

EXHIBIT F

CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

October 2024 | Final Environmental Impact Report
State Clearinghouse No. 2023090467

CONTRA COSTA COUNTY 2045 GENERAL PLAN AND CLIMATE ACTION AND ADAPTATION PLAN: CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT

County of Contra Costa

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**CEQA FINDINGS OF FACT
AND STATEMENT OF OVERRIDING CONSIDERATIONS
REGARDING THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
CONTRA COSTA COUNTY 2045 GENERAL PLAN AND CLIMATE ACTION AND
ADAPTATION PLAN
STATE CLEARINGHOUSE NO. 2023090467**

I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA. The potential environmental effects of the proposed Contra Costa County 2045 General Plan and Contra Costa County Climate Action and Adaptation Plan 2024 Update (CAAP) have been analyzed in a Draft Environmental Impact Report (DEIR) (State Clearinghouse [SCH] 2023090467) dated February 2024. A Final EIR has also been prepared that incorporates the DEIR and contains comments received on the DEIR, responses to the individual comments, revisions to the DEIR including any clarifications based on the comments and the responses to the comments. A Mitigation Monitoring and Reporting Program (MMRP) has also been prepared for the proposed project. This document provides the findings required by CEQA for approval of the proposed project.

A. Statutory Requirements for Findings

The CEQA (Pub. Res. Code §§ 21000, *et seq.*) and the State CEQA Guidelines (Guidelines) (14 Ca. Code Regs §§ 15000, *et seq.*) promulgated thereunder, require the environmental impacts of a project be examined before a project is approved. Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
 - 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
 - (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
 - (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
 - (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
 - (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the project which mitigate or avoid the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

B. Certification

Having received, reviewed, and considered the Final EIR for the Contra Costa County 2045 General Plan and CAAP, as well as other information in the record of proceedings on this matter, Contra Costa County Board of Supervisors adopts the following Findings of Fact and Statement of Overriding Considerations (Findings), in its capacity as the legislative body for Contra Costa County (County), which is the CEQA Lead Agency. The Findings set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the County and responsible agencies for implementation of the proposed project.

In addition, pursuant to State CEQA Guidelines Section 15090, the Contra Costa County Board of Supervisors hereby certifies that:

- (1) The Final EIR has been completed in compliance with CEQA.
- (2) The Final EIR was reviewed and considered by the Board of Supervisors prior to project approval.
- (3) The Final EIR reflects the County’s independent analysis and judgement.

The findings required under California Public Resources Code Section 21081 and State CEQA Guidelines Section 15091 are set forth in Section III below.

C. Project Environmental Report and Discretionary Actions

The Final EIR addresses the direct, indirect, and cumulative environmental effects associated with the proposed project. The Final EIR provides the environmental information necessary for the County to make a final decision on adoption of the 2045 General Plan and CAAP. The Final EIR is also intended to support discretionary reviews and decisions by the County.

II. PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The County published the DEIR for the project on February 9, 2024. The Final EIR has been prepared in accordance with CEQA and the CEQA Guidelines, as amended. As authorized in State CEQA Guidelines Section 15084(d)(2), the County retained a consultant to assist with preparation of the environmental documents. County staff from multiple departments, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Final EIR reflects the County's independent analysis and judgement. The key milestones associated with preparation of the DEIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the DEIR and to solicit comments on the results of the environmental analysis presented in the DEIR.

A. Public Notification and Outreach

In conformance with CEQA, the State CEQA Guidelines, and the Contra Costa County CEQA Guidelines, the County conducted an extensive environmental review of the proposed project.

- Completion of a Notice of Preparation (NOP) on September 20, 2023, titled "Notice of Preparation (NOP) for the Contra Costa County 2045 General Plan and Climate Action Plan Environmental Impact Report (EIR) and Notice of Public Scoping Meeting." A public scoping meeting was conducted on October 16, 2023, and the public comment period for the NOP closed on October 20, 2022.
- Preparation of a DEIR, which was made available for a 60-day public review period beginning February 9, 2024, and ending April 8, 2024. The scope of the DEIR was determined based on the CEQA Guidelines Appendix G Checklist, and comments received in response to the NOP. The Notice of Availability (NOA) for the DEIR was sent to interested persons and organizations, sent to the State Clearinghouse in Sacramento for distribution to public agencies, posted at the County's website, and published in the East Bay Times on February 9, 2024. The NOA was posted at the Contra Costa County Clerk's office on February 9, 2024.
- A public hearing to receive written and oral comments on the DEIR was held by the County Zoning Administrator on March 18, 2024.
- Preparation of a Final EIR, including the responses to comments to the DEIR. The Final EIR was released for a 10-day agency review period prior to certification of the Final EIR.
- Public hearings to consider certification of the Final EIR and adoption of the proposed project will be held by the County Planning Commission on October 23, 2024, and Board of Supervisors on November 5, 2024.

In summary, the County conducted all required noticing and scoping for the proposed project in accordance with Section 15083 of the CEQA Guidelines, and conducted the public review for the DEIR, which exceeded the requirements of Section 15087 of the CEQA Guidelines.

B. Final Environmental Impact Report and Proceedings

The County prepared a Final EIR, including Responses to Comments to the DEIR. The Final EIR/Response to Comments contains comments on the DEIR, responses to those comments, and revisions to the DEIR. A total of 15 comment letters were received. Of the 15 comment letters, 13 letters were from public agencies and organizations, one letter was from a resident, and one letter was received from an organization after the public review period ended. Revisions in response to these comments were incorporated within Section 3.2, *DEIR Revisions in Response to Written Comments*, of the FEIR.

The Final EIR found that prior to mitigation, implementation of the proposed project would result in potentially significant impacts to agriculture and forestry resources, air quality, biological resources, cultural and tribal resources, geology and soils, mineral resources, noise, transportation and wildfire. Impacts to agriculture and forestry resources, air quality, cultural and tribal resources, mineral resources, noise, transportation, and wildfire would remain significant and unavoidable. The County prepared a Statement of Overriding Considerations (see Section V.A, *Project Benefits in Support of the Statement of Overriding Considerations*, below) for the following impacts which were found to be significant and unavoidable:

Agriculture and Forestry Resources

- **Impact 5.2-1:** The proposed project could convert approximately 13,816 acres of Important Farmland to nonagricultural use.
- **Impact 5.2-4:** The proposed project would result in the loss of forest land or conversion of forest land to non-forest use.

Air Quality

- **Impact 5.3-2:** Short-term construction activities associated with the proposed project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under applicable federal or State ambient air quality standards.
- **Impact 5.3-3:** Development under the proposed project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under applicable federal or State ambient air quality standards (AAQS).
- **Impact 5.3-5:** Operational-phase emissions associated with the proposed project could expose sensitive receptors to substantial pollutant concentrations.

Cultural and Tribal Resources

- **Impact 5.5-1:** Implementation of the proposed project could cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5.

Mineral Resources

- **Impact 5.12-1:** Implementation of the proposed project could result in the loss of availability of a known mineral resource.

Noise

- **Impact 5.13-1:** Construction activities would result in temporary noise increases in the vicinity of the proposed project.
- **Impact 5.13-2:** Project implementation would generate a substantial traffic noise increase on local roadways and could locate sensitive receptors near rail in areas that exceed established noise standards.

Transportation

- **Impact 5.16-2:** Implementation of the proposed project would/not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

Wildfire

- **Impact 5.18-2:** Development under the proposed project in or near SRAs or lands classified as Very High FHSZs could exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire.
- **Impact 5.18-5:** Development in designated High or Very FHSZs could expose structures and/or residences to fire danger.

The public can view searchable agendas for scheduled Board of Supervisors meetings and access agenda-related County information and services directly on the following website: <https://contra-costa.legistar.com/Calendar.aspx>.

The Final EIR document will be posted for viewing and download with the previously posted DEIR prior to the County's consideration of the Final EIR and proposed project recommendations on the County's website.

A date for consideration of the Final EIR and proposed project recommendations at the Board of Supervisors was set and notice of the meeting was provided consistent with the Brown Act (Government Code Sections 54950 et seq.). The Board of Supervisors will take testimony on the proposed project and may continue on its calendar to a subsequent meeting date in its discretion.

C. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP, NOA, and all other public notices issued by the County in conjunction with the proposed project.
- The DEIR and Final EIR for the proposed project.

- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR.
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR.
- All written and verbal public testimony presented during a noticed public hearing for the proposed project.
- The Mitigation Monitoring and Reporting Program.
- The reports and technical memoranda included or referenced in the Final EIR.
- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and Final EIR.
- The Resolutions adopted by the County in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto.
- Matters of common knowledge to the County, including but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings.
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

D. Custodian and Location of Records

The documents and other materials that constitute the administrative record for the County's actions related to the proposed project are at the Contra Costa County Department of Conservation and Development (DCD) (30 Muir Road, Martinez, CA 94553). The Contra Costa County DCD is the custodian of the administrative record for the proposed project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request of the Contra Costa County DCD. The DEIR was also made available for public review at Contra Costa County libraries – El Sobrante Branch, Pleasant Hill Branch, and Brentwood Branch. The documents are available online at: <https://envisioncontracosta2040.org/documents/>. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

E. Project Location

Contra Costa County is in the East Bay subregion of the San Francisco Bay Area. It borders Alameda County to the south, San Joaquin County to the east, Solano and Sacramento Counties to the north, and San Francisco County to the west. North-to-south regional access is provided through Interstate (I-) 80, I-680, and State Route (SR-) 242; east to west regional access is provided through I-580, SR-4, and SR-24.

The proposed project defines the project area as unincorporated Contra Costa County. This EIR focuses on the analysis of potential impacts on lands and waters only in unincorporated Contra Costa County, including in and outside the Urban Limit Line (ULL) and in each incorporated city's sphere of influence (SOI), but not inside municipal limits.

F. Project Objectives

The following objectives for the Contra Costa County 2045 General Plan and CAAP 2024 Update will aid decision makers in their review of the proposed project and associated environmental impacts:

- Extend the General Plan planning horizon to year 2045 and establish a legally adequate General Plan and CAAP that meet State requirements through a community-based planning process.
- Through the updates to the land use map, align the map with existing uses that already exist on the ground today, while also focusing more mixed-use development and higher density housing within community cores, where infrastructure and services are available.
- Provide planning guidance at a community scale, rather than relying on a one-size-fits-all policy approach throughout the county.
- Create a modern and visionary policy document intended to address the opportunities and challenges of the 21st century including:
 - **Environmental Justice.** Environmental justice policies and actions intend to reduce the unique or compounded health risks in communities that experience the highest levels of pollution and negative health outcomes, such as asthma and low birth weight babies, and the greatest social and economic disadvantages, such as poverty and housing instability. The General Plan refers to these areas as “Impacted Communities” and focuses on improving environmental justice for the people living there by promoting meaningful community engagement and prioritizing improvements that address their needs. Environmental justice is a new topic that was not discussed in the prior General Plan. State law now requires that general plans address environmental justice and it is a matter of great concern to many county residents. While this topic is addressed throughout the General Plan, the Stronger Communities Element provides detailed information about Impacted Communities and environmental justice.
 - **Community Health.** The physical and mental health of community members is inextricably linked to where and how communities are developed. Therefore, the community health policies and actions guide planning and development decisions to provide opportunities for community members to live healthy lifestyles, including by improving peoples’ ability to walk or use other non-automobile forms of transportation to travel between destinations, providing multi-modal transportation connections, creating opportunities for social interaction, and promoting access to outdoor recreation, healthy food, and medical facilities. The community health policy guidance additionally aims to reduce exposure of all community members to pollutants that can adversely affect their health.
 - **Economic Development.** The economic development policies and actions aim to develop the county’s workforce and attract and support sustainable businesses and industries that provide living-wage jobs, invest in hiring from the local workforce, and engage with

communities. Investment in diversified industries, as supported in the economic development policy guidance, promotes innovation, builds the tax base, and allows residents to work in the county where they live.

- **Sustainability.** Sustainability means meeting the needs of today's population while leaving viable resources to meet the needs of future generations. One important part of a sustainable future is resiliency, which is the ability to withstand, recover, and learn from a disruptive experience, such as a wildfire, flood, or pandemic. The sustainability policies and actions aim to conserve resources, improve resiliency (especially to the impacts of climate change), protect the environment, reduce pollution, and enhance overall quality of life.

G. Project Description

Contra Costa County 2045 General Plan

The primary component of the project is an update of Contra Costa County's General Plan. The General Plan is a State-required legal document that provides guidance to decision-makers regarding allocation of resources and determining the future physical form and character of development within the unincorporated county, including land inside each incorporated city's Sphere of Influence (SOI), but not inside municipal limits. The proposed General Plan serves as the County's primary land use regulatory tool and is the basis for all planning-related decisions made by County staff, the Planning Commission, and Board of Supervisors. The proposed General Plan includes the Stronger Communities; Land Use; Transportation; Conservation, Open Space, and Working Lands; Public Facilities and Services; Health and Safety; and Growth Management Elements. The Housing Element, while also a required part of the General Plan, was updated through a separate process, being adopted by the Board of Supervisors on December 12, 2023.

Climate Action and Adaptation Plan 2024 Update

The Contra Costa County CAAP 2024 Update is a comprehensive plan for reducing greenhouse gas (GHG) emissions through a series of actions and strategies that would be undertaken by the County. The CAAP identifies strategies and measures to meet the State's GHG reductions targets. The CAAP also includes an adaptation plan that recommends actions to reduce the community's vulnerability to the anticipated impacts of climate change. The proposed CAAP does not include any development proposals and would not directly result in physical environmental effects associated with construction or operation of facilities.

III. CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

A. Format

Section 15091 of the CEQA Guidelines requires that a Lead Agency make a finding for each significant effect for the proposed project. This section summarizes the significant environmental impacts of the proposed project, describes how these impacts are to be mitigated, and discusses various alternatives to the proposed project, which were developed to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation unless otherwise stated in the findings.

This remainder of this section is divided into the following subsections:

Section B, Findings on “No Impact” and “Less Than Significant Impacts,” presents environmental issues, as identified in Chapter 5 of the DEIR, which would result in no impact or less than significant impacts.

Section C, Findings on Significant Environmental Impacts That Can Be Mitigated to Less Than Significant, presents significant impacts of the proposed project that were identified in Chapter 5 of the DEIR, the mitigation measures identified in the Mitigation Monitoring Program, and the rationales for the findings.

Section D, Significant and Unavoidable Impacts that Cannot be Mitigated to Below the Level of Significance, presents significant impacts of the proposed project that were identified in the DEIR, the mitigation measures identified in the Mitigation Monitoring Program, the findings for significant impacts, and the rationales for the findings.

Section IV, Alternatives to the Proposed Project, presents alternatives to the proposed project and evaluates them in relation to the findings set forth in Section 15091(a)(3) of the State CEQA Guidelines, which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

Section V, Statement of Overriding Considerations, presents a description of the proposed project’s significant and unavoidable adverse impacts and the justification for adopting a statement of overriding considerations.

Section VI, Findings on Responses to Comments on the DEIR and Revisions to the Final EIR, presents the County’s findings on the response to comments and revisions to the Final EIR, and decision on whether a recirculated DEIR is necessary or not.

Summary of Environmental Impacts

Based on the NOP and DEIR, the following is a summary of the environmental topics considered to have no impact, a less than significant impact, a less than significant impact with incorporation of mitigation measures, or a significant and unavoidable impact.

Less Than Significant Impact or No Impact, No Mitigation Required

- Aesthetics (Impact 5.1-1, Impact 5.1-2, Impact 5.1-3)
- Agriculture and Forestry Resources (Impact 5.2-2, Impact 5.2-3, Impact 5.2-5)
- Air Quality (Impact 5.3-1, Impact 5.3-6)
- Biological Resources (Impact 5.4-1, Impact 5.4-2, Impact 5.4-3, Impact 5.4-5)
- Cultural and Tribal Cultural Resources (Impact 5.5-3)
- Energy (Impact 5.6-1, Impact 5.6-2, Impact 5.6-3)
- Geology and Soils (Impact 5.7-1, Impact 5.7-2, Impact 5.7-3, Impact 5.7-4)
- Greenhouse Gas Emissions (Impact 5.8-1, Impact 5.8-2)
- Hazards and Hazardous Materials (Impact 5.9-1, Impact 5.9-2, Impact 5.9-3, Impact 5.9-4)
- Hydrology and Water Quality (Impact 5.10-1, Impact 5.10-2, Impact 5.10-3, Impact 5.10-4, Impact 5.10-5)

- Land Use and Planning (Impact 5.11-1, Impact 5.11-2)
- Noise (Impact 5.13-4)
- Population and Housing (Impact 5.14-1, Impact 5.14-2)
- Public Services and Recreation (Impact 5.15-1, Impact 5.15-2, Impact 5.15-3, Impact 5.15-4, Impact 5.15-5)
- Transportation (Impact 5.16-1, Impact 5.16-3, Impact 5.16-4)
- Utilities and Service Systems (Impact 5.17-1, Impact 5.17-2, Impact 5.17-3, Impact 5.17-4, Impact 5.17-5, Impact 5.17-6, Impact 5.17-7)
- Wildfire (Impact 5.18-1, Impact 5.18-3, Impact 5.18-4)

Less Than Significant Impact with Mitigation Incorporated

- Air Quality (Impact 5.3-4)
- Biological Resources (Impact 5.4-4)
- Cultural and Tribal Resources (Impact 5.5-2, Impact 5.5-4)
- Geology and Soils (Impact 5.7-5)
- Noise (Impact 5.13-3)

Significant and Unavoidable Impact

- Agriculture and Forestry Resources (Impact 5.2-1, Impact 5.2-4)
- Air Quality (Impact 5.3-2, Impact 5.3-3, Impact 5.3-5)
- Cultural and Tribal Resources (Impact 5.5-1)
- Mineral Resources (Impact 5.12-1)
- Noise (Impact 5.13-1, Impact 5.13-2)
- Transportation (Impact 5.16-2)
- Wildfire (Impact 5.18-2, Impact 5.18-5)

B. Findings on “No Impact” and “Less Than Significant Impacts”

The County determined that the proposed project would have no impact or less than significant impacts, including direct, indirect, and cumulative impacts, for the environmental issues summarized below. The rationale for the conclusion that no significant impact would occur in each of the issue areas is based on the environmental evaluation in the listed topical EIR sections in Chapter 5 of the DEIR.

CEQA Guidelines Section 15901 states that an EIR may not be certified for a project that has one or more significant environmental effects unless one of three findings is made for each significant effect. Since the following environmental issue areas were determined to have no impact or a less than significant impact, no findings for these issues are required.

1. Aesthetics

Impact 5.1-1: Development in accordance with the proposed project would not substantially alter or damage scenic vistas or substantially damage scenic resources,

including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. [Thresholds AE-1 and AE-2]

Proposed General Plan

As shown in Figure 5.1-1, *Scenic Resources*, of the DEIR, scenic resources are identified throughout the county, including the State-designated scenic route State Route 24 (SR-24) and eligible scenic route State Route 4 (SR-4). The county has vast open spaces, estuary systems, and rolling hills that encompass an outstanding variety of scenic natural vistas, water resources, and landscapes. Therefore, future development under the proposed General Plan could impact scenic resources.

The proposed General Plan includes policies aimed at reducing impacts to identified scenic resources from future development, including:

- **Policy LU-P4.3:** Encourage smooth transitions between new and existing or planned development.
- **Policy LU-P4.4:** Require site and building reconfigurations, setback increases, landscaping enhancements, screening, or other design solutions wherever necessary to minimize potential conflicts between uses.
- **Policy LU-P10.3:** Preserve the rural character of the following areas, which are displayed in Figure LU-5 [of the General Plan] (DEIR Figure 5.1-2):
 - a) Alhambra Valley/Briones;
 - b) Tassajara Valley;
 - c) Delta Primary Zone;
 - d) Agricultural Core between Brentwood and Discovery Bay;
 - e) Crockett Hills between Crockett and State Route 4;
 - f) Franklin Canyon/State Route 4 corridor between Hercules and Martinez;
 - g) Bollinger Canyon Road corridor between Las Trampas Regional Wilderness and Crow Canyon Road;
 - h) Norris Canyon Road corridor between San Ramon and the Alameda County line;
 - i) Marsh Creek Road corridor between Clayton and Byron Highway;
 - j) Kirker Pass Road corridor;
 - k) Morgan Territory Road corridor;
 - l) Deer Valley Road corridor.

Pay special attention to potential aesthetic impacts in these areas and ensure such impacts are adequately mitigated.

- **Policy COS-P12.2:** Require redesign of project components that negatively impact viewsheds or the visual quality of the area.
- **Policy COS-P12.3:** Prohibit development within 100 vertical feet of the top of designated scenic ridges and within 50 vertical feet of other visually prominent ridgelines. Exceptions may be considered on existing legal lots where no other feasible building sites exist, and for infrastructure that requires high-elevation siting, such as wind turbines, communications towers, and water tanks.

When siting buildings or infrastructure on or near ridges is unavoidable, require appropriate measures, such as screening, undergrounding, or camouflaging to mitigate visual impacts.

- **Policy COS-P12.4:** Preserve the scenic qualities of hillsides by encouraging designs that are sensitive to a site's topography and prohibiting unnecessary grading and vegetation removal.
- **Policy COS-P12.5:** Require restoration of natural contours and vegetation after grading and other land disturbances.
- **Policy COS-P12.6:** Prohibit extreme topographic modification, such as filling in canyons or removing prominent hilltops. Exemptions may be considered for landfills, mining operations, and public or semi-public projects that necessitate such modifications.
- **Policy COS-P12.7:** Support preservation and enhancement of natural and human-made features that contribute to the scenic quality of the landscape and viewshed along designated scenic routes and discourage projects that interfere with public views of those features.
- **Policy COS-P12.8:** Require a visual impact analysis for projects with potential to significantly impact public views along designated scenic routes.

Development allowed by the proposed General Plan would be required to comply with development standards in the County Ordinance Code, such as Chapter 814-2, which governs hillside development. Additionally, the ULL limits the extent of urban development, protecting agricultural and open space areas from urbanization, while the 65/35 Standard ensures that urban development is limited to no more than 35 percent of the county's land area, preserving the remaining 65 percent for agriculture, open space, wetlands, parks, and other non-urban uses. The proposed project would continue to support these standards through Policy LU-P2.1, which directs the County to continue implementing the 65/35 Land Preservation Standard in order to preserve agricultural land, rangeland, natural habitats, watersheds, and open space, while focusing development in urban and suburban communities, and Policy LU-P2.3, which directs the County to limit development outside the ULL to non-urban uses.

Public Resources Code Section 12220(g) defines "forest land" as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. As noted in DEIR Section 5.2, *Agriculture and Forestry Resources*, there are a total of approximately 63,806 acres of forested area in the county. Although development allowed by the proposed General Plan would consist mainly of infill and redevelopment, future development could create aesthetic impacts through conversion of forest to non-forest lands. However, Chapter 816-6, *Tree Protection and Preservation*, of the County Ordinance Code requires that a property owner obtain a Tree Permit from the County before trenching, grading, or filling within the dripline of any protected tree or before cutting down, destroying, trimming by topping, or removal of any protected tree. In addition, the proposed Conservation, Open Space, and Working Lands Element includes policies aimed at preserving and protecting trees from future development. Specifically, Policy COS-P6.1 directs the County to preserve natural woodlands and significant trees, particularly mature native species, intact coastal scrub and chaparral, and grasslands, especially those with native grass and wildflower populations, and Action COS-A6.2 directs the County

to establish an Oak Woodland Conservation Program with mitigation ratios and tree replacement and planting standards.

The proposed project would not substantially alter scenic resources, and the urban nature of future development would be similar to existing conditions. Therefore, public vistas and scenic resources from publicly accessible locations in the county would not be adversely impacted. All General Plan policies, ordinances, and development standards would apply to future development, and impacts would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects that would have a direct, adverse effect on scenic resources. However, the proposed CAAP includes actions that could result in construction of physical improvements and infrastructure in the county that are designed to help meet the emissions targets in the CAAP. Where located in developed areas, these projects are not expected to significantly affect views from scenic vistas or viewsheds because they would be more likely to blend in with surrounding development and would not be likely to create changes to visual quality that would be visible from a scenic vista or that would significantly interrupt views available from scenic vistas. In addition, future projects facilitated by the CAAP would need to comply with the applicable design standards, ordinances, and proposed General Plan policies discussed previously, which would mitigate potential aesthetic impacts. Therefore, impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact relating to scenic vistas or substantially damage scenic resources. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.1-2: Development under the proposed project would alter visual appearance in the county but would not substantially degrade its existing visual character or quality. [Threshold AE-3].

Proposed General Plan

Although new developments could alter the visual appearance of the county, much of the area inside the ULL is already developed with urban and suburban uses. Future urban growth allowed by the proposed General Plan would be inside the ULL and would be anticipated to develop over time. As discussed in Impact 5.1-1, the proposed project would support the ULL and 65/35 Standard (i.e., through Policy LU-P2.1 and Policy LU-P2.4), which preserve agricultural land, rangeland, natural habitats, watersheds, and open space, while focusing development in urban and suburban communities.

Adherence to County ordinances regarding development, lighting, and landscaping is required of all development. Compliance with development regulations is verified prior to issuance of a building permit and is therefore not reliant on future CEQA action. Because future urban development would be inside the ULL and all projects must comply with design regulations of the County, the proposed project would not substantially degrade the visual character or quality of the county, and impacts are less than significant.

Proposed CAAP

The proposed CAAP does not include specific projects that could directly result in new or expanded development that could substantially degrade the existing visual character or quality of public views of the area due to their height, bulk, pattern, scale, character, or other features; however, projects facilitated by proposed CAAP strategies and actions could do so. All projects facilitated by the proposed CAAP strategies and actions must be consistent with the General Plan and comply with applicable provisions of the County Ordinance Code, including its regulation of height limits, setbacks, bulk, and other development standards appropriate to each zone. Therefore, the impact would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact relating to the visual character or quality. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.1-3: The proposed project would not generate substantial light and glare. [Thresholds AE-4]

Proposed General Plan

The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates outside the intended area. Glare is light that shines directly or is reflected from a surface into a viewer's eyes. Spill light and glare impacts are effects of a project's exterior lighting on adjoining uses and areas.

Sources of light in the county include building lighting (interior and exterior), security lighting, sign illumination, sports fields lighting, and parking area lighting. These sources of light and glare are mostly associated with residential, commercial, and industrial uses, as well as larger community parks. Other sources of nighttime light and glare include streetlights, vehicular traffic along surrounding roadways, and ambient lighting from surrounding communities.

Future development allowed by the proposed General Plan could increase nighttime light and glare, including in areas that are currently undeveloped. However, all new development is required to comply with the lighting standards of the County Ordinance Code in Chapter 76-4, Modifications, which requires that lighting fixtures be installed, controlled, or directed so that the light will not glare or be blinding to pedestrians or vehicular traffic or on adjoining property. Additionally, landscaping, walls, and fences that would be constructed as part of future projects would further reduce light and glare spillover. Furthermore, future development must comply with the most recent CALGreen standards, including 5.106.8, Light Pollution Reduction, which establishes backlight, uplight, and glare ratings to minimize light pollution for nonresidential development. The local building permit process enforces the provisions of CALGreen. Through compliance with the County Ordinance Code and site-planning/design standards pertaining to light and glare, any potential spillover would be minimized, and the impact is considered less than significant.

Proposed CAAP

The proposed CAAP could result in the introduction of lighting to the environment as a result of development of projects called for in proposed CAAP actions, such as mixed-use or infill development, building retrofits, or solar energy generation facilities. Depending on the location and design of these projects, they have the potential to create shade, shadows, daytime or nighttime glare, or nighttime lighting of buildings or other structures. However, through compliance with the County Ordinance Code and site-planning/design standards pertaining to light and glare, any potential spillover would be minimized, and the impact is considered less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact relating to light and glare. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

2. Agriculture and Forestry Resources

Impact 5.2-2: The proposed project would conflict with Williamson Act contracts. [Threshold AG-2]

Proposed General Plan

As described in Chapter 3, *Project Description*, of the DEIR, the proposed General Plan includes an updated land use map, which includes Agricultural Core (AC), Agricultural Lands (AL), and Resource Conservation (RC) land use designations.

The AL designation includes non-irrigated, rural lands that support grazing and dryland farming. Other types of agricultural, open space, and non-urban uses are also allowed. The maximum density under the proposed General Plan is 1 unit per 10 acres, which reduces the density allowance in areas designated AL by half compared to the existing General Plan. AC is a designation applied to 11,900 acres between Brentwood and Discovery Bay, where agricultural production is the primary use and limited tourism activities are allowed. The maximum density is 1 unit per 40 acres. The RC designation applies to open space lands for watershed protection and other environmentally sensitive areas – activities can include low intensity agriculture.

As shown in Figure 5.2-3 of the DEIR, the EIR Study Area contains approximately 40,545 acres of land under Williamson Act contracts, as of 2023. Under the proposed General Plan, most of this land is designated AC, AL, or RC. There are some parcels with Williamson Act contracts that are designated Water, meaning they are inundated by water, or Parks and Recreation. The areas designated Parks and Recreation are owned by East Bay Regional Park District and planned for park and open space uses. The proposed General Plan would not change the Williamson Act process that is owner-initiated through a 10-year contract annually renewed. While conversion of agricultural land is addressed in Impact 5.2-1 and found to be significant and unavoidable, the Williamson Act program is unchanged with adoption of the proposed project, resulting in a less-than-significant impact.

Proposed CAAP

Projects facilitated by the CAAP would be required to be consistent with the proposed General Plan; therefore, the proposed CAAP would result in a less-than-significant Williamson Act contract impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact relating to conflicts with Williamson Act contracts. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.2-3: The proposed project would not 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)). [Threshold AG-3]

Proposed General Plan

There are no areas zoned as forest land in unincorporated Contra Costa County. The Zoning Code and the existing and proposed General Plan do not designate any land for forest or timberland uses. Forest and timber lands defined by the State include both land that is used for timber harvesting and other forested land that has aesthetic, recreational, and biological amenities. The proposed General Plan would not conflict with existing zoning for, or cause rezoning of forest land, or timberland zoned Timberland Production. Thus, no impact would occur.

See Section 5.1, *Aesthetics*, of this DEIR regarding consideration of tree aesthetics as defined in Public Resources Code Section 12220(g).

