQMD outlines an approach to determine the significance of projects. The BAAQMD recommends that lead agencies determine appropriate GHG emissions thresholds of significance based on substantial evidence in the record. 2017 BAAQMD CEQA Air Quality Guidelines establish the following significance thresholds for operational GHG emissions from land use development projects (BAAQMD 2017b):

- Compliance with a qualified GHG reduction strategy
- Annual emissions less than 1,100 MT of CO₂e per year
- Annual emissions less than 4.6 MT of CO₂e per service population (residents and employees) per year

The BAAQMD has not established a quantitative significance threshold for evaluating construction-related emissions, but it does recommend quantifying and disclosing construction-generated GHG emissions. To assess the construction emissions, the total emissions generated during construction were amortized based on the life of the development (i.e., 30 years), added to the operational emissions, and assessed against the BAAQMD's significance thresholds for operational GHG emissions.

Methodology

GHG emissions for project construction and operation were calculated using CalEEMod version 2016.3.2 (Appendix AQ). CalEEMod calculates emissions of CO₂, CH₄, and N₂O associated with construction activities, energy use, area sources, waste generation, and water use and conveyance as well as emissions of CO₂ and CH₄ associated with project-generated vehicle trips (i.e., mobile sources). Operational emissions were modeled for the year 2030 to be consistent with the State's next GHG emission reduction milestone target of achieving 40 percent reduction in 1990 GHG emission levels by 2030. Emissions of all GHGs are converted into their equivalent global warming potential in terms of CO₂ (i.e., CO₂e).

Mobile source emissions were calculated based on trip generation rates estimated using the Institute of Transportation Engineers, *Trip Generation Manual, 10th edition* (Appendix TRA). Because CalEEMod does not calculate N₂O emissions from mobile sources, N₂O emissions were quantified using guidance from CARB and the EMFAC2017 Emissions Inventory for the BAAQMD region for year 2030 using the EMFAC2011 categories (Appendix AQ).

Because project construction would begin in July 2021, the project would be constructed in accordance with 2019 Building Energy Efficiency Standards. Non-residential buildings built in

accordance with the 2019 Building Energy Efficiency Standards will use approximately 30 percent less energy than those constructed under the 2016 standards (California Energy Commission [CEC] 2018). Therefore, electricity usage was reduced by 30 percent to account for the requirements of 2019 Title 24 standards. In addition, modeling of GHG emissions from water consumption and wastewater generation includes a 20 percent reduction in indoor water use to account for compliance with CALGreen, use of low-flow fixtures, and installation of a water-efficient irrigation system.

Impact Analysis

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

As discussed in Section 6, *Energy*, the project would be required to comply with the GHG reduction strategies and policies within the City of San Pablo CAP (City of San Pablo 2012). Additionally, project construction would generate GHG emissions from the operation of heavy equipment, motor vehicles, and worker trips to and from the site. In addition to construction emissions, project operation would generate GHG emissions from new vehicle trips, electricity usage and area sources. Calculations of CO₂, CH₄, and N₂O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO₂, CH₄, and N₂O because these make up 98.9 percent of all GHG emissions by volume and are the GHG emissions that the project would emit in the largest quantities (Intergovernmental Panel on Climate Change 2007).

Project construction would emit approximately 338 MT of CO₂e, which would result in approximately 11 MT of CO₂e per year when amortized over 30 years. The amortized emissions from construction were added to the operational emissions to determine the total combined annual emissions. Project operations would also result in GHG emissions from approximately 561,857 annual VMT. Table 10 summarizes combined annual GHG emissions generated by project construction and operation based on the CalEEMod output files in Appendix AQ.

Table 10 Combined 2030 Annual Emissions of Greenhouse Gases

Emission Source	Annual 2030 Emissions (MT of CO₂e)
Project Construction (Amortized over 30 Years)	11
Operational	
Area	<1
Energy	71
Solid Waste	59
Water	31
Mobile	
CO ₂ and CH ₄	177
N ₂ O	6
Combined Annual Emissions	355

MT = Metric Tons, CO₂e = carbon dioxide equivalent

Source: Appendix AQ

As shown in Table 10, in year 2030 the project would generate approximately 355 MT of CO₂e per year. Therefore, the project would not exceed the allowable 1,100 MT of CO₂e threshold as determined by BAAQMD. Impacts related to GHG emissions would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Table 11 outlines how the proposed project would be consistent with the goals and policies of the San Pablo CAP relevant to reducing GHG emissions. Therefore, impacts related to consistency with GHG emissions reduction plans would be less than significant.

Table 11 2012 San Pablo Climate Action Plan Consistency for GHG Emissions

San Pablo Climate Action Plan Policy	Consistency
Energy	
Objective E1. Increase new construction efficiency above Title 24 standards.	Consistent The project would be required to comply with Title 24, CalGreen standards. The project would include the implementation of LED technology in indoor and outdoor lighting, installation of drought-resistant landscaping, the provision of one EV parking space, and compliance with waste diversion requirements. The project would also include the installation of solar photovoltaic panels for renewable energy onsite. Therefore, the proposed project would be consistent with Energy Objective 1 in exceeding Title 24 standards.
Solid Waste	
Objective SW 2. Divert 30% of solid waste to composting and recycling activities. Strategy SW 2.4. Construction & Demolition Waste Management Ordinance. Expand the City’s Construction & Demolition Waste Ordinances to exceed Cal Green requirements.	Consistent The project would comply with City mandated construction and demolition waste diversion requirements including the submission of a construction waste management plan prior to construction. Pursuant to SPMC Chapter 15.60, the project would be required to divert 50 percent of operational solid waste. Therefore, the project would be consistent with Objective SW 2.

Source: City of San Pablo 2012

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

Phase I Environmental Site Assessment

A Phase I Environmental Site Assessment (ESA) was prepared for the project site by Rincon Consultants, Inc. in July 2020 and included as Appendix HAZ to this Initial Study. As part of the Phase I ESA, Environmental Data Resources, Inc. (EDR) was contracted to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred for the project site and surrounding area. Federal, state, and county lists were reviewed as part of the research effort.

NEARBY PROPERTIES

The Phase I ESA found that three sites within 1 mile of the project site were listed by EDR. Of these sites, one is an adjacent property to the south and one is an adjacent property to the west. The third property is located approximately 350 feet northwest of the project site. The Phase I concludes that the available information does not indicate that any of the nearby listed sites pose a significant threat to the environmental integrity of the project site.

PROJECT SITE

The Phase I ESA finds that the project site is not listed on a database maintained by EDR. In addition, site visits and a review of historical uses and permits provided no evidence of contamination conditions, improper hazardous substance production or storage, environmentally suspicious dumping or discharge, or significant staining. The report finds that the site was previously developed with structures associated with the El Portal School; however, those structures have since been removed and the site historically was vacant land.

Impact Analysis

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

Construction

Project construction may include the temporary transport, storage, use, or disposal of potentially hazardous materials including fuels, lubricating fluids, cleaners, solvents, or contaminated soils. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, state, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under U.S. Department of Transportation (DOT) regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's own

hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, California Code of Regulations, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and state requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction.

As the proposed project would disturb over one acre of land, the applicant would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) to comply with CWA NPDES requirements. Compliance with these requirements would include preparation of a SWPPP, which would specify BMPs to quickly contain and clean up accidental spills or leaks. Therefore, the potential for an accidental release of hazardous materials to harm the public or the environment would be minor. Impacts related to hazardous materials during construction would be less than significant.

Operation

Self-storage uses typically do not use or store large quantities of hazardous materials other than those typically used for household cleaning, maintenance, and landscaping. In addition, customers would be required to sign a lease agreement committing to a policy that prohibits the storage of hazardous materials on site. Therefore, project operation would not involve the use, storage, transportation, or disposal of substantial quantities of hazardous materials and would not result in the release of such materials into the environment. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

There are three schools within 0.25 mile of the project site. Middle College High School is located approximately 0.1-mile northeast of the project site; Contra Costa College is located approximately 0.1-mile west of the project site; and the Happy Lion Day Care Center, Inc. is located approximately 100 feet south of the project site. However, project operation would not involve the use or storage of hazardous materials. Though potentially hazardous materials such as fuels, lubricants, solvents, and oils could be used during project construction, the transport, use and storage of any and all hazardous materials would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the CCR, Title 22. The project would have a less than significant impact on hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

LESS THAN SIGNIFICANT IMPACT

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

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. According to the Phase 1 ESA, the project site is not listed as a known hazardous cleanup site, does not contain a hazardous waste facility, and has no record of known contamination (Appendix HAZ). Moreover, as described in the *Setting* Section above, the Phase I concludes that contamination from other nearby sites is not expected to have migrated such that the project site is affected by off-site contamination. Therefore, the proposed project would not create a significant hazard to the public or environment and there would have a less than impact.

LESS THAN SIGNIFICANT IMPACT

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

The nearest airport to the project site is the Buchanan Field Airport, located approximately 19 miles to the east of the project site. The project site is not located within a Safety Zone as designated by the Contra Costa County Airport Land Use Compatibility Plan (ALUCP) (Contra Costa County 2000). The proposed project would not subject people working at the site to safety hazards or excessive noise. Therefore, there would be no impact.

NO IMPACT

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

Project construction would occur within the project site and no street closures would occur. The proposed project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, including the Contra Costa County Hazard Mitigation Plan, which was adopted in 2018 (Contra Costa County 2018). No streets or property access points would be closed, rerouted, or substantially altered during or after construction. There would be no impact.

NO IMPACT

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

As described below in Section 20, *Wildfire*, the project site is in a developed urban area and is not within or adjacent to a designated very high wildland fire hazard area. Therefore, the project would not expose people or structures to a significant loss, injury or death involving wildland fires. There would be no impact.