Proposed CAAP

As described above, there is no timberland in the EIR Study Area; therefore, neither the proposed CAAP nor projects facilitated by the CAAP strategies and actions would result in an adverse impact on timberland, so there is no impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to existing zoning for, or cause rezoning of, forest land. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.2-5: The proposed project could potentially result in other agricultural impacts not related to the above, such as diminishing available water quality and supply for agricultural uses. [Threshold AG-5]

Proposed General Plan

Future development under the proposed General Plan would increase water demand, as further described in DEIR Section 5.17, *Utilities and Service Systems*, which would diminish the available water supply for agricultural uses. Such development would occur throughout the county, which spreads the impact over a large geographic area. Further, most development would require connection to municipal water provider(s). Water connections are regulated by Section 414-4.2 of the County Ordinance Code, the purpose of which is to “...provide protection of the county’s groundwater sources from degradation that could result from inadequately constructed, defective, or improperly abandoned wells, to provide for regulation of small water systems in accordance with federal standards as mandated by

the state, and to require submission of tentative subdivision maps and building permit applications to the health officer for him to review the availability of an approved water supply prior to recordation of final maps and issuance of building permits.”

Construction activities can increase urban runoff containing nutrients, sediments, and toxic contaminants, which would pollute nearby water streams and could impact agricultural uses. In addition, future development will bring in more residents and people, which can increase urban runoff. However, existing regulations would help avoid or mitigate potential impacts to agricultural lands. For example, Chapter 74-6.012 of the County Ordinance Code states that a drainage plan for development projects is required to determine methods to reduce runoff. The drainage plan must include provisions to stop erosion of exposed soil into drainages, such as by covering stockpiles, using jute-bales and silt fencing, frequent watering, and replanting to prevent both wind and rain erosion. Through compliance with the County Ordinance Code, sediment and erosion of material would not leave project sites and would not affect available water quality or supply for agricultural uses.

In addition, the proposed General Plan also includes Policy COS P2.4, which requires new projects adjacent to agriculture to establish appropriate buffers, with consultation with the County Agricultural Commissioner, on their properties as necessary to minimize conflicts and protect agriculture. The General Plan also includes Action COS-A2.4, which would amend County Ordinance Code Title 8 – Zoning to include development standards and design guidelines for urban land uses that interface with agricultural uses, addressing setbacks on urban properties. Therefore, the other agricultural impacts of the proposed General Plan would be less than significant.

Proposed CAAP

Projects facilitated by the proposed CAAP could result in a beneficial effect on farmland, while other projects could cause other changes in the environment that could result in conversion of farmland to nonagricultural use. However, compliance with the County Ordinance Code and proposed General Plan policies and actions described above would reduce impacts to a less than significant level.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to other agricultural impacts. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

3. Air Quality

Impact 5.3-1: Implementation of the proposed project would not conflict with or obstruct implementation of the BAAQMD Clean Air Plan. [Threshold AQ-1]

Proposed General Plan

Bay Area 2017 Clean Air Plan – Criteria Air Pollutants and Precursors

The proposed General Plan plays an important role in local agency project review by linking local planning and individual projects to the *2017 Clean Air Plan*. It fulfills the CEQA goal of informing decision-makers of the environmental efforts of the project under consideration at an early enough

stage to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals in the Bay Area.

Bay Area Air Quality Management District (BAAQMD) requires consistency evaluation of long-range plans with current air quality plan (AQP) control measures. To have a less significant impact on air pollutants and precursor impacts, the plan must support primary goals, include applicable control measures, and not disrupt or hinder implementation. Long-range plans must also demonstrate consistency with projected vehicle activity growth rate vehicle miles traveled (VMT) or vehicle trips, ensuring the project's VMT or trip increase is less than or equal to the projected population increase.

Bay Area Air Quality Management District 2017 Clean Air Plan Goals

The primary goals of the 2017 Clean Air Plan are to attain the State and federal AAQS, reduce population exposure and protect public health in the Bay Area, reduce GHG emissions, and protect the climate. Furthermore, the 2017 Clean Air Plan lays the groundwork for reducing GHG emissions in the Bay Area to meet the State's 2030 GHG reduction target and 2050 GHG reduction goal.

Attain Air Quality Standards

BAAQMD's 2017 Clean Air Plan strategy is based on regional population and employment projections in the Bay Area compiled by the Association of Bay Area Governments (ABAG), which are based in part on County's General Plan land use designations. These demographic projections are incorporated into Plan Bay Area. Demographic trends incorporated into Plan Bay Area determine VMT in the Bay Area, which BAAQMD uses to forecast future air quality trends. The San Francisco Bay Area Air Basin (SFBAAB) is currently designated a nonattainment area for O₃, PM_{2.5}, and PM₁₀ (State AAQS only).

As discussed in Chapter 5.14, *Population and Housing*, of the DEIR, implementation of the proposed General Plan would exceed current regional projections for housing by 26 percent and population by 18 percent. However, the Land Use Element includes goals, policies, and actions aimed to focus the development in areas where current buildings are aging, vacant, or not maintained and approved/pending projects. Therefore, implementation of the proposed General Plan itself would not introduce a substantial amount of unplanned population in the EIR Study Area and is instead the overriding policy document that plans for such growth.

Thus, the population projections of the proposed General Plan would be consistent with regional projections. The emissions resulting from potential future development associated with the proposed General Plan are included in BAAQMD projections, and future development accommodated under the proposed General Plan would not hinder BAAQMD's ability to attain the California or National AAQS. Accordingly, impacts would be less than significant.

Reduce Population Exposure and Protect Public Health

Development under the proposed General Plan could result in new sources of TACs and PM_{2.5}. Stationary sources, including smaller stationary sources (e.g., emergency generators and boilers) are subject to review by BAAQMD as part of the permitting process. Adherence to BAAQMD permitting regulations would ensure that new stationary sources of TACs do not expose populations to significant health risk. Mobile sources of air toxics (e.g., truck idling) are not regulated directly by BAAQMD. Development associated with the proposed General Plan may generate truck traffic; however, CARB regulates limits on diesel truck and bus idling to 5 minutes. Furthermore, individual development

projects would be required to achieve the incremental risk thresholds established by BAAQMD. Thus, implementation of the proposed General Plan would not result in introducing new sources of TACs that on a cumulative basis, could expose sensitive populations to significant health risk. Therefore, impacts would be less than significant.

Reduce GHG Emissions and Protect the Climate

Consistency of the proposed General Plan with State, regional, and local plans adopted for the purpose of reducing GHG emissions are discussed under Impact 5.8-2 in Chapter 5.8, *Greenhouse Gas Emissions*, of this DEIR. Future development allowed by the proposed General Plan would be required to adhere to statewide measures that have been adopted to achieve the GHG reduction targets of AB 32 and SB 32, and a trajectory consistent with the carbon neutrality targets of AB 1279. The proposed General Plan is consistent with regional strategies for infill development identified in *Plan Bay Area 2050* and the existing Contra Costa County CAP. While Impact GHG 5.8-1 identifies that the proposed General Plan would generate a substantial increase in emissions, Impact GHG 5.8-2 identifies that the proposed General Plan is consistent with State, regional, and local plans to reduce GHG emissions. Therefore, the proposed General Plan is consistent with the goal of the 2017 *Clean Air Plan* to reduce GHG emissions and protect the climate, and the impact would be less than significant.

2017 Clean Air Plan Control Measures

Table 5.3-8, *Control Measures from the BAAQMD 2017 Clean Air Plan*, of the DEIR, identifies the control measures included in the 2017 *Clean Air Plan* that are required by BAAQMD to reduce emissions for a wide range of both stationary and mobile sources. As shown in Table 5.3-8, the proposed General Plan would not conflict with the 2017 *Clean Air Plan* and would not hinder BAAQMD from implementing the control measures in the 2017 *Clean Air Plan*. Accordingly, impacts would be less than significant.

Regional Growth Projections for VMT and Population

Future potential development allowed by the proposed General Plan would result in additional sources of criteria air pollutants. Growth accommodated by the proposed General Plan could occur throughout the 2045 planning horizon. BAAQMD's approach to evaluating impacts from criteria air pollutants generated by a plan's long-term growth is done by comparing population estimates to the VMT estimates. This is because BAAQMD's AQMP plans for growth in the SFBAAB are based on regional growth projections identified by ABAG and growth in VMT identified by CCTA. Changes in regional, community-wide emissions in the project area could affect the ability of BAAQMD to achieve the air quality goals in the AQMP. Therefore, air quality impacts for a plan-level analysis are based on consistency with the regional growth projections. Table 5.3-9, *Comparison of the Change in Population and VMT in the Contra Costa County*, of the DEIR, compares the proposed General Plan growth forecast with the projected increase in total VMT.

BAAQMD's AQMP requires that the VMT increase by less than or equal to the projected population increase from the proposed General Plan (i.e., generate the same or less VMT per population). However, because the proposed General Plan accommodates both residential and nonresidential growth, a better indicator of how efficiently the county is growing can be made by comparing the increase in VMT to the increase in service population (e.g., generate the same or less VMT per service

population). This approach is similar to the efficiency metrics for GHG emissions, which consider the total service population when calculating project efficiency.

VTM estimates based on data provided by Fehr & Peers were calculated for Contra Costa County. As shown in Table 5.3-9, implementation of the proposed General Plan would result in an increase of daily VMT by 742,009 vehicle miles per day in the unincorporated county (about a 21-percent increase), but lead to a lower VMT per capita than under existing conditions (approximately a 12-percent decrease) and lower VMT per service population than existing conditions (approximately a 10-percent decrease). Thus, the proposed General Plan would be consistent with the goals of the 2017 *Clean Air Plan* and impacts would be less than significant.

Environmental Justice

BAAQMD's CEQA Air Quality Guidelines also require an analysis of consistency of the proposed General Plan with applicable Community Emission Reduction Plans (CERPs) and local Environmental Justice policies. Environmentally overburdened, underserved, and economically distressed communities may be subject to a higher risk of pollutant-related health effects than the general population because they may be exposed to higher pollutant concentrations; they may experience a larger health impact at a given pollutant concentration; or they may be adversely affected by lower pollutant concentrations than the general population. The most critical air pollutant affecting health in the Bay Area is PM_{2.5}, which includes DPM. The burden of breathing unhealthy air is often disproportionately borne by low-income communities and communities of color, many of which are situated closer to busy highways, ports, factories, and other pollution sources.

Community Emissions Reduction Plans in Unincorporated Contra Costa County

The Richmond-North Richmond-San Pablo AB 617 community (Richmond Area) is partially within the EIR Study Area. The Draft PTCA Plan (Community Emissions Reduction Plan) for the Richmond Area was released for public review in December 2023. The PTCA Plan includes various strategies and actions to address the needs of people who have been disproportionately harmed by environmental injustice. Implementation of Mobile Strategy 6, *Public Transit, Bike, and Pedestrian Infrastructure*, would help to expand access to shared modes of travel and benefit the people who have been historically burdened with lack of viable transportation alternatives. Land Use Strategy 1, *Land Use*, provides recommended strategies to protect sensitive receptors and residential areas from existing and potential future pollution sources and exposure, with an intended outcome of improving community health for all, especially disproportionately impacted communities. Marine & Rail Strategy 1, *Reduce Cancer and Chronic Health Risk from Rail Operations and Facilities*, would directly benefit overburdened communities living adjacent to rail lines and/or operations, such as the Iron Triangle neighborhood in the City of Richmond. Requirements for cleaner rail equipment would improve the health of those most acutely impacted, as well as for the greater community.

Thus, the PTCA Plan considers measures to reduce emissions and improve community health within Overburdened and AB 617 Communities consistent with BAAQMD's environmental justice goals. The proposed General Plan integrates goals, policies, and actions that seek to lessen the environmental burden on disadvantaged populations. Thus, the proposed project would be consistent with the draft PTCA Plan and BAAQMD's environmental justice goals; and impacts would be less than significant.

Contra Costa County Environmental Justice Policies

The proposed General Plan integrates goals, policies, and actions that seek to lessen the environmental burden on disadvantaged populations. The process to develop environmental justice policy guidance involved extensive discussions and many meetings with community members and other stakeholders who live in, work in, or engage with communities that are most impacted by environmental justice issues to ensure the Plan directly responds to the specific needs of Impacted Communities. Engagement included two collaboration meetings with environmental justice stakeholders to identify Impacted Communities and key environmental justice issues, three to four meetings with community members from each Impacted Community in the county, about 15 meetings with community-based organizations who work with Impacted Communities, a three-part meeting series with environmental justice stakeholders to review and refine draft policy guidance, and several meetings with the Board of Supervisors Sustainability Committee and the County's Sustainability Commission and Hazardous Materials Commission to discuss draft policy guidance. The County also conducted a hard copy and online survey to solicit feedback on draft environmental justice policy guidance, working with community partners to distribute hard copies at strategic locations to reach people during the COVID-19 pandemic, including at schools, libraries, farmers markets, food banks, and soup kitchens.

Contra Costa County is home to a high concentration of refineries and other large industrial facilities. To improve the health and safety impacts of these industrial facilities, the County adopted an Industrial Safety Ordinance. This Ordinance requires additional safety measures that go beyond State requirements that protect public health and safety.

In 2022, the County established the Office of Racial Equity and Social Justice to address local racial inequality and social injustice issues. The Office of Racial Equity and Social Justice is envisioned to enact and sustain principles, policies, practices, and investments that are racially just and equitable across all the County's departments and divisions.

State law, enacted through SB 1000, requires that general plans address environmental justice and respond to this inequity by both alleviating pollution and health impacts and compelling cities and counties to include the voices of previously marginalized residents in planning decisions. Therefore, the proposed General Plan contains certain goals, policies, and actions that help aim to promote environmental justice, especially within Impacted Communities.

Proposed policies within the Stronger Communities and Health and Safety Element would reduce and/or avoid environmental effects on vulnerable populations, include:

- Stronger Communities Element Policies SC-P1.1 through SC-P1.6 and Actions SC-A1.1 through SC-A1.8, which ensure an equitable distribution of resources so that Impacted Communities are not disproportionately burdened by environmental pollution and other hazards.
- Health and Safety Element Policies HS-P1.1 through HS-P1.10 and Actions HS-A1.1 through HS-A1.6, that support community and environmental health.
- Health and Safety Element Policies HS-P2.1 through HS-P2.3 and Actions HS-A2.1 through HS-A2.5 that aim to reduce the disproportionate burden of environmental hazards and health risks in the county.

Thus, the proposed General Plan considers measures to reduce emissions and improve community health within Overburdened and AB 617 Communities consistent with BAAQMD's environmental justice goals. Thus, the proposed General Plan would be consistent with BAAQMD's environmental justice goals and impacts would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions. The proposed CAAP includes the "Clean Transportation Network" group of strategies, including Strategy TR-1, which provides actions for reducing VMT and associated transportation related emissions. As discussed under Impact 5.16-1, this strategy supports the County's existing plans to ensure accessibility and safety for alternative transportation options. Thus, implementation of the proposed CAAP would result in beneficial impacts to air quality. Because the proposed CAAP does not involve any land uses changes that would result in indirect growth or change in building density and intensity, implementation of the proposed CAAP would not conflict with or obstruct implementation of the 2017 Clean Air Plan and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the implementation of an applicable air quality plan. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.3-6: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number or people. [Threshold AQ-4]

Proposed General Plan

Construction-Related Odors

During construction activities of future development in the county, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern, and impacts would be less than significant.

Operational-Related Odors

Industrial Land Uses

Industrial land uses are the primary types of land uses that have the potential to generate objectionable odors. Future environmental review could be required for industrial projects listed in BAAQMD's CEQA Guidelines Table 4 Project Screening Trigger Levels for Potential Odor Sources to ensure that sensitive land uses are not exposed to nuisance odors. Consequently, review of projects using BAAQMD's odor screening distances is necessary to ensure that odor impacts are minimized. Odor

impacts could be significant for new projects that have the potential to generate odors within the odor screening distances.

Residential and Other Land Uses

Residential and other nonresidential, nonindustrial land uses that would be accommodated by the proposed General Plan could result in the generation of odors such as exhaust from landscaping equipment and from cooking. Unlike industrial land uses, these are not considered potential generators of odor that could affect a substantial number of people.

Furthermore, nuisance odors are regulated under BAAQMD Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. In addition, odors are also regulated under BAAQMD Regulation 1, Rule 1-301, *Public Nuisance*. Compliance with BAAQMD Regulation 7 would ensure that odor impacts associated with the proposed General Plan are minimized to a less than significant level.

Proposed CAAP

As discussed under Impact 5.3-2, implementation of the proposed CAAP would not involve any land use changes that would result in indirect growth or change in building density or intensity; therefore, its implementation would not directly result in the generation of odors or other emissions. Therefore, implementation of the proposed CAAP would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to odors. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

4. Biological Resources

Impact 5.4-1: Implementation of the proposed project would not 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 plan, policies, or regulations or by the CDFW or USFWS. [Thresholds B-1]

Proposed General Plan

Tables 5.4-2, *Special-Status and Covered Plant Species in Contra Costa County*, and 5.4-3, *Special-Status and Covered Wildlife Species in Contra Costa County*, of the DEIR, list all the special-status plant and wildlife species in the county (including the EIR Study Area) that have been documented in the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS). The county contains 66 special-status plant species that are found across the diverse and, in some cases, specialized habitats in the county. Special-status plants are more abundant in the eastern portions of the EIR Study Area, which retains a rural development pattern that is compatible with the habitat needs of many of the special-status plant species. A total of 59 special-status wildlife species are known to occur in the EIR Study Area. Similar to its benefits for special-status plant species, the rural eastern portion of the county provides some of the best remaining undeveloped habitat for special-status wildlife species.

Often, these special-status wildlife species occur in protected areas, such as Mount Diablo State Park or Los Vaqueros Reservoir, or in various East Bay regional parks.

As detailed in Tables 5.4-2 and 5.4-3, critical habitat occurs in the county (including the EIR Study Area) for five plant and five wildlife species. Impacts on special-status species would include the direct loss of individuals or localized populations, elimination or degradation of habitat, and isolation of subpopulations due to habitat fragmentation. The conversion of existing natural habitat to urban development, roadways, or other infrastructure could result in the elimination of populations of special-status species where present within the limits of development. Indirect impacts could include disruption of critical functions, affecting reproductive success; degradation of habitat quality to such an extent that occupied habitat would no longer be suitable for individual survival; and other influences. Indirect impacts on special-status species could also occur because of increases in stormwater runoff, erosion and downstream sedimentation, and the use of pesticides for agriculture and landscaping. However, given that most development under the proposed General Plan is anticipated to occur within the ULL, specific impacts may be lessened through implementation of the goals, policies, and actions of the proposed General Plan.

As detailed in Section 5.4.1.1 in the DEIR, there are a number of federal and State regulations in place to protect biological resources, including special-status species and their habitat, within the EIR Study Area. In addition, the proposed General Plan policies take a comprehensive approach to the protection of biological resources, including special-status species and their habitats. The Conservation, Open Space, and Working Lands Element of the proposed General Plan includes policies and actions that would mitigate potential impacts on special-status species and their habitats, including policies and actions associated with goals that aim to preserve and enhance ecological resources and wildlife habitat (Goal COS-4); protect and restore natural watercourses, riparian corridors, and wetland areas (Goal COS-5); preserve and enhance native upland habitat (Goal COS-6); and protect, preserve, and enhance natural resources of the San Francisco Bay/Sacramento-San Joaquin Delta estuary system and shoreline (Goal COS-9).

The goals, policies, and actions in the proposed General Plan, in combination with existing policies and regulations under the Federal Endangered Species Act (FESA), Migratory Bird Treaty Act (MBTA), California Endangered Species Act (CESA), California Fish and Game Code, Clean Water Act (CWA), and Native Plant Protection Act (NPPA), as well as consistency with the East Contra Costa County HCP/NCCP, would ensure that the potential impacts of the proposed General Plan on special-status species would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially impact special-status species. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan, applicable provisions of the Contra Costa County Ordinance Code, the East Contra Costa County HCP/NCCP, and existing policies and regulations under the FESA, MBTA, CESA, California Fish and Game Code, CWA, and NPPA. Compliance with the aforementioned

policies and regulations would reduce potential impacts of the proposed CAAP on special-status species to a less-than-significant level.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to any species identified as sensitive or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.4-2: Implementation of the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. [Thresholds B-2]

Proposed General Plan

As explained in Appendix 5.4-2, *California Department of Fish and Wildlife: RareFind Report, Contra Costa County*, of the DEIR, riparian habitat (i.e., riparian woodland) makes up only 0.16 percent of the county, which includes the EIR Study Area. Most creeks and streams in the EIR Study Area are disconnected from their historic floodplains by levees and channelization. Many of these streams are maintained as flood control channels, which support little or no riparian vegetation, and most drainages outside the urbanized areas are ephemeral or intermittent, generally supporting narrow floodplains with limited riparian habitat. Additional sensitive natural communities in the EIR Study Area include shrublands, woodlands, conifer forests, wetlands and ponds, and baylands. Altogether, nine sensitive natural communities are mapped in the CNDDB as occurring within the county, which includes the EIR Study Area. All but two of these communities are aquatic; thus, most of the sensitive natural communities mapped in the CNDDB are located along the edge of the Delta and/or San Francisco Bay. The eastern portion of the EIR Study Area, in the vicinity of the Los Vaqueros Watershed and Bryon Hills/Vasco Caves, is also a hot spot for sensitive habitats. It contains one of the upland vegetation communities, valley needlegrass grassland. The other upland community, serpentine bunchgrass, is found on the Contra Costa-Alameda County boundary, southwest of the cities in vicinity of Oakland.

Construction activities could have direct and indirect impacts on riparian habitat and other sensitive natural communities. Construction projects in the EIR Study Area could also affect sensitive natural communities by spreading or introducing invasive plant species to currently uninfected areas. Invasive species spread aggressively and crowd out native species, potentially altering the species composition of natural communities. A predominance of invasive species reduces the overall habitat quality for native plants and wildlife. However, given that most development under the proposed General Plan is anticipated to occur within the ULL, specific impacts may be lessened through implementation of the goals, policies, and actions of the proposed General Plan. The Conservation, Open Space, and Working Lands Element of the proposed General Plan includes policies and actions that would mitigate potential impacts on riparian habitat or other sensitive natural communities, including policies and actions associated with goals that aim to preserve open space for environmental protection (Goal COS-1); preserve and enhance ecological resources and wildlife habitat (Goal COS-4); protect and restore natural watercourses, riparian corridors, and wetland areas (Goal COS-5); preserve and enhance native upland habitat (Goal COS-6); protect water quality (Goal COS-8); and protect, preserve, and enhance

natural resources of the San Francisco Bay/Sacramento-San Joaquin Delta estuary system and shoreline (Goal COS-9).

Furthermore, any disturbance or alteration of streams, lakes, or non-federally protected (non-jurisdictional) wetlands would require a permit with conditions that would protect sensitive natural communities. A Section 1602 Streambed Alteration Agreement (SAA) would be needed from the CDFW prior to initiation of project construction activities that would divert, obstruct, or change the natural flow of a river, stream, or lake or use material from a streambed. Non-jurisdictional wetlands include wetland features that are not hydrologically connected to navigable waters in rivers and are not under Corps jurisdiction. These wetlands would still be considered waters of the State and would be regulated according to the waste discharge requirements that would be issued by the RWQCB.

Implementation of proposed General Plan goals, policies, and actions, including conditions associated with SAAs and waste discharge requirements, would ensure that the potential impacts of the proposed General Plan on riparian corridors and other sensitive natural communities would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially impact riparian corridors and other sensitive natural communities. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan as well as conditions associated with SAAs and waste discharge requirements. Compliance with the aforementioned policies and regulations would reduce potential impacts of the proposed CAAP on riparian corridors and other sensitive natural communities to a less-than-significant level.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.4-3: Implementation of the proposed project would not 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. [Thresholds B-3]

Proposed General Plan

The EIR Study Area contains waters of the United States, which include jurisdictional wetlands and other waters. Construction activities could have direct and indirect impacts on waters of the United States. However, given that most development under the proposed General Plan is anticipated to occur within the ULL, specific impacts may be lessened through implementation of the goals, policies, and actions of the proposed General Plan. The Conservation, Open Space, and Working Lands Element of the proposed General Plan includes policies and actions that would mitigate potential impacts on

wetlands, including policies and actions associated with goals that aim to protect and restore natural watercourses, riparian corridors, wetland areas (Goal COS-5) and water quality (Goal COS-8).

Implementation of the proposed General Plan goals, policies, and actions, including conditions associated with Section 404 permits and Section 401 water quality certifications, would ensure that the potential impacts of the proposed General Plan on State and federally protected wetlands would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially impact federally protected wetlands. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan, conditions associated with Section 404 permits and Section 401 water quality certifications, as well as additional mitigation protection for wetlands during construction activities. Compliance with the aforementioned policies and regulations would reduce potential impacts of the proposed CAAP on federally protected wetlands to a less-than-significant level.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to any on State or federally protected wetlands. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.4-5: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. [Thresholds B-5 and B-6]

Proposed General Plan

As discussed in Chapter 3, *Project Description*, of the DEIR, in 1990, voters adopted Measure C-1990, which created the 65/35 Land Preservation Standard and ULL. County Ordinance Code Chapter 82-1, Section 82-1.010, *Urban Limit Line*, establishes the ULL to ensure the enforcement of the 65/35 Standard set forth in Section 82-1.006 of the County Ordinance Code. The 65/35 Standard limits the amount of land that can be devoted to urban development, while the ULL limits the areas where such development can occur. The 65/35 Standard limits urban development to no more than 35 percent of the land area of the county. The remaining 65 percent must be preserved for agriculture, open space, wetlands, parks, and other non-urban uses. Institutional/public uses such as schools, transit facilities, fire and police stations, water and wastewater treatment plants, correctional facilities, and airports are also counted as non-urban. Urban and non-urban uses are allowed inside the ULL while only non-urban uses are allowed outside. Any change to the ULL that exceeds 30 acres is subject to a four-fifths vote of the Board of Supervisors and requires countywide voter approval. In addition, County Ordinance Code Chapter 12.45, *Trees on Private Property*, requires the preservation of significant trees and permitting for impacts on, or removal of, such trees.

The policies in the proposed General Plan would not conflict with existing aforementioned County ordinances for the protection of biological resources but, rather, would expand on them to address issues regarding sensitive biological resources. Regarding County Ordinance Code Chapter 82-1, Policy LU-P2.1 requires continued implementation of the 65/35 land preservation standard, using the County ULL to focus development while preserving agricultural land, rangeland, natural habitats, watersheds, and open space; Policy LU-P2.2 enhances the ULL's effectiveness by supporting efforts to acquire and permanently protect land along the ULL boundary; and Policy LU-P2.3 limits development outside the ULL to non-urban uses. Regarding County Ordinance Code Chapter 12.45, Policy COS-P6.1 requires the preservation of natural woodlands and significant trees, particularly mature native species, intact coastal scrub and chaparral, and grasslands, especially those with native grass and wildflower populations; Policy COS-P6.3 supports the protection of native trees, especially oaks, in foothill woodlands and agricultural areas by encouraging the voluntary installation of fencing around individuals or clusters of trees to prevent grazing and promoting the replanting of native species. Action COS-A6.1 directs the County to update County Ordinance Code Chapter 816-6 to enhance the protection of specified native trees and strengthen mitigation requirements for removal commensurate with the benefits the tree provides; Action COS-A6.2 directs the County to develop an Oak Woodland Conservation Program that establishes special mitigation ratios for the removal of oak trees, along with specific tree replacement and planting standards to ensure long-term growth and survival and amendments to the County Ordinance Code as needed to implement the program.

The proposed General Plan also includes policies supporting the East Contra Costa County HCP/NCCP. For example, Policy COS-P4.2 supports preservation of HCP/NCCP conservation areas and the Priority Conservation Areas mapped by the Association of Bay Area Governments. Additional policies for the protection of biological resources are also consistent with the HCP/NCCP, including Policy COS-P4.3, which requires a biological resources assessment, prepared according to State and federal protocols, for projects with the potential to affect rare, threatened, endangered, or special-status species or their habitat and implementation of appropriate mitigation for identified impacts, preferably near the impact and within the county; Policy COS-P4.4, which protects wildlife migration corridors including natural and channelized creeks providing habitat in urban settings; Policy COS-P4.5, which requires floristic and vegetation surveys, prepared according to State and federal protocols, when development is proposed on land with potentially suitable habitat for special-status plant species, sensitive natural plant communities, or locally rare plants, including areas mapped by CNPS as Botanical Priority Protection Areas; and Policy COS-P5.1, which supports the protection, restoration, and enhancement of wetlands, marshes, sloughs, tidelands, natural watercourses, and riparian corridors.

Implementation of proposed General Plan goals, policies, and actions, as well as conditions associated with County Ordinance Code Chapters 82-1 and 816-6, would ensure that the potential impacts of the proposed General Plan related to local policies or ordinances for the protection of biological resources or an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of

physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially conflict with local policies or ordinances for the protection of biological resources or an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan as well as conditions associated with County Ordinance Code Chapters 82-1 and 816-6. Compliance with the aforementioned policies and regulations would reduce potential conflicts of the proposed CAAP with local policies or ordinances for the protection of biological resources or an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan to a less-than-significant level.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to any local policies or ordinances protecting biological resources. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

5. Cultural and Tribal Cultural Resources

Impact 5.5-3: Implementation of the proposed project would not disturb any human remains, including those interred outside of dedicated cemeteries. [Threshold C-3]

Proposed General Plan

The EIR Study Area has been long inhabited by Native Americans. Therefore, Native American burials may be found in the future on sites where no record of such burials exists. Buried human remains that were not identified during previous research and field studies could be inadvertently unearthed during ground-disturbing activities, possibly resulting in damage to the remains. Accordingly, implementation of the proposed General Plan could potentially damage or destroy human remains in the EIR Study Area.