NO IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The project site is approximately 4.1 acres and generally flat with a maximum elevation of approximately 60 feet above mean sea level. The site is almost entirely covered in pervious surfaces (mowed grass). There is an existing storm drain system on Moraga Road. San Pablo Creek is located approximately 0.3-mile to the south of the project site and outfalls into the San Francisco Bay. The City of San Pablo receives approximately 21 inches of rain annually, with rainfall concentrated in the winter months (Cal-Adapt 2020).

Regulatory Setting

Federal and State

CLEAN WATER ACT (CWA)

Congress enacted the CWA, formally the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the NPDES permit process (CWA Section 402). California State Water Resources Control Board (SWRCB) and its nine RWQCBs administer NPDES permitting authority. The project site is under the jurisdiction of the RWQCB Region 2 (San Francisco Bay Area Region).

Section 401 of the CWA requires that the RWQCB certify any activity that may result in discharges into a state waterbody. This certification ensures the proposed activity does not violate federal and/or state water quality standards. The limits of non-tidal waters extend to the Ordinary High Water Mark, defined as the line on the shore established by the fluctuation of water and indicated by physical characteristics, such as natural line impressed on the bank, changes in the character of the soil, and presence of debris. The U.S. Army Corps of Engineers may issue either individual, site-specific permits or general, nationwide permits for discharge into waters of the U.S.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

The primary regulatory control relevant to the protection of water quality is the NPDES permit administered by the SWRCB. The SWRCB establishes requirements prescribing the quality of point sources of discharge and water quality objectives. These objectives are established based on the designated beneficial uses (e.g., water supply, recreation, and habitat) for a particular surface waterbody. The NPDES permits are issued to point source dischargers of pollutants to surface waters pursuant to Water Code Chapter 5.5, which implements the federal CWA. Examples include, but are not limited to, public wastewater treatment facilities, industries, power plants, and groundwater cleanup programs discharging to surface waters (SWRCB, Title 23, Chapter 9, Section 2200). The RWQCB establishes and regulates discharge limits under the NPDES permits.

PORTER-COLOGNE WATER QUALITY CONTROL ACT

The SWRCB regulates water quality through the Porter-Cologne Water Quality Control Act of 1969, which contains a complete framework for the regulation of waste discharges to both surface waters and groundwater of the State. RWQCBs regulate stormwater quality under authorities of the federal CWA and the state Porter-Cologne Water Quality Control Act.

NPDES STATEWIDE CONSTRUCTION GENERAL PERMIT

Construction projects that disturb one or more acres of soil or are part of a larger common plan of development that disturbs one or more acres of soil must obtain coverage under the statewide NPDES General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). To obtain coverage under the Construction General Permit, a project specific SWPPP must be prepared. The SWPPP outlines BMPs to reduce stormwater and non-stormwater pollutant discharges including erosion control, minimize contact between construction materials and precipitation, and implement strategies to prevent equipment leakage or spills.

Regional and Local

MUNICIPAL REGIONAL STORMWATER NPDES PERMIT

The San Francisco Bay RWQCB has issued a Municipal Regional Stormwater NPDES Permit (Permit Number CAS612008) (MRP) that covers the project area (RWQCB 2015). Under provisions of the NPDES Municipal Permit, redevelopment projects that disturb more than 10,000 square feet are required to design and construct stormwater treatment controls to treat post-construction stormwater runoff. The MRP requires regulated projects to include Low Impact Development (LID) practices, such as pollutant source control measures and stormwater treatment features aimed to maintain or restore the site's natural hydrologic functions. The MRP also requires that stormwater treatment measures are properly installed, operated and maintained.

Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Construction

During grading activities, the project site's soils would be exposed to wind and water erosion that could transport sediments into local stormwater drainages. Also, accidental spills of fluids or fuels from construction vehicles and equipment, or miscellaneous construction materials and debris, could be mobilized and transported off-site in overland flow. These contaminant sources could degrade the water quality of receiving water bodies (i.e., San Francisco Bay), potentially resulting in a violation of water quality standards.

The proposed project would be subject to the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (MRP) – NPDES Permit Order No. R2-2015-0049, and the provisions set forth in Section C.3 *New Development and Redevelopment*. Under the conditions of the permitting program, the applicant would be required to eliminate or reduce non-stormwater discharges to waters of the nation, develop and implement a SWPPP for construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the site SWPPP. Because the proposed project would disturb at least one acre of land, the project must provide stormwater treatment and would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ or 2009-0009-DWQ General Permit).

Further, in accordance with SPMC Chapter 8.40 (Stormwater Management and Discharge Control), all construction projects within the City would be required to implement site-specific BMPs for erosion control and would be required to submit a stormwater control plan to prevent erosion during construction. Therefore, with compliance with construction-related water quality and erosion control requirements, project construction would not violate water quality standards, substantially alter the drainage pattern of the area such that substantial erosion or siltation would occur and would not degrade water quality. Impacts during construction would be less than significant.

Operation

The proposed project would increase the impervious surfaces on the site by approximately 100,000 square feet compared to existing conditions. An increase in the total area of impervious surfaces can carry a variety of pollutants, including oil and grease, metals, and sediment and pesticide residues from roadways, parking lots, rooftops, and landscaped areas depositing them into adjacent waterways via the storm drain system.

The proposed project would replace impervious surfaces in excess of 10,000 square feet, and thus would be required to comply with the C.3 provisions set by RWQCB. The proposed project would be required to meet criteria including: 1) incorporate site design, source control, and stormwater treatment measures into the project design; 2) minimize the discharge of pollutants in stormwater runoff and non-stormwater discharge; and 3) minimize increases in runoff flows as compared to pre-development conditions. A Stormwater Control Plan (SCP) that details the site control, source control, and stormwater measures that would be implemented at the site would be required to be submitted to the City. In addition, the project would be required to implement Low Impact Development (LID) features. The Contra Costa Clean Water Program's C.3 Guidebook provides guidance on how to meet the C.3 requirements (Contra Costa Clean Water 2017).

The proposed project would, in accordance with C.3 requirements, be designed to direct runoff from roofs and sidewalks into vegetated areas along the perimeter of the site and would include landscaped bioretention swales to treat runoff before entering the stormwater system. Consistent with the Contra Costa Clean Water Program Addendum to the Stormwater C.3 Guidebook, *Preparing a Stormwater Control Plan for a Small Land Development Project*, the project would be required to incorporate one or more LID features. The project would incorporate bioretention swales and direct runoff from roofs and pavement to vegetated areas, compliant with the Contra Costa Clean Water Program Addendum. The project, in compliance with the provisions of NPDES Section C. 3, a SWPPP, and a stormwater control plan would not result in adverse effects on water quality or violate water quality standards or waste discharge requirements during construction or operation. Therefore, the proposed project would have a less than significant impact on water quality.

The project site overlies the East Bay Plain Basin, which is being managed in accordance with the Sustainable Groundwater Management Act by the EBMUD through development of a Groundwater Sustainability Plan or the South East Bay Plain Basin. The EBMUD South East Bay Plain Basin Groundwater Management Plan study area includes Oakland, Alameda, San Leandro, San Lorenzo, and Hayward. The California Department of Water Resources (DWR) delineates the northern border of the basin as San Pablo Bay. However, the South East Bay Plain Groundwater Management Plan delineates the northern boundary of the basin in Oakland because the deep aquifer thins to the north and becomes an insignificant source of groundwater near Berkeley (EBMUD 2013). Therefore,

the project would not result in a significant impact to groundwater and would be consistent with the groundwater sustainability plan.

With implementation of the measures contained in these plans, excessive stormwater runoff, substantial erosion or siltation on- or off-site would not occur and the potential for the project to violate water quality standards and substantially degrade water quality would be reduced. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

As discussed in Section 19, *Utilities and Service Systems*, the proposed project would receive its water from the East Bay Municipal Utility District (EBMUD). EBMUD's primary water source for its water supply system is the Mokelumne River and its secondary source is local runoff from East Bay watersheds. While the City of San Pablo does overlie the East Bay Plan Subbasin, according to the City of San Pablo General Plan, San Pablo does not rely on groundwater and no groundwater wells exist within the city. However, an unlisted well is present on the project site that would be removed during construction. A well removal permit from Contra Costa County would be required to remove it prior to construction. Therefore, the proposed project would not rely on groundwater for its water supply and would not increase groundwater usage such that a net deficit in aquifer volume would occur.

The proposed project would not include installation of new groundwater wells or use of groundwater from existing wells. Additionally, the construction of stormwater management bio-retention areas would allow for stormwater runoff from the project site into the ground surface and would not substantially interfere with groundwater recharge. Impacts related to groundwater would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*
- c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

Project site drainage facilities currently direct flow to the west of the project site and outfall into the City's current storm drain system.

Construction

Construction activities would involve stockpiling, grading, excavation, paving, and other earth-disturbing activities that could temporarily alter existing drainage patterns. Compliance with the SWRCB's NPDES Construction General Permit, NPDES MS4 Permit, and SPMC Chapter 8.40 which regulates stormwater and discharge within the city would reduce the risk of short-term erosion and increased runoff resulting from drainage alterations during construction. Rheem Creek located approximately 500 feet north of the project's northern boundary, and San Pablo Creek, located approximately 0.3 mile south of the project boundary, are the nearest watercourses to the site and do not flow through or adjacent to the site. Project construction would not alter the course of this creek or other stream or river as there are no other surface water features identified in the project vicinity. Therefore, impacts would be less than significant.

Operation

As described above under criteria (a) and (e), the project would result in a substantial increase in impervious surfaces including for the proposed parking lot and structures, which would alter the existing drainage pattern of the project site. However, vegetation and trees would remain along the site's perimeter and it would continue to drain toward Moraga Road and San Pablo Avenue. With the implementation of the C.3 provisions set by the RWQCB and a SCP, impacts related to drainage changes would be reduced. Therefore, while the project would alter the existing drainage patterns internal to the site, the project would continue to connect to the existing municipal stormwater drainage system in the area.

New impervious surfaces could increase the rate and/or amount of surface runoff from sheet flow to channelized flow. Surface water runoff rate and amount is determined by multiple factors, including the amount and intensity of precipitation, amount of other imported water that enters a watershed, and amount of precipitation and imported water that infiltrates to the groundwater. Infiltration is also determined by several factors, including soil type, antecedent soil moisture,

rainfall intensity, the amount of impervious surface in a watershed, and topography. The rate of surface runoff is largely determined by topography. Runoff that does not infiltrate and flows off site would be captured in the San Pablo storm drain system, and ultimately discharge to local surface waters.

As discussed above in criterion (a), applicable regulations that would limit pollutant discharges, including sediment and silt, from the project include SPMC Chapter 8.40. SPMC Chapter 8.40 requires measures to reduce and eliminate stormwater pollutants and BMPs to control stormwater runoff from construction sites, in addition to obtainment of grading permits. The City requires compliance with the applicable MS4 General Permit and LID Manual during construction. In addition, on-site development and any associated off-site improvements greater than one acre in size would be required to comply with the NPDES Construction General Permit, which requires the development of a SWPPP, as described above. Thus, the proposed project would not substantially increase stormwater discharge, substantially alter drainage patterns on-site or the surrounding area, and would not contribute runoff that would result in flooding on- or off-site or exceed the capacity of the existing on-site or off-site stormwater drainage system. The project would not result in a substantial increase in erosion or siltation. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

According to the Federal Emergency Management Agency Flood Insurance Rate Map, the project site is located in Zone X, which is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance to be inundated by flood waters as a result of a storm event (Map #06013C0227F, June 16, 2009) (Federal Emergency Management Agency 2020). According to the California Governor’s Office of Emergency Services (Cal OES) MyHazards online database, the project site is not located in a 100-year floodplain (Cal OES 2015). Therefore, the proposed project is not located within a flood zone and impacts concerning flood hazards would be less than significant. Since the project site is not near a large body of water and is approximately 2 miles inland from the San Francisco Bay, the project site would not risk release of pollutants due to inundation by seiche or tsunami. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

As stated in the *Project Description*, the project site currently has a land use designation of Parks/Recreation in the City’s General Plan. The zoning designation for the project site is Open Space.

Impact Analysis

a. *Would the project physically divide an established community?*

The project would be constructed on one contiguous property and would not separate connected neighborhoods or land uses from each other. No new roads, linear infrastructure, or other development features are proposed that would divide an established community or limit movement, travel, or social interaction between established land uses. No impact would occur.

NO IMPACT

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

The project site is located entirely in the City of San Pablo. The City’s General Plan is the fundamental document governing land use development and includes goals and policies relating to economic development; land use and physical design; growth management; circulation; parks, schools, community facilities and utilities; open space and conservation; health; and safety and noise. The proposed project would require a General Plan Amendment to modify the existing land use designation of Parks/Recreation to the Public/Institutional designation. The project applicant has also requested a Major Design Review and Conditional Use Permit which would allow for the development of the self-storage facility on the project site under the proposed land use and zoning designations including adjustments to allow for a greater height and reduced parking.

San Pablo General Plan

The project site has a land use designation of Parks/Recreation. The proposed project would involve a General Plan Amendment to change the land use designation to Public/Institutional. The Public/Institutional designation is intended for “uses that serve a public purpose, including public and private schools, administrative offices, corporation yards, and public facilities” (City of San Pablo 2011). There is no assumed buildout intensity for non-residential development (City of San Pablo 2011). The proposed project would be allowed, with a Conditional Use Permit, under the Institutional District of the Zoning Ordinance. The project would serve a public purpose in providing necessary self-storage space. Therefore, the project would be consistent with the buildout intensity of the General Plan. The City’s General Plan identifies goals and policies to guide land use patterns to strategically accommodate future growth while preserving and enhancing the city as a whole. Specifically, the project would be consistent with land use guiding policy LU-G-9: “Provide for the development of civic and institutional land uses to meet the educational, medical, social, economic, cultural, and religious needs of the community,” as the project would include the provision of public storage, an economic need in the area. The project would also be consistent with land use policy LU-I-34: “Designate the El Portal School and Armory sites as future land use planning opportunities for uses complementary to adjacent land use patterns,” as the project would include an amendment to the General Plan to introduce an institutional land use similar to surrounding institutional land uses. With approval of the requested General Plan amendment, the project would not conflict with the City’s General Plan and impacts would be less than significant.

City of San Pablo Zoning Ordinance

The project site is zoned Open Space (OS). However, the project would involve a zone change to Institutional District (I). The purpose of the Institutional District is to “implement the public/semi-public land use designation in the general plan by providing for uses such as parks, government administrative offices, schools and school playgrounds, hospitals, convalescent homes, fire stations, public utility stations, post offices, and various types of state and federal facilities. In some situations, other types of complementary uses are allowed with a use permit” (SPMC Section 17.36.020). Approval of the proposed rezoning would be subject to review by the Planning Commission and City Council to ensure compliance with the General Plan and applicable zoning standards and guidelines. In addition, the project would require a Conditional Use Permit pursuant to SPMC Section 17.20.040, which requires the Planning Commission to make the required findings of fact and allows the planning commission to impose conditions on the project. The project would also be subject to Major Design Review as set forth by SPMC Section 17.20.030. The height of the proposed project would exceed development standards of a maximum of 27 feet in height within the SPMC for the Institutional District and would require consideration of the increased height as part of the conditional use permit to allow for the project’s proposed height of 35 feet (SPMC Section 17.36.040). The project would also require consideration of a parking adjustment as part of the conditional use permit (SPMC Section 17.54.050) to allow a reduction in parking requirements. Pursuant to SPMC Section 17.54.030, the project would be required to provide 127 parking spaces (at a rate of one space/1,000 square feet and one per employee) and seven bicycle parking spaces. However, the project would provide 16 on-site parking spaces and three bicycle parking spaces. A parking study was conducted by Kittelson and Associates, Inc. in August 2020 (Appendix TRA), which utilized studies of weekday parking demand of three storage sites similar in size included in ITE’s Parking Generation Manual, 5th Edition. The three similar sized sites had an average parking demand of approximately 0.10 parking spaces per 1,000 square feet. Based on the findings in Appendix TRA, the project would generate a parking demand rate of approximately 0.12 parking spaces per 1,000

square feet which would match the highest parking demand rate observed of the three storage facilities of similar size within the ITE Parking Demand Manual, 5th Edition. Therefore, the 16 parking spaces would be sufficient to meet anticipated demand. The project would include 16 parking spaces which would exceed the recommended number of 15 parking spaces. In addition, the project would utilize adjacent on-street spaces along Moraga Road to make up for this shortfall. The project would also provide parking near individual self-storage units that could conservatively provide an additional 40 vehicles should the parking demand exceed the provided parking spaces. The parking reduction would be considered by the Planning Commission as part of the conditional use permit in accordance with SPMC Section 17.54.050.

With approval of the requested General Plan amendment, zoning designation change, conditional use permit, and adjustments, the project would not conflict with the City's General Plan or zoning ordinance. Therefore, impacts of the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

Extractive resources known to exist in Contra Costa County include crushed rock near Mt. Zion, on the north side of Mt. Diablo, in the Concord area; shale in the Port Costa area; and sand and sandstone deposits, mined from several locations. Resources are mostly focused in the Byron area of southeast County (Contra Costa County 2005).

Regulatory Setting

Surface Mining and Reclamation Act of 1975

Pursuant to the mandate of the Surface Mining and Reclamation Act of 1975, the State Mining and Geology Board requires all cities to incorporate into their general plans mapped mineral resources designations approved by the State Mining and Geology Board. Some mineral resources can be found within Contra Costa County. However, there are no mineral resources in the San Pablo area subject to the Surface Mining and Reclamation Act (Contra Costa County 2005).

Impact Analysis

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

The City's General Plan and County General Plan do not identify significant mineral resources or mining operations within the City (City of San Pablo 2011; Contra Costa County 2005). The project would not require the uses of substantial mineral resources during construction or operation and would not involve construction on a mineral resource site. Therefore, no impact would occur.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise Background

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5

dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

The impact of noise is not a function of sound level alone. The time of day when noise occurs and the duration of the noise are also important. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is summed over a one-hour period.

Noise Regulations

The City’s General Plan and Municipal Code regulate noise in San Pablo. The San Pablo Municipal Code sets forth exterior noise standards within SPMC Chapter 17.50. SPMC also restricts construction between the hours of 10 PM and 7 AM. The *Safety and Noise* Element of the City’s General Plan identifies the project site as being within the greater than 55dB noise contour and directly adjacent to Moraga Road which is within the greater than 60 dB noise contour.

Vibration Setting

Ground borne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most ground borne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007). This analysis assumes that vibration-generating equipment could be located as close as 25 feet from sensitive receptors adjacent to construction at the project site, which is the reference distance for vibration levels provide by Caltrans. Table 12 estimates vibration levels from equipment at this distance.

Table 12 Vibration Levels for Construction Equipment at Noise-Sensitive Receptors

Equipment	PPV (in/sec)
	25 feet
Vibratory Roller	0.210
Large Bulldozer	0.089
Loaded Trucks	0.076
Jackhammer	0.035

Source: Caltrans 2013b

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as ground borne noise. Ground borne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. Particle velocity is the velocity at which the ground moves. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the greatest magnitude of particle velocity associated with a vibration event.

Impact Analysis

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

The proposed project would generate temporary noise increases during construction and long-term increases during operation.

Construction

The SPMC Chapter 17.50 restricts construction activities between the hours of 10 PM and 7 AM on weekdays. Construction is not allowed on City-recognized holidays or Sundays. The SPMC does not establish noise level limits for construction occurring during these hours. In the absence of applicable local noise level limits, this analysis references guidance from the Federal Transit Administration’s (FTA) *Transit Noise and Vibration Impact Assessment Manual* to establish a quantified threshold against which to assess the impact of construction noise (FTA 2018); FTA recommends that reasonable noise criteria may include those shown in Table 13. Construction would be limited to between the hours of 10 PM and 7 AM; therefore, daytime noise criteria would be appropriate.