In the event that human remains are discovered during grading or construction activities, compliance with California Health and Safety Code Section 7050.5, which includes specific provisions for the protection of human remains in the event of discovery, would be required. The treatment of Native American human remains is regulated by Public Resources Code Section 5097.98, as amended by AB 2641, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes. In addition, California Health and Safety Code Section 7052 makes the willful mutilation, disinterment, or removal of human remains a felony. The Health and Safety Code is applicable to any project where ground disturbance would occur. The proposed Conservation, Open Space, and Working Lands Element includes policies and actions that would mitigate potential impacts on human remains. Specifically, in the event of the discovery of a burial, human remains, or suspected human remains, Policy POS-P11.11 requires excavation and grading activities to halt immediately, protection of the area surrounding the find, notification of the County Coroner, and compliance with California Health and Safety Code Section 7050.5.

The proposed General Plan policy guidance, in combination with existing federal and State regulations in place to protect human remains within the EIR Study Area, would ensure that the potential impacts of the proposed General Plan on human remains would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially impact human remains in the EIR Study Area. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan, California Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.98. Compliance with the aforementioned policies and regulations would reduce potential impacts of the proposed CAAP on human remains to a less-than-significant level.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to disturbance of any human remains, including those interred outside of dedicated cemeteries. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

6. Energy

Impact 5.6-1: Implementation of the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Proposed General Plan

Short-Term Construction Impacts

Development projects constructed under the proposed General Plan would create temporary demands for electricity. Natural gas is not generally required to power construction equipment, and therefore is not anticipated during construction phases. Electricity use would fluctuate according to the phase of construction. Additionally, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities.

Construction of development projects facilitated by the proposed General Plan would also temporarily increase demands for energy associated with transportation. Transportation energy use depends on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. Energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. It is anticipated that most off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. In addition, all operation of construction equipment would cease upon completion of project construction.

Furthermore, the construction contractors would be required to minimize nonessential idling of construction equipment during construction in accordance with the California Code of Regulations Title 13, Chapter 9, Article 4.8, Section 2449. Such required practices would limit wasteful and unnecessary energy consumption. Also, future projects within the EIR Study Area would be similar to projects currently in development within Contra Costa County. Overall, there would be no unusual project characteristics anticipated that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in other parts of California. Therefore, short-term construction activities that occur as a result of implementation of the proposed General Plan would not result in inefficient, wasteful, or unnecessary fuel consumption.

Long-Term Impacts During Operation

Operation of potential future development accommodated under the proposed General Plan would create additional demands for electricity and natural gas compared to existing conditions. Operational use of electricity and natural gas would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; lighting; and charging electric vehicles. Land uses accommodated under the proposed General Plan would also result in additional demands for transportation fuels (e.g., gasoline, diesel, compressed natural gas, and electricity) associated with on-road vehicles.

Decreasing Overall per Capita Energy Consumption

Building Electricity

Electrical service to the county is provided by Pacific Gas and Electric (PG&E) and Marin Clean Energy (MCE) through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 5.6-4, *Year 2045 Forecast Electricity Consumption*, in the DEIR, by horizon year 2045, electricity use in the EIR Study Area is estimated to increase by 47,697,580 kWh/year, or approximately 9 percent, from existing conditions. As a result, the per service population electricity consumption is estimated to decrease from 4,319 kWh per person per year in existing baseline to 1,982 kWh per person per year in 2045, or a reduction of approximately 474 kWh per person annually.

As previously discussed, all new development facilitated by the proposed General Plan would be required to demonstrate compliance with the current Energy Code and California Green Building Code (CALGreen) standards in effect at the time the individual development applications are submitted and can therefore be expected to be more energy-efficient than the use being replaced, resulting in reductions in electricity consumption on a per dwelling unit and per square foot basis when compared to existing development. It should be noted that it is unknown how much more energy-efficient future iterations of the Energy Code and CALGreen standards would be in 2045 compared to existing conditions as those code updates are released on a 3-year cycle.

Moreover, the proposed General Plan Policies COS-P7.6, COS-P14.7, COS-P14.8, HS-P1.8, and HS-P3.2 would serve to improve energy efficiency and reduce energy consumption in new development facilitated by the proposed General Plan. As a result of compliance with Title 24 energy efficiency standards and implementation of the above proposed General Plan policies and actions, per service

population building electricity consumption is expected to decrease in 2045 compared to existing conditions.

Building Natural Gas and Propane

As shown in Table 5.6-5, *Year 2045 Forecast Natural Gas and Propane Consumption*, in the DEIR, existing natural gas use and propane use in the EIR Study Area totals 43,885,050 therms and 92,942 million British thermal units (MMBTU) annually. By 2045, natural gas use in the EIR Study Area would increase by 6,972,060 therms annually, or approximately 16 percent, from existing conditions to a total of 50,857,110 therms per year. Future development is unlikely to require propane in more rural areas of the county, especially due to the County's all-electric requirements for new construction. Therefore, the propane use in the EIR Study Area is anticipated to remain the same, for a total of 92,942 MMBTU per year.

As a result, the per service population natural gas consumption is estimated to decrease from 206 therms per person per year in existing baseline to 177 therms per person per year in 2045. Propane is also estimated to decrease from 0.44 MMBTU per person per year to 0.32 MMBTU per person per year in 2045.

Similar to electricity consumption, all new development facilitated by the proposed General Plan would be required to demonstrate compliance with the current CBSC and CALGreen and would result in reductions in heating fuel (i.e., natural gas or propane) consumption on a per dwelling unit and per square foot basis when compared to existing development in the county. As stated above, the proposed General Plan Policies COS-P7.6, COS-P14.7, COS-P14.8, HS-P1.8, and HS-P3.2 would serve to improve energy efficiency and reduce energy consumption in new development facilitated by the proposed General Plan. As a result, per service population heating fuel consumption is expected to decrease in 2045 compared to existing baseline conditions.

Transportation Energy

The growth accommodated under the proposed General Plan would consume transportation energy from the use of motor vehicles (e.g., gasoline, diesel, compressed natural gas, and electricity). Table 5.6-6, *Operation-Related Annual Fuel Usage: Net Change from Existing*, in the DEIR shows the net change in VMT, fuel usage, and fuel efficiency under forecast year 2045 proposed General Plan conditions from existing baseline year conditions.

As shown in Table 5.6-6, when compared to existing baseline year conditions, the proposed General Plan and CAAP would result in a decrease in fuel usage for gasoline-, compressed natural gas-, and diesel-powered vehicles, but not for electric-powered vehicles. The decrease in fuel usage for gasoline-powered vehicles and large increase in VMT and fuel usage for electric-powered vehicles are primarily based on the assumption in EMFAC that a greater mix of light-duty automobiles would be electric-powered in future years based on regulatory (e.g., Advanced Clean Cars) and consumer trends. Furthermore, per service population VMT generation would decrease by an estimated 722 VMT/SP from baseline conditions.

The overall VMT as shown in the table would be primarily attributable to the overall growth associated with the proposed General Plan compared to existing conditions. As discussed in Section 5.14, *Population and Housing*, in the DEIR implementation of the proposed General Plan would exceed

current regional projections for housing by 26 percent and population by 18 percent. However, it is important to note that regional projections used were from *Plan Bay Area 2040* and not the updated *Plan Bay Area 2050*, which does not differentiate between Contra Costa County as a whole and only the unincorporated portion of the county.

As identified in Section 5.16 of the DEIR, *Transportation*, the proposed General Plan Land Use Element includes goals, policies, and actions to minimize VMT and therefore reduce emissions from automobiles. Additionally, fuel efficiency of vehicles under year 2045 conditions would improve compared to existing baseline year conditions. The improvement in fuel efficiency would be attributable to regulatory compliance (e.g., Corporate Average Fuel Economy standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to residents or land use development projects, but to car manufacturers. Thus, Contra Costa County and its residents do not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the county more fuel-efficient vehicle options.

While the demand in electricity would increase under the proposed General Plan, in conjunction with the regulatory (i.e., Renewables Portfolio Standard, SB 350, and SB 100) and general trend toward increasing the supply and production of energy from renewable sources, it is anticipated that a greater share of electricity used to power electric vehicles would be from renewable sources in future years (e.g., individual photovoltaic systems, purchased electricity from PG&E, and/or purchased electricity from MCE that is generated from renewable sources). In addition to regulatory compliance that would contribute to more fuel-efficient vehicles and less demand in fuels, the proposed General Plan includes policies that will contribute to minimizing overall VMT, and thus associated fuel usage. In combination with improvements in fuel economy standards through 2045, the proposed General Plan would result in a decrease in transportation energy consumption. As a result, the proposed General Plan would result in an overall decrease in energy consumption through 2045.

Decreasing Reliance on Fossil Fuels

The proposed General Plan would be considered to conflict with this criterion if it did not take steps to decrease the reliance on fossil fuels. As discussed in Section 5.8 of the DEIR, *Greenhouse Gas Emissions*, individual development projects accommodated by the proposed General Plan would be required to comply with the California Building Standards Code (CBSC) that is current at the time of their building application submittal. As the current CBSC is the 2022 CBSC, individual development projects going through the application process today would result in greater energy efficiency than the current performance of existing structures in the EIR Study Area. In addition, the 2022 CBSC currently includes provisions for development projects to include rooftop photovoltaic systems and BES infrastructure or demonstrate energy efficiency performance equivalent to including photovoltaic and BES features.

In addition to improvements in energy efficiency and on-site renewable energy generation and energy storage requirements, SB 100 requires that Load Serving Entities (LSEs) incrementally increase their energy procurement sources to include eligible renewable and carbon-free sources. By January 1, 2046, all LSEs in California are required to source 100 percent of their in-state electricity sales from renewable

and carbon-free sources. As a result, individual development projects accommodated by the proposed General Plan would improve their energy efficiency through compliance with the CBSC current at the time of their building application submittal and LSEs would supply electricity that is increasingly sourced from carbon-free sources.

Moreover, consistent with Executive Order N-79-20 and CARB's Advanced Clean Cars II Regulation, which require that 100 percent of new passenger vehicles sold in-state are ZE (i.e., battery electric, hybrid plug-in electric, and fuel cell electric vehicles) by 2035, vehicles utilized by future residents and employees accommodated by the proposed General Plan are expected to consist more of EVs than what is experienced under existing conditions. In addition, the proposed General Plan includes policies that are intended to reduce the use of nonrenewable energy. Specifically, Policies COS-P14.7, COS-P14.8, HS-P1.8, and HS-P3.2 encourage the reduction of nonrenewable energy use and the utilization of new energy sources and building electrification. As a result, the proposed General Plan would incrementally decrease reliance on fossil fuel energy resources through 2045.

Increasing Reliance on Renewable Energy

As previously discussed, the 2022 CBSC currently requires a variety of development projects that don't meet specific exceptions or exemptions to include rooftop photovoltaic systems and Battery Energy Storage (BES) infrastructure or otherwise match or exceed the energy efficiency performance experienced by including photovoltaic and BES systems, as applicable. In addition, it is anticipated that each new Code cycle for the CBSC will improve on the last one by requiring higher performance for energy efficiency and incorporating additional requirements for on-site renewable energy and EV charging infrastructure. Future development projects accommodated by the proposed General Plan would therefore result in a net increase from existing conditions in on-site photovoltaic electricity generation and EV charging stations and associated infrastructure, further supporting and accelerating the adoption of EVs and the use of renewable energy in future years.

Similarly, LSEs that serve future development projects accommodated by the proposed General Plan, such as PG&E and MCE, would be required to incrementally increase their energy procurement sources to include eligible renewable and carbon-free sources through 2045 under SB 100. As a result, electricity consumed by individual development projects under the proposed General Plan, as well as existing structures in the county, would rely more on renewable and carbon-free sources for electricity in future years than is experienced under existing conditions.

Moreover, the proposed General Plan includes various policies that are intended to support the use of renewable energy beyond compliance with the CBSC, including creating a walkable urban environment to encourage future residents and employees in the county to use active modes of transportation instead of motorized vehicles.

The following proposed General Plan policies focus on minimizing VMT through land use and transportation planning efforts that work in conjunction, including:

Policy TR-P1.4 which aims to reduce single-occupant vehicle usage and VMT by significantly enhancing the availability and safety of other travel modes through infrastructure investment, policy support (Vision Zero, Transportation Demand Management Ordinance, and other best practices), and support for public transit. Policy TR-P4.7 which promotes walkability and safety through traffic-

calming measures through the Neighborhood Traffic Management Program. Policy TR-P5.2 that focuses on coordinating with Caltrans to provide safe highway interchange crossings for all ages and abilities. Policy TR-P5.7 encourages walking, bicycling, and rolling as travel modes for short to medium-length trips to schools, parks, transit stops, local shopping areas, and neighborhood services. Policy TR-P5.10 requires generous parking for bicycles and other mobility devices at key destinations, such as shopping centers, parks, schools, employment centers, transit stations, and multiple-family housing, and directs that this parking be conveniently located near entrances, include charging infrastructure, and accommodate cargo bikes when appropriate for the land use.

Summary

Compliance with federal, State, and local regulations (e.g., Energy Code, CALGreen, Renewables Portfolio Standard, and CAFE standards) would increase building energy efficiency and vehicle fuel efficiency. Compliance would also reduce building energy demand and transportation-related fuel usage in the future. Additionally, the proposed General Plan includes policies related to land use and transportation planning, energy efficiency, promotion of housing near public and active transit, and renewable energy generation that will contribute to minimizing building and transportation-related energy demands overall. As stated, development that could occur under the proposed General Plan would reduce the per capita transportation energy consumption, decrease reliance on fossil fuels, and increase reliance on renewable energy sources.

Implementation of policies under the proposed General Plan, in conjunction with and complementary to regulatory requirements, would ensure that energy demand associated with growth under the proposed General Plan would decrease overall energy consumption, decrease reliance on fossil fuels, and increase reliance on renewable energy. As such, the energy consumption under the proposed General Plan would not be considered inefficient, wasteful, or unnecessary. Therefore, energy impacts associated with implementation and operation of land uses accommodated under the proposed General Plan would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions; it does not involve any land use changes that would result in indirect growth or change in building density or intensity. Because there is no specific land use component associated with the proposed CAAP, its implementation would not directly result in energy impacts.

Furthermore, the proposed CAAP would help reduce GHG emissions and energy demand generated by existing and proposed land uses in the EIR Study Area. For example, proposed CAAP transportation strategies that reduce VMT (e.g., Strategy TR-1) would result in a reduction in transportation-related fuel usage. Likewise, the proposed CAAP also promotes building energy-efficiency improvements (e.g., Strategies BE-1 and BE-2), increasing water efficiency (e.g., Strategy DR-1 and DR-2), and reducing energy demand through renewable energy sources (e.g., Strategy BE-3) to minimize energy sector emissions. In addition, the proposed CAAP supports the East Bay Energy Watch, which is a partnership between PG&E and local governments in the East Bay region to conduct energy efficiency outreach to residents and businesses, retrofit existing government facilities to improve energy efficiency, and provide training to agency staff. Thus, implementation of the proposed

CAAP would result in beneficial impacts to energy consumption. Overall, implementation of the proposed CAAP would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to wasteful, inefficient, or unnecessary consumption of energy resources. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.6-2: Implementation of the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Proposed General Plan

The state's electricity grid is transitioning to renewable energy under California's Renewable Portfolio Standard (RPS) Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. In general, California has RPS requirements of 33 percent renewable energy by 2020 (SB X1-2), 40 percent by 2024 (SB 350), 50 percent by 2026 (SB 100), 60 percent by 2030 (SB 100), and 100 percent by 2045 (SB 100). SB 100 also establishes RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 1020 requires all State agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as PG&E and MCE, whose compliance with RPS requirements would contribute to the State's objective of transitioning to renewable energy. In addition, the County Board of Supervisors voted to go Deep Green 100 percent renewable (i.e., all power which customers buy comes from 100 percent non-polluting wind and solar power) with MCE for the majority of the County's accounts. Even if customers in the county were to opt-out of the Deep Green program, and therefore receive all their electricity from PG&E, 33 percent of PG&E's electricity has been generated from renewable energy since 2017. By 2030, PG&E is set to meet the State's new 60 percent renewable energy mandate set forth in SB 100.

The land uses accommodated under the proposed General Plan would be required to comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen. Furthermore, as described for Impact Discussion 5.6-1, the proposed General Plan includes policies that would support the statewide goal of transitioning the electricity grid to renewable sources. The net increase in energy demand associated with implementation of the proposed General Plan would be within the service capabilities of MCE and PG&E and would not impede their ability to implement California's renewable energy goals. Therefore, implementation of the proposed General Plan would not conflict with or obstruct implementation of California's Renewables Portfolio Standard program, and the impact would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions; it does not involve any land use changes that would result in indirect growth or change in building density or intensity. As discussed under Impact Discussion 5.6-1, the proposed CAAP transportation strategies would reduce VMT (e.g., Strategy TR-1) to aid in the reduction in transportation-related fuel usage. Likewise, the proposed CAAP also promotes building energy-efficiency improvements (e.g., Strategies BE-1 and BE-2), increasing water efficiency (e.g., Strategy DR-1 and DR-2), and reducing energy demand through renewable energy sources (e.g., Strategy BE-3) to minimize energy sector emissions. Furthermore, the proposed CAAP supports the East Bay Energy Watch, which is a partnership between PG&E and local governments in the East Bay region to conduct energy efficiency outreach to residents and businesses, retrofit existing government facilities to improve energy efficiency, and provide training to agency staff. Therefore, the proposed CAAP would complement the statewide goal of transitioning the electricity grid to renewable sources. Implementation of the proposed CAAP would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to conflicting with a State or local plan for renewable energy or energy efficiency. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.6-3: Implementation of the proposed project would not require or result in the relocation or construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects.

Proposed General Plan

The proposed General Plan would accommodate future growth in the EIR Study Area that would require new or expanded energy facilities; however, the proposed General Plan would not directly result in the construction of new or expanded energy facilities that would not otherwise be reviewed and mitigated to reduce potentially significant environmental effects. As discussed in Section 5.6.1.1, *Regulatory Background*, of the EIR, the Integrated Resource Plan (IRP) is the principal planning document that identifies California Independent System Operator (CAISO's) forecasts for electricity demand, supply, and transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs. These forecasts consider the expected growth in population and development in corresponding LSE's service areas, such as the population and development envisioned under the proposed General Plan within PG&E and MCE's service area.

The IRP is developed in collaboration with LSEs, regulators, and other stakeholders, and is updated periodically to reflect changes in the energy landscape and evolving policy goals. Overall, the IRP plays a critical role in ensuring the reliability and resilience of California's electricity grid as the state continues to transition to a cleaner and more sustainable energy system. When an LSE identifies that new or expanded energy facilities are needed to accommodate the population and development growth in its service area, those proposed improvements are reviewed to identify consistency with local, State, and

federal regulatory compliance as well as potential environmental effects that may result. For on-site systems, such as rooftop solar, the review would be conducted by the applicable lead agency as part of that individual development project. For energy infrastructure improvements that involve the construction of new or expansion of existing transmission lines, generation systems, or BES facilities separate from an individual development project, the review would be conducted by the California Public Utilities Commission (CPUC) and/or California Energy Commission (CEC) depending on the type of facility. The CEC typically acts as a CEQA lead or responsible agency for energy infrastructure improvements involving generation or BES systems, whereas the CPUC typically acts as a CEQA lead or responsible agency for improvements involving transmission lines or other distribution infrastructure.

Once the new or expanded energy facility is reviewed and approved, incorporating any necessary and appropriate mitigation, it is assigned a point of interconnection on the grid, and its output is added to the IRP as a resource that can provide electricity and other grid services, such as frequency regulation or ramping support. The facility is then dispatched by CAISO based on its bids into the day-ahead and real-time electricity markets, and its output is used to help balance supply and demand on the grid in real-time. CAISO operates a wholesale electricity market in which LSEs can participate by offering to buy or sell electricity and other grid services, such as demand response or energy storage. This market helps to ensure that the electricity system operates efficiently and reliably by providing economic incentives for electricity providers to use their resources effectively.

In addition to the IRP, which principally governs the planning efforts for new and expanded electricity and natural gas facilities, the CPUC in December 2022 adopted a new framework to comprehensively review utility natural gas infrastructure investments in order to help the State transition away from natural-gas fueled technologies and avoid stranded assets in the gas system. The new framework requires utilities to seek CPUC approval of natural gas infrastructure projects of \$75 million or more or those with significant air quality impacts. The new framework is intended to capture natural gas projects likely to have the most substantial community and environmental impacts and to require demonstrate project compliance with CEQA. Therefore, while the proposed General Plan may result in increased energy resource demand by facilitating population and development growth in the EIR Study Area, and subsequently in PG&E and MCE's service area, any new or expanded facilities needed as a result of meeting that increased demand would undergo its own review to mitigate potentially significant environmental effects and demonstrate compliance with regulatory requirements. As such, the proposed General Plan would not result in new or expanded energy facilities which may cause significant environmental effects. This impact would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions; it does not involve any land use changes that would result in indirect growth or change in building density or intensity. Because there is no specific land use component associated with the proposed CAAP, its implementation would not directly result in relocation or construction of new or expanded energy facilities.

As discussed under Impact Discussion 5.6-1, the proposed CAAP promotes building energy-efficiency improvements (e.g., Strategies BE-1 through BE-2) and reducing energy demand through renewable energy sources (e.g., Strategy BE-3) to minimize energy sector emissions. Furthermore, the proposed

CAAP supports the East Bay Energy Watch, which is a partnership between PG&E and local governments in the East Bay region to conduct energy efficiency outreach to residents and businesses, retrofit existing government facilities to improve energy efficiency, and provide training to agency staff. Therefore, implementation of the proposed CAAP would not directly result in new or expanded energy facilities which may cause significant environmental effects and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the relocation or construction of new or expanded energy facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

7. Geology and Soils

Impact 5.7-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; ii) Strong seismic ground shaking; iii) Seismic-related ground failure, including liquefaction; or iv) Landslides, mudslides, or other similar hazards. [Threshold G-1i, G-1ii, G-1iii and G-1iv)].

Proposed General Plan

Surface Rupture of a Fault

As shown in Figure 5.7-1, *Regional Fault Map*, of the DEIR, there are five major faults that run through Contra Costa County including the Calaveras (North Central), Concord-Green Valley, Greenville, Hayward, and Mount Diablo Faults. The EIR Study Area also includes Alquist-Priolo Fault Zones. Future development within the EIR Study Area could have potential impacts in regard to seismic activities at or from nearby faults. However as required by the Alquist-Priolo Act Fault Zoning Act, the approval of projects within Earthquake Fault Zones must be in accordance with the policies and criteria established by the Surface Mining and Geology Board (SMGB). SMGB regulations require that fault investigation reports be prepared by a professional geologist registered in the State of California. Additionally, the Seismic Hazards Mapping Act requires projects for human-occupancy that are within mapped fault zones to obtain a site-specific geotechnical report prior to the issuance of individual grading permits, and each new development would be required to retain a licensed geotechnical engineer to design new structures to withstand probable seismically induced ground shaking.

The proposed General Plan Health and Safety Element includes policies aimed at reducing potential impacts from development in and near areas with known faults. In particular, Policy HS-P4.3 discourages new below-market-rate housing in Alquist-Priolo Fault Zones; Policy HS-P11.1 requires appropriately detailed engineering geologic or geotechnical investigations for projects in Alquist-Priolo Earthquake Fault Zones or Seismic Hazard Zones delineated by the California Geological Survey, as well as any other areas of steep slopes or areas of suspected ground failure known to the county; Policy HS-P11.2 prohibits the construction of buildings for human occupancy in areas where seismic and other geologic hazards cannot be adequately mitigated; and Policy HS-P11.3 discourages construction of critical facilities and buildings in Alquist-Priolo Fault Zones, encourages earthquake retrofitting, and

requires critical facilities and buildings to be sited, designed, and constructed to withstand seismic stresses.

Furthermore, all new development in California is subject to the seismic design criteria of the CBC, which requires that all improvements be constructed to withstand anticipated ground shaking from regional fault sources. The CBC standards require all new developments to be designed consistent with a site specific, design-level geotechnical report, which would be fully compliant with the seismic recommendations of a California-registered professional geotechnical engineer. Adherence to the applicable CBC requirements, Alquist-Priolo Fault Zoning Act, Seismic Hazards Mapping Act, and proposed General Plan policies would ensure that implementation of the proposed General Plan would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Compliance with State and local regulations would therefore mitigate impacts due to rupture of a known fault to a less than significant level.

Ground Shaking

Due the location and underlying geology of Contra Costa County, all future development in the EIR Study Area would likely be subject to strong seismic ground shaking. Several policies in the proposed Health and Safety Element help to mitigate impacts from ground shaking. Policy HS-P11.2 prohibits construction of buildings for human occupancy in areas where seismic and geologic hazards cannot be mitigated. Policy HS-P11.3 discourages construction of critical facilities and buildings in Alquist-Priolo Fault Zones, encourages earthquake retrofitting, and if there are no feasible alternatives to siting critical facilities and buildings intended for human occupancy in the Fault Zones, requires buildings to be sited, designed, and constructed to withstand seismic stresses. Additionally, all future residential development would be required to conform to CBC requirements and standards established to prevent significant damage due to ground shaking during seismic events. Adhering to these requirements would make impacts associated with ground shaking less than significant.

Liquefaction

As shown in Figure 5.7-2, Liquefaction Hazard Zones, of the DEIR, several areas of the county are susceptible to liquefaction hazards. Therefore, future development under the proposed General Plan has the potential to be subject to liquefaction hazards. However, the proposed General Plan Health and Safety Element includes policies that address development in areas prone to liquefaction hazards and help to mitigate the risks posed by liquefaction. Policy HS-P11.1 requires appropriately detailed engineering geologic or geotechnical investigations for projects in Alquist-Priolo Earthquake Fault Zones or Seismic Hazard Zones delineated by the California Geological Survey, as well as any other areas of steep slopes or areas of suspected ground failure known to the county and requires that these reports include recommended means of mitigation of any adverse condition representing a hazard to improvements and recommendations to assure proper implementation of mitigation measures during construction. In addition, Policy HS-P11.2 prohibits construction of buildings intended for human occupancy in areas where geologic hazards, such as liquefaction, cannot be adequately mitigated.

Additionally, all future development would be required to conform to CBC requirements and standards established to prevent significant damage due to ground shaking during seismic events. Therefore, impacts associated with liquefaction would be considered less than significant.

Landslides

As shown on Figure 5.7-3, *Landslide Hazards*, of the DEIR, large areas of the EIR Study Area with hill terrain are susceptible to landslides. The County restricts development on open hillsides and ridgelines and generally prohibits development on hillsides above a 26 percent grade, as referenced in Section 82-1.016, *Hillside Protection*, of the County Ordinance Code. Compliance with CBC requirements, including implementation of recommendations provided in site-specific geotechnical reports would reduce or avoid impacts related to landslides. In addition, the proposed General Plan Health and Safety Element includes policies that help to mitigate impacts related to landslides and unstable geologic conditions. For example, Policy HS-P11.5 discourages development on slopes exceeding 15 percent and prohibits development on slopes of 26 percent or greater to avoid instability, unnecessary grading, and extensive land disturbance and facilitate long-term control of erosion and sedimentation, and Policy HS-P11.6 prohibits road dedications or private road construction in unstable hillside and landslide hazard areas unless potential hazards have been mitigated to the County's satisfaction.

Based on the existing and proposed County regulations, policies, and actions, combined with CBC requirements, implementation of the proposed General Plan would not directly or indirectly result in adverse effects related to landslides, and the impact would be less than significant.

Summary

Overall, implementation of the above proposed policies and actions, as well as compliance with State, regional, and local regulations pertaining to structural safety regarding fault rupture, ground shaking, liquefaction, and landslides, would ensure that potential future development that results from implementation of the proposed project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death. Therefore, impacts would be less than significant.

Proposed CAAP

The proposed CAAP aims to reduce GHG emissions from activities in the county. The proposed CAAP is a policy document that does not include specific projects that could cause potential substantial adverse impacts, 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 active fault trace, or involving seismic ground shaking, liquefaction, or landslides. In addition, the proposed CAAP includes actions under Strategy CE-1 and Strategy NI-6 that require new housing for low-income households to be outside of hazard-prone areas, including for landslides. Therefore, the impact is less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to geological hazards. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.7-2: Development under the proposed project would not result in substantial soil erosion or the loss of topsoil. [Threshold G-2]

Proposed General Plan

Future development facilitated by the proposed General Plan would involve soil disturbance, construction, and operation of developed land uses that could be subject to unstable soils conditions. However, the proposed General Plan is a policy-level document and does not include any development proposals or development entitlements that would directly result in the construction or expansion of any new development.

As described further in Section 5.10 of the DEIR, *Hydrology and Water Quality*, of this DEIR, any new development that would require the disturbance of one or more acres during construction would be subject to the requirements of the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities (Construction General Permit). The NPDES permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would include Best Management Practices (BMPs) designed to control and reduce soil erosion. The BMPs may include dewatering procedures, storm water runoff quality control measures, watering for dust control, and the construction of silt fences, as needed. In addition, County Ordinance Code Section 716-4.202 requires standard erosion control practices to be implemented for all construction. These State and local regulations would effectively mitigate construction stormwater runoff impacts from development under the proposed General Plan.

Furthermore, the proposed General Plan also include policies aimed at mitigating soil erosion. The Health and Safety Element includes Policy HS-P11.5, which discourages development on slopes exceeding 15 percent to avoid excessive grading. The Conservation, Open Space, and Working Lands Element includes Policy COS-P8.4, which requires new development to retain vegetation and topography and use BMPs to minimize erosion. The Public Facilities and Services Element includes Policy PFS-P7.10, which requires that new landfills provide an approved erosion control and drainage plan.

Implementation of these State and local requirements, as well as policies in the proposed General Plan would effectively ensure that future projects would not result in substantial soil erosion or the loss of topsoil from construction activities, and impacts would be less than significant.

Proposed CAAP

The proposed CAAP aims to reduce GHG emissions from activities in the county. Although the proposed CAAP is a policy document that does not include specific projects, projects could be facilitated by proposed CAAP actions that involve construction activity and soil disturbance, creating the potential for soil erosion. However, such projects would be subject to the same State and local requirements and proposed General Plan policies described above for the discussion of proposed General Plan impacts. Therefore, the impact is less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to substantial soil erosion or the loss of topsoil. Accordingly, no changes or alterations

to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.7-3: Development under the proposed project would not subject people or structures to hazards from unstable soil conditions. [Thresholds G-3 and G-4]

Proposed General Plan

Development on unstable or expansive soils could create substantial risks to life or property and result in adverse impacts such as on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. As shown in Figures 5.7-1, *Regional Fault Map*, 5.7-2, *Liquefaction Hazard Zone*, and 5.7-3, *Landslide Hazards*, of the DEIR, there are seismic and geologic hazards throughout the EIR Study Area. In addition, as mentioned in Section 5.7.1.2, *Existing Conditions*, of the DEIR, the three classified soils in the county have expansive capabilities; therefore, future development within the EIR Study could have potentially significant impacts if located in these hazardous areas.