Table 13 Construction Noise Criteria

Land Use	Daytime L _{eq} (8-hour)	Nighttime L _{eq} (8-hour)
Residential	80	70
Commercial	85	85
Industrial	90	90

Source: FTA 2018.

Construction activity would result in temporary noise in the project site vicinity, exposing surrounding nearby receivers to increased noise levels. Project construction noise would be generated by heavy-duty diesel construction equipment used for demolition of existing structures, earthworks, loading, unloading, and placing materials and paving. Typical heavy construction equipment during project grading could include dozers, loaders, graders, and dump trucks. It is assumed that diesel engines would power all construction equipment. Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some would have higher continuous noise levels than others, and some have high-impact noise levels. Construction noise would typically be higher during the more equipment-intensive phases of initial construction (i.e., site preparation and grading) and would be lower during the later construction phases (i.e., building construction and paving).

During construction, equipment goes through varying load cycles and is operated intermittently to allow for non-equipment tasks such as measurement. Power variation is accounted for by describing

the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FHWA 2018). Reference noise levels for heavy-duty construction equipment were estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006).

The nearest sensitive noise receptors in the project vicinity are the residences directly adjacent to the project site to the east. Construction equipment such as bulldozers, graders, and loaders and excavators would operate as close as 50 feet to adjacent residences; however, over the course of a typical construction day, the equipment would move around the project site. For example, during a typical construction day, the equipment may operate at an average distance of 235 feet west of the residences. A likely construction scenario includes simultaneous operation of a dozer and a front-end loader working during grading to excavate and move soil. At a distance of 50 feet, a dozer and a front-end loader would generate a noise level of 79.6 dBA L_{eq} and at a distance of 235 feet a dozer and a front-end loader would generate a noise level of 68.2 dBA L_{eq} (RCNM calculations are included in Appendix NOI). Therefore, construction noise would not exceed the applicable threshold of 80 dBA L_{eq} . Impacts would be less than significant.

Operation

The primary on-site noise sources associated with project operation would include vehicle circulation noise (e.g., engine startups, alarms, parking) in the parking lot, mechanical sounds associated with automated gate opening, outdoor conversations, loading and unloading activity, and heating, ventilation, and air conditioning (HVAC) equipment at the proposed office structure.

Parking Lot Noise

Typical noise sources associated with parking lots include tire squealing, door slamming, car alarms, horns, and engine start-ups. The proposed project includes 16 parking stalls in the northwestern portion of the project site, which would be located approximately 150 feet from residences to the east of the site. Table 14 shows typical noise levels at this distance from various noise sources on parking lots. These are instantaneous noise levels which would occur for short bursts of time during the use of cars on the project site.

Table 14 Maximum Noise Levels from Parking Lot Activity

Source	Maximum Noise Level (dBA) at 50 Feet
Autos at 14 mph	50
Car Alarm Signal	69
Car Alarm Chirp	54
Car Horns	69
Door Slams or Radios	64
Talking	36
Tire Squeals	66

Source: Gordan Bricken & Associates, 1996. Estimates are based on actual noise measurements taken at various parking lots.

As shown in Table 14 above, instantaneous parking lot noise could reach a maximum estimated 69 dBA at a distance of 50 feet. Given the proposed use, noise levels at the proposed parking lot would likely fluctuate depending on operating hours.

Because of the maximum noise levels shown in Table 14 and their instantaneous nature, parking lot noise on the project site would not exceed the City's noise standards for residential properties. Instantaneous noise reaching an estimated 69 dBA at adjacent sensitive receptors would not result in average hourly noise levels exceeding the daytime standard of 70 dBA L_{eq} . The loudest individual noise sources in parking lot areas shown in Table 14, including car horns, car alarm signals, and tire squeals, would occur infrequently and would be instantaneous in nature.

Moreover, parking lot activity is a typical noise source in San Pablo, even near residential uses. For example, there are several parking lots that serve the institutional buildings that abut the site to the south. Estimated intermittent noise levels of up to 69 dBA also would not be unusually loud and intense, with respect to typical noise sources in a residential neighborhood such as landscaping equipment. Therefore, the project would have a less than significant impact from parking lot noise.

Loading and Unloading

Primary noise sources of the proposed project would be typical of self-storage facilities and would include noise associated with loading and unloading of self-storage units. SPMC Section 17.50.060(2) provides the following limitations on loading and unloading operations of commercial uses: "No person shall cause the loading, unloading, opening, closing, or other handling of boxes, crates, containers, building materials, garbage cans, or similar objects between the hours of 10 PM and 7 AM. which would cause a noise disturbance to a residential area." Loading areas would be set back approximately 50 feet from the eastern property line and residences are located approximately 50 feet east from the eastern property line of the project site, thus, residences would be located approximately 100 feet from loading areas. The loudest source of noise from loading and unloading would be back-up beepers from moving trucks which would be similar to car alarm signals listed in Table 14, which would reach a noise level of 69 dBA at a distance of 50 feet. At a distance of 100 feet, back-up beepers would reach a noise level of approximately 66 dBA at residences to the east. However, as described above, the use of back-up beepers would occur infrequently and would be instantaneous in nature and thus would not cause a significant noise disturbance to a residential area.

The project's proposed customer access hours would be Monday through Sunday, 6 AM to 10 PM. While the project would allow for customer access to storage units prior to 7 AM, noise from outdoor conversations and vehicles circulating through the site could result in a noise level of approximately 55 dBA at the nearest loading area and would not significantly contribute to ambient noise levels. Consistent with noise limitations for commercial uses within SPMC Section 17.50.060(1): "All commercial activities shall not create noise that would exceed an exterior noise level of 65 dBA during the hours of 10 PM and 7 AM and 70 dBA during the hours of 7 AM to 10 PM when measured at the adjacent property line." The project's loading and unloading activities would not exceed 65 dBA at the adjacent property line and impacts would be less than significant.

Mechanical Equipment

Mechanical equipment includes HVAC equipment typically located on the roof of a building or within an interior mechanical room. Noise levels from large-scale rooftop-mounted commercial HVAC systems are typically in the range of 60 to 70 dBA L_{eq} at a distance of 15 feet from the source (Illingworth & Rodkin, Inc. 2009). It is assumed that HVAC equipment for the new office structure would not exceed this reference noise level for large-scale commercial facilities. Conservatively, HVAC equipment at the project site would be installed at a distance of at least 50 feet from the nearest sensitive receptors. At this distance, HVAC equipment would generate an estimated noise

level of up to 60 dBA L_{eq} , without accounting for a shielding effect by rooflines and parapets. Therefore, HVAC equipment would not result in noise levels at the closest residential buildings that would exceed the daytime noise limit of 70 dBA L_{eq} or the nighttime noise limit of 65 dBA L_{eq} identified in SPMC 17.50.060. Therefore, new HVAC noise would not generate a substantial increase in ambient noise levels at nearby sensitive receptors. On-site mechanical equipment would have a less than significant noise impact.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?

Project construction would intermittently generate vibration on and adjacent to the project site. Vibration-generating equipment may include bulldozers and loaded trucks to move materials and debris, and vibratory rollers for paving. It is assumed that pile drivers, which generate strong ground borne vibration, would not be used during construction. Vibration-generating equipment on the project site would be used as close as approximately 25 feet from the nearest sensitive receptors to the west and east.

Unlike construction noise, vibration levels are not averaged over time to determine their impact. The most important factors are the maximum vibration level and the frequency of vibratory activity. Therefore, it is appropriate to estimate vibration levels at the nearest distance to sensitive receptors that equipment could be used, even though this equipment would typically be located farther from receptors. As shown in Table 12, construction activity would generate vibration levels reaching an estimated 0.21 PPV at a distance of 25 feet, if vibratory rollers are used to pave asphalt. Vibration-generating equipment would be operated on a transient basis during construction.

A maximum vibration level of 0.21 PPV during the potential use of vibratory rollers would not exceed 0.25 PPV, Caltrans' recommended criterion for distinctly perceptible vibration from transient sources. Construction activity that generates loud noises (and therefore vibration) also would be limited to daytime hours on weekdays and Saturdays, which would prevent the exposure of sensitive receptors to vibration during evening and nighttime hours. As a result, it would not result in substantial annoyance to people of normal sensitivity. In addition, the vibration level would not exceed the Caltrans' recommended criterion of 0.5 PPV for potential damage of historic and old buildings from transient vibration sources. Therefore, the impacts of vibration on people and structures would be less than significant.

The proposed project would not generate significant sources of vibration during operation, based on the nature of the proposed use. Therefore, operational vibration impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

As discussed in Section 9, *Hazards and Hazardous Materials*, the nearest airport to the project site is the Buchanan Field Airport, located approximately 19 miles to the east of the project site. The project site is not located within the project noise contours from Exhibit 6E of the Contra Costa County ALUCP (Contra Costa County 2000). The proposed project would not subject people at the site to excessive noise and there would be no impact.

NO IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

According to the California Department of Finance (DOF), San Pablo has an estimated population of 31,413 with 9,542 housing units (DOF 2020). The average number of persons per household is estimated at 3.41. The Association of Bay Area Governments (ABAG) provides projections for population in San Pablo through the year 2040. ABAG projects the population of San Pablo to be 34,090 by the year 2040 (ABAG 2017).

Impact Analysis

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The project would not involve the construction of new dwelling units and would therefore not directly induce population growth in the City. The project would create jobs that could indirectly cause population growth through employee relocations to the project area. However, project operation is expected to require approximately two full-time employees. This incremental increase in the City’s employment would not induce substantial population growth.

The project would not involve the extension of roads or other infrastructure since it would be constructed within City limits and connected to existing infrastructure systems in the area. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

2600 Moraga Road Self Storage Project

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

There are no existing housing units or temporary housing accommodations on the project site. Therefore, the project would not displace existing housing units or people. No impact would occur.