However, the proposed General Plan policies listed in Impact Discussion 5.7-1 would ensure geologic hazards such as unstable soils, liquefaction, subsidence, and other potential geologic or soil stability issues be addressed and mitigated. In addition, the County Ordinance Code Section 94-4.420 requires the preparation of a preliminary soil report to accompany a tentative parcel for a subdivision, and Section 716-2.418 requires a soil investigation for all development identified to have the potential for hazards related to soil conditions such as expansive soils, so the project can mitigate impacts through site-specific design. In addition, all new projects within the EIR Study Area must comply with the CBC, which contains provisions for soil preparation and conditioning to minimize geologic hazards such as unstable soils, liquefaction, subsidence, and other potential geologic or soil stability issues. Therefore, this impact is less than significant.

Proposed CAAP

The proposed CAAP aims to reduce GHG emissions from activities within the county. Although the proposed CAAP is a policy document that does not include specific projects, projects could be facilitated by proposed CAAP actions that would place structures on a geologic unit or soil that is unstable. However, such projects would be subject to the same State and local requirements and proposed General Plan policies described above for the discussion of proposed General Plan impacts. Therefore, the impact is less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to unstable soil conditions. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.7-4: Development under the proposed project would connect to existing sewer lines or comply with State and local regulations for on-site septic tanks or alternative wastewater disposal systems. [Threshold G-5].

Proposed General Plan

Most new development would connect to existing sewer lines, and on-site septic tanks and alternative wastewater disposal systems would be limited to rural areas. Any new development within the EIR Study Area that would include the utilization of a septic tank or alternative wastewater disposal system would be regulated by the Contra Costa Health Services Environmental Health Division. Obtaining a permit would be required prior to the construction of any septic tank or alternative wastewater disposal system, and each system would be constructed within the parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems, as well as the Contra Costa County Health Officer Regulations for Sewage Collection and Disposal. As this procedure would be required prior to construction of any and all septic tanks and alternative wastewater disposal systems, all new development under the proposed General Plan would be subject to these State and local requirements. Proper soils are essential for installation and maintenance of septic tank and alternative wastewater disposal systems; compliance with these State and local requirements would ensure that impacts related to adequate soils for supporting such systems are less than significant.

Proposed CAAP

The proposed CAAP aims to reduce GHG emissions from activities within the county. Although the proposed CAAP is a policy document that does not include specific projects, projects could be facilitated by proposed CAAP actions that include structures that connect to existing sewer lines, on-site septic tanks, and/or alternative wastewater disposal systems. In the event that a septic tank or alternative wastewater disposal system installation is proposed, a testing and permitting process would be completed before installation based on individual project-level review, as described above for the discussion of proposed General Plan impacts.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to alternative wastewater disposal systems. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

8. Greenhouse Gas Emissions

Impact 5.8-1: Implementation of the proposed project is not projected to result in emissions that would exceed the unincorporated county's GHG reduction target established under SB 32 and progress toward the State's carbon neutrality goal. [Thresholds GHG-1]

Proposed General Plan

Future potential development under the proposed General Plan would contribute to global climate change through direct and indirect emissions of GHGs from land uses within the unincorporated

county. However, a general plan is a long-range policy document that does not directly result in development without additional approvals. Before any development can occur in the unincorporated county, it must be analyzed for consistency with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits from regulatory agencies.

Horizon Year 2045 Emissions Compared to Existing Conditions

The projected development under the proposed General Plan is not linked to a specific development time frame but is assumed over a 20-year project horizon through 2045. Implementation of the proposed General Plan by the horizon year of 2045 would result in a net increase in service population of 74,969 in the EIR Study Area. Table 5.8-6, *Unincorporated Contra Costa County GHG Emissions Business-as-Usual Forecast*, in the DEIR, provides a comparison of the change in GHG emissions in the EIR Study Area between the CEQA baseline (2019) and the proposed General Plan horizon year (2045) conditions.

As shown in Table 5.8-6, the increase in residential units and population associated with the proposed General Plan results in an increase in on-road transportation, residential and nonresidential building energy use, solid waste, off-road equipment, water and wastewater, and BART.

After accounting for reductions from State actions, projected development in 2045 that would be accommodated under the proposed General Plan would result in a net decrease of 109,209 MTCO₂e GHG emissions from existing conditions. The primary reason for the decrease in overall community-wide GHG emissions, despite an increase in service population, is a result of regulations adopted to reduce GHG emissions and turnover of California's on-road vehicle fleets. Consequently, implementation of the proposed General Plan would not result in a substantial increase in GHG emissions because there would be a decrease in emissions from existing conditions (CEQA baseline). However, without additional local GHG reduction strategies, Contra Costa County would not achieve consistency with the GHG reduction goals of AB 1279 (i.e., 85 percent reduction below 1990 levels by 2045).

Local GHG Reduction Measures

The proposed General Plan directs implementation of the proposed CAAP. The proposed CAAP draws upon strategies from the 2015 CAAP, with new strategies to address current State regulations and local issues of concern. Contra Costa County has implemented the following GHG reduction measures identified in the 2015 CAAP to reduce GHG emissions in the EIR Study Area:

- To increase the number of carbon neutral buildings, the Board of Supervisors adopted the All-Electric Ordinance (Ordinance No. 2022-02) to require new construction of residential, detached accessory dwelling units (ADU), hotel, office, and retail building types to be all-electric. As of June 2022, 67 single-family or duplex projects and 40 ADU projects received permits in alignment with the all-electric ordinance. Current new construction and major renovations of County facilities include LED lighting and heat pump technology, and the County enrolled in MCE's Strategic Energy Management Program to increase energy efficiency in County facilities. Additionally, 42 projects within the unincorporated area utilized the Bay Area Regional Energy Network program, which provides rebates to single-family homeowners for energy efficiency improvements.

- To replace fossil fuel electricity with renewable electricity, the majority of residential accounts in the unincorporated area are enrolled in MCE for an estimated 43,690 metric tons of CO₂e reduced. Around 70 percent of the County's electricity usage is associated with MCE's Deep Green account, which provides electricity from 100 percent renewable energy.
- The County has developed a carbon sequestration feasibility study through a grant from the California Department of Conservation. The study, *Healthy Lands, Healthy People*, will identify strategies to store carbon in various land uses across the county, such as agriculture, parks and open space, conservation lands, and towns and cities.
- The County has also enhanced the accessibility and connectivity of active transportation options with the adoption of the Active Transportation Plan and 2022 Capital Road Improvement & Preservation Program (CRIPP). The CRIPP lays out funded transportation projects in the county that provide safe, efficient, and reliable transportation. Currently, there are 33 actively funded projects.
- The County is working to implement projects at over 25 sites to facilitate the transition to an all-electric County fleet. MCE has also established numerous EV charging ports over the years, including 33 EV charging port installations in year 2022.

The proposed CAAP identifies GHG emissions reductions targets for the EIR Study Area that would ensure consistency with the State GHG reduction goals of AB 1279 and substantial progress toward the State's carbon neutrality goals. In addition, the proposed CAAP includes additional GHG reduction measures to achieve the State's carbon neutrality goals identified in the 2022 Scoping Plan. Table 5.8-7, *Proposed CAAP Local GHG Reduction Strategies*, of the DEIR, shows the local GHG reduction measures and reductions associated with the local measures in the proposed CAAP in 2045 that would help achieve those reductions.

Table 5.8-8, *Contra Costa County 2045 GHG Emissions Reduction Target Analysis with the Proposed CAAP*, in the DEIR, shows that with the additional local measures identified in the proposed CAAP, the unincorporated county would achieve the AB 1279 GHG reduction targets for year 2045. With implementation of the proposed CAAP, Contra Costa County would achieve an 85-percent decrease in GHG emissions in the unincorporated areas of the county by 2045 from 1990 levels and would make substantial progress toward the State's carbon neutrality goals. Therefore, the proposed General Plan, which includes implementation of the proposed CAAP, would not result in a substantial increase in the magnitude of GHG emissions and would be consistent with the GHG reduction goals identified under AB 1279.

Additionally, implementation of the following proposed General Plan policies and actions would also minimize energy and mobile-source emissions in the unincorporated areas.

- **Policy LU-P3.3:** Encourage extremely high-density, mixed-use development that combines employment, housing, and services near major transit facilities. Such development should be planned and designed to encourage walking, micromobility, and transit use; shorter commutes; and reduced dependency on single-occupant vehicles.
- **Policy LU-P3.7:** Welcome development that supports the countywide goal of reducing VMT, thus reducing greenhouse gas emissions, to meet climate change targets. Require projects that do not support the County's VMT-reduction goals to incorporate necessary changes (e.g., design, land use mix) to ensure they support those goals.

- **Policy TR-P1.3:** Ensure emerging transportation technologies and travel options, such as autonomous and ZEVs and transportation network companies, support the County's goals for reducing emissions, adapting to climate change, improving public safety, and increasing equitable mobility.
- **Policy TR-P1.4:** Reduce single-occupant vehicle usage and VMT by significantly enhancing the availability and safety of other travel modes through infrastructure investment, policy support (Vision Zero, TDM Ordinance, and other best practices), and support for public transit.
- **Policy TR-P1.11:** Support transitioning all on-road vehicles, including personal vehicles and business, government, and public transit fleets, to electric power from renewable sources or other emission-free fuels.
- **Policy TR-P1.12:** Continue to improve ZEV charging/fueling infrastructure within new development and public rights-of-way, incorporating new technologies whenever possible.
- **Policy TR-P1.13:** Require designs for new parking facilities to incorporate ZEV charging/fueling infrastructure and maximize opportunities for adaptive reuse.
- **Action TR-A1.4:** Implement programs to encourage transit use, bicycling, walking, telecommuting, and use of alternative vehicle fuels by County employees.
- **Action TR-A1.11:** Coordinate with CCTA and other local and regional agencies to implement the Contra Costa Electric Vehicle Readiness Blueprint and related policies and apply best practices in ZEV charging/fueling infrastructure requirements.
- **Action TR-A1.12:** Update the County Ordinance Code as necessary to support advances in ZEV charging/fueling infrastructure.
- **Policy COS-P14.1:** Implement Climate Action and Adaptation Plan strategies to improve energy efficiency and conservation, promote carbon-free energy sources, and reduce energy-related GHG emissions.

Individual development projects facilitated by the proposed General Plan would experience emission reductions from implementation of State measures and strategies to reduce statewide GHG emissions, such as the Low Carbon Fuel Standard (LCFS) mandate or RPS requirements. The above proposed General Plan policies and actions would serve to further support potential GHG reductions for individual development projects facilitated by the proposed General Plan. Furthermore, individual projects would be required to demonstrate consistency with the proposed CAAP by preparing a CAAP Consistency Checklist, identify specific GHG emissions reduction strategies from the proposed CAAP that are applicable to the project, and demonstrate how the project will implement these strategies to ensure that the project's emissions are consistent with the community-wide emissions forecast contained herein.

In summary, implementation of the proposed General Plan would result in a net decrease in emissions from existing conditions. Additionally, with implementation of the proposed CAAP, emissions from existing and planned development in the EIR Study Area would achieve the GHG reduction goals identified under AB 1279 for year 2045, which is consistent with the thresholds identified by BAAQMD in their CEQA Guidelines. Therefore, growth within the county associated with the proposed General Plan would not have a cumulatively considerable impact on GHG emissions and this impact would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions; it does not involve any land use changes that would result in indirect growth or change in building density or intensity. Because there is no specific land use component associated with the proposed CAAP, its implementation would not directly result in the generation of GHG emissions.

In addition, the proposed General Plan directs implementation of the proposed CAAP, recognizing that the County's climate action planning efforts must be updated more regularly to be responsive to the changing regulations, guidance, technology, best practices, and science. For instance, the proposed CAAP transportation strategies that reduce VMT (e.g., Strategy TR-1) would result in a reduction in GHG emissions from the transportation sector. Likewise, the proposed CAAP also promotes building energy-efficiency improvements (e.g., Strategies BE-1 and BE-2), increasing water efficiency (e.g., Strategy DR-1 and DR-2) and reducing energy demand through renewable energy sources (e.g., Strategy BE-3) to minimize energy sector emissions. Furthermore, the proposed CAAP supports the East Bay Energy Watch, which is a partnership between PG&E and local governments in the East Bay region to conduct energy efficiency outreach to residents and businesses, retrofit existing government facilities to improve energy efficiency, and provide training to agency staff. Thus, implementation of the proposed CAAP would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to generating GHG emissions. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.8-2: Implementation of the proposed project would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. [Thresholds GHG-2]

Proposed General Plan

CARB Scoping Plan

The CARB Scoping Plan is applicable to State agencies but is not directly applicable to cities, counties, and individual projects (i.e., the Scoping Plan does not require local jurisdictions to adopt its policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies from the Scoping Plan result in GHG emissions reductions at the local level. So local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the CAFE standards. Additionally, local jurisdictions are encouraged to prepare local GHG reduction plans to align local GHG reductions with the State GHG reduction targets identified in the Scoping Plan.

Development projects under the proposed General Plan would be required to adhere to the programs and regulations identified by the Scoping Plan and implemented by State, regional, and local agencies

to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. Future development projects would be required to comply with these State GHG emissions reduction measures because they are statewide strategies. For example, new buildings under the proposed General Plan would be required to meet the CALGreen and Building Energy Efficiency Standards in effect at the time when applying for building permits. Furthermore, the proposed General Plan includes policies that minimize GHG emissions and therefore help achieve GHG reduction goals.

Moreover, the proposed General Plan directs implementation of the proposed CAAP. As described under Impact 5.8-2, the proposed CAAP aligns the GHG reduction goals for the unincorporated areas for existing and new development with AB 1279 and the carbon neutrality goals identified in the 2022 Scoping Plan. Therefore, the proposed General Plan would result in a net benefit because implementation of the proposed CAAP would align future development in the county with the policies and objectives identified by CARB. Implementation of the proposed General Plan would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

ABAG/MTC's Plan Bay Area

Plan Bay Area 2050 is the Bay Area's regional transportation plan to achieve the passenger vehicle emissions reductions identified under SB 375. Plan Bay Area 2050 is the current SCS for the Bay Area, adopted October 21, 2021. In addition to significant transit and roadway performance investments to encourage focused growth, Plan Bay Area 2050 directs funding to neighborhood active transportation and complete streets projects, climate initiatives, lifeline transportation and access initiatives, safety programs, and PDA planning. In Contra Costa County, a number of PDAs and Transit Priority Areas have been designated in the EIR Study Area, as shown on Figure 5.16-1, *Priority Development Areas and Transit Priority Areas*, in Section 5.16 of the DEIR.

While Plan Bay Area 2050 does not override local land use control, it provides guidance to the local jurisdictions such as Contra Costa County on how future development can be consistent with the State's GHG and VMT reduction goals. This includes constructing more infill development in downtowns and centers in close proximity to jobs and services.

As further discussed in Section 5.14 of the DEIR, *Population and Housing*, the proposed General Plan would exceed current regional projections for housing and population. However, it is important to note that regional projections used were from Plan Bay Area 2040, which does not differentiate between Contra Costa County as a whole and the unincorporated portion of the county. In addition, the proposed General Plan includes policies and actions that would limit development in certain areas and control the growth within the EIR Study Area. All potential future development would be required to comply with any required site-specific infrastructure improvements and to pay any project-specific impact fees.

The proposed Land Use Element includes policies to encourage high-density, mixed-use development to create shorter commutes and reduced dependency on single-occupant vehicles (see Land Use and Planning Impact 5.11-2). The proposed Growth Management Element also establishes goals, policies, and actions intended to manage and mitigate impacts of future growth within the unincorporated county. Furthermore, future development projects that could result in significant VMT impacts are required to include Transportation Demand Management (TDM) strategies and physical measures to reduce VMT.

Overall, the proposed General Plan would be consistent with the goals of Plan Bay Area 2050 in concentrating new development in locations where there is existing infrastructure and transit. Therefore, the proposed General Plan would not conflict with the land use concept plan in Plan Bay Area 2050 and impacts would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions; it does not involve any land use changes that would result in indirect growth or change in building density or intensity. Furthermore, as discussed under Impact Discussion 5.8-1, implementation of the proposed CAAP would result in beneficial GHG emissions impacts by contributing to reducing VMT, increasing energy and water use efficiency, and increasing renewable energy use. Therefore, the proposed CAAP would be complementary to statewide and regional plans to reduce GHG and would not interfere with or obstruct the implementation of the CARB Scoping Plan or Plan Bay Area 2050. Implementation of the proposed CAAP would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to an applicable plan, policy, or regulations regarding GHG emissions. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

9. Hazards and Hazardous Materials

Impact 5.9-1: Implementation of the proposed project, including construction and operation activities, could involve the transport, use, and/or disposal of hazardous materials; however, compliance with existing local, state, and federal regulations would ensure impacts are minimized. [Thresholds H-1, H-2, and H-3].

Proposed General Plan

Pipelines

As noted in Section 5.9.1.2, *Existing Conditions*, of the DEIR, several hundred miles of pipelines transporting natural gas, petroleum, or other hazardous liquids run through the EIR Study Area. The pipelines are monitored by pipeline operators who are responsible for the upkeep of pipelines and the authorization of excavations around pipeline locations. Development under the proposed General Plan would increase the exposure of people and the environment to potential hazards related to pipeline or electrical line rupture. As with all developments in California, development in Contra Costa County would be required to follow the procedural requirements of the Underground Service Alert of Northern California, or USA North 811.

Construction

Construction of future projects would involve the use of substances such as paints, sealants, solvents, greases, adhesives, cleaners, lubricants, and fuels. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard to the public or the

environment. These activities would also be short term or one time in nature. Project construction workers would be trained in safe handling and hazardous materials use, as required under Occupational Safety and Health Administration (OSHA) Regulation 29 CFR 1926.62 and CCR Title 8. Project construction contractors would maintain equipment and supplies on construction sites for containing and cleaning up spills. If a hazardous materials release could not be safely contained and cleaned up by on-site personnel, the affected project applicant would notify the applicable fire department immediately.

Additionally, to prevent hazardous conditions, existing local, State, and federal laws and regulations—such as those listed under Section 5.9.1.1, *Regulatory Background*, of the DEIR, are required to be enforced at construction sites. For known or potential contaminated sites, prior to issuing a grading or building permit, the County would require an assessment of potential hazards. If the development project could pose a human health or environmental risk, the Contra Costa Health Services Hazardous Materials Programs (CCHSHMP) would require that such hazards be managed appropriately. This could include, but would not be limited to, actions such as removal of the contaminants, site controls to reduce exposure, or administrative mechanisms.

Compliance with existing laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.

Demolition

Future development projects under the proposed General Plan may involve demolition of existing buildings and structures associated with a specific development site. Some building materials used in the mid and late 1900s are considered hazardous to the environment and harmful to people. Asbestos, for example, was generally not used in building materials by 1980, but was still occasionally used until the late 1980s. Lead-based paint was banned for residential use in 1978 and phased out for commercial structures in 1993.

Due to the age of the buildings and structures in the EIR Study Area (many over 50 years old), it is likely that some contain asbestos-containing materials (ACMs) and lead-based paint (LBP), as well as other building materials containing lead. Demolition could cause encapsulated ACM (if present) to become friable; once airborne, they are considered a carcinogen. Demolition could also cause the release of lead into the air. The USEPA has classified lead and inorganic lead compounds as “probable human carcinogens”, and such releases could pose significant risks to persons living and working in and around a proposed development.

Abatement of all ACM and LBP encountered during any future building demolition activities would be required in accordance with all applicable laws and regulations, including those of the USEPA (which regulates disposal), OSHA, U.S. Department of Housing and Urban Development, the California Division of Occupational Safety and Health (Cal/OSHA, which regulates employee exposure), and BAAQMD.

To further prevent impacts from the potential release of ACM or LBP, an ACM and LBP survey of existing buildings and structures prior to the commencement of any demolition or renovation is required under BAAQMD Regulation 11, Rule 2, *Asbestos Demolition, Renovation, and Manufacturing*. Lead

emissions are similarly controlled under Regulation 11, Rule 1, *Lead*. With compliance of existing laws and regulations, hazardous impacts related to the release of ACMs and LBP are not anticipated to occur. Compliance with these laws, regulations, and mitigation measures would be ensured through the County's development review and building plan check process.

Operation

Industrial uses and some commercial uses utilize greater amounts of hazardous materials than do other uses such as residential uses and schools. The proposed General Plan could facilitate the development of up to 1.2 million square feet of new commercial space and 5 million square feet of new industrial space in the EIR Study Area. Uses of hazardous materials in operations of land uses permitted under the proposed General Plan would be subject to regulations enforced by the same agencies as for uses of hazardous materials in construction.

However, per Chapter 83-63, *Land Use Permits for Development Projects Involving Hazardous Material*, of the County Ordinance Code, the operation or expansion of hazardous waste facilities is required to comply with the County Hazardous Waste Management Plan, which identifies siting criteria, siting principles, and other policies applicable to hazardous waste facilities. Businesses that generate any amount of hazardous waste or handle hazardous materials equal to, or greater than, program threshold quantities are also required to obtain a Hazardous Materials (CUPA) Permit per Chapter 450-2, *Hazardous Materials Release Response Plans and Inventories*. Under these regulations, businesses would be required to provide workers with training on safe use, handling, and storage of hazardous materials. Businesses would maintain equipment and supplies for containing and cleaning up spills of hazardous materials that could be safely contained and cleaned by onsite workers; and would immediately notify emergency response agencies in the event of a hazardous materials release that could not be safely contained and cleaned up by onsite personnel.

Furthermore, the proposed Health and Safety Element contains goals, policies, and actions that require local planning and development decisions to consider impacts that contribute to the risk of loss, injury, or death as a result of hazardous materials releases. The proposed policies and actions under Goal HS-9 that are italicized in Section 5.9.3.1, *Proposed General Plan Goals, Policies, and Actions*, of the DEIR, would serve to minimize potential adverse impacts from hazardous materials, including by proposing more stringent regulation on certain hazardous material uses. For example, Policy HS-P9.5 would require industrial projects involving use, management, or generation of hazardous materials or waste, particularly those utilizing stationary or fixed storage tanks, in areas at risk from sea-level rise, surface or emergent groundwater flooding, or tsunami to incorporate best management practices to reduce risk and prepare plans for prevention and remediation of hazardous materials/waste releases resulting from inundation. Policy HS-P9.10 specifically prohibits hazardous waste facilities in ecologically sensitive areas or areas at-risk of flood and geologic hazards. Policies HS-P9.10, HS-P9.11, and HS-P9.12 would also help to ensure that hazardous waste facilities are assessed and sited in compliance with SB 673 (Health and Safety Code Sections 25200.21(b) and (c)).

Furthermore, the proposed Health and Safety Element contains goals, policies, and actions that require local planning and development decisions to consider impacts that contribute to the risk of loss, injury, or death as a result of hazardous materials releases. The proposed policies and actions under Goal HS-9 that are italicized in Section 5.9.3.1, *Proposed General Plan Goals, Policies, and Actions*, would serve to minimize potential adverse impacts from hazardous materials, including by proposing more

stringent regulation on certain hazardous material uses. For example, Policy HS-P9.5 would require industrial projects involving use, management, or generation of hazardous materials or waste, particularly those utilizing stationary or fixed storage tanks, in areas at risk from sea-level rise, surface or emergent groundwater flooding, or tsunami to incorporate best management practices to reduce risk and prepare plans for prevention and remediation of hazardous materials/waste releases resulting from inundation. Policy HS-P9.10 specifically prohibits new hazardous waste facilities in ecologically sensitive areas or areas at-risk of flood and geologic hazards. Policies HS-P9.10, HS-P9.11, and HS-P9.12 would also help to ensure that hazardous waste facilities are assessed and sited in compliance with SB 673 (Health and Safety Code Sections 25200.21(b) and (c)).

Proposed CAAP

The proposed CAAP is a policy document that aims to reduce greenhouse gas (GHG) emissions and help the County to adapt to changing climate conditions and is therefore not expected to result in any specific impacts with regard to the use, transport, or disposal of hazardous materials. Strategies and actions included in the proposed CAAP could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP. However, future construction of these physical infrastructure improvements and other related development would be unlikely to involve the transport or disposal of hazardous materials. Additionally, all future construction would be subject to the applicable federal, State, and local regulations outlined above.

Furthermore, in addition to including strategies that aim to reduce GHG emissions, the proposed CAAP includes a suite of climate adaptation strategies aimed at responding to the key vulnerabilities identified in the County's vulnerability assessment. As noted in Section 5.9.1.2, *Existing Conditions*, of the DEIR, this assessment identified several existing industrial and hazardous waste facilities located within areas at risk of climate hazards, including flooding, landslides, and wildfire. Strategies that address these hazards include Strategy NI-1 and its accompanying actions that aim to protect the community against permanent and temporary inundation from rising sea levels and shoreline flooding through green infrastructure, effective building siting and retrofits, and informed land use decisions; Strategy NI-2 and its actions that aim to increase community resilience to the direct and indirect effects of wildfires; and Strategy NI-6 and its actions that include a broader suite of actions aimed at protecting existing and future development from hazards including by considering projected impacts of climate change when siting, designing, and identifying the construction and maintenance costs of capital investment projects. These strategies and actions would help to reduce impacts from climate-related hazards to existing and future development in the county, including facilities and uses that involve the handling of hazardous materials.

Therefore, adoption of the proposed CAAP would primarily result in beneficial impacts with regard to hazardous material use, transport, and disposal, and would therefore have less than significant impacts.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the routine transport, use, or disposal of hazardous materials. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.9-2: Implementation of the proposed project could facilitate development of a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5, but would not create a significant hazard to the public or the environment. [Threshold H-4].

Proposed General Plan

As indicated in Table 5.9-1 *Active Hazardous Materials Sites in the EIR Study Area*, and in Figure 5.9-1, *Active Hazardous Material Sites*, of the DEIR, there are multiple sites identified in the EIR Study Area that are considered active, open, or in need of further review for hazardous material cleanup. Redevelopment of these sites for development under the proposed General Plan could potentially expose future residents and workers to hazards from known hazardous materials releases on and near the sites.

However, development would be conducted in accordance with the proposed General Plan and the regulations and policies of the agency assigned to the site (i.e., DTSC, Water Quality Control Board, CUPA, or USEPA). Environmental site assessments by a qualified professional would also be required as applicable to ensure that the relevant projects would not disturb hazardous materials on any of the hazardous materials sites or plumes of hazardous materials diffusing from one of the hazardous materials sites, and that any proposed development, redevelopment, or reuse would not create a substantial hazard to the public or the environment. Phase I Environmental Site Assessments are also required for land purchasers to qualify for the Innocent Landowner Defense under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and to minimize environmental liability under other laws such as Resource Conservation and Recovery Act (RCRA). Properties contaminated by hazardous substances are also regulated at the local, State, and federal level and are subject to compliance with stringent laws and regulations for investigation and remediation. For example, compliance with the CERCLA, RCRA, California Code of Regulations Title 22, and related requirements would remedy all potential impacts caused by hazardous substance contamination.

Furthermore, requirements for hazardous materials sites are bolstered by various goals, policies, and actions of the proposed General Plan, including those discussed in Impact 5.9-1 of the DEIR. Additional relevant General Plan policies and actions included under Goal HS-10 specifically address efforts to ensure that future and existing development would not be impacted by historic hazardous material releases. These include Policy HS-P10.2, which requires development of contaminated sites to comply with all cleanup plans, land use covenants, and deed restrictions imposed by the DTSC or RWQCB, and Action HS-A10.2, which directs the County to establish a mechanism to ensure that new or expanded industrial uses involving hazardous materials will fund any needed cleanup of resulting contamination.

Compliance with existing regulations and adherence to proposed General Plan goals, policies, and actions would ensure that impacts from the proposed project would be less than significant.

Proposed CAAP

As indicated in the discussion of the proposed CAAP in Impact 5.9-1, this policy document is not expected to result in any specific impacts with regard to hazardous materials, including development on a hazardous material release or cleanup site. The proposed CAAP does not include strategies or

actions specific to hazardous materials and contaminated sites; however, as noted above, several CAAP strategies and actions would help to increase the County's ability to adapt to climate change-related hazards and increase resiliency against these hazards. As such, the proposed CAAP would have no impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to being located on or near hazardous listed sites. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.9-3: Development under the proposed project would not result in a safety hazard or excessive noise for people residing or working within two miles of an airport. [Threshold H-5].

Proposed General Plan

Airport-related hazards are generally associated with aircraft accidents, particularly during take-off and landing. Airport operation hazards include incompatible land uses, power transmission lines and tall structures that penetrate airspace operational areas, visual distractions, and wildlife hazards (e.g., bird strikes). In accordance with State law, the Contra Costa County Airport Land Use Commission adopted an Airport Land use Compatibility Plan (ALUCP). The ALUCP sets land use compatibility and design criteria applicable to all development, including residential, that is within a certain distance from one of the County's two public airports. The ALUCP was updated in 2022 to implement the Byron Development Program. This effort included updates with new policies and maps specific to Byron Airport that reflect the 2017 Airport Layout Plan for Byron Airport, the 2005 Byron Airport Master Plan, and guidance set forth in the most recent version of the Caltrans California Airport Land Use Planning Handbook.

The proposed General Plan would allow for the development of sites that are within the Safety Zones of the Buchanan Field Airport or Byron Airport, as shown in Figure 5.9-2, *Buchanan Field Airport and Byron Airport Safety Zones*, of the DEIR. However, all potential development within each airports' Safety Zones would be required to comply with the provisions for development within the ALUCP, which restricts the heights of structures pursuant to FAA Part 77 regulations. The height regulations are also adopted within the County Ordinance Code under Chapter 86.4, Airport Zoning, for the Buchanan Field Airport. Additionally, pursuant to Section 21096 of the Public Resources Code, the County must consider during future environmental review whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area. In addition to the provisions of the ALUCP, the FAA and Caltrans Division of Aeronautics provide guidance for land use safety near airports. With adherence to these guidelines, high concentrations of people will not be exposed to potential airplane accidents along runways or near airports while airplanes are departing and arriving. There are also guidelines on the placement of housing, schools, and other sensitive land uses near airports because of the noise pollution caused by airplanes (see also Section 5.13, *Noise*, of the DEIR).

The proposed General Plan also includes several policies under Goal TR-7 of the Transportation Element that would help to ensure that development is compliant with the airport land use requirements. These include Policy TR-P7.4, which directs the County to protect its airports from

encroachment by incompatible uses and minimize the public's exposure to safety hazards and excessive noise by ensuring that all future development within each Airport Influence Area is consistent with the Contra Costa County ALUCP. Additionally, Policies TR-P7.5 and TR-P7.6 further reinforce the County's commitment to land use compatibility by directing the County to support existing and planned airport activities consistent with each airport's respective Airport Master Plan and the ALUCP.

With adherence to applicable procedures and requirements described above, future development projects under the proposed project would not contribute to airport-related hazards and the impact would be less than significant.

Proposed CAAP

As indicated in the discussion of the proposed CAAP in Impact 5.9-1 and Impact 5.9-2, the CAAP is a policy document and is not expected to result in any specific impacts with regard to hazards, including safety and noise hazards associated with development in proximity to an airport. The proposed CAAP does not include any strategies or actions specific to airports or airport-related hazards. Therefore, the proposed CAAP would have no impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to development within an airport land use plan. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.9-4: Development under the proposed project could affect the implementation of an emergency responder or evacuation plan. [Threshold H-6].

Proposed General Plan

As shown in Figure 5.9-4, *Evacuation Routes*, of the DEIR, major evacuation routes for the county include a large network of interstate freeways, state routes, arterial streets, and minor roads that feed into the higher capacity evacuation routes. However, as shown in Figure 5.9-5, *Single-Access Road Residential Parcels*, of the DEIR, many residential areas in the EIR Study Area have access to only one viable evacuation route, which presents a significant risk to safe evacuation for existing and future residents of these areas. As discussed in greater detail within Section 5.7, *Geology and Soils*, Section 5.10, *Hydrology and Water Quality*, and Section 5.18, *Wildfire*, of the DEIR, many areas of the county are vulnerable to hazards including earthquakes, liquefaction, landslides, flooding, and wildfire. Any disasters involving these hazards can cause damage to transportation infrastructure, preventing or impeding access by emergency responders and evacuation by residents. In addition, future development under the proposed General Plan would result in construction activities that could temporarily affect roadways as a result of lane closures or narrowing for roadway and/or utility improvements. This could affect emergency response times or evacuation routes. By increasing the residential and daytime population in the EIR Study Area, traffic congestion may increase in some areas as well. Therefore, in the event of an accident or natural disaster, evacuation plans and routes could be adversely affected by the increased traffic.

To address such impacts, the County has adopted and continually updates an LHMP. The LHMP reduces injury, loss of life, property damage, and loss of services from natural disasters and provides a

comprehensive analysis of the natural and human-caused hazards that threaten the county, with a focus on mitigation. This allows the County to remain eligible to receive additional federal and State funding to assist with emergency response and recovery, as permitted by the federal Disaster Mitigation Act of 2000 and California Government Code Sections 8685.9 and 65302.6. In addition to the LHMP, the County implements the EOP and a Community Wildfire Protection Plan (CWPP) to address emergency response and wildfire mitigation planning. Contra Costa County also participates in implementing regional plans, including the Bay Area Multi-Jurisdictional Hazard Mitigation Plan, to provide the framework for responding to major emergencies or disasters.

Additionally, several proposed General Plan Health and Safety Element policies and actions support the update and implementation of the County's LHMP and other emergency planning efforts, as described in Impact 5.9-4, Section 5.9, *Hazards and Hazardous Materials*, of the DEIR.

Implementation of these proposed General Plan policies would ensure that development under the proposed General Plan would not affect the implementation of an emergency responder or evacuation plan, resulting in a less-than-significant impact.

Proposed CAAP

As indicated in the impact discussions above, the proposed CAAP is a policy document that provides strategies to reduce GHG emissions and improve climate resiliency and adaptation. As such, all strategies and actions within the proposed CAAP inherently support the implementation of emergency responder and evacuation plans, while some directly address County efforts for emergency planning. For example, Strategy NI-3 and its accompanying actions direct the County to establish and maintain community resilience hubs with microgrids, education, training opportunities, and other community-focused resources, in line with the policies and actions included under proposed Health and Safety Element Goal HS-12. Therefore, the proposed CAAP would have no impact on emergency response and evacuation plans.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to interference with an emergency response or evacuation plan. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

10. Hydrology and Water Quality

Impact 5.10-1: Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. [Threshold HYD-1].

Proposed General Plan

Construction Impacts

Clearing, grading, excavation, and other construction activities have the potential to impact water quality due to soil erosion and increases in the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. The refueling and parking of construction vehicles and other equipment on-site during

construction may result in oil, grease, or related pollutant leaks and spills that could discharge into the storm drain system.

To minimize these potential impacts, future development that disturbs one acre or more of land would require compliance with the Construction General Permit (CGP) Order WQ 2022-0057-DWQ, which includes the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). A SWPPP requires the incorporation of best management practices (BMPs) to control sediment, erosion, and hazardous materials contamination of runoff during construction and prevent contaminants from reaching receiving water bodies. The CGP also requires that prior to the start of construction activities, the project applicant must file Permit Registration Documents (PRDs) with the State Water Resources Control Board (SWRCB), which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, and SWPPP. The construction contractor is required to maintain a copy of the SWPPP at the site and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, the project applicant is required to provide proof of filing of the PRDs with the SWRCB and Contra Costa County.

Submittal of the PRDs and implementation of the SWPPP throughout the construction phase of the future development through implementation of the proposed General Plan would address anticipated and expected pollutants of concern from construction activities. As a result, water quality impacts associated with construction activities would be less than significant.

Operational Impacts

Future development has the potential to generate pollutants, such as nutrients, pesticides, sediment, trash and debris, oxygen demanding substances, oil and grease, and pathogens. These pollutants could eventually end up in stormwater discharged from the site and impact downstream watercourses. However, development under the proposed General Plan would be subject to the MS4 permit issued by the San Francisco Bay RWQCB, which was recently updated and reissued in December 2022. Project applicants would also need to comply with the requirements outlined in the CCCWP's *Stormwater C.3 Guidebook*. The Guidebook is updated periodically to reflect the latest MS4 permit requirements; therefore, future development under the proposed General Plan would need to comply with the latest thresholds listed for the area and the reissuance of the MS4 permit.

All projects that create or replace between 2,500 and 5,000 square feet of impervious surface must submit a Stormwater Control Plan for a Small Land Development Project, as described in CCCWP's *Stormwater C.3 Guidebook*. The project applicant also must incorporate at least one of the control measures listed in the guidebook:

- Disperse runoff from the roof or paved area to a vegetated area.
- Incorporate some amount of permeable pavement.
- Include a cistern or rain barrel, if allowed by the municipality.
- Incorporate a bioretention facility or planter box.

The 2022 revised MS4 permit has new stricter criteria for what constitutes a Regulated Project. Prior to July 1, 2023, approved projects that created or replaced more than 10,000 square feet of impervious surface were considered Regulated Projects. Effective July 1, 2023, approved projects that meet the following thresholds are considered Regulated Projects:

- A single-family home that is not part of a larger development that creates and/or replaces 10,000 square feet or more.
- All other projects that create and/or replace between 5,000 square feet and one acre of impervious surface. This now includes road and sidewalk repair projects that are greater than 5,000 contiguous square feet and road reconstruction and pavement widening that is greater than one contiguous acre.

These Regulated Projects are required to prepare a Stormwater Control Plan (SCP) that incorporates low impact design (LID) features. The SCP must include site design features that protect natural resources, source control measures that reduce pollutants in stormwater, and stormwater treatment measures that temporarily retain and treat stormwater on-site prior to discharge to the storm drain system. The project applicant must also prepare an Operation and Maintenance Plan that details how the stormwater treatment measures will be inspected and maintained and provide a maintenance agreement that “runs with the land” for perpetuity.

The SCP would demonstrate that runoff from impervious areas is either dispersed to landscape or routed to a properly designed LID treatment facility. LID is an approach to land development (or redevelopment) that works with nature to manage stormwater as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features and minimizing impervious surfaces. There are many options for LID features, including bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and directs runoff to natural landscape features. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological function.

In addition, projects that create and/or replace one acre or more of impervious surfaces must comply with the hydromodification requirements of the MS4 permit, unless exempted. This requires the design and construction of stormwater treatment measures so that post-project runoff rates and durations match the pre-project runoff rates and durations for ten percent of the 2-year peak flow up to the pre-project 10-year peak flow. Since the proposed General Plan does not include specific or detailed development plans, SCPs are not required at this time. New development and redevelopment projects within the EIR Study Area will be required to prepare SCPs consistent with the guidance in the CCCWP Stormwater C.3 Guidebook and the MS4 permit at the time of project application.

As part of the statewide mandate to reduce trash within receiving waters, the County is required to adhere to the requirements of the California Trash Amendments and is also required to adhere to Provision C.10 of the San Francisco Bay MS4 permit. This includes the installation and maintenance of trash screening devices at all public curb inlets, grate inlets, and catch basin inlets or control measures for full trash capture equivalency. The trash screening devices must be approved by the SWRCB. Additionally, all development that discharges storm water associated with industrial activity must also comply with the requirements of the General Industrial Permit (Order No. 2014-0057-DWQ, last amended in 2018).

As described above in Section 5.10.3.1, *Proposed General Plan Goals, Policies, and Actions*, of the DEIR, the proposed Conservation, Open Space, and Working Lands and Public Services and Facilities Elements of the proposed General Plan contain goals, policies, and actions that require local planning

and development decisions to consider impacts to water quality. Compliance with and implementation of these proposed General Plan goals, policies, and actions, in conjunction with the CCCWP and MS4 permit requirements, would ensure that development pursuant to the proposed General Plan would not violate any water quality standards or waste discharge requirements for both construction and operational phases, and impacts would be less than significant.

Proposed CAAP

The proposed CAAP focuses on the reduction of GHG emissions and help the County adapt to changing climate conditions. As part of the proposed CAAP's strategies to reduce water use and increase drought resilience (DR), provisions which ensure sustainable and diverse water supply are encouraged. For example, Strategy DR-2 includes actions that encourage the County Environmental Health Division to work with Groundwater Sustainability Agencies (GSAs) to ensure sustainable yield goals are met through hydrogeological evaluations in areas with known water shortages and that discourage new development that may lead to negative groundwater quality impacts. Therefore, implementation of the proposed CAAP would likely be beneficial and would result in a less than significant effect on water quality.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to water quality. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.10-2: Implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. [Threshold HYD-2]

Proposed General Plan

Groundwater Use

Five of the eight groundwater basins within Contra Costa County are categorized as very low priority basins and there is no groundwater withdrawal from these basins for municipal water supply. East Bay Municipal Utility District (EBMUD) and Contra Costa Water District (CCWD) are the main water purveyors in Contra Costa County. EBMUD's service area is generally in the western portion of the county and CCWD's service area includes most of central and northeastern Contra Costa County.

Although EBMUD does pump groundwater from the Santa Clara Valley – East Bay Plain groundwater basin, most of its water supply is from surface water sources. Because of saltwater intrusion issues, there are no municipal groundwater wells in the northern portion of this groundwater basin that is within the county. Therefore, implementation of the proposed General Plan would not have a significant impact on groundwater supply in this basin. CCWD's water supply is surface water from the Central Valley Project (CVP) and CCWD does not use groundwater to meet its demands.

The Diablo Water District obtains approximately 20 percent of its total water supply from groundwater wells that are located within the San Joaquin Valley-East Contra Costa groundwater basin. This has been designated as a medium priority basin by DWR and is not in overdraft. The Diablo Water District is one of the GSAs for the East Contra Costa Subbasin Groundwater Sustainability Plan (GSP). The

GSP states that there are no signs of over pumping in this groundwater subbasin, and groundwater conditions reflect stability over the past 30 years. In addition, the Diablo Water District passed Regulation No. 10, Groundwater Sustainability and Protection, in 2021, which requires new residential developments and non-residential groundwater wells to install groundwater monitoring wells, connect to a recycled water system (if developed), provide access to groundwater elevation data, and perform regular water quality testing. Although Diablo Water District plans to install additional groundwater wells to supplement its surface water supply with future growth, compliance with the provisions of the GSP and Regulation No. 10 will ensure that there are no substantial decreases in groundwater supplies or interferences with sustainable groundwater management of the basin.

Bay Point, Discovery Bay, and Byron in eastern Contra Costa County have small community systems that rely on groundwater provided by Golden State Water Company and the Town of Discovery Bay Community Services District. These water agencies pump a total of 2,000 and 3,224 acre-feet per year of groundwater. Golden State Water Company pumps groundwater from the Pittsburg Plain Basin, which is a very low priority basin because of minimal groundwater use and the availability of surface water supplies. Therefore, a GSP is not required for this basin. The Town of Discovery Bay Community Services District relies solely on groundwater, but it is a GSA with the East Contra Costa Subbasin GSP. As stated previously, the GSP indicates that the East Contra Costa Subbasin is being operated within its sustainable yield and projected future growth in this area is modest. Therefore, additional development in these areas would not substantially impact groundwater supplies. In addition, the Contra Costa County Ordinance Code 81-56 § 1 states that any property needing water for domestic purposes must demonstrate an approved water supply and obtain written approval from the health officer for such development.

Additionally, future development pursuant to the proposed General Plan would be required to implement the water-efficient requirements specified in the CALGreen and California Plumbing Codes and the Model Water Efficient Landscape Ordinance requirements for water efficient landscaping. As specified in California Water Code Section 10910, future projects subject to CEQA that also meet the criteria under California Water Code Section 10912 would be required to prepare a Water Supply Assessment (WSA) that demonstrates that project water demands would not exceed water supplies. In addition, residential, commercial, and industrial water usage can be expected to decrease in the future as a result of the implementation of water conservation practices.

Groundwater Recharge

Although new projects pursuant to the proposed General Plan would increase the amount of impervious surfaces and could potentially impact groundwater recharge, these projects would be required to implement BMPs and LID measures, which include on-site infiltration, where feasible. The MS4 permit and the CCCWP *Stormwater C.3 Guidebook* require site design measures, source control measures, stormwater treatment measures, and hydromodification measures to be included in a SCP that must be submitted and approved by the County. These measures minimize the impact of impervious surfaces by including permeable pavement, drainage to landscape areas and bioretention areas, and the collection of rooftop runoff in rain barrels or cisterns. These measures would increase the potential for groundwater recharge and have a less than significant impact on groundwater levels.

If construction dewatering is required with future development within the EIR Study Area, a permit would need to be obtained from the County's Environmental Health Division for the construction of

dewatering wells. An application and permit fee are required and the water discharge location, whether it is the sewer system or storm drain, must be approved by the local Building Department. The applicant must also evaluate the impact of the dewatering system on neighboring wells or the potential of spreading contamination if near a cleanup site. Construction dewatering could have a temporary effect on the shallow groundwater aquifer, but this effect would be limited in terms of the quantity of water withdrawn and the duration of the withdrawal. Therefore, construction dewatering would not result in a significant impact in terms of groundwater recharge.

As described above in Section 5.10.3.1, *Proposed General Plan Goals, Policies, and Actions*, of the DEIR, the proposed Conservation, Open Space, and Working Lands Land Use, and Public Services and Facilities Elements of the proposed General Plan contain goals, policies, and actions that require local planning and development decisions to consider impacts to water quality and groundwater supply. Compliance with and implementation of these proposed General Plan goals, policies, and actions would serve to minimize potential adverse impacts on groundwater.

Therefore, the proposed project would not significantly interfere with groundwater recharge and would not substantially deplete groundwater supplies. Thus, impacts would be less than significant.

Proposed CAAP

The proposed CAAP focuses on strategies to reduce GHG emissions and foster a sustainable community. As part of the CAAP's strategies to reduce water use and increase drought resilience (DR), provisions which ensure sustainable and diverse water supply are encouraged. For example, Strategy DR-2 includes actions that encourage the County Environmental Health Division to work with GSAs to ensure sustainable yield goals are met through hydrogeological evaluations in areas with known water shortages and coordination with GSAs to expand opportunities for groundwater recharge. The CAAP also provides reduction strategies to minimize this increase in GHG emissions through water conservation, water efficient retrofits, water-wise landscaping, and graywater and recycled water programs. Implementation of the proposed CAAP would further reduce water demand as compared to the analysis provided above (and provided in Section 5.17 of the DEIR, *Utilities and Service Systems*). Therefore, impacts to groundwater supply and recharge are less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to groundwater supplies or recharge. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.10-3: Implementation of the proposed project would not 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; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 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 iv) impede or redirect flood flows. [Threshold HYD-3]

Proposed General Plan

Erosion and Siltation

All potential new development pursuant to the proposed General Plan would be required to implement construction-phase BMPs as well as post-construction site design, source control measures, and treatment controls in accordance with the requirements of the CGP, the MS4 Permit, and the CCCWP *Stormwater C.3 Guidebook*. Typical construction BMPs include silt fences, fiber rolls, catch basin inlet protection, water trucks, street sweeping, and stabilization of truck entrances and exits. Each new development or redevelopment project that disturbs one or more acre of land would also be required to prepare and submit a SWPPP to the SWRCB that describes the measures to control discharges from construction sites. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources.

Once potential future development projects have been constructed, there are C.3 requirements in the MS4 permit for new development or redevelopment projects that must be implemented and include site design measures, source control measures, LID, and stormwater treatment measures that address stormwater runoff and would reduce the potential for erosion and siltation. Site design measures include minimizing impervious surfaces, conserving the natural areas of the site as much as possible, and protecting slopes and channels from erosion. LID measures include the use of permeable pavements, directing runoff to pervious areas, and the construction of bioretention areas. The SCP must also include operation and maintenance procedures and an agreement to maintain any stormwater treatment facilities for perpetuity. Adherence to the streambed alteration agreement process under Sections 1601 to 1606 of the California Fish and Game Code would further reduce erosion and siltation impacts that may occur due to streambed alterations. Projects that create or replace one acre or more of impervious surface and are subject to hydromodification may not increase the erosion potential of the receiving stream over pre-project conditions. Compliance with these regional and local regulatory requirements will ensure that erosion and siltation impacts from implementation of the proposed General Plan would be less than significant.

Flooding On- or Off-Site

New development and/or redevelopment and changes in land uses could result in increases in impervious surfaces, which in turn could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause nuisance flooding in areas without adequate drainage facilities. However, all potential future development must comply with the requirements of the MS4 Permit and the CCCWP *Stormwater C.3 Guidebook*. Regulated projects must implement BMPs, including LID BMPs and site design BMPs, which effectively minimize imperviousness, temporarily detain stormwater on-site, decrease surface water flows, and slow runoff rates. Projects that create and/or replace one acre or more of impervious surface must also adhere to the hydromodification requirements of the CCCWP *Stormwater C.3 Guidebook* to ensure that post project runoff does not exceed pre-project runoff for 10 percent of the pre-project 2-year peak flow rate up to the pre-project 10-year peak flow rate. Adherence to these regulatory requirements would minimize the amount of stormwater runoff from new development and redevelopment within the EIR Study Area. Therefore,

the projects pursuant to the proposed General Plan would not result in flooding on- or off-site and impacts would be less than significant.

Stormwater Drainage System Capacity

As stated in the impact discussions above, an increase in impervious surfaces with new development or redevelopment could result in increases in stormwater runoff, which in turn could exceed the capacity of existing or planned stormwater drainage systems. However, municipalities within the county have storm drain master plans, green infrastructure plans, and capital improvement programs that account for future development and expansion of the storm drain system, as needed. Also, the Contra Costa County Flood Control and Water Conservation District (CCCFCWCD) has detailed Flood Control Zone and Drainage Area maps that are used to evaluate future development plans within each zone or area and determine if the existing storm drainage infrastructure is adequate to accommodate the proposed projects.

All potential future development and redevelopment projects would be required to comply with the MS4 permit requirements and follow the CCCWP *Stormwater C.3 Guidebook* when designing on-site stormwater treatment facilities. Hydrology studies and SCPs are subject to County review for projects in the unincorporated areas to verify that the on-site storm drain systems and treatment facilities can accommodate stormwater runoff from the site and would not exceed the capacity of downstream drainage systems at the point of connection. Also, implementation of the C.3 provisions for new development, which include LID design and bioretention areas, would minimize increases in peak flow rates and runoff volumes, thus reducing stormwater runoff to the storm drain system. In addition, the County requires the payment of drainage area fees before filing the final map for new subdivisions or prior to the issuance of a building permit. These fees are paid directly to the CCCFCWCD or via cities per fee collection agreements and the funds are used to construct new storm drain infrastructure and/or maintain or repair existing storm drain infrastructure, as needed. With implementation of these regulatory requirements, there would not be a significant increase in stormwater runoff to the existing storm drain systems.

Also, new development pursuant to the proposed General Plan would not create substantial additional sources of polluted runoff. During the construction phase, projects would be required to prepare SWPPPs, thus limiting the discharge of pollutants from the site. During operation, projects must implement BMPs and LID measures that minimize the amount of stormwater runoff and associated pollutants.

With implementation of these control measures and regulatory provisions to limit runoff from new development sites, the proposed General Plan would not result in significant increases in runoff that would exceed the capacity of existing or planned storm drain facilities, and the impact is less than significant.

Redirecting Flood Flows

The discussion above regarding on- and off-site flooding is also applicable to the analysis of impeding or redirecting flood flows. Since new development projects are required to comply with MS4 permit requirements, implement the procedures in the CCCWP *Stormwater C.3 Guidebook*, and retain stormwater on-site via the use of LID design and bioretention facilities, any flood flows would also be retained for a period of time on-site, which would minimize the potential for flooding impacts. Impact

5.10-4 of the DEIR discusses the potential for impeding or redirecting flood flows with development in areas within the 100-year floodplain. Based on these discussions, impacts related to impeding or redirecting flood flows would be less than significant.

As described above in Section 5.10.3.1, *Proposed General Plan Goals, Policies, and Actions*, of the DEIR, the proposed Conservation, Open Space, and Working Lands, Health and Safety, Land Use, and Public Services and Facilities Elements of the proposed General Plan contain goals, policies, and actions that require local planning and development decisions to consider impacts of future development and redevelopment on erosion and siltation, surface drainage, and flooding. Compliance with and implementation of these proposed General Plan goals, policies, and actions, in conjunction with State and local requirements, would not result in substantial erosion or siltation and would not substantially increase the rate of surface runoff that would result in flooding, impede or redirect flood flows, or exceed the capacity of the drainage system. Impacts would be less than significant.

Proposed CAAP

The proposed CAAP focuses on the reduction of GHG emissions and includes strategies and actions for reducing these emissions in the water and wastewater sectors. As part of the proposed CAAP's strategies related to resilient communities and natural infrastructure (NI), provisions protect against and adapt to changes in sea levels and other shoreline flooding conditions. For example, Strategy NI-1 includes actions that establish requirements for new development to locate habitable areas above the highest expected water level for the lifetime of the project, support natural infrastructure that protects against sea-level rise and shoreline flooding, coordinate with State and regional agencies to prepare for sea-level rise adaptation, and identify opportunities for employing natural area buffers against sea levels. Therefore, implementation of the proposed CAAP would have a less than significant effect on erosion or siltation, storm drain capacity, flooding on- or off-site, or impeding or redirecting flood flows.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to erosion and siltation, flooding, stormwater drainage, redirecting flood flows, tsunamis, and seiches. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.10-4: Implementation of the proposed project would not risk release of pollutants due to project inundation if in a flood hazard, tsunami, or seiche zones. [Threshold HYD-4].

Proposed General Plan

Flood Hazard Zones

Implementation of the proposed General Plan could involve development of some projects in FEMA 100-year flood zones. As shown in Figure 5.10-3, *FEMA 100-Year and 500-Year Flood Zones*, of the DEIR, large areas around the north and the eastern portion of Contra Costa County are within the 100-year floodplain, as well as inland areas adjacent to creeks and streams.

Future development in these areas would be subject to Contra Costa County's Floodplain Management Ordinance. Prior to the start of construction or development within a Flood Hazard Area (i.e., 100-year floodplain or coastal high hazard area), the County requires project applicants to apply for a

Floodplain Permit from the Public Works Department and construct new development in accordance with the standards of construction in Article 82-28.1002. The standards of construction vary depending on where the proposed structure is located, but typically the finished floor must be elevated at least one to two feet above the base flood elevation. Prior to occupancy of any building, proof that a Letter of Map Revision (LOMR) and an elevation certificate have been submitted to FEMA must be provided to the County. Compliance with FEMA's NFIP requirements and the County's floodplain requirements would reduce potential flood hazards and ensure that pollutants are not released during flood inundation.

Sea-Level Rise

Similar to flood hazard zones, implementation of the proposed General Plan could involve development of some projects in areas that will be inundated by sea-level rise and associated coastal flooding. Future development under the proposed project within 100 feet of the San Francisco, San Pablo, or Suisan Bay shoreline would be subject to review and approval by Bay Conservation and Development Commission (BCDC). Future large shoreline projects, including shoreline protection projects, would be required to conduct a sea-level rise risk assessment and be designed to be resilient to a midcentury sea-level rise projection. BCDC requires that, if it is likely that the project will remain in place longer than midcentury, an adaptive management plan be developed to address the long-term impacts that will arise, based on the risk assessment.

Sea-level rise is also expected to raise groundwater levels, inundating areas with contaminated soils. Given that some contaminated sites in the county are located near the shoreline, rising groundwater associated with sea-level rise may cause the release of pollutants. Sea-level rise and associated groundwater rise are considered to be an effect of the environment on the project.

As explained in Chapter 5, *Environmental Analysis*, of the DEIR, the California Supreme Court has determined that the evaluation of the significance of project impacts under CEQA should focus on the potential impacts of the proposed project on the environment, including whether the proposed project may exacerbate any existing environmental hazards. Sea-level rise is an existing environmental hazard in Contra Costa County. The discussion in this section explains the potential of the proposed project to exacerbate impacts from sea-level rise. However, the effects of sea-level rise on the proposed project are not subject to CEQA review following the *California Building Industry Association vs. Bay Area Air Quality Management District* (CBIA vs. BAAQMD) case. Therefore, this EIR does not make a finding regarding level of impact from sea-level rise.

Dam Inundation

There are several portions of the county that are impacted by dam inundation zones. The probability of dam failure is low and there has never been a reported dam failure in Contra Costa County. In addition, dam owners are required to maintain EAPs that include procedures for damage assessment and emergency warnings. An EAP identifies potential emergency conditions at a dam and specifies preplanned actions to help minimize property damage and loss of life should those conditions occur. The Contra Costa County Office of Emergency Services maintains copies of the most recent dam EAPs and inundation maps and uses this information to notify downstream areas in the event of a dam failure. The likelihood of catastrophic dam failure is very low.

Tsunami and Seiches

Given that Contra Costa County has never been impacted by a tsunami, the risk of flooding and the release of pollutants due to a tsunami event is unlikely. The probability that tsunamis would impact San Francisco Bay and San Pablo Bay is much smaller than areas along the Pacific Coast because the bays are enclosed bodies of water. Due to the infrequent nature of tsunamis and relatively low predicted tsunami wave heights in the area, the county is reasonably safe from tsunami hazards. Also, the County's Floodplain Ordinance includes requirements for development within coastal high-hazard areas, which include tsunami zones. In addition, there are various precautions and warning systems that would be implemented by the County in the event of a tsunami. As discussed previously, seiches are unlikely to occur because tsunamis have frequencies too short to resonate within San Pablo and San Francisco Bay.

Summary

As described above in Section 5.10.3.1, *Proposed General Plan Goals, Policies, and Actions*, of the DEIR, the proposed Conservation, Open Space, and Working Lands, Health and Safety, Land Use, and Public Services and Facilities Elements of the proposed General Plan contain goals, policies, and actions that require local planning and development decisions to address the potential for flooding, dam inundation, and tsunamis. Compliance with and implementation of these proposed General Plan goals, policies, and actions, in conjunction with FEMA and County regulatory requirements regarding construction in 100-year floodplains, the potential impact that there would be a release of pollutants from flooding, dam inundation, tsunamis, or seiches would be less than significant.

Proposed CAAP

The proposed CAAP focuses on the reduction of GHG emissions and includes strategies and actions for reducing these emissions in the water and wastewater sectors. As part of the CAAP's strategies related to resilient communities and natural infrastructure (NI), provisions protect against and adapt to changes in sea levels and other shoreline flooding conditions. For example, Strategy NI-1 includes actions that establish requirements for new development to locate habitable areas above the highest expected water level for the lifetime of the project, support natural infrastructure that protects against sea-level rise and shoreline flooding, coordinate with State and regional agencies to prepare for sea-level rise adaptation, and identify opportunities for employing natural area buffers against sea levels. Therefore, implementation of the proposed CAAP would not result in any issues related to flooding and would have a less than significant impact on flood hazards.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the release of pollutants due to inundation of flood hazards, tsunamis, or seiche zones. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.10-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. [Threshold HYD-5].

Proposed General Plan

Adherence to the Construction General Permit, the MS4 permit, and the CCCWP *Stormwater C.3 Guidebook* would ensure that surface and groundwater quality are not adversely impacted during construction and operation of future development pursuant to the proposed General Plan. As a result, site development would not obstruct or conflict with implementation of the San Francisco Bay RWQCB's and the Central Valley RWQCB's Water Quality Control Plans (Basin Plans).

There are three groundwater basins within Contra Costa County that have GSPs. No water agencies are using groundwater from the Santa Clara Valley – East Bay Plain Subbasin as a municipal water supply source. The Livermore Valley Subbasin is managed by the Zone 7 Water Agency, which submitted an Alternative GSP. The groundwater basin is not in critical overdraft condition and the 2021 Alternative GSP demonstrates that the basin has continued to operate within its sustainable yield over a period of at least 10 years. The San Joaquin Valley – East Contra Costa Subbasin is not in critical overdraft and does not show any signs of over-pumping. In addition, the water purveyors within the Contra Costa County service area rely primarily on surface water, which accounts for more than 85 percent of their water supply.