NO IMPACT

15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2 Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3 Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4 Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5 Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The Contra Costa County Fire Protection District (CCFPD) provides fire and emergency medical services to the project site, and responds to all fires, hazardous materials spills, and medical emergencies in the city, local Bay Area Rapid Transit (BART) stations, regional parks, and unincorporated areas in the county and fifteen cities including San Pablo. CCCFPD operates one station in San Pablo (Station #70) which is currently being constructed on the corner of 23rd Street and Market Avenue to replace the existing station on San Pablo Avenue and is expected to be operational before the project is completed (City of San Pablo 2020b). The newly constructed fire station would be approximately 1.3 miles southwest of the project site. San Pablo adopted the 2018 edition of the International Fire Code and the 2019 California Fire Code, as amended by the Contra Costa County Fire Protection District, as the City’s Fire Code in 2019 (SPMC Section 15.04.010).

The San Pablo Police Department (SPD) provides law enforcement services in San Pablo. SPD operates one police station in the City, which is located at 13880 San Pablo Avenue, approximately 0.9-mile southwest of the project site (approximately 4 minutes driving time). In 2019, SPD received 39,372 calls for service (City of San Pablo 2020c).

The West Contra Costa Unified School District (WCCUSD) serves the San Pablo area. In San Pablo, WCCUSD operates five elementary schools, one middle school, and one high school (City of San Pablo 2020d).

The City of San Pablo Recreation Division operates seven parks spread over 22 acres within the city, including the El Portal soccer fields on the project site (City of San Pablo 2011). Additional parkland is provided through a joint-use agreement with the West Contra Costa Unified School District and Contra Costa College to allow for use of their facilities for recreation during non-school hours (City of San Pablo 2011). The Recreation Division also oversees a community center and two senior centers within the city.

The Contra Costa County Library operates 26 branch libraries throughout the county. The San Pablo branch library is located at 13751 San Pablo Avenue, approximately 1 mile south of the project site.

Impact Analysis

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The project site is currently within the CCCFPD service area and construction would be required to comply with applicable Fire Code standards. The project would incrementally increase the demand for fire and medical services. However, as discussed in Section 14, *Population and Housing*, the proposed project would not generate growth beyond that anticipated for the City. In addition, storage facilities do not typically generate a high demand for fire protection services. The project would also be subject to approval by CCCFPD prior to the beginning of construction. Therefore, the proposed project would not place an unanticipated burden on fire protection services or affect response times or service ratios such that new or expanded fire facilities would be needed. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The project site is in an area currently served by the SPD. Although the project would incrementally increase the demand for police services, the project site is located in close vicinity (within 5 miles) of the City's police headquarters, and as described in Section 14, *Population and Housing*, the project would not result in population growth beyond expectations in Plan Bay Area 2017. In addition, storage facilities do not typically generate a high demand for police protection services. The project would not require the construction or expansion of police protection facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.3. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The project site is served by the WCCUSD. As described in Section 14, *Population and Housing*, the project would not result in direct population growth or substantial indirect population growth; therefore, the project would not result in a substantial increase in the number of students attending schools operated by WCCUSD. In addition, pursuant to SB 50 (Section 65995(h)), payment of mandatory fees to the affected school district would reduce potential school impacts to a less than significant level under CEQA. Therefore, the proposed project would have a less than significant impact with respect to schools.

LESS THAN SIGNIFICANT IMPACT

- a.4. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Please see Section 16, *Recreation*, for an analysis of impacts related to parks and recreation resources. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.5. *Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

As discussed in Section 14, *Population and Housing*, the project would not involve construction of new dwelling units and would generate two new jobs which could be filled by the existing labor pool. Therefore, the project would not result in significant impacts to Contra Costa County library services or facilities.

NO IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The City of San Pablo Recreation Division operates seven parks spread over 22 acres within the city, including the El Portal soccer fields on the project site (City of San Pablo 2011). Additional parkland is provided through a joint-use agreement with the West Contra Costa Unified School District and Contra Costa College to allow for use of their facilities for recreation during non-school hours (City of San Pablo 2011). The Recreation Division also oversees a community center and two senior centers within the city.

Impact Analysis

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

The project would not involve the construction of public recreational facilities. The existing soccer fields would be removed as a result of project construction and relocated in the future to the area just north of the site. This would result in temporary increase in use of other local and regional recreational facilities, such as Wanlass Park, Hilltop Park, and the Rumrill Sports Park, which could cause an adverse physical effect on the environment. However, the City plans to construct new park and recreational facilities on approximately 4.8 acres which would be created through the lot split on the larger 9-acre parcel. Potential environmental impacts from those facilities are being analyzed concurrently with this project. While the removal of the fields on the project site would result in an increased use of existing neighborhood and regional parks, this increase would be temporary as the new recreational facilities are anticipated to be complete by late 2023.

City of San Pablo

2600 Moraga Road Self Storage Project

The project would not increase residents in the City of San Pablo. While the project would increase the demand for parks and recreational facilities due to the removal of the fields on the site, these impacts would be temporary. Impacts related to parks and recreational facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Much of the analysis in this section is based on a transportation analysis prepared for the proposed project by W-Trans in January 2021 and included as Appendix TRA.

Setting

Regional access to the site is provided by San Pablo Avenue to the west and I-80 to the east. The following descriptions are provided for roadways that would provide access to the site and are most likely to serve most of the project’s generated vehicle, bicycle, and transit traffic.

Roadway Network

MORAGA ROAD

Moraga Road is a two-lane collector roadway, that extends from Castro Road to the intersection of Moraga Road and Library Drive. There are continuous sidewalks on both sides of the street and parking is provided on the eastern side of Moraga Road. The posted speed limit is 15 miles per hour. All vehicle, bicycle, and pedestrian access to the project site is provided via Moraga Road.

EL PORTAL DRIVE

El Portal Drive is an east-west, four-lane arterial roadway that extends from the intersection of El Portal Drive and San Pablo Dam Road to the intersection of El Portal Drive and San Pablo Avenue. There is no parking on either side of the street. Continuous sidewalks are provided on both sides of the street. The posted speed limit is 30 miles per hour, which is reduced to 25 miles per hour near schools. El Portal Drive provides access to surrounding institutional uses and local commercial and residential uses.

SAN PABLO AVENUE

San Pablo Avenue is a north-south, four-lane arterial roadway that extends from the intersection of Willow Avenue and San Pablo Avenue near the City of Rodeo and terminates at the Frank H. Ogawa Plaza in Oakland. The posted speed limit is 30 miles per hour. On-street parking and continuous sidewalks are provided along both sides of the street.

Regulatory Setting

SB 743 and Vehicle Miles Traveled

SB 743 was signed into law by Governor Brown in 2013 and tasked the State Office of Planning and Research (OPR) with establishing new criteria for determining the significance of transportation impacts under CEQA. SB 743 requires the new criteria to “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” It also states that alternative measures of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.”

On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. SB 743 requires the Governor’s OPR to identify new metrics for identifying and mitigating transportation impacts within CEQA. In January 2018, OPR transmitted its proposed CEQA Guidelines implementing SB 743 to the California Natural Resources Agency for adoption, and in January 2019 the Natural Resources Agency finalized updates to the CEQA Guidelines, which incorporated SB 743 modifications, and are now in effect. SB 743 changed the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (Public Resource Code, Section 21099 (b)(2)). In addition to new exemptions for projects consistent with specific plans, the CEQA Guidelines replaced congestion-based metrics, such as auto delay and level of service (LOS), with VMT as the basis for determining significant impacts, unless the Guidelines provide specific exceptions.

Contra Costa Transportation Authority Central County Action Plan

The Contra Costa Transportation Authority (CCTA) is a joint powers authority that handles short- and long-term regional transportation planning for Contra Costa County and its incorporated cities. It works with local, regional, State, and federal agencies to improve the County’s streets, highways, bicycle, and pedestrian facilities, and it provides funding for improvement projects and transportation programs. It also serves as the Congestion Management Agency for Contra Costa County, and it manages the Contra Costa Connection public transit system.

The passage of Proposition 111 by California voters in 1990 required urban counties to designate a congestion management agency, whose primary responsibility is to coordinate transportation planning, funding and other activities in a congestion management program. The CCTA has developed a congestion management program that reflects existing travel patterns and utilizes traffic analysis zones to support a travel demand model (CCTA 2019). The CCTA developed the travel demand model to support local planning efforts by forecasting traffic growth trends in traffic analysis zones that consider approved and potential projects in the immediate area.

Screening Criteria

The City of San Pablo has not yet adopted a standard of significance for evaluating Vehicle Miles Travelled (VMT). Therefore, guidance was provided by the OPR in the publication *Technical Advisory on Evaluating Transportation Impacts in CEQA* and CCTA Technical Memorandum, *VMT Analysis Methodology for Land Use Projects in Contra Costa, GMTF Review Draft* (OPR 2018; Contra Costa County 2020).

VMT Screening Criteria

Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, the following types of projects would have a less-than-significant impact under CEQA and do not require further VMT analysis:

- CEQA exemption - Any project that is exempt from CEQA is not required to conduct a VMT analysis.
- Small projects - Small projects can be presumed to cause a less-than-significant VMT impact. Small projects are defined as having 10,000 square feet or less of non-residential space or 20 residential units or less, or otherwise generating less than 836 VMT per day.
- Local-serving uses - Projects that consist of local-serving uses can generally be presumed to have a less-than-significant impact absent substantial evidence to the contrary, since these types of projects will primarily draw users and customers from a relatively small geographic area that will lead to short-distance trips and trips that are linked to other destinations.
- Projects located in Transit Priority Areas (TPAs) - Projects located within a TPA can be presumed to have a less-than-significant impact absent substantial evidence to the contrary. Some exempted cases will be noted.
- Projects located in low VMT areas - Residential and employment-generating projects located within a low VMT-generating area can be presumed to have a less-than-significant impact absent substantial evidence to the contrary. A low VMT area is defined as follows:
 - For housing projects: Cities, towns, and unincorporated portions within Contra Costa County that have existing home-based VMT per capita that is 85 percent or less of the existing county-wide average.
 - For employment-generating projects: Cities, towns, and unincorporated portions within Contra Costa County that have existing home-work VMT per worker that is 85 percent or less of the existing regional average.