As described in Section 5.10.3.1, *Proposed General Plan Goals, Policies, and Actions*, in the DEIR, the proposed Conservation, Open Space, and Working Lands, Land Use, and Public Services and Facilities Elements of the proposed General Plan contain goals, policies, and actions that require local planning and development decisions to consider impacts to groundwater supply and groundwater management. Therefore, future development and redevelopment as a result of the proposed project would not obstruct or conflict with any groundwater management plans, and the impact would be less than significant.

Proposed CAAP

The proposed CAAP focuses on strategies to reduce GHG emissions and foster a sustainable community. It provides reduction strategies to minimize increases in GHG emissions through water conservation, water efficient retrofits, water efficient landscaping, and graywater and recycled water programs. Proposed CAAP Strategy DR-2 includes actions that encourage the County Environmental Health Division to work with GSAs to ensure sustainable yield goals are met through hydrogeological evaluations in areas with known water shortages and coordination with GSAs to expand opportunities for groundwater recharge. The CAAP also provides reduction strategies to minimize this increase in GHG emissions through water conservation, water efficient retrofits, water-wise landscaping, and graywater and recycled water programs. Therefore, implementation of the proposed CAAP would not conflict or obstruct implementation of the Basin Plan or GSP, and impacts are considered less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the obstruction of a water quality or management plan. Accordingly, no changes or

alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

11. Land Use and Planning

Impact 5.11-1: Project implementation would not divide an established community. [Threshold LU-1]

Proposed General Plan

The project does not propose project-specific development. The design direction for the proposed General Plan is to improve access and mobility for existing and future residents by providing vehicular connections and non-motorized transportation options. The land use pattern proposed in the General Plan would increase development density and intensity in established community cores. The county provides access through these community cores and throughout the county via major roadways and transit and pedestrian pathways. Overall, the land uses in the proposed General Plan are largely consistent with existing development patterns.

No aspect of the proposed General Plan would divide existing communities in the county. In addition, the proposed General Plan includes provisions that directly address land use connectivity, compatibility, and encroachment of new development on existing neighborhoods and land uses, as detailed in Section 5.11, *Land Use and Planning*, of the DEIR.

Because implementation of the proposed General Plan would not divide established communities and it includes policies and a land use plan that improve connectivity, the impact would be less than significant.

Proposed CAAP

The proposed CAAP aims to reduce GHG emissions and improve resiliency to future climate conditions. The proposed CAAP does not involve any land use changes. As this is a policy document with no land use changes, the proposed CAAP would not have any significant physical environmental effects related to land use and planning. No impact would occur.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the division of an established community. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.11-2: Project implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]

Proposed General Plan

Plan Bay Area 2050

Plan Bay Area 2050 is a 30-year plan that charts a course for a Bay Area that is affordable, connected, diverse, healthy, and vibrant for all residents through 2050 and beyond. While Plan Bay Area 2050 does

not override local land use control, it provides guidance to local jurisdictions, including Contra Costa County, on how future development can be consistent with the State's GHG and VMT reduction goals. This includes constructing more infill development in downtowns and centers in close proximity to jobs and services.

The Land Use Element of the proposed General Plan sets the foundation for future growth, change, and preservation in the EIR Study Area. In addition to the policies identified in Impact 5.11-1, the following proposed General Plan goals and policies would serve to support the concepts in Plan Bay Area by encouraging infill and limiting the extent of development (Goal LU-2 and associated policies), supporting a sustainable development pattern that places a mix of jobs and housing in close proximity to each other and to transit (Goal LU-3 and associated policies), directing development to where there is already infrastructure and services (Goal LU-5 and associated policies, plus Policy LU-P7.6), and promoting mixed-use development (Goal LU-8 and associated policies).

The proposed General Plan goals and policies listed above would support the goals of Plan Bay Area. Accordingly, the proposed project would not conflict with or be inconsistent with Plan Bay Area 2050, resulting in a less-than-significant impact.

Airport Land Use Compatibility Plan

Areas within the unincorporated county and several cities are in Buchanan Field and Byron Airports' Safety Compatibility Zones, as shown in Figure 5.9-3, *Buchanan Field Airport and Byron Airport Safety Zones*, in Section 5.9, *Hazards and Hazardous Materials*, in the DEIR. These zones restrict certain land uses and heights of structures pursuant to Federal Aviation Administration Part 77 Regulations protecting airspace near the airport. All potential development within each airport's Safety Zones would be required to comply with the provisions for development in the ALUCP and FAA Part 77 regulations. In addition, proposed General Plan Policies TR-P7.4 through TR-P7.6 would serve to minimize impacts from development in close proximity to the airports.

In accordance with these policies, the County will continue to coordinate with agencies and jurisdictions regarding development in close proximity to the airports and ensure that future development is consistent with the ALUCP. Future development within airport influence areas would also be subject to review by the ALUC for a determination of consistency with the ALUCP. Therefore, the proposed project would not conflict with or be inconsistent with the ALUCP, resulting in a less-than-significant impact.

Delta Plan

The Delta Plan is a comprehensive long-term management plan for the Sacramento-San Joaquin River Delta. The Delta Plan includes rules and recommendations that support the State's goals for the Delta to: (1) improve water supply; (2) protect and restore a vibrant and healthy Delta ecosystem; and (3) preserve, protect, and enhance the unique agricultural, cultural, and recreational characteristic of the Delta. The proposed General Plan includes goals and policies that support these goals of the Delta Plan:

Policy COS-P7.1 requires new developments to reduce water consumption through the use of water-saving devices, efficient technology, landscaping strategies, and treated recycled water where available. Policy COS-P7.4 requires proof of adequate on-site groundwater during the development review

process for projects in areas without a water service provider and compliance with the County's well regulations ensuring the project will not significantly impact the aquifer or negatively affect existing development. Policy COS-P7.5 prohibits new developments that would create or significantly aggravate groundwater overdraft conditions, land subsidence, or other "undesirable results," as defined in Section 354.26 of the California Water Code. Policy COS-P7.6 supports having multipurpose water storage options that incorporate water supply, flood control, surface and groundwater storage, groundwater management, and ecosystem components. Policy COS-P8.1 protects public water supplies by preventing pollution from new sources in groundwater basins and watersheds and supporting efforts to acquire and protect reservoir watersheds. Policy COS-P8.5 requires having groundwater monitoring programs for all large-scale commercial and industrial facilities using wells and prohibit discharge of hazardous materials through injection wells. Policy COS-P9.1 promotes for having increased freshwater flow into, through, and from the Delta into San Francisco Bay, and support other efforts to protect and improve Delta water quality. Policy COS-9.2 supports having continued maintenance and improvement of Delta levees to protect water quality, ecosystems, agricultural land, and at-risk communities. Policy COS-P9.3 opposes all efforts to construct an isolated conveyance (such as a peripheral canal or tunnel) or any other water diversion system that reduces Delta water flows unless and until it can be conclusively demonstrated that such a system would protect, preserve, and enhance water quality and fisheries of the San Francisco Bay/Delta estuary system. Policy COS-P9.4 plans for land uses near shorelines that do not pose a threat to Bay or Delta resources, including water quality and shoreline and marshland habitats.

In addition, Delta Plan Policy DP P1 requires that any new residential, commercial, or industrial development must be limited to areas within the ULL, and also specifies that no new residential, commercial, or industrial development may occur on Bethel Island, even though it is inside the ULL unless it is consistent with the existing General Plan. Although the proposed General Plan would redistribute some of the existing General Plan development capacity on Bethel Island by expanding commercial uses and reducing residential uses, the proposed General Plan does not allow a net increase in allowed development on the island. Therefore, the proposed General Plan is consistent with this key Delta Plan policy.

Furthermore, proposed Policy LU-P6.1 directs the County to ensure that County projects and decisions on private development and land use activities in the Legal Delta are consistent with the Delta Plan. Overall, the proposed General Plan goals, policies, and land use map support the goals of the Delta Plan, and the impact is less than significant.

Land Use and Resource Management Plan for the Primary Zone of the Delta

As mentioned in Section 5.11.1.1, *Regulatory Background*, of the DEIR, the Land Use and Resource Management Plan guides local decisions related to agriculture, flood protection, Delta communities, natural resources, recreation, and utilities and infrastructure within the Primary Zone of the Delta. General plans and projects within the Primary Zone must align with the Plan and are subject to review by the Commission. As shown in Figure 5.11-1, *Sacramento-San Joaquin Delta*, in the DEIR, the Primary Zone extends into the eastern portion of the county, including the unincorporated areas of Winter Island, Jersey Island, Bradford Island, Web Tract, Quimby Island, Holland Tract, a portion of Knightsen, Veale Tract, Palm Tract, Orwood Tract, and Coney Island. The proposed General Plan would designate these areas as Public/Semi-Public, Parks and Recreation, Resource Conservation, Agriculture Core, and Agriculture Lands. These designations would maintain the primarily agricultural,

natural resource, recreation, and public service uses in these areas, which are consistent with the Land Use and Resource Management Plan. In addition, proposed Policy LU-P6.1 directs the County to ensure that County projects and decisions on private development and land use activities in the Legal Delta are consistent with the Land Use and Resource Management Plan. Therefore, the impact would be less than significant.

San Francisco Bay Plan

The San Francisco Bay Plan provides a formula for developing the Bay and shoreline to their highest potential while protecting the Bay as an irreplaceable natural resource. General plans and projects within the Bay Area must align with the San Francisco Bay Plan. The portions of the EIR Study Area that are covered by the San Francisco Bay Plan include the west and northwest portions of the unincorporated county along Suisun Bay and San Francisco Bay. The proposed General Plan includes policies aimed at protecting these areas and Bayshore resources. In particular, Policy COS-P9.3 directs the County to oppose all efforts to construct an isolated conveyance or any other water diversion system that reduces Delta water flows unless and until it can be conclusively demonstrated that such a system would protect, preserve, and enhance water quality and fisheries of the San Francisco Bay/Delta estuary system. In addition, Policy COS-P9.4 directs the County to plan for land uses along shorelines that do not pose a threat to Bay or Delta resources, including water quality and shoreline and marshland habitats. Furthermore, Policy LU-P9.4 directs the County to prioritize industrial land along the Bay and Delta for uses requiring deep-water access or large quantities of raw water and discourages the siting of other industrial uses at these locations. This would help to ensure the area along the Bay in the EIR Study Area is developed to its highest potential, as called for in the Bay Plan. Therefore, the proposed General Plan would be consistent with the Bay Plan and the impact would be less than significant.

East Contra Costa HCP/NCCP

As discussed in Section 5.4, *Biological Resources*, in the DEIR, the East Contra Costa County HCP/NCCP is intended to provide regional conservation and development guidelines to protect natural resources while improving and streamlining the permit process for take of State and federally listed species. The HCP/NCCP was developed by a team of scientists and planners with input from independent panels of reviewers and stakeholders. The proposed General Plan discourages conversion of land designated Resource Conservation or Parks and Recreation to urban uses and requires mitigation through the replacement of land with equal biologic, scenic, or recreational value if such conversion is to occur, per Policy COS-P1.3. Additionally, Policy COS-P4.2 encourages consistency with the HCP/NCCP by directing the County to support land conservation and restoration consistent with the HCP/NCCP and discourage development in areas where conservation is planned. Policies COS-P1.1 and COS-P1.2 also support the goals of the HCP/NCCP to protect open space and ecologically sensitive areas. As such, the proposed General Plan is consistent with the adopted HCP/NCCP in terms of land uses and habitat protection. Implementation of the General Plan would not conflict with the provisions of the East Contra Costa HCP/NCCP.

Summary

In summary, the proposed General Plan is the primary planning document for Contra Costa County. The proposed General Plan is intended in part to ensure consistency between the General Plan and updated State laws. As described above, it would support applicable land use plans adopted for the

purpose of avoiding or mitigating an environmental impact. The proposed General Plan is the overriding planning document for the county, and it would replace the current General Plan. Therefore, the impact would be less than significant.

Proposed CAAP

The proposed CAAP aims to reduce GHG emissions and improve resiliency to future climate conditions. The proposed CAAP does not involve any land use changes. As this is a policy document with no land use changes, the proposed CAAP would not have any significant physical environmental effects related to conflicts with land use plans adopted for the purpose of avoiding or mitigating an environmental impact. No impact would occur.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to conflicting with adopted plans aimed at avoiding or mitigating environmental effects. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

12. Noise

Impact 5.13-4: Implementation of the proposed project would not expose future residents to excessive levels of airport-related noise. [Threshold N-3].

Proposed General Plan

Aircraft noise in the county is typically characterized as occasional, and the majority of flights served by the Buchanan Field Airport and Byron Airport are for training or recreational purposes. Pursuant to Section 21096 of the Public Resources Code, the lead agency must consider whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area. Future housing development or other sensitive uses could be in areas that exceed the 60 dBA CNEL as a result of implementation of the proposed project. However, several proposed General Plan policies in the Transportation and Health and Safety Element would reduce impacts to a less than significant impact, as discussed in Impact 5.13-4, Section 5.13, *Noise*, in the DEIR.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions. The proposed CAAP would not directly result in any new development that would place sensitive receptors near airport noise sources, nor would it facilitate the development of new airstrips or airports. Therefore, impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to exposure of future residents to excessive levels of airport-related noise. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

13. Population and Housing

Impact 5.14-1: The proposed project would not induce substantial unplanned population growth in the EIR Study Area. [Threshold P-1].

Proposed General Plan

Future development in the EIR Study Area is projected to occur through approved and pending development projects and on vacant and underutilized parcels within unincorporated communities that are designated for a use that allows development. Therefore, the proposed General Plan could induce substantial, unplanned population growth directly or indirectly in any particular location. As of 2020, the EIR Study Area has a population of approximately 174,000 with about 64,000 homes. The proposed General Plan is projected to result in an increase of 23,200 new housing units and 65,600 new residents in the EIR Study Area by 2045. This equates to a 38-percent increase in housing units and a 36-percent increase in total population over the 25-year planning timeframe.

Approximately 33 percent of this residential growth would be required to fulfill the unincorporated county's 2023-2031 Regional Housing Needs Allocation (RHNA) of 7,610 units, which is growth dictated by California Housing Law and not the County. It is anticipated that future RHNA cycles will continue to dictate additional housing growth within the EIR Study Area after 2031 and through the proposed General Plan's 2045 horizon.

As shown in Table 5.14-6, *Summary of the EIR Area's Projected Growth (5-Year Increments)*, of the DEIR, regional projections for the EIR Study Area anticipate an approximately 12-percent increase in housing units and a 20-percent increase in population by 2040. The development potential under the proposed General Plan would allow for a 38-percent increase in housing units and population by 2045. Therefore, implementation of the proposed General Plan would exceed current regional projections for housing by 26 percent and population by 18 percent based on these factors alone. However, it is important to note that regional projections used were from Plan Bay Area 2040 and not the updated Plan Bay Area 2050 because the more recent Plan does not differentiate between Contra Costa County as a whole and the unincorporated portion of the county. In addition, Plan Bay Area relies on local general plan growth projections when preparing growth forecasts, so the proposed project would be incorporated into future growth forecasts.

The proposed Land Use Element serves as the blueprint for the development of public and private property in the EIR Study Area and sets the foundation for future growth, change, and preservation. Several Land Use Element policies and actions would serve to minimize potential adverse impacts related to growth, as discussed in Impact 5.14-1, Section 5.14, *Population and Housing*, of the DEIR. These policies and actions described would limit development to areas that are planned for urban uses and direct the County to monitor and control growth in the EIR Study Area to ensure it remains within the development projections analyzed in the EIR.

Although the proposed General Plan would accommodate population and housing growth that exceeds the Plan Bay Area 2040 projections, it would not introduce a substantial amount of unplanned population in the EIR Study Area because it will become the overriding policy document that plans for such growth. All potential future development would be required to adhere to the policy guidance described above, which limits development to areas that are already planned for urban uses, as well as

comply with any required site-specific infrastructure improvements and pay any project-specific impact fees. Therefore, implementation of the proposed General Plan would not induce substantial unplanned population growth either directly or indirectly and the impact is less than significant.

Proposed CAAP

The proposed CAAP does not include projects that would result in residential development nor an unanticipated increase in density or population growth outside of what was accounted for and projected within the proposed General Plan. Some CAAP strategies could promote the construction of utility-scale energy projects (e.g., solar, battery storage, substation, and transmission) and water facilities and supplies. However, these types of facilities would not directly serve residential uses such that they would induce population growth in their vicinity. Therefore, impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to population growth. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.14-2: The proposed project would not result in the displacement of people and/or housing. [Threshold P-2].

Proposed General Plan

Implementation of the proposed General Plan is projected to result in an increase of 23,200 housing units in the EIR Study Area over a 25-year horizon, contributing to a net increase in housing units. It is anticipated that residential development would occur on vacant sites, as well as through redevelopment on sites that may include existing housing units, although no major redevelopment projects are envisioned in the General Plan. Therefore, it is possible that construction activities could displace an unknown number of existing residents or housing units. However, all redevelopment would be voluntary in nature, and no housing units would be displaced without permission of the property owners.

In addition, the County's 6th Cycle Housing Element includes policies that minimize potential adverse impacts related to population and housing displacement. For example, Policy HE-P1.4 directs the County to maintain a condominium conversion ordinance aimed at mitigating the impacts to displaced tenants and ensuring the quality of the units being sold to homeowners. Also, Policy HE-P1.5 directs the County to preserve existing affordable housing developments at risk of converting to market-rate housing through bond refinancing and other mechanisms.

Because the proposed General Plan would allow a net increase of housing and does not envision substantial redevelopment projects, and because the existing Housing Element includes policies that protect existing neighborhoods and housing, the impact related to housing displacement would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include projects that would displace substantial numbers of existing people or housing. To the contrary, the proposed CAAP strategies and actions would support affordable housing, promote stability in housing, and otherwise support development as already anticipated by General Plan land use assumptions. Strategy BE-2 includes an action to create a detailed County road map to convert existing homes and business to use low-carbon or carbon-free appliances while supporting an equitable that minimizes the risk of displacement or disruptions. These retrofits and upgrades for new developments are not anticipated to displace substantial housing or population. This impact would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the displacement of existing people or housing. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

14. Public Services and Recreation

Impact 5.15-1: The proposed project could introduce new structures and residents into the CCCFPD, RHFPD, SRVFPD, and KFPD service boundaries, thereby increasing the requirement for fire protection facilities and personnel. [Threshold FP-1]

Proposed General Plan

As discussed under Section 5.15.1.1, *Environmental Setting*, of the DEIR, the EIR Study Area is served by several fire protection districts including the Contra Costa County Fire Protection District (CCCFPD), Rodeo-Hercules Fire Protection District (RHFPD), San Ramon Valley Fire Protection District (SRVFPD), and Kensington Fire Protection District (KFPD). The total growth projected in the unincorporated county by 2045 under the proposed General Plan is approximately 23,200 new housing units, 65,600 new residents, 1.2 million square feet of new commercial space, and 5 million square feet of new industrial space. The increase in population as a result of the proposed General Plan would be expected to generate the typical range of service calls, including fire, emergency medical service, and other incidents. New fire personnel, vehicles, and equipment would be required to provide adequate response times to serve future development. Therefore, the CCCFPD, RHFPD, SRVFPD, and KFPD's respective costs to maintain equipment and facilities and to train and equip personnel would also increase. However, the additional personnel and materials costs would likely be gradual as the increase in population would occur incrementally over time.

As detailed in the policies and actions included under Goal PFS-3 in the proposed Public Facilities and Services Element, future development would help to fund public facilities and services, including fire protection services. For example, Policy PFS-P3.2 requires that new development pay its fair share of public improvement costs for services based on the proportionate cost of serving the project. Action PFS-A3.2 would require the County to regularly update its development fees to support Policy PFS-P3.2. Policy PFS-P3.3 would require new development lacking sufficient infrastructure and facilities to implement a public facilities financing plan. The proposed General Plan's wildfire safety-related policies

within the Health and Safety Element would also ensure that new development is designed and operated under stringent safety standards, thereby reducing the demand on fire services.

As such, it would be possible to assess the need for additional fire and emergency medical service personnel and equipment and address these needs to ensure that adequate fire service response time standards are maintained. However, as a matter of information, if and when the construction or expansion of facilities to accommodate additional personnel or equipment should become necessary, CEQA review, General Plan provisions, Ordinance Code regulations, and payment of impact fees would all be required. The County would continue to monitor service needs and construct facilities as needed over time. The impact on fire protection and emergency medical response services would be less than significant.

Proposed CAAP

As a policy document that aims to reduce GHG emissions and to help the county to adapt to changing climate conditions, the proposed CAAP is not expected to result in any impacts with regard to fire protection services. Strategy BE-3 under the proposed CAAP would seek to accelerate the replacement of electricity generated by fossil fuels with electricity generated from renewable or carbon-free sources. To implement this strategy, the CAAP directs the County to work with CCCFPD and other organizations that provide fire protection services to promote participation in the Self-Generation Incentive Program and related efforts to provide education and incentives for battery storage programs. The Self-Generation Incentive Program is a statewide initiative to provide incentives for battery storage systems among other energy storage systems. While this action directs coordination with the county's fire protection districts to potentially provide increased fire protection services, it is not likely to result in the need for new facilities. Therefore, impacts from the proposed CAAP are considered less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the need for new or physically altered fire protection facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.15-2: The proposed project could introduce new structures and residents into the CCCOS service boundaries, thereby potentially increasing the requirement for police protection facilities and personnel. [Threshold PP-1].

Proposed General Plan

While no specific development proposals are directly associated with the proposed General Plan, theoretical development would result in an increase in population and thus an increase in demand for police protection services from the Contra Costa County Office of the Sheriff. As discussed under Impact 5.15-1 in the DEIR, development under the proposed General Plan could result in an increase of approximately 65,600 new residents in the county. As development occurs, there would be an increase in calls for service which may require additional police personnel. Future development is expected to generate the typical range of service calls. Additional police personnel, vehicles, and equipment would likely be required to provide adequate response times to serve future growth. Therefore, the County's costs to maintain equipment and facilities and to train and equip personnel

would also increase. However, the additional personnel and materials costs would likely be gradual as the increase in population would occur incrementally over time.

Several policies and actions proposed in the General Plan would ensure that future development would be provided police services and contribute to the funding of such services. As discussed under Impact 5.15-1, Policies PFS-3.2 and PFS-3.3 would require new development to pay its fair share of costs for public improvements and services or develop a public facilities financing plan in the event that existing infrastructure cannot adequately serve the development. Action PFS-A6.1 also directs the County to revise the County Ordinance Code to incorporate standards for new development that support a safe, accessible public realm for all through environmental design, thereby decreasing potential demand for police services. The County also currently levies land development impact fees to fund police services.

As such, it would be possible to assess the need for additional police personnel and equipment and address these needs to ensure that the law enforcement response time standards in the county are maintained. However, as a matter of information, if and when the construction or expansion of facilities to accommodate additional personnel or equipment could become necessary, CEQA review, proposed General Plan provisions, Ordinance Code regulations, and payment of impact fees would all be required. Therefore, the impact on police protection services would be less than significant.

Proposed CAAP

As a policy document that aims to reduce GHG emissions and to help the county to adapt to changing climate conditions, the proposed CAAP is not expected to result in any impacts with regard to police protection services. The CAAP does not include any strategies or actions that would result in a direct increase in demand for police protection services, nor does it otherwise address police services. As such, the proposed CAAP would have no impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the need for new or physically altered police facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.15-3: Development under the proposed project could generate new students who would impact the school enrollment capacities of area schools and result in the need for new and/or expanded school facilities, the construction of which could result in environmental impacts [Threshold SS-1].

Proposed General Plan

A significant impact would result if, in order for the school districts to adequately serve the EIR Study Area, increased school enrollment would require the construction of new facilities or the expansion of existing schools, the construction or operation of which would cause significant environmental impacts. New development under the proposed General Plan would cause an increase of student population over the next 20 years. The projected increase in students across the EIR Study Area would likely be gradual for the duration of the proposed project as more housing units are incrementally added to the EIR Study Area.

Under the proposed project, approximately 23,200 new housing units are projected to be developed across the unincorporated county by 2045. The average of all school districts' published single- and multi-family generation factors is 0.295 students per housing unit, per the student generation factors shown in Table 5.15-5. *Student Generation Factors for Contra Costa County School Districts*, from the DEIR. Therefore, approximately 6,844 new students would be added to the unincorporated county's student population from new residential development. Similarly, development under the proposed General Plan could result in 1.2 million square feet of new commercial space and 5 million square feet of new industrial space. If using West Contra Costa USD's 2020 student generation factor (SGF) for students per square foot of commercial/industrial space shown in Table 5.15-5, the resulting increase in student population from new commercial and industrial development is approximately 3,100 students. Therefore, approximately 9,944 total new students would be added to the unincorporated county over the planning horizon of the proposed project.

To ensure that school capacities are not exceeded from new development, the proposed Public Facilities and Services Element includes Policy PFS-P9.1 which directs the County to coordinate with affected school districts to ensure adequate school capacity is or will be available, school sites are designated or dedicated if necessary, and adequate access is provided, when reviewing new development proposals. Additionally, existing funding mechanisms would lessen potential impacts related to an increase in the student population. As detailed in Section 5.15.3.1, *Environmental Setting*, of the DEIR, all districts in the county are funded through the payment of development fees pursuant to SB 50/Government Code Section 65995 and County Ordinance 812. These fees are required to be paid by future development prior to issuance of building permits and would be used to offset the impact of the number of new students generated by the anticipated population increase under the proposed General Plan. Ultimately, the provision of schools is the responsibility of the school district. SB 50 provides that the statutory fees found in the Government and Education Codes are the exclusive means of considering and mitigating for school impacts. Imposition of the statutory fees constitutes full and complete mitigation (Government Code Section 65995[b]).

Furthermore, a school district and a development project have the option of entering into various alternative mitigation agreements to ensure the timely construction of school facilities to house students from new residential development. The primary financing mechanism authorized in these mitigation agreements is the formation of a community facilities district, pursuant to the Mello-Roos Community District Act of 1982. In lieu of an alternative mitigation agreement, State-mandated school facilities fees, which help maintain adequate school facilities and levels of service, may also reduce potential impacts, as described above.

The existing regulatory setting, including funding mechanisms, would ensure that potential impacts to school facilities and services with development under the proposed General Plan would be less than significant. Furthermore, the proposed General Plan includes goals and policies to maintain adequate levels of service for schools. Therefore, impacts would be less than significant.

Proposed CAAP

As a policy document that aims to reduce GHG emissions and to help the county to adapt to changing climate conditions, the proposed CAAP is not expected to result in any impacts with regard to school services. There are no strategies or actions in the proposed CAAP that relate to school services, nor

would the CAAP directly contribute to population growth in the EIR Study Area that would result in increased student population. Therefore, the proposed CAAP would have no impacts.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the need for new or physically altered school facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.15-4: Development under the proposed project could generate new residents in the county and result in the need for new and/or expanded library facilities, the construction of which could result in environmental impacts. [Threshold LS-1].

Proposed General Plan

Projected development under the proposed General Plan would result in the potential for increased demand for library services within the county to the extent that expansion and construction of new facilities could be required. As described above, the horizon-year projection for the proposed General Plan includes approximately 65,600 new residents in the county. To meet the future demand for library services, the proposed Public Facilities and Services Element would include Policy PFS-P10.3 which requires the County to ensure the County budget has adequate funding for maintaining and improving library services. Action PFS-A10.1 directs the County to develop library service and facility standards, while PFS-A10.2 directs the County to adopt a library impact fee to ensure that new development mitigates its impacts on library services.

Future development would also generate new tax revenues and funding sources for the Contra Costa Library System consisting of property taxes, State assistance, and revenue from fines, fees, and other miscellaneous revenue. Furthermore, development or expansion of libraries would be subject to the County's policies that protect environmental resources including environmental review and impact mitigation per CEQA. Impacts associated with development of new libraries are therefore determined to be less than significant.

Proposed CAAP

As a policy document that aims to reduce GHG emissions and to help the county to adapt to changing climate conditions, the proposed CAAP is not expected to result in any impacts with regard to library services. There are no strategies or actions in the proposed CAAP that relate to library services, nor would the CAAP directly contribute to population growth in the EIR Study Area that would result in increased population. Therefore, the proposed CAAP would have no impacts.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to new or physically altered library facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.15-5: The proposed project could generate additional residents that would increase the use of existing park and recreational facilities but would not require the

**immediate provision of new and/or expanded recreational facilities.
[Thresholds R-1 and R-2].**

Proposed General Plan

As discussed in Section 5.15.5.1, *Environmental Setting*, of the DEIR, a total of 108,393 acres of parks and recreation land are available to residents of the unincorporated county. This acreage includes regional park facilities managed by EBRPD, EBMUD, and CCWD, as well as State and federal park facilities. Development under the proposed General Plan would introduce approximately 65,600 new residents, which would increase the demand for parks and recreational facilities. The California Department of Finance's E-5 Population and Housing Estimates estimate the total 2023 population for Contra Costa County (incorporated and unincorporated) to be 1,147,653 people; based on that estimate, the existing total park acreage per 1,000 residents in all of Contra Costa County is 94.45. If no further parkland is added, the ratio of parkland per 1,000 population would decrease to 89 acres of parks per 1,000 residents when the projected residential buildout of the proposed General Plan is added to the county's total population. However, this is a very conservative assumption; it is expected that parks will be acquired, expanded, and/or made publicly accessible as part of private development over the horizon of the proposed General Plan.

As shown, the combination of existing local, regional, State, and national parks and recreation facilities exceed all targets for parks and recreation service standards for both the county's existing population and future population that includes the projected growth under the General Plan. In addition, while this calculation includes the total population of both the incorporated and unincorporated county to account for the use of regional park and recreational facilities, most incorporated jurisdictions also provide local parks and recreation facilities for their respective populations that have not been accounted for in this calculation. However, as noted in Table 5.15-6, *Contra Costa County Parks and Recreation Services Summary*, of the DEIR, most local districts and service areas providing parks and recreation facilities in the county do not currently provide enough service within their district to meet the County's existing service standard of four acres per 1,000 residents. As shown in the proposed Policy PFS-P8.2, the County aims to provide a local park within a safe 10-minute walk for all residents in urban communities or within a 5-minute drive for residents in suburban communities, as indicated in Figures PFS-9 and PFS-10 of the proposed Public Facilities and Services Element. While the county does not have a deficit of regional parks and recreation facilities, additional local facilities are likely needed to meet the existing and future demand of development.