VMT Thresholds of Significance

For projects that do not meet the screening criteria, the CCTA guidance provides the following thresholds related to VMT:

- Residential projects should use the home-based VMT per capita metric to evaluate their project generated VMT. The project-generated home-based VMT per resident constitutes a significant impact if it is higher than 85 percent of the home-based VMT per resident in the subject municipality or unincorporated Authority subregion (for areas outside of municipalities) or 85 percent of the existing county-wide average home-based VMT per resident, whichever is less stringent.
- Employment-generating projects should use the home-work VMT per worker metric for their project-generated VMT estimates. The project-generated home-work VMT per worker

constitutes a significant impact if it is higher than 85 percent of the home-work VMT per worker in the subject municipality or unincorporated Authority subregion (for areas outside of municipalities) or 85 percent of the existing Bay Area region-wide average home-work VMT per worker, whichever is less stringent.

- Other uses and projects need to be analyzed using a methodology developed by the lead agency specifically for the project, prepared and documented based on available data and taking into account the specific methodologies and thresholds identified in this document.
- Mixed-use projects may be analyzed using a combination of techniques described above.

Additionally, SB 743 establishes the significance of a project's impact if it:

- Conflicts with a plan, ordinance, or policy addressing the safety or performance of the circulation system, including transit, roadways, bicycle lanes, and pedestrian paths (except for automobile level of service or other measures of vehicle delay).
- Substantially induces additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network.

Impact Analysis

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Trip Generation

Project trip generation was estimated using rates published by the ITE *Trip Generation Manual*, 10th Edition. The rate most closely aligned with the proposed project use would be "Mini-Warehouse" (ITE LU 151). The standard rates for "Mini-Warehouse" includes vehicle trips related to the operation of a self-storage facility such as for the maintenance, office operations and other services. Because the site is currently occupied by a sports field, the trip generation for "Public Park" (ITE LU 411) was used to estimate the existing trips at the site and would result in a credit of 2 daily trips to the expected trip generation of the proposed project. Therefore, the proposed project is expected to generate an average of 187 trips per day, including 13 trips during the AM peak hour and 21 during the PM peak hour.

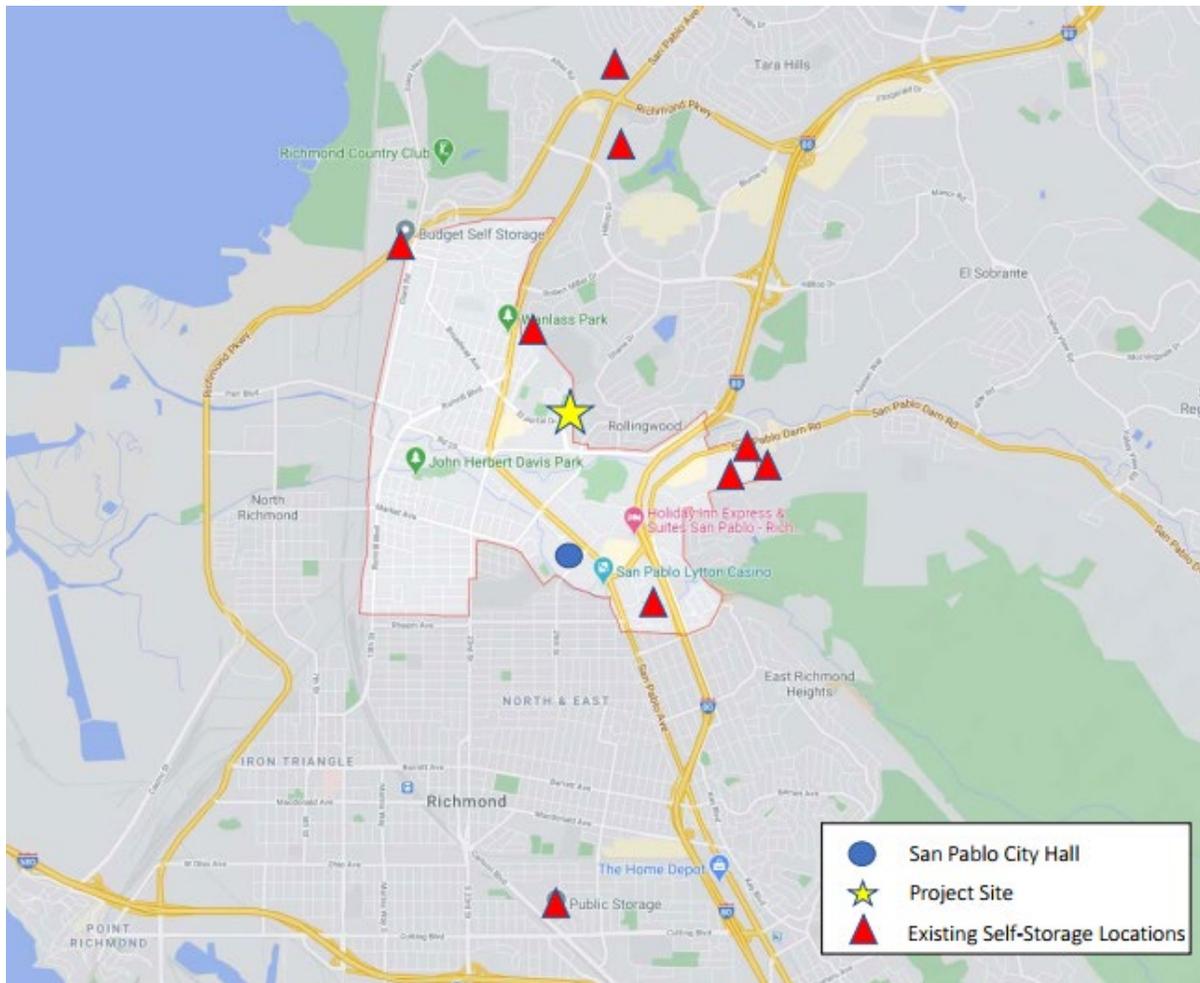
Using the guidance provided by OPR and CCTA, the proposed project's land use may be considered local-serving as the demand for self-storage services in the area are constant and the addition of a new self-storage facility would redistribute existing self-storage-based trips within the City instead of creating new trips. A quantitative approach was developed to evaluate the potential change in project-related VMT (Appendix TRA). This method is summarized as follows:

- Determine the average self-storage trip length in the immediate area by measuring the distance between existing self-storage facilities and a common point near the geographic center of San Pablo (in this case the previous location of City Hall [13831 San Pablo Avenue]) was used as the common point and geographic center of the City).
- Measure the trip length from the project site to the common point (San Pablo City Hall).

- If the project trip length is less than the average self-storage trip length for existing self-storage facilities, then the project may be presumed to reduce the average distance traveled for this type of use and is considered to have a less than significant VMT impact.

There are currently nine similar self-storage facilities in the vicinity within a 3-mile radius of San Pablo City Hall. Figure 5 provides a map of all nine self-storage locations within a 3-mile radius of San Pablo City Hall. The average distance between these facilities and the San Pablo City Hall is 1.9 miles. Table 15 provides an overview of self-storage facilities within 3 miles of City Hall, their distance to City Hall, and the average distance.

Figure 5 Self-Storage Locations within 3 miles of Old San Pablo City Hall



Source: Appendix TRA

Table 15 San Pablo Self-Storage Facilities' Distance to Old City Hall

Self-Storage Facility	Address, City	Distance to City Hall (Miles)
Public Storage	398 Carlson Blvd., Richmond	2.9
Budget Self Storage	3445 Collins Ave., Richmond	2.1
Security Public Storage	801 Madeline Rd., Richmond	2.9
Extra Space Storage	4031 Lakeside Dr., Richmond	2.7
Public Storage	3255 San Pablo Dam Rd., San Pablo	1.4
Security Public Storage	3415 San Pablo Dam Rd., San Pablo	1.7
Public Storage	14820 San Pablo Ave., San Pablo	1.1
San Pablo Mini Storage	5310 Riverside Ave., San Pablo	0.9
Extra Space Storage	3500 San Pablo Dam Rd., El Sobrante	1.6
Average Distance		1.9

Source: Appendix TRA

The distance between the project site and City Hall is 1.3 miles, which is below the average distance of self-storage facilities within 3 miles of City Hall. Therefore, the project would have a less than significant VMT impact because the length of travel from City Hall to the project site is less than the average distance to other existing similar self-storage facilities.

Transit, Bicycle, and Pedestrian Facilities

The proposed project would not conflict with adopted policies, plans, or programs regarding transit facilities as it would not include alterations to existing transit routes. Because construction and operations would be contained within the boundary of the project site, no changes to the existing transportation policies, plans, or programs would result, either directly or indirectly, from development on the project site.

The project does not include features that would be hazardous to bicycles nor is it forecast to generate bicycle demand that would exceed the capacity of the area’s existing bicycle network. No features are proposed that would conflict with City or regional plans, policies or ordinances pertaining to bicycle facilities or travel. No significant impacts to bicycle facilities would occur.

The project does not include features that would be hazardous to pedestrians nor is it forecast to generate pedestrian demand that would exceed the capacity of the area’s pedestrian network. No features are proposed that would conflict with City or regional plans, policies or ordinances pertaining to pedestrian facilities or travel. No significant impacts to pedestrian facilities would occur.

The proposed project would not involve the obstruction, removal or relocation of, or excessive additional demand for, existing transit, bicycle or pedestrian facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

The project would be developed on an existing parcel that is currently used as the El Portal soccer fields and would not alter or affect existing street and intersection networks. The project would be required to comply with City design standards for vehicular access and circulation and the Fire Code. Compliance with these standards would prevent hazardous design features and would ensure adequate and safe site access and circulation. The proposed project would not introduce incompatible uses, including vehicles or equipment, to the site or the surrounding area. There would be no impact.

NO IMPACT

- d. *Would the project result in inadequate emergency access?*

The project site would be accessible via a single driveway on Moraga Road. The proposed project would be required to comply with all building, fire, and safety codes and development plans would be subject to review and approval by the City's Engineering Division and CCFPD. Required review by these departments would ensure the circulation system for the project site would provide adequate emergency access. In addition, the proposed project would not require temporary or permanent closures to roadways. There would be no impact.

NO IMPACT

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2600 Moraga Road Self Storage Project

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those having requested notice of projects proposed in the jurisdiction of the lead agency.

The proposed project includes a General Plan amendment and, therefore, must also comply with PRC Sections 65352.3 – 65352.4 (SB 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the Native American Heritage Commission prior to the adoption or amendment of a city or county general plan for the purpose of protecting cultural places on lands affected by the proposal.

On December 21, 2020 and January 6, 2021, the City distributed AB 52/SB 18 consultation letters for the proposed project, including project information, map, and contact information to seven Native American tribes. The tribal governments provided with an AB 52/SB 18 consultation letter (via return receipt email) include the following list of recipients:

- Amah Mutsun Tribal Band
- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Confederated Villages of Lisjan
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- North Valley Yokuts Tribe
- The Ohlone Indian Tribe

Under AB 52, Native American Tribes have 30 days and under SB 18, Tribes have 90 days to respond to request further project information and request formal consultation

On January 26, 2021, Chairperson Corrina Gould of the Confederated Villages of Lisjan requested additional information regarding the site and records searches, additional information was provided on January 28, 2021 and formal consultation was requested on February 24, 2021. On March 2, 2021, Kanyon Sayers-Roods, on behalf of the Indian Canyon Band of Costanoan Ohlone People, requested that a Native American Monitor and archaeologist be present on-site during construction activities.

At the request of Chairperson Gould, tribal consultation pursuant to the requirements of AB 52 and SB 18 occurred on March 3, 10, and 12, 2021, between the City and the Confederated Villages of Lisjan (Tribe). During each of the three videoconferences, the City and Tribe exchanged information regarding the potential for the project to encounter and potentially impact cultural resources, Tribal Cultural Resources, and/or human remains during ground-disturbing construction, consistent with the requirements of PRC Section 21080.3.2(a). Based on a review of the project’s cultural resources study (Appendix CUL) and geotechnical study (Appendix GEO), the City and Tribe mutually agreed on measures to avoid or substantially reduce potential impacts to these resources and/or human

remains; these measures are included as Mitigation Measure CUL-1, which is described previously and requires archaeological and tribal monitoring of ground-disturbing construction, pursuant to AB 52 (PRC Section 21080.3.2(b)(1)). The City received an email from the Tribe on March 25, 2021, agreeing that consultation had been concluded.

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

No archaeological resources were identified within the project site during the NWIC records search and the site has been previously developed; however, the SLF search returned positive results, which increases the general sensitivity of the area for archaeological resources.

During AB 52 consultation conducted for the project, a review of geotechnical information indicated the presence of clamshell remains in a dark, clayey soil substrate in the southern portion of the site at a depth of approximately 4 feet. Although noted by the report as likely being associated with a ponding or alluvial event due to the former presence of a seasonal drainage adjacent to the project site, it cannot be conclusively demonstrated that such clamshell remains are not cultural in origin, or that additional cultural deposits lie within the project site at depth. Based on the fact that the proposed excavation does not occur at the site of this clamshell deposit, as well as other factors that indicate that the deposit could be a natural occurrence, construction monitoring was deemed to be an appropriate approach to avoid, or substantially reduce, the potential impact to the deposit or related deposits. Therefore, as discussed in the Cultural Resources section, Mitigation Measure CUL-1 would be required.

Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources that may qualify as Tribal Cultural Resources to less than significant by requiring observation of ground disturbance by a tribal representative. The tribal monitor would provide recommendations for the respectful treatment of any archaeological deposits and/or human remains that may be identified during monitoring to address potential tribal concerns. No additional mitigation measures are required.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

Potable Water

Potable water would be provided to the project by the East Bay Municipal Utility District (EBMUD). According to the EBMUD Urban Water Management Plan, EBMUD's water supply system collects, transmits, treats, and distributes water from its primary water source, the Mokelumne River. EBMUD's secondary water supply source is local runoff from East Bay watersheds, which is then stored in terminal reservoirs within EBMUD's service area. The water supply system consists of a network of reservoirs, pipelines, water treatment plants, pumping plants, and other distribution

facilities and pipelines that convey Mokelumne River water (East Bay Municipal Utility District [EBMUD] 2016).

Wastewater

The City of San Pablo receives sewer and wastewater collection from the West County Wastewater District (WCWD). The sanitary sewer system currently serves the City of San Pablo, Tara Hills, a portion of Richmond, East Richmond Heights, a portion of the City of Pinole, El Sobrante, Rollingwood, Bayview, and parts of the unincorporated county (WCWD 2020). The system owns, operates, and maintains a collection system with 249 miles of gravity sewer pipelines, 17 lift stations, 6 miles of pressure force mains, and one wastewater treatment plant (WCWD 2020). WCWD conveys all wastewater flow to its Water Quality and Resource Recovery Plant located at 2377 Garden Tract Road in Richmond. The plant has a capacity of 12.5 million gallons per day (mgd), average dry weather flow (WCWD 2020).

Stormwater

The site currently drains to existing storm drains in the adjacent roadway on Moraga Road to the west and El Portal Drive to the south where the flow joins with the City’s stormwater system. Stormwater runoff is collected and directed to storm drains located along San Pablo Avenue, Rumrill Boulevard, Broadway Avenue, and El Portal Drive, as well as San Pablo and Wildcat creeks (City of San Pablo 2011). The City participates in the Contra Costa Clean Water Program, which implements the NPDES permit throughout Contra Costa County (City of San Pablo 2011).

Solid Waste

Republic Services of West Contra Costa County manages the trash and recycling services for the City of San Pablo. Nearly all solid waste generated in the City is transported to and disposed of at the Golden Bear Waste Recycling Center and then to the Keller Canyon Landfill, located at 901 Bailey Road in Bay Point, or the Potrero Hills Landfill, located at 3675 Potrero Hills Lane in Suisun City. The Keller Canyon landfill comprises 1,399 acres and approximately 244 acres are permitted for disposal (California Department of Resources Recycling and Recovery [CalRecycle] 2020a). The Potrero Hills landfill comprises approximately 526 acres, approximately 340 acres of which are permitted for disposal (CalRecycle 2020b). Table 16 provides the permitted and remaining capacities of Keller Canyon and Potrero Hills landfills.

Table 16 Estimated Landfill Capacities and Closure Dates

Landfill Facility	Permitted Capacity	Remaining Capacity	Anticipated Closure Date
Keller Canyon Landfill	75,018,280 cy	63,408,410 cy	2030
Potrero Hills Landfill	83,100,000 cy	13,872,000 cy	2048

Source: CalRecycle 2020a; 2020b

The Golden Bear Waste Recycling Center is a waste processing facility with a design capacity of 1,400 tons per day (CalRecycle 2020c). The Golden Bear Waste Recycling Center redirects waste to the Potrero Hills landfill (City of San Pablo 2011).

Other Utilities

Electric utilities would be provided to the project site by PG&E and supplemented by MCE, as described in Section 6, *Energy*. Telecommunication services including telephone and internet services are provided by AT&T and Comcast. Infrastructure capable of supporting electric and telecommunications is present in the project vicinity. The project would not require the use of natural gas.

Regulatory Setting

State of California

CALIFORNIA GREEN BUILDING STANDARDS CODE

In January 2020, the State of California adopted CALGreen which establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a mandatory set of guidelines, as well as more rigorous voluntary measures, for new construction projects to achieve specific green building performance levels, including:

- Reducing indoor water use by 20 percent
- Reducing wastewater by 20 percent
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris
- Providing readily accessible areas for recycling by occupant

Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- c. *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?*

Water

EBMUD's UWMP is based on growth projections for Contra Costa County through the year 2040. As determined in the UWMP, there is adequate water supply available to serve anticipated growth in Contra Costa County. The project would not directly result in an increase in population within the City and thus, would not generate growth beyond that anticipated in the General Plan or the UWMP. Therefore, there would be sufficient potable water supply and infrastructure to accommodate the proposed project. Project construction and operation would not require relocation or construction of new or expanded water supply facilities. Impacts would be less than significant.

Wastewater

Water quality in California is regulated by the State Water Resources Control Board (State Water Board) and the nine Regional Water Quality Control Boards. The City of San Pablo is located in the jurisdiction of the San Francisco Bay RWQCB. Section 303(d) of the CWA requires that states identify water bodies, including bays, rivers, streams, creeks, and coastal areas, that do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting established water quality standards. A TMDL requires that all sources of pollution and all aspects of a watershed's drainage system be reviewed and set forth action plans that examine factors and sources adversely affecting water quality and identify specific plans to improve overall water quality and reduce pollutant discharges into impaired water bodies.

The proposed project would connect to the WCWD sanitary sewer system. Sanitary sewage is treated at the Water Quality and Resource Recovery Plant located in Richmond. The treatment facility discharges into the San Francisco Bay under a permit with the RWQCB. Since the Water Quality and Resource Recovery Plant is considered a publicly owned treatment facility, operational discharge flows treated at the plant would be required to comply with applicable water discharge requirements issued by the RWQCB. Compliance with conditions or permit requirements established by the City as well, water discharge requirements outlined by the RWQCB, and WCWD Code, Title 9, *Sewage and Discharge Regulations*, would ensure that wastewater discharges coming from the project site and treated by the system would not exceed applicable RWQCB wastewater treatment requirements. Moreover, the project site is located in an urban area within the boundaries of the EBMUD's water system. Utility infrastructure would not require significant improvements other than infrastructure to service the proposed structures. Therefore, the project would not result in relocation or construction of new or expanded wastewater treatment facilities, and impacts would be less than significant.