To offset impacts from future development, all new projects must adhere to County Ordinance Code Division 720 (Ordinance No. 2007-17), which collects impact fees from new development to fund parks and recreation services. The County's continued implementation of park improvement and development projects would ensure that the adequate amount of parkland would be available. Each RPD and CSD (of those that provide parks and recreation services) also collect revenue from property taxes, assessments, and service charges to fund improvements, which in turn would serve to reduce the potential for deterioration of existing facilities. Several additional policies and actions under Goal PFS-8 of the proposed Public Facilities and Services Element would also help to provide adequate local facilities. For example, Policy PFS-P8.5 directs the County to require projects subject to the Park Dedication or Park Impact Fee Ordinances to develop parks and recreation amenities identified in, or proposed for addition to, the County's Park Capital Improvement Plan. Park impact fees or in-lieu fees

should be assessed only when the County determines developer improvements are not feasible. Action PFS-A8.3 would help to implement this policy by requiring an annual update of the park dedication and in-lieu fee requirements. Action PFS-A8.1 would also support local parks by creating a cross-agency County entity that coordinates the planning and funding of local parks, recreational facilities, and trails.

The estimated timing or location of new facilities or the exact nature of these facilities are not known, so project-specific environmental impacts that would occur from their construction and operation cannot be determined at this time. However, depending on the type, size, and location of new parks, the construction of new parks would be subject to environmental review and the mitigating policies and mitigation measures described in the EIR to ensure the impacts from the construction would be less than significant. The construction of project-specific parks would require permitting and review in accordance with County standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Therefore, the impact is considered less than significant.

Proposed CAAP

As a policy document that aims to reduce GHG emissions and to help the county to adapt to changing climate conditions, the proposed CAAP is not expected to result in any impacts with regard to parks and recreational services. As part of the CAAP's climate adaptation and equity strategies, the provision of parks for health and climate-related uses is encouraged. For example, Strategy NI-5, which aims to minimize the urban heat island effect through use of green infrastructure, tree, canopy, cool paint and pavement, and other emerging strategies, includes an action that encourages the County to plant trees in urbanized areas and open spaces which in turn promotes the creation of new or more inviting public spaces. Strategy CE-3 specifically targets the increase of access to parks and open space by encouraging the County to adopt a target to provide all residents a park or other green space within a half-mile of their dwelling, supporting land acquisition for new parks and open space areas and protecting such lands through fee title acquisition or through deed restrictions like conservation easements, continuing to construct and develop opportunities for new trails, and supporting investment in existing park facilities in partnership with regional agencies.

The proposed CAAP would not directly contribute to increased population growth in the EIR Study Area and includes several strategies and actions aimed at improving and providing parks and recreational facilities in the county. As such, the CAAP is expected to have beneficial impacts on parks and recreational facilities, resulting in a less than significant impact finding.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to new or expanded recreational facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

15. Transportation

Impact 5.16-1: Implementation of the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. [Threshold T-1].

Proposed General Plan

As discussed in Section 5.15.1.1, *Regulatory Background*, of the DEIR, several programs, plans, and policies guide the planning of circulation systems in the EIR Study Area. In general, the overarching goals of these policy documents are to ensure a safe, efficient, and accessible multi-modal transportation network for all users that also reduces VMT to improve air quality and reduce GHG emissions. As discussed in Chapter 3, *Project Description*, of the DEIR, the proposed General Plan would guide development in the unincorporated county to the planning horizon year of 2045, but it would not otherwise result in any immediate development actions and impacts to the county's circulation system. Therefore, impacts would be less than significant if the proposed General Plan goals, policies, and actions are consistent with and support the equivalent policy guidance of the applicable program, plan, ordinance, or policy.

While the proposed General Plan includes several policies and actions specific to roadway, bicycle, transit, and pedestrian facilities, as discussed below, the policies and actions listed under Goal TR-3 specifically target coordination and consistency with other agencies for the purpose of providing well-planned, funded, and maintained transportation facilities. For example, Policy TR-P3.1 would direct the County to coordinate planning, construction, and maintenance of streets, transit infrastructure, non-motorized rights-of-way and associated facilities, the countywide bicycle network, and Pedestrian Priority Areas with neighboring jurisdictions and Contra Costa Transportation Authority (CCTA). Action TR-A3.1 similarly directs the County to work with Caltrans, neighboring jurisdictions, CCTA, and the Regional Transportation Planning Committees (see Section 5.16.1.1 of the DEIR) to implement complete streets concepts. Action TR-A3.2 would also have the County partner with these agencies to explore and implement options for transportation system funding, including assessment districts, county service areas, impact fees, tax revenue, and other funding sources. Similarly, the policies and actions included in the proposed Growth Management Element also seek to ensure that the County develops consistent with its growth management requirements under Measure J. Each of these policies and actions, as listed above in Section 5.16.3.1, *Proposed General Plan Goals, Policies, and Actions*, of the DEIR, address coordination with other transportation-related agencies. These policies and actions, in addition to others shown under Goal TR-3 in Section 5.16.3.1, of the DEIR, and those discussed below related to specific transportation facility types, express a commitment to consistency with the planning efforts of other agencies and would help to ensure that the proposed project does not conflict with these efforts.

With regard to impacts of future development under the proposed General Plan, the County requires all development to go through a review of pedestrian, bicycle, and transit facilities in the area surrounding the individual development project to ensure that developments do not conflict with existing or planned facilities supporting those travel modes. Therefore, development under the proposed General Plan would not conflict with any adopted plans, policies, ordinances or programs related to circulation systems and impacts would be less than significant.

Roadway

CCTA implements and manages several countywide programs that direct circulation improvements on County roadways, including the Congestion Management Program (CMP) and Growth Management Program. These programs help to ensure that County roadway improvements are organized and funded. The County's Transportation Demand Management Ordinance (Chapter 82-32 of the County Ordinance Code) helps to implement these CCTA programs within the EIR Study Area. Development under the proposed General Plan would be subject to Transportation Demand Management (TDM) requirements in addition to transportation impact development fees, as applicable. Several proposed General Plan policies and actions also demonstrate compliance with and support CCTA's and the County's roadway-related programs. These include Policy TR-P1.4, which would reduce single-occupant vehicle use and vehicle miles traveled (VMT) by improving infrastructure, implementing supportive policies such as the TDM Ordinance, and enhancing public transit options, and Policy TR-P1.6, which directs the County to partner with CCTA and Caltrans to better manage traffic operations on the State highway system in the county. Action TR-A1.2 would ensure that the County reviews and updates County Ordinance Code Chapter 82-32 – Transportation Demand Management and the TDM guidelines at least every five years to incorporate best practices. Through these and other policies and actions throughout the Transportation Element, the proposed General Plan shows consistency with the goals and intent of the County/CCTA's roadway-related programs, plans, policies, and ordinances. Therefore, impacts are less than significant.

Bicycle and Pedestrian Facilities

Both CCTA and the County also manage and implement several bicycle and pedestrian-related planning efforts, including the Countywide Transportation Safety Policy and Implementation Guide and CBPP from CCTA, which focus on improving safety for and access to active transportation options across both the incorporated and unincorporated county, and the County's Active Transportation Plan (ATP), Vision Zero Action Plan, and Complete Streets Policy that promote similar goals and efforts within the jurisdiction of unincorporated Contra Costa County. The policies and actions included under Goal TR-5 of the proposed Transportation Element express the County's commitment to improving active transportation including by prioritizing construction of capital improvement project in the County ATP, per Policy TR-P5.3, and supporting the explicit goals of the Complete Streets Policy, per Policy TR-P5.1. Action TR-P5.8 would also support CCTA bicycle and pedestrian planning efforts by directing the County to partner with CCTA to build out the countywide bicycle and pedestrian network. Through these and other policies and actions throughout the Transportation Element, the proposed General Plan shows consistency with the goals and intent of the County/CCTA's bicycle and pedestrian facility-related programs, plans, policies, and ordinances. Therefore, impacts are less than significant.

Transit Service and Facilities

As discussed in Section 5.16.1.2, *Existing Conditions*, of the DEIR, the EIR Study Area is served by numerous transit agencies that provide residents opportunities for long-range and short-range travel across the county and Bay Area region. Each of these agencies have published planning documents that guide the provision of their services and update the documents as necessary to accommodate demand for service. Future potential development under the proposed General Plan would contribute to an increased use of transit in the EIR Study Area due to growth in population and employment.

However, several goals, policies, and actions within the proposed Transportation Element would support the goals of these agencies by encouraging enhanced transit access and increased coordination of service needs and opportunities in the county. For example, Policy TR-P1.8 would support improvement and expansion of passenger and commuter rail service countywide and Policy TR-P1.10 directs the County to enhance multi-modal access to all transit stops. Several actions under Goal TR-1 would also ensure that transit planning efforts are coordinated between the County and providers, including Action TR-A1.6 which directs the County to partner with transit providers, cities, and CCTA to develop a countywide transit stop program that takes a holistic approach to transit stop planning and construction. Action TR-A1.7 would have the County work with transit agencies to provide options for residents to report transit shelters and other amenities that are in disrepair.

Through these and other policies and actions throughout the Transportation Element, the proposed General Plan shows consistency with the goals and intent of transit agency's programs, plans, policies, and ordinances. Therefore, impacts are less than significant.

Summary

In summary, the proposed Transportation Element includes goals, policies, and actions that both support the goals of circulation-related planning efforts and requirements and specifically direct consistency and coordination with the county's circulation planning and other transportation-related agencies' efforts. All development under the proposed General Plan would be required to comply with existing transportation-related laws and policies as applicable, so impacts would be less than significant.

Proposed CAAP

As a policy document that aims to reduce GHG emissions and help the county to adapt to changing climate conditions, the proposed CAAP is not expected to result in any specific impacts with regard to conflicts with circulation-related policies and planning. Similar to the proposed General Plan, the proposed CAAP provides a policy framework that supports the goals of the transportation planning efforts discussed above. For example, Strategy TR-1 provides actions for improvements to walking, biking and other zero-carbon commuting options to reduce GHG emissions, which reference support of the County's TDM program, CCTA programs, and regional transit agencies. As such, the proposed CAAP is expected to result in beneficial impacts with regard to this impact and would have no significant impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to conflicting with a program, plan, ordinance, or policy addressing the circulation system. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.16-3: Implementation of the proposed would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). [Threshold T-3]

Proposed General Plan

While adoption of the proposed General Plan would not directly result in any physical development projects or construction activities, implementation of the policy framework in the proposed General

Plan could result in transportation improvement projects. While these types of improvements could be installed and implemented under the proposed General Plan, they would be intended to facilitate movement throughout the EIR Study Area and accommodate existing local development, and would therefore be unlikely to introduce conflicts, hazards, or incompatible uses.

All subsequent development under the proposed General Plan, including residential, commercial, and industrial development, in addition to transportation improvement projects, would be subject to and designed in accordance with County standards and specifications that address potential design hazards, including sight distance, driveway placement, and signage and striping. Additionally, any new transportation facilities or improvements to such facilities associated with subsequent projects would be constructed based on industry design standards and best practices consistent with the County Ordinance Code, building design and inspection requirements, and any applicable community-based transportation plans. The County's evaluation of projects' access and circulation will incorporate analysis with respect to County standards for vehicular level of service and queueing, as well as for service to pedestrians, bicyclists, and transit users.

Furthermore, the proposed Transportation Element provides additional guidance to help design a sustainable and comprehensive transportation system that is safe and accessible for all users and modes of travel. For example, the policies and actions included under Goal TR-2 provide several strategies for reducing roadway hazards and improving safety. Policy TR-P2.1 directs the County to pursue the priorities in the County's Vision Zero program and Policy TR-P2.2 advises careful site planning and prioritization of safety for active modes of travel. Action TR-A2.3 would require coordination with the California Public Utilities Commission and railroads to design and implement projects that address safety concerns and conflicts from at-grade rail crossings. In compliance with the County's standards and the proposed General Plan policies and actions, development under the proposed General Plan would result in a less-than-significant impact to transportation hazards.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions. While the proposed CAAP would not directly result in any new development, the implementation of its actions, which may indirectly result in new development, would be subject to the same County standards that apply to development under the proposed General Plan, as applicable. The proposed CAAP does not include any strategies or actions that would otherwise result in roadway hazards, so impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to hazards due to a geometric design feature or incompatible uses. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.16-4: Development associated with the proposed project would not result in inadequate emergency access. [Threshold T-3]

Proposed General Plan

The implementation of transportation improvements supported by the proposed project would include modifications to the existing transportation network that could potentially impact emergency access response times. These modifications, along with land use changes under the proposed General Plan, could result in increased vehicle delays at intersections as well as along roadway segments. Although the project would reduce VMT overall, as described in Impact Discussion 5.16-2, increased delays at intersections could result in an increase in emergency response times. However, future development under the proposed project would be subject to the requirements contained in the County Ordinance Code, which includes requirements for emergency access, and would be reviewed by public safety officials for compliance with applicable safety, fire, and building codes as part of the County's entitlement process.

Additionally, the proposed General Plan includes several policies and actions that would help to ensure that roadways accommodate emergency access, including Policy TR-P4.10 in the proposed Transportation Element, which would ensure that roadway infrastructure within new development areas balances the accommodation of emergency response vehicles with the day-to-day safety of vulnerable road users. Additionally, policies and actions in the proposed Health and Safety Element that apply to evacuation routes would have similar impacts on emergency access routes. These include Policy HS-P7.3, which requires new development within a Very High Fire Hazard Severity Zone in the Local Responsibility Area (LRA) or State Responsibility Area (SRA) or in areas that may be designated as the Wildland-Urban Interface (WUI), and on a residential parcel with evacuation constraints, to prepare a traffic control plan to ensure that construction equipment or activities do not block roadways or interfere with evacuation plans during the construction period; this policy would ensure that temporary roadway impairments are addressed within traffic control plans. In addition, Policy HS-P13.1 requires new development in High and Very High Fire Hazard Severity Zones, the WUI, and 100-year or 200-year floodplains to have access to at least two emergency evacuation routes. Action HS-A13.1 would direct the County to partner with cities and public protection agencies to delineate evacuation routes, identifying their capacity, safety, and viability under different hazard scenarios, as well as emergency vehicle routes for disaster response, and where possible, alternate routes where congestion or road failure could occur.

Furthermore, emergency vehicles are able to use vehicle preemption technology (where possible) and sirens to reduce their response times, and they would continue to do so regardless of any roadway capacity modification. Locations that would experience a reduction in vehicular roadway capacity would undergo individual operations analyses to assess the potential impacts to emergency vehicle access, and mitigation measures would be developed as needed to reduce potentially significant impacts.

Implementation of the proposed General Plan goals, policies, and actions identified would address emergency access by considering access routes, developing and updating emergency response plans, and incorporating emergency access considerations in the design of future street improvements

Therefore, implementation of the proposed General Plan would not result in inadequate emergency access. Impacts would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that aims to reduce GHG emissions and provide guidance to the County for adapting to changing climate conditions. Therefore, the proposed CAAP would not have any direct impacts on emergency access. Strategy NI-2 of the proposed CAAP provides an action that would require projects requiring a land use permit in a High or Very High Fire Hazard Severity Zone to prepare a site-specific fire protection plan. This action supports the policies and actions in the proposed Health and Safety Element and would further ensure proper emergency access for the purpose of firefighting. As such, the proposed CAAP would have potentially beneficial impacts on emergency access and no significant impacts would occur.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to emergency access. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

16. Utilities and Service Systems

Impact 5.17-1: Sewer and wastewater treatment systems are adequate to meet project requirements. [Thresholds U-1 and U-2].

Proposed General Plan

Wastewater generation associated with the proposed General Plan was calculated using the 2045 horizon-year growth projections shown in Table 3-2 *2045 Horizon-Year Growth Projections* in Chapter 3, *Project Description*, of the DEIR.

The estimated increase in wastewater generation from 2020 to 2045 is shown on Table 5.17-3, *Wastewater Demand Increase: Proposed General Plan*, of the DEIR. The projected increase in wastewater discharge resulting from implementation of the proposed General Plan is estimated to be 3.31 megagallons per day (MGD). This increase would be distributed throughout the entire county such that the level of service would not substantially impact any individual wastewater collection provider or wastewater treatment plant. This projection also assumes that all new construction is connected to an existing or future sewer collection system, but some of the projected growth may be in rural areas where there is no available sewer connection, and the residences would be on individual Onsite Wastewater Treatment Systems (OTWS)s. However, the Land Use Element (Policy LU-P5.1) states that new development should be focused in areas where infrastructure and services, such as sewer collection and wastewater treatment, can be provided. Also, as shown in Table 5.17-2, *Wastewater Treatment Plants within Contra Costa County*, of the DEIR, the wastewater treatment facilities within the county have a residual capacity of 99.7 MGD and therefore would be able to accommodate the projected growth.

In addition, many of the wastewater treatment and wastewater collection providers have capital improvement programs that will be fully implemented by 2045. EBMUD has a \$2.8 billion, 5-year

capital improvement program, which includes upgrades to its wastewater treatment plant; replacement and rehabilitation of aging pipelines and sewage collections systems; rebuilding neighborhood reservoirs; and modernizing wastewater facilities.

Central Contra Costa Sanitary District's (CCCSD's) \$1.1 billion, 10-year capital improvement program includes improvements to its collection system, treatment plant, and expansion of recycled water facilities. Delta Diablo and the other wastewater collection and treatment providers have similar plans to expand wastewater treatment plant capacities and/or rehabilitate and replace aging sewer infrastructure.

In addition, all wastewater collection providers require new development projects to pay a sewer connection fee as well as monthly wastewater collection fees, which are used to continually upgrade components of the wastewater collection and treatment system through the capital improvement plan programs.

The proposed Land Use Element and Public Facilities and Services Element contain policies and actions that require local planning and development decisions to consider impacts to wastewater services. Policy LU-P5.1 states that development should only occur where community infrastructure can be provided. Policy PFS-P3.1 promotes cooperation between LAFCO and service providers to ensure that infrastructure and services can be provided. And Action PFS-A3.2 requires regular updates to development impact fees to ensure that new development pays its fair share of infrastructure and service costs.

Therefore, implementation of the proposed General Plan would not require the construction or expansion of wastewater treatment facilities within the county. Adherence to the County Ordinance Code requirements, continued water conservation efforts, and implementation of the proposed General Plan policies and actions would reduce wastewater generation rates over time, and therefore impacts associated with the sewer collection and wastewater treatment systems would be less than significant.

Proposed CAAP

The proposed CAAP provides estimates of GHG emissions in the water and wastewater sectors and accounts for the increase in emissions with implementation of the proposed General Plan. It also provides reduction strategies to minimize GHG emissions through water conservation, water-efficient retrofits, water-wise landscaping, and graywater and recycled water programs. Any reduction in indoor water demand would also result in a reduction in wastewater generation rates. Therefore, the proposed CAAP would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects, and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to new or expanded wastewater treatment facilities. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.17-2: Water supply and delivery systems are adequate to meet project requirements. [Thresholds U-3].

Proposed General Plan

Both EBMUD and CCWD, who are the largest water purveyors in the county, project population increases within the county that exceed the horizon-year projection of the proposed General Plan. In the EBMUD 2020 Urban Water Management Plan (UWMP), a population increase of 79,000 is projected within the county's service area between 2020 and 2040, and the CCWD 2020 UWMP projects a population increase of 236,110 within its service area between 2020 and 2045. These numbers are much greater than the projected horizon-year population increase of 65,600 from the proposed General Plan.

CCWD states in the 2020 UWMP that they have sufficient supplies to meet water demands as both a wholesale and retail water provider for normal, single-dry, and multiple-dry years through 2045. CCWD prepares an Annual Water Supply and Demand Assessment to identify potential shortages and recommend response actions, as appropriate. The District evaluates weather data, CVP allocation estimates, and demand projections to determine what demand management measures should be implemented. The 2020 UWMP also includes a Water Shortage Contingency Plan that would be implemented in the event of a drought and/or CVP water supply reductions.

CCWD is in the process of updating the 2015 Contra Costa Water District Treated Water Master Plan to evaluate its existing water distribution system as well as its pumping and storage capacity to address future needs. The updated report will also recommend and prioritize capital improvement programs to ensure that the system will meet future water demands. CCWD is evaluating an Industrial Recycled Water Project to deliver up to 3,400 acre-feet-year (AFY) to major industrial customers. CCWD is also investigating long-term water transfer options to meet multiple-dry year shortfalls. And CCWD continues to implement its water conservation and rebate programs.

The EBMUD 2020 UWMP shows that water supplies will exceed the demand through 2050 for both normal and single dry years. However, in the third year of a drought, the demand would exceed the supply. Under these conditions, various measures would be implemented to ensure that all of EBMUD's customers have a reliable water supply. EBMUD prepares a preliminary Water Supply Availability and Deficiency report by March 1 of each year, evaluating the adequacy of that year's water supply. These reports inform decisions by EBMUD regarding whether to declare a water shortage emergency and implement a drought management plan, institute mandatory water use restrictions, and/or obtain supplemental water supplies. EBMUD has a comprehensive Drought Management Plan that is implemented under extended drought conditions.

In addition, EBMUD is working on implementing a number of programs and projects to improve the reliability of its water supply, including:

- Bayside Groundwater Project
- Groundwater banking and exchange program with eastern San Joaquin County
- Water transfer program with Placer County Water Agency, Yuba County Water Agency, and Sycamore Mutual Water Company

- Expansion of surface water storage facilities
- Bay Area Regional Desalination Project
- Bay Area Regional Reliability Project
- Expansion of its recycling water network and supplies

The other cities and water purveyors within the county also have 2020 UWMPs and water master plans that describe the upgrades and expansions of their water distribution and treatment systems to address future increases in population and climate change impacts. Each UWMP also contains a water shortage contingency plan to address potential shortages in future water supplies and implement demand reduction strategies.

In addition, the water purveyors in the UWMPs have assumed increases in their service populations that are higher than the projected horizon-year increase from the proposed General Plan. The projected growth for the proposed General Plan will be distributed throughout the county and within various service areas of the 14 water purveyors. Because the horizon-year growth projection for the proposed General Plan is less than the projected growth in the service areas of the water purveyors, no new water treatment facilities or water distribution systems beyond what is described in the UWMPs would be necessary. Also, compliance with the County's requirements for new construction and water-efficient landscaping, combined with implementation of the proposed General Plan policies and actions listed above, would further reduce potential impacts, resulting in less than significant impacts with respect to the need for new and/or expanded water facilities.

Proposed CAAP

The proposed CAAP provides estimates of GHG emissions in the water and wastewater sectors and accounts for the increase in emissions with implementation of the proposed General Plan as both residential and employment populations increase. It also provides reduction strategies to minimize this increase in GHG emissions through water conservation, water-efficient retrofits, water-wise landscaping, and graywater and recycled water programs. The strategies and actions in the proposed CAAP include measures to reduce indoor and outdoor water use, ensure sustainable and diverse water supplies, and implement water use audits at County facilities. Implementation of the proposed CAAP would further reduce water demand as compared to the analysis provided above. Therefore, the proposed CAAP would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects, and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to water supplies and delivery systems available to serve the project and future development. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.17-3: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. [Thresholds U-4]

Proposed General Plan

As shown in Table 3-2, *2045 Horizon-Year Growth Projection* in Chapter 3, *Project Description*, of the DEIR, the proposed General Plan would result in 7,100 new single-family residences and 16,100 new multi-family residences, as well as 1.2 million square feet of commercial and office space and 5.0 million square feet of industrial space. The projected increase in population is much less than the projected population increases in the EBMUD and CCWD 2020 UWMPs.

The increase in water demand with implementation of the proposed General Plan is provided in Table 5.17-5, *Net Increase in Water Demand with Proposed General Plan*, of the DEIR. The water demand for the single-family and multi-family residential units was based on an indoor water demand of 55 gallons per capita per day (gpcd), which is the current requirement in the California Water Code for water purveyors to meet by 2023. It was assumed that there would be 2.83 people per household and that outdoor water use would be 33 percent of the total water demand for single-family homes and 14 percent of the total water demand for multi-family homes. This results in a total water demand of 223 gpd/du for single-family residences and 181 gallons per day per dwelling unit (gpd/du) for multi-family residences. For the commercial/office and industrial land use categories, the water demand factors were taken from CCWD's 2015 Treated Water Master Plan.

The projected water demand increase with implementation of the proposed General Plan is estimated to be 5,118 AFY. In comparing the 2045 water supply to water demand from the various UWMPs, as shown in Table 5.17-4, *Water Providers serving Contra Costa County*, of the DEIR there is a surplus of available water of 22,218 AFY. Therefore, the water purveyors would be able to accommodate the projected increase in water demand with implementation of the proposed General Plan. In addition, the projected growth would occur gradually between 2020 and 2045. Also, the growth within the county would be dispersed among the various water purveyors' service areas and therefore impacts to each water purveyor's water supplies would be minor.

Additionally, future development pursuant to the proposed General Plan would be required to implement the water-efficient requirements specified in the CALGreen and California Plumbing Codes and the MWELo requirements for water-efficient landscaping. As specified in California Water Code Section 10910, future projects subject to CEQA that also meet the criteria under California Water Code Section 10912 would be required to prepare a WSA that demonstrates that project water demands would not exceed water supplies. In addition, residential, commercial, and industrial water usage can be expected to decrease in the future as a result of the implementation of water conservation practices. In the case of a water shortage, each water purveyor would implement their Water Shortage Contingency Plan, as described in the 2020 UWMPs. Also, the proposed General Plan policies and actions presented in Section 5.17.2.3, *Programs, Plans, and Policies*, of the DEIR would further reduce future water demands.

In summary, future development associated with the proposed General Plan would not result in a shortage of water supplies. In addition, compliance with the County's Code requirements for new

construction and adherence to the proposed General Plan policies and actions will reduce future water demands, and impacts associated with water supply would be less than significant.

Proposed CAAP

As discussed in Impact 5.15-2, of the DEIR, the proposed CAAP provides strategies to minimize increases in GHG emissions by implementing water conservation, water-efficient retrofits, water-wise landscaping, and graywater and recycled water programs. The strategies and actions also include measures to reduce indoor and outdoor water use, ensure sustainable and diverse water supplies, and implement water use audits at County facilities. Implementation of the proposed CAAP would further reduce water demand as compared to the analysis provided above. Therefore, the proposed CAAP would not adversely affect water supplies and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to adequate water supplies for future development in dry, dry, and multiple dry years. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.17-4: Existing and/or proposed storm drainage systems are adequate to serve the drainage requirements of the proposed project. [Threshold U-5]

Proposed General Plan

New development, redevelopment, and changes in land uses under the proposed General Plan would result in an increase in impervious surfaces, which in turn could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause nuisance flooding in areas without adequate drainage facilities. However, municipalities within the county have storm drain master plans, green infrastructure plans, and capital improvement programs that account for future development and expansion of the storm drain system, as needed. Also, the CCCFCD has detailed Flood Control Zone and Drainage Area maps that are used to evaluate future development plans within each zone or area and determine if the existing storm drainage infrastructure is adequate to accommodate the proposed project. The schedule and costs for the construction of new drainage projects and maintenance of existing storm drain infrastructure is described in the Capital Improvement Plan (CIP) and is funded by property taxes and development impact fees in each Flood Control Zone or Drainage Area.

In addition, all future development that involves the disturbance of one acre or more of land would be subject to NPDES construction permit requirements, including preparation of a SWPPP, which includes BMPs to limit the discharge of sediment and non-stormwater discharges from the project site. Also, all regulated projects that create or replace 5,000 square feet or more of impervious surface would be required to implement site design, source control, and stormwater treatment and runoff measures using specific numeric sizing criteria based on the volume and flow rate of stormwater that is generated. Each project undergoes review by County personnel to ensure that the regulatory requirements for temporary on-site stormwater runoff retention have been met. New projects are also subject to storm drainage impact fees, which are used to fund new storm drain infrastructure within the county.

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

Also, as described above, the Public Facilities and Services Element of the proposed General Plan contains policies and actions that consider impacts to storm drain infrastructure and would minimize potential adverse impacts on stormwater discharge. Compliance with and implementation of these proposed General Plan policies and actions that ensure adequate infrastructure, combined with the regulatory provisions in the MS4 permit that limit runoff from new development, would further ensure that the implementation of the proposed General Plan would not result in significant increases in runoff and would therefore not contribute to the construction of new storm drain facilities or expansion of existing facilities that would cause significant environmental impacts. In addition, the County would continue to repair, rehabilitate, and upgrade the storm drain system through implementation of the CIP program funded through the property taxes and developer impact fees. Therefore, impacts with respect to stormwater infrastructure would be less than significant.

Proposed CAAP

The proposed CAAP is a strategic plan focused on GHG emissions reduction, including through strategies and actions that reduce emissions in the water and wastewater sectors. However, there are no sections in the proposed CAAP that specifically address stormwater other than strategies to increase park space, tree plantings, and vegetation, which would reduce the volume of stormwater runoff. Therefore, implementation of the proposed CAAP, would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to adequacy of current storm drainage systems. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.17-5: Existing and/or proposed facilities would be able to accommodate project-generated solid waste. [Threshold U-6]

Proposed General Plan

With implementation of the proposed General Plan, the population is anticipated to increase by 65,600 residents and approximately 9,400 jobs are projected to be generated. As shown in Table 5.17-8, *Increase in Solid Waste Generation Rates*, of the DEIR, this projected growth would result in an increase in solid waste of approximately 127 tons/day or 46,355 tons/year. These numbers are conservative because with continued recycling and waste reduction programs implemented by the County, cities, and Joint Power Authorities (JPAs), the waste generation rates would be reduced over time.