Stormwater

The stormwater collection and filtration system would not change with project implementation. New stormwater pipes would need to be connected to the existing system near the site. The proposed project would increase the amount of impervious surfaces on the project site by approximately 100,000 square feet, which would incrementally reduce the potential for groundwater recharge, increasing stormwater runoff from the site. However, as discussed in Section 10, *Hydrology and Water Quality*, the proposed project would include approximately 5,480 square feet of stormwater bioretention swales to assist with groundwater recharge and would be required to comply with all applicable stormwater management requirements. In addition, the bioretention swale located in the northern portion of the site would be equipped with a meter release that would release stormwater from the area at the pre-development rate. Therefore, the proposed project would not result in the need for new off-site stormwater drainage facilities. All site runoff would be directed to the City's existing municipal storm drainage system, which was designed to accommodate flows resulting from buildout in the project area. The proposed project would be subject to local policies requiring that post construction runoff volumes be less than or equal to preconstruction volumes (MS4 C.3). Therefore, expansion of the existing stormwater collection system would not be required. Impacts would be less than significant.

Electricity, Natural Gas, and Telecommunications

A significant impact to electricity, natural gas, and telecommunications facilities may occur if the demand for services exceeds the capacity of local providers. Telecommunications are available in the project area. Therefore, facility upgrades would not be necessary.

As described in Section 6, *Energy*, the proposed project would require approximately 0.5 GWh of electricity. The project's electricity demand would be served by PG&E (likely through MCE), which provided approximately 9,639 GWh of electricity to Contra Costa County in 2019; therefore, PG&E would have sufficient supplies for the proposed project (CEC 2019b). The project would be fully electric and would not require the use of natural gas. Improvements to existing facilities or the provision of new electricity and natural gas facilities would not be needed. The proposed project would have a less than significant impact on local electricity, natural gas, and telecommunications providers.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

As described under criterion (a) above, the City's water supply is provided by the East Bay Municipal Utility District which draws its water primarily from the Mokelumne River and local runoff from East Bay watersheds. In the event of a drought where the Mokelumne River cannot serve projected customer demands, EBMUD has signed a Long-Term Renewal Contract with the U.S. Bureau of Reclamation for delivery of Central Valley Project water from the American River for emergency supplies (EBMUD 2016). EBMUD's UWMP describes that there is adequate water supply available to serve anticipated growth in San Pablo (EBMUD 2016). As described in Section 13, *Population and Housing*, the project would not generate growth beyond that anticipated in the General Plan. Therefore, the proposed project would be consistent with the anticipated development and growth in the General Plan and is covered by the analysis in the UWMP. EBMUD's existing water supply is sufficient to supply to the proposed project and reasonably foreseeable future, including normal, dry, and multiple dry years. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The proposed project would generate solid waste during construction and operation. Handling of debris and waste generated during construction would be subject to SPMC Chapter 17.44, which would require the project applicant to develop a Waste Management Plan for the project site. The 2019 CalGreen code requires that 65 percent of construction and demolition debris be diverted. Construction activities would generate substantial waste; however, compliance with SPMC Chapter 17.44 would aid in reaching AB 939 goals and the City's diversion requirement. Therefore, the project would not impair the attainment of solid waste reduction goals.

According to CalEEMod default values, the project would generate approximately 640 pounds of solid waste per day (approximately 0.32 tons) or 234,000 pounds of solid waste per year

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(approximately 117 tons). Project-generated waste would be approximately 0.01 percent of Keller Canyon's daily allowable waste limit of 3,500 tons per day and would be less than 0.01 percent of Potrero Hills Sanitary Landfill's daily allowable waste limit of 4,300 tons per day (CalRecycle 2019a; 2019b). The project would be required to comply with City and State plans and policies to reduce solid waste generation, including a requirement to divert at least 50 percent of solid waste and recyclables, as required by AB 939. The project's incremental increase in solid waste would not adversely affect solid waste facilities and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

20 Wildfire

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

Setting

The City of San Pablo is not located within a fire hazard severity zone (City of San Pablo 2011). The project site is located within an urbanized area of the City and is surrounded by existing institutional and residential development. The nearest high fire hazard severity zone is the Wildcat Canyon Regional Park, located approximately 1.2 miles southeast of the project site.

2600 Moraga Road Self Storage Project

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project site is not in a California Department of Forestry and Fire Protection (CALFIRE) designated very high fire hazard severity zone and is located approximately 1.2 miles northwest of the nearest very high fire hazard severity zone (California State Geoportal 2020). As such, project implementation would not impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks; require the installation or maintenance of associated infrastructure that may exacerbate fire risk; or expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post fire slope instability, or drainage changes in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts would occur.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Does the project:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <p>a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>b. 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)?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

As discussed in Section 4, *Biological Resources*, the project would not substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife species population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal with compliance with Mitigation Measure BIO-1. Implementation of Mitigation Measure BIO-1 would reduce impacts to bird species to less than significant levels with implementation.

As discussed in Section 5, *Cultural Resources*, and Section 7, *Geology and Soils*, no historical, archaeological, or paleontological resources were identified on site. Nevertheless, the potential for the recovery of buried cultural materials during construction remains. Implementation of Mitigation Measure CUL-1 would reduce impacts to previously undiscovered cultural resources to a less than significant level by providing a process for evaluating and, as necessary, avoiding impacts to any resources found during construction.

As discussed in Section 18, *Tribal Cultural Resources*, the potential to discover unanticipated resources during development is a possibility. Mitigation Measure CUL-1 would provide steps to take in the event of an unanticipated discovery. With the implementation of Mitigation Measure CUL-1, impacts related to tribal cultural resources would be reduced to a less than significant level. Therefore, impacts to important examples of California history or prehistory would be less than significant with mitigations incorporated.

As noted throughout the Initial Study, all other potential environmental impacts related to the quality of the environment would be less than significant or less than significant with implementation of mitigation measures.

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- 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)?*

Pursuant to CEQA Guidelines Section 15064(h)(3), cumulative impacts associated with some of the resource areas have been addressed in the individual resource sections above: Air Quality, Greenhouse Gases, Water Supply, and Solid Waste. As discussed in these sections, impacts (including cumulative impacts) would be less than significant or less than significant with mitigation incorporated in the case of air quality. Some of the other resource areas were determined to have no impact in comparison to existing conditions and therefore would not contribute to cumulative impacts, such as mineral resources and agriculture and forestry resources. As such, cumulative impacts in these issue areas would also be less than significant (not cumulatively considerable). Other issues (e.g., aesthetics, hazards and hazardous materials) are site-specific by nature, and impacts at one location do not add to impacts at other locations or create additive impacts. The project would incrementally increase traffic compared to existing conditions. However, the project would be below screening thresholds for VMT analysis and would have a less than significant VMT impact because the length of travel from the central point of the old City Hall to the project site is less than the average distance to other existing similar self-storage facilities. While the project would require a General Plan Amendment and a rezoning, the project would be subject to review by the San Pablo Planning Commission and City Council who would be required to make findings of fact outlined in the SPMC prior to approval of the project. The project’s impacts would not be cumulatively considerable with implementation of mitigation measures.

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As discussed in Section 3, *Air Quality*, impacts related to construction fugitive dust emissions would be reduced to less than significant levels with Mitigation Measure AQ-1. Mitigation Measure AQ-1 would require the contractor to implement fugitive dust BMPs to reduce fugitive dust emissions during project construction. As discussed in Section 7, *Geology and Soils*, impacts related to the risk of loss, injury, or death involving an Alquist-Priolo fault zone, ground failure, and expansive soils would be reduced to less than significant impacts with Mitigation Measures GEO-1, GEO-2, and GEO-3. Mitigation Measure GEO-1 would require structures on the site to be sited at an appropriate distance to minimize risks to buildings intended for human occupation. Mitigation Measure GEO-2 would require that structure foundations on the project site be constructed on a soil mat to reduce impacts from differential settlement and fault rupture. Mitigation Measure GEO-3 would ensure that fill and compaction of soils onsite would minimize lenses, pockets, and/or layers of materials that differ substantially in texture or gradation from surrounding fill materials underneath buildings and exterior flatwork. Mitigation Measure GEO-4 would reduce impacts related to expansive soils through structure foundation requirements. As discussed in Section 9, *Hazards and Hazardous Materials*, impacts related to groundwater, vapor, or soil contamination would not be significant as a result of project implementation and would not have a cumulatively considerable contribution to significant cumulative hazards impacts. As discussed in Section 13, *Noise*, the project would not generate significant impacts related to ambient noise or ground-borne vibration. Therefore, the project would not cause substantial adverse effects on human beings with mitigation implemented.

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List of Preparers

Rincon Consultants, Inc. prepared this IS-MND under contract to the City of San Pablo. Persons involved in data gathering analysis, project management, and quality control are listed below.

RINCON CONSULTANTS, INC.

Abe Leider, AICP CEP, Principal in Charge
Darcy Kremin, AICP, Project Manager
Leslie Trejo, Deputy Project Manager
Annaliese Miller, Associate Environmental Scientist
Hannah Haas, M.A., RPA, Senior Archaeologist
Elaine Foster, M.A., RPA, Archaeologist
Sherri Miller, Principal, Natural Resources
Anastasia Ennis, Associate Biologist
Jack Emerson, Planner IV
David Daitch, Ph.D., Principal
Jorge Mendieta, Paleontologist

W-TRANS

Mark Spencer, PE, Senior Principal
Kenneth Jeong, PE, Traffic Engineer

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