Conservatively assuming that all of the solid waste generated in the county is transported to Keller Canyon Landfill, an increase of 127 tons/day with the implementation of the proposed General Plan would be about 14 percent of the current residual capacity of the landfill. In addition, the landfill is in the process of increasing its permitted daily disposal capacity to 4,900 tons/day. Even without the increase in capacity, the solid waste generated from the proposed General Plan would be easily accommodated by this landfill. This estimate also assumes that all of the generated waste is landfilled, whereas the majority of the waste generated in the county is diverted from landfill disposal by recycling and composting. The results in Table 5.17-8 show that the proposed General Plan would not generate solid waste in excess of the capacity of the landfills that serve the county.

In addition, all new development pursuant to the proposed General Plan would require compliance with Division 4.4 of the 2022 CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential construction operations be recycled and/or salvaged for reuse. New development and redevelopment would also need to comply with the requirements of AB 341 that mandate recycling for commercial and multi-family residential land uses. Therefore, solid waste facilities would be able to accommodate project-generated solid waste, and impacts would be less than significant. Also, the Public Services and Facilities Element of the proposed General Plan, as listed above, contains policies and actions that are intended to reduce solid waste generation and increase recycling efforts, which in turn would minimize potential impacts on the solid waste infrastructure and landfill capacities.

With continued compliance with the applicable regulations, leading to increased recycling and waste diversion, and adherence to the proposed General Plan policies and actions, anticipated rates of solid waste disposal would be less than significant with respect to permitted landfill capacity. In addition, the County, as well as the cities and JPAs within the county boundaries, are well below the CalRecycle target disposal rates and meet the regulatory requirements of AB 939. Therefore, implementation of the proposed General Plan would not generate solid waste in excess of the capacity of the landfills, or otherwise impair the attainment of solid waste reduction goals, and the impact is less than significant.

Proposed CAAP

The proposed CAAP focuses on GHG emissions reduction, including by reducing waste generation, increasing composting, and expanding community waste minimization programs. This also includes reducing the amount of packaging used in food service and retail projects. Additional strategies to achieve waste reduction goals and increase recycling and organic waste collections are provided in the proposed CAAP. Therefore, implementation of the proposed CAAP would not 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, and impacts would be less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to existing facilities being able to accommodate project generated solid waste. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.17-6: The proposed project would comply with federal, State, and local statutes and regulations related to solid waste. [Threshold U-7].

Proposed General Plan

All of the solid waste collection and transport franchises within the county comply with all State requirements to reduce the volume of solid waste through recycling and organic waste diversion. Unincorporated Contra Costa County's per capita disposal rates of 2.2 pounds per day (ppd) per resident and 11.7 ppd per employee are well below CalRecycle targets of 3.9 ppd for residents and 20.1 ppd for employees. In addition, all potential future development pursuant to the proposed General Plan would comply with Division 4.4, *Material Conservation and Resource Efficiency*, of the CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Potential future development would also comply with AB 341, which mandates recycling for commercial and multi-family residential land uses as well as schools and school districts. Additionally, potential future businesses pursuant to the proposed General Plan that generate organic waste in amounts over a certain threshold would be mandated to recycle organic matter in accordance with AB 1826. Therefore, the County and its solid waste collection providers would comply with all applicable federal, State, and local solid waste regulations, and impacts would be less than significant.

Proposed CAAP

As described under Impact Discussion 5.17-5, the proposed CAAP provides many strategies to achieve waste reduction goals and increase recycling and organic waste collection. Therefore, the proposed project would comply with federal, State, and local statutes and regulations related to solid waste, and implementation of the proposed CAAP would have less than significant impacts.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to the compliance with federal, state, and local laws regarding solid waste. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.17-7: Existing telecommunication facilities are adequate to meet project requirements. [Threshold U-8].

Proposed General Plan

As discussed in Section 5.17.5.1, *Environmental Setting*, of the DEIR, there are multiple telecommunication providers in Contra Costa County, including internet services, wireless services, cable television, and satellite television. All new franchises and existing franchises that are up for renewal will be required to follow the regulations and procedures specified by the CPUC and the Contra Costa County Ordinance Code for cable systems, video systems, and wireless telecommunications systems. Also, the Contra Costa County Ordinance Code requires the undergrounding of communication and cable television lines within any residential or commercial subdivision to minimize potential aesthetic and visual impacts.

Each telecommunication provider also prepares long-range plans to accommodate projected growth in their service areas. Future expansion or construction projects would be required to comply with the requirements of the FCC, CPUC, and Contra Costa County Ordinance Code prior to approvals. Therefore, with adherence to the policies of the proposed General Plan and the federal, State, and local regulatory requirements, the proposed General Plan is not expected to require or result in new or expanded telecommunication facilities beyond those already planned, and the impact is less than significant.

Proposed CAAP

Because the proposed CAAP focuses on the reduction of GHG emissions and telecommunication systems are not associated with these emissions, there are no specific provisions in the proposed CAAP regarding telecommunication facilities. However, the implementation of the proposed CAAP would not have an adverse impact on telecommunications systems and therefore the impact is less than significant.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to adequacy of existing communication facilities able to meet project requirements. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

17. Wildfire

Impact 5.18-1: Development under the proposed project in or near SRAs or lands classified as Very High FHSZs and a single access roadway or in an Evacuation-Constrained Area could substantially impair an adopted emergency response plan or emergency evacuation plan. [Threshold W-1]

Proposed General Plan

Any potential development under the proposed General Plan would be required to integrate the County Emergency Operations Plan (EOP) as necessary to continue its facilitation in evacuation for the people in wildfire prone areas. Development under the proposed project would not result in substantial changes to the circulation patterns or emergency access routes in the county that would conflict with or require changes to the EOP. Additionally, future development within the Sate Responsibility Area (SRA), Wildland Urban Interface (WUI), or Very High Fire Hazard Severity Zones (FHSZs) would be required to comply with the SRA and Very High FHSZ Fire Safe Regulations, the California Building Code, the California Fire Code, and the Contra Costa County Ordinance Code, which have maximum requirements for lengths of single access roads, minimum widths of roadways, and vegetation fuel management around roadways. Furthermore, to ensure emergency services in the county are not impaired by future development, all future development projects would be reviewed and approved by the applicable fire protection district prior to project approval. In addition, several proposed General Plan policies and actions promote or require enforcement of the Fire Safety Code requirements, including Policy HS-P7.4, which would require projects in High or Very FHSZs to implement a site-specific fire protection plan.

Additionally, Policy HS-P7.3, which requires new development within a Very High Fire Hazard Severity Zone in the LRA or SRA or in areas that may be designated as the WUI, and on a residential parcel with evacuation constraints, to prepare a traffic control plan to ensure that construction equipment or activities do not block roadways or interfere with evacuation plans during the construction period, would ensure that temporary roadway impairments or evacuation plan impacts are addressed within traffic control plans. Policy HS-P7.1 also directs the County to deny entitlements for projects creating additional residential units in a Very High Fire Hazard Severity Zone in the LRA or SRA in addition to discouraging such projects in High Fire Hazard Severity within the SRA and LRA unless adequate fire protection services are provided. With the implementation of these policies, impacts would be less than significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies to reduce greenhouse gas (GHG) emissions and improve climate resiliency and adaptation. As such, all strategies and actions within the proposed CAAP inherently support the implementation of emergency responder and evacuation plans, while some directly address County efforts for emergency planning. For example, Strategy NI-3 and its accompanying actions direct the County to establish and maintain community resilience hubs with microgrids, education, training opportunities, and other community-focused resources, in line with the policies and actions included under proposed Health and Safety Element Goal HS-12. The proposed CAAP also includes Strategy NI-2, which specifically addresses adaptation efforts for wildfire events and reflects the policies and actions included under Goal HS-7. The proposed CAAP directly supports and directs compliance with adopted emergency response and evacuation plans, and therefore would have no impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to emergency response plans. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.18-3: Development under the proposed project in or near SRAs or lands classified as Very High FHSZs could require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), but it would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. [Threshold W-3]

Proposed General Plan

Development under the proposed General Plan would result in additional infrastructure, such as roadways, transmission lines, and other utilities, in order to serve new residential development. Fuel breaks and emergency water sources would also be required to comply with State and local development regulations. These types of improvements would involve temporary construction and result in changes to the existing built environment. The installation and operation of new above-ground power transmission lines would create a higher risk of exacerbating wildfire risks compared to other infrastructure. However, the CPUC requires maintenance of vegetation around power lines, strict wire-to-wire clearances, annual inspections of above-ground power lines, and the preparation of fire prevent

plans for above-ground power lines in high fire-threat districts. These measures would reduce the reduce the wildfire risks associated with the installation and maintenance of power lines.

Any residential development in the wildfire-prone parts of the EIR Study Area would also be required to comply with building and design standards in the CBC and California Fire Code, which include provisions for fire-resistant building materials, the clearance of debris, and fire safety requirements during demolition and construction activities. Public Resources Code Section 4291 also requires that vegetation around buildings or structures maintain defensible space within 100 feet of a structure and an ember resistant zone within five feet of a structure. Additionally, SRA and Very High FHSZ Fire Safe Regulations would prevent structures from being placed within 30 feet of a roadway, reducing the potential for new roadways to exacerbate wildfire risks. These measures, along with policies and actions in the proposed General Plan Health and Safety Element and Public Facilities and Services Element limiting residential development unless adequate fire protection services are provided, requiring fire-resistant materials and landscaping with irrigated or fire-resistant materials, and requiring review by fire protection agencies for adequate water supplies, road design, and building design, would minimize wildfire risks associated with the installation and maintenance of infrastructure.

Such infrastructure and maintenance activities would also be required to comply with the adopted State regulations, County Ordinance Code standards, and the proposed General Plan policies and actions to mitigate the impact of infrastructure on the environment. Therefore, impacts would be less than significant.

Proposed CAAP

As noted in the discussions of Impacts 5.18-1 and 5.18-2, the proposed CAAP is a policy document that among other efforts, contains strategies aimed at improving wildfire safety and resilience in the EIR Study Area. This includes an action under Strategy NI-2 that directs the County to coordinate with energy service providers to underground power lines, especially in the WUI and FHSZs, similar to Policy HS-P7.8 in the proposed Health and Safety Element. While the proposed CAAP would not directly result in new development that could exacerbate fire risk, strategies and actions included in the proposed CAAP could result in the construction of physical improvements and infrastructure in the county designed to help meet the emissions targets in the CAAP. However, under Policy HS-P7.7 of the proposed Health and Safety Element, construction of critical facilities in high fire risk areas would be discouraged. Additionally, all future construction associated with the proposed CAAP would be subject to the applicable federal, State, and local regulations outlined above.

Overall, adoption of the proposed CAAP would primarily result in beneficial impacts with regard to wildlife risks from proposed infrastructure. Therefore, the proposed CAAP would have less than significant impacts.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to infrastructure maintenance/installation that could exacerbate fire risk. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

Impact 5.18-4: The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. [Threshold W-4]

Proposed General Plan

Wildfires on hillsides can create secondary hazards in the form of flooding and landslides. Wildfires on steep slopes can burn the vegetation that stabilizes the slope and create hydrophobic conditions that prevent the ground from absorbing water. This can lead to landslides, debris flows, and flooding.

As discussed in Chapter 5.10, *Hydrology and Water Quality*, of the DEIR, Contra Costa County contains lands within the 100-year and 500-year floodplain. As shown in Figure 5.10-3, *Existing and Potential Beneficial Uses in Groundwater Basins in Contra Costa County*, of the DEIR, floodplains are primarily located along creeks, canals, shorelines, and low-lying lands in the Sacramento-San Joaquin Delta. Many flood-prone areas are not, however, located within High or Very High FHSZs or WUI areas.

As discussed in Chapter 5.7, *Geology and Soils*, of the DEIR, landslide-prone areas are located throughout the county, with many of the moderate to high landslide potential areas coinciding with High or Very High FHSZs. Many of the high landslide potential areas are located on the steep slopes of the Diablo Mountain Range, creating overlapping landslide-prone areas in the steep mountain ranges. This overlap may cause areas outside of a landslide susceptible zone to be affected by runoff, post-fire slope instability, or drainage changes following a wildfire.

Potential future development under the proposed General Plan could contribute to post-fire slope instability or drainage changes upstream. However, as discussed above, proposed Health and Safety Element Policy HS-P7.1 would require denial of entitlements for projects creating additional residential units (i.e., units not allowed by-right) in Very High FHSZs and Policy HS-P4.3 discourages locating below market-rate housing development inside of mapped hazard zones as identified in the Health and Safety Element; however, this does not prevent other types of residential development from being located in mapped hazard zones. Additionally, all new development in the county is required to comply with State and local regulations, such as the CBC, California Fire Code, and County Ordinance Code, which have provisions to reduce downslope or downstream landslides and flooding. For example, Section 1803 of the CBC requires a geotechnical investigation that must assess existing landslide susceptibility on a project site. Contra Costa County Ordinance Code, Title 7, Article 716, *Grading*, requires a grading permit issued by a building inspector to control excavating, grading, and earthwork construction, including fills or embankments and related work, ultimately minimizing slope instability. Furthermore, as discussed in Impact 5.18-2 in the DEIR, all potential future development within wildfire-prone areas in the EIR Study Area would be required to comply with SRA and Very High FHSZ Fire Safe Regulations, Public Resources Code Section 4291, and the California Fire Code. These regulations would ensure fire-resilient structures and properties, and therefore would reduce the potential for post-wildfire flooding or landslides downstream or downslope.

New development complying with State and local regulations would not expose people or structures to downslope landslides or downstream flooding due to post-fire hazards. Furthermore, as identified in Impact Discussions 5.18-1 and 5.18-2 in the DEIR, development under the proposed project must also comply with the County EOP, LHMP, and CWPP. All future development, regardless of the location, is required to comply with adopted local, regional, and State plans and regulations addressing

wildfire prevention, which would minimize risks of post-fire hazards. As such, compliance with these policies and regulatory requirements would ensure impacts from post-fire instability would be less than significant.

Proposed CAAP

As discussed above, the proposed CAAP is a policy document that provides strategies to reduce GHG emissions and improve climate resiliency and adaptation. The intent of proposed CAAP is therefore to reduce risks associated with climate change and is not expected to result in significant impacts with regard to landslide and flooding impacts associated with post-fire instability. The proposed CAAP contains several strategies and actions that align with the guidance of the proposed General Plan and other applicable State and local regulations, including Strategy NI-6, which provides actions to reduce impacts from other climate-related hazards, including drought, flooding, landslides, and severe weather. The proposed CAAP would therefore result in no impact.

Finding. The proposed project would have a less than significant direct, indirect, and cumulative impact related to exposing people or structures to significant post-fire slope instability risks. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds.

C. Findings on Significant Environmental Impacts That Can Be Mitigated to Less Than Significant

The following summary describes impacts of the proposed project that, without mitigation, would result in significant adverse impacts. Upon implementation of the mitigation measures provided of the DEIR, these impacts, from Chapter 5, would be considered less than significant.

1. Air Quality

Impact 5.3-4: Construction activities associated with the proposed project could expose sensitive receptors to substantial pollutant concentrations. [Threshold AQ-3]

Proposed General Plan

Construction Community Risk and Hazards

Future construction under the proposed General Plan would temporarily elevate concentrations of TACs and DPM in the vicinity of sensitive land uses during construction activities. Since the details regarding future construction activities are not known at this time due to this analysis being conducted at a program level—including phasing of future individual projects, construction duration and phasing, and preliminary construction equipment—construction emissions are evaluated qualitatively in accordance with BAAQMD’s plan-level guidance. Subsequent environmental review of future development projects would be required to assess potential impacts under BAAQMD’s project-level thresholds. However, construction emissions associated with the proposed General Plan could exceed BAAQMD’s project level and cumulative significance thresholds for community risk and hazards. Therefore, construction-related health risk impacts associated with the proposed General Plan are considered potentially significant.

Proposed CAAP

As discussed under Impact 5.3-2, of the DEIR, implementation of the proposed CAAP would not involve any land use changes that would result in indirect growth or change in building density or intensity; therefore, its implementation would not directly result in the generation of TAC and DPM emissions. In addition, as stated under Impact 5.3-3, of the DEIR, implementation of the CAAP could result in beneficial long-term air quality impacts from the increase in energy efficiency, usage of clean energy, and reduction in VMT. Therefore, implementation of the proposed CAAP would not expose sensitive receptors to substantial pollutant concentrations of TACs, and impacts would be less than significant.

Mitigation Measures

AQ-3 Prior to discretionary approval by the County for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), future development involving construction on 1 acre or more and within 1,000 feet of residential and other sensitive land uses (e.g., hospitals, nursing homes, schools, and day care centers) in the unincorporated county¹, shall submit a health risk assessment (HRA) to the County Department of Conservation and Development for review and approval. The HRA shall be prepared in accordance with policies and procedures of the Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District (BAAQMD). The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds the respective threshold established by the BAAQMD—project-level risk of six in one million in Impacted Communities, BAAQMD's Overburdened Communities, and within 1,000 feet of a BAAQMD Overburdened Community; ten in a million in all other areas; PM_{2.5} emissions that exceed 0.3 µg/m³; or the appropriate noncancer hazard index exceeds 1.0—the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks below the respective threshold, including appropriate enforcement mechanisms. Measures to reduce risk may include, but are not limited to:

- Use of construction equipment rated as US EPA Tier 4 Interim or higher for equipment of 50 horsepower or more.
- Use of construction equipment fitted with Level 3 Diesel Particulate Filters for all equipment of 50 horsepower or more.

Measures identified in the HRA shall be included in the environmental document and/or incorporated into the site development plan as a component of the proposed project. Prior to issuance of any construction permit, the construction contractor

¹ As measured from the property line of the project site to the property line of the source/edge of the nearest travel lane.

shall ensure that all construction plans submitted to the Department of Conservation and Development clearly show incorporation of all applicable mitigation measures.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The Contra Costa County Board of Supervisors hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding:

Mitigation Measure AQ-3 would ensure that future construction within 1,000 feet of sensitive receptors submit a health risk assessment showing that the document has been prepared in accordance with policies and procedures of the OEHHA and BAAQMD, and requires mitigation be provided if the health risk assessment shows that the incremental cancer risk exceeds ten in one million (10E-06), PM_{2.5} concentrations exceed 0.3 µg/m³, or the appropriate noncancer hazard index exceeds 1.0. Therefore, Mitigation Measure AQ-3 would reduce impacts to air quality less than significant.

2. Biological Resources

Impact 5.4-4: Implementation of the proposed project could 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. [Threshold B-4].

Proposed General Plan

Implementation of the proposed General Plan could potentially 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 in the EIR Study Area.

The definition of “wildlife corridor,” along with an explanation of critical linkages, natural landscape blocks, and essential connectivity areas that occur in the county, are provided in the Existing Conditions Report (Appendix 5.4-1, Figure 3-5 of the DEIR). Two linkages that are crucial to maintaining connectivity for wildlife between large landscape blocks within and adjacent to the nine-county Bay Area, as well as overlapping Contra Costa County, are the East Bay Hills: Diablo Range linkage and the Mount Diablo: Diablo Range linkage. Natural landscape blocks and essential connectivity areas overlap the Diablo Range in the county. Furthermore, the East Contra Costa County HCP/NCCP identifies four potential movement routes (i.e., Round Valley, Briones Valley, Deer Valley, and Horse and Lone Tree Valleys) between the Los Vaqueros Watershed and Black Diamond Mines Regional Preserve.

Regarding movement within natural communities, the baylands west of the EIR Study Area’s western boundary and the Baylands along the EIR Study Area’s northern boundary serve as a migratory corridor for anadromous fish, including green sturgeon and steelhead. The riparian woodland community also provides movement corridors for fish and wildlife species. The grassland natural

community is an important movement corridor for species such as American badger, Alameda whipsnake, and San Joaquin kit fox. Grasslands in the eastern county connect to grassland communities in counties to the south, including Alameda County and San Joaquin County, providing a movement corridor to greater habitat patches and facilitating a genetic exchange with other populations of San Joaquin kit fox and American badger. Aquatic habitats such as streams and ponds provide breeding habitat for California red-legged frog and California tiger salamander, while the matrix of upland grassland habitats between the aquatic habitats and riparian corridors provide dispersal habitat.

Development under the proposed General Plan could restrict local or regional movement of native wildlife and fish species by fragmenting intact habitat areas. Development in natural or open space areas serves to fragment habitat areas, which reduces the number of special-status species within these areas. This reduction in habitat, including movement corridors or wildlife nursery areas, affects the ability of special-status species to increase in number and increases the probability that such species will be affected by other environmental factors (e.g., disease, catastrophic weather, and predation). However, given that most development under the proposed General Plan is anticipated to occur within the ULL, specific impacts may be lessened through implementation of the goals, policies, and actions of the proposed General Plan.

The Conservation, Open Space, and Working Lands Element of proposed General Plan includes policies and actions that would mitigate potential impacts associated with the movement of native resident or migratory fish or wildlife species, or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. This includes policies and actions that are associated with goals that aim to preserve open space for environmental protection (Goal COS-1); preserve and enhance ecological resources and wildlife habitat (Goal COS-4), including Action COS-A4.3 which directs the County to work with conservation agencies to identify appropriate locations and methods for incorporating wildlife crossings into future road projects; protect and restore natural watercourses, riparian corridors, and wetland areas (Goal COS-5); preserve and enhance native upland habitat (Goal COS-6); and protect, preserve, and enhance natural resources of the San Francisco Bay/Sacramento-San Joaquin Delta estuary system and shoreline (Goal COS-9).

As detailed in Section 5.4.1.1 of the DEIR, a number of federal and State regulations are in place to protect wildlife movement, wildlife corridors, and nursery sites within Contra Costa County. However, even with implementation of the proposed General Plan goals, policies, and actions, the regulations would not fully reduce potential impacts associated with the movement of wildlife species, migratory wildlife corridors, or native wildlife nursery sites. Additional project-specific analysis would be required to ensure that development does not impede wildlife movement in the identified areas. Therefore, this is considered a potentially significant impact.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially impact wildlife species, migratory wildlife corridors, or native wildlife nursery sites. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan, as well as a number of federal and State regulations that are in place to protect wildlife movement, wildlife corridors, and nursery sites, as

detailed in Section 5.4.1.1 of the DEIR. However, even with implementation of the proposed General Plan goals, policies, and actions, the regulations would not fully reduce potential impacts of the proposed CAAP associated with the movement of wildlife species, migratory wildlife corridors, or native wildlife nursery sites. Therefore, this is considered a potentially significant impact.

Mitigation Measures

BIO-1 Prior to the issuance of a building permit for projects not exempt from the California Environmental Quality Act, the County shall require a habitat connectivity/wildlife corridor evaluation for future development that may impact existing connectivity areas and wildlife linkages. The evaluation shall identify project design features that would reduce potential impacts and maintain habitat and wildlife movement. To this end, the County shall incorporate the following measures, to the extent practicable, for projects impacting wildlife movement corridors:

- Encourage clustering of development
- Avoid known sensitive biological resources
- Provide shielded lighting adjacent to sensitive habitat areas
- Encourage development plans that maximize wildlife movement
- Provide buffers between development and wetland/riparian areas
- Protect wetland/riparian areas through regulatory agency permitting process
- Encourage wildlife-passable fence designs (e.g., three-strand barbless wire fence) on property boundaries.
- Encourage preservation of native habitat on developed parcels
- Minimize road/roadway development to help prevent loss of habitat due to roadkill and habitat loss
- Use native, drought-resistant plant species in landscape design
- Encourage participation in local/regional recreational trail design efforts

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The Contra Costa County Board of Supervisors hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding:

Implementation of Mitigation Measure BIO-1 would require projects that may impact wildlife migration corridors to conduct an evaluation that identifies potential impacts and project design features that can be feasibly implemented to reduce impacts. This would ensure that impacts to wildlife migration corridors are identified and reduced to the extent possible under project-level review. As such, impacts would be less than significant.

3. Cultural and Tribal Cultural Resources

Impact 5.5-2: Implementation of the proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines, Section 15064.5. [Thresholds C-2]

Proposed General Plan

Archaeological resources are known to be present in the EIR Study Area. Implementation of the proposed General Plan could potentially result in direct or indirect impacts on both prehistoric and historic archaeological resources in the EIR Study Area. If archaeological resources are present in the areas where development is planned, they could be damaged by earth-disturbing construction activities, such as those associated with excavating foundations, placing fill, trenching for utility systems, or grading the site for roads and staging areas. In particular, construction activities may disturb resources by exposing them to potential vandalism or causing them to be displaced from the original context. This could result in a significant impact on archaeological resources.

As detailed in Section 5.5.1.1 of the DEIR, there are a number of federal and State regulations in place to protect archaeological resources within the EIR Study Area. Compliance with the State and federal regulations is intended to ensure that development would not result in adverse impacts to identified archaeological resources. In addition, the proposed General Plan policies take a comprehensive approach to the protection of archaeological resources. The proposed Conservation, Open Space, and Working Lands Element includes policies and actions that would mitigate potential impacts on archaeological resources, including through the policies and actions under Goal COS-10, which aims to identify and preserve archaeological resources. For example, Policy COS-P10.1 encourages the preservation of sites and areas having identifiable archaeological significance. Policy COS-P10.5 requires applicants to engage a qualified consultant to prepare an evaluation of archaeological resources that may be present on a project site when warranted through the CEQA process. Policy COS-P10.6 requires that upon discovery of a significant archaeological artifact during construction, ground disturbing activities must halt within a 50-foot radius of the find until its significance can be determined by a qualified archeologist and appropriate protection and preservation measures developed. Policy COS-P10.7 requires significant archaeological resources to be either preserved onsite or adequately documented as a condition of removal (any documentation of historic resources shall be conducted in accordance with Historic American Building Survey Level III standards, as defined by the US Secretary of the Interior), COS-A10.1 through COS-A10.4 support these policies, ensuring that surveys of existing and as-yet unknown resources are performed and updated regularly, and that planning tools, such as ordinances, design guidelines, context statements, and management plans are put in place to support implementation of the policies.

The proposed General Plan would not substantially alter any policies regarding the significance of impacts on archaeological resources. In addition, the proposed General Plan would not alter the significance of impacts on archaeological resources compared to the existing General Plan. Furthermore, the proposed General Plan would not modify the procedures or policies regarding how archaeological resources are identified or evaluated for historical significance, nor would it change how impacts on archaeological resources are assessed or mitigated under the General Plan.

As noted previously, the proposed General Plan includes multiple policies that attempt to mitigate impacts on archaeological resources through preservation and evaluation. The proposed General Plan also includes policies and actions that attempt to provide better documentation and improve the review of archaeological resources to protect known and as yet unknown historic resources. Overall, the goals, policies, and actions in the proposed General Plan, in combination with existing federal and State regulations in place to protect archaeological resources within the EIR Study Area, would help to avoid adverse impacts to archaeological resources; however, they do not prevent ground-disturbing activities from occurring that could potentially impact archaeological resources. Therefore, this is considered a potentially significant impact.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially impact archaeological resources in the EIR Study Area. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan as well as federal and State regulations in place to protect archaeological resources within the EIR Study Area. However, even with implementation of the proposed General Plan goals, policies, and actions, the regulations would not fully reduce potential impacts of the proposed CAAP on archaeological resources. Therefore, this is considered a potentially significant impact.

Mitigation Measures

CUL-1 Prior to initiation of construction activities for discretionary projects that are not exempt from CEQA and would involve ground-disturbing activities on previously undisturbed sites or alteration of potentially significant built environment resources, or as otherwise directed by the County, the project applicant shall be required to retain a cultural resources consultant with staff that meets the Secretary of the Interior's Professionally Qualified Standards to conduct a cultural records search and complete the following steps as relevant.

The cultural resources consultant shall:

- Conduct a records search with the California Historical Resources Information System.
- If the record search shows a pedestrian survey has been conducted within the last 10 years and the survey results were negative, the project applicant shall provide those results to the County for summary in environmental analysis.

- If no survey has been performed, or if cultural resources are present, the project applicant shall direct the cultural resources consultant to:
 - Conduct a pedestrian survey (if none has been completed).
 - Update the records for known resources.
 - Record new built environment and archaeological resources.
 - Determine if the resources have been previously evaluated for the California Register of Historical Resources.
 - If the resources were previously determined ineligible for listing, the cultural resources consultant shall describe those results for use in the County's environmental analysis.
 - If the resources have not been evaluated, the cultural resources consultant shall evaluate the resources for listing on the California Register of Historical Resources, and local registers.
 - If the resources were previously determined eligible or are proposed to be register-eligible, the cultural resources consultant shall determine if the project would result in a "substantial adverse change in the resource" as defined in CEQA Guidelines Section 15064.5(b)(1).
 - If a substantial adverse change would occur, the cultural resources consultant shall support the County in identifying feasible mitigation approaches.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The Contra Costa County Board of Supervisors hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding:

Development under the proposed project could impact undiscovered archaeological resources during ground disturbing activities. Mitigation Measure CUL-1 requires project applicants to retain a cultural resources consultant with staff that meets the Secretary of the Interior's Professionally Qualified Standards to conduct a cultural records search, conduct appropriate surveys, and identify mitigation for any substantial adverse changes in a resource. This would ensure that potential resources are identified and protected. With implementation of Mitigation Measure CUL-1, Impact 5.5-2 would be less than significant.

Impact 5.5-4: Implementation of the proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or a local register of historical resources, as defined in Public Resources Code Section 5020.1(k),

Proposed General Plan

TCRs are known to be present in the EIR Study Area. Ground-disturbing activities could occur on sites that may have sensitive TCRs. Grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than needed for the existing development could potentially cause disturbance to TCRs by potentially unearthing previously unknown or unrecorded TCRs. Accordingly, implementation of the proposed General Plan could potentially cause a substantial adverse change in the significance of TCRs in the EIR Study Area.

In compliance with the tribal consultation requirements discussed, invitations for consultation were sent to representatives of the Native American tribes provided by the NAHC on January 15, 2021, and to the County's AB 52 Tribal Consultation List on October 5, 2023. The Confederated Villages of Lisjan Nation Tribe requested consultation and consulted with the County in November 2021 regarding the draft goals, policies, and actions of the General Plan Update. During this process, the Lisjan Tribe provided comments and edits for the General Plan that have been incorporated as new and modified policies and actions. Additionally, the tribe provided mitigation measures that have been incorporated as Mitigation Measures TCR-1 and TCR-2 and within Mitigation Measure CUL-1. No further consultation was requested from the Lisjan Tribe. The tribe also responded on October 25, 2023, to the updated consultation invitation, requesting information about the proposed project that was sent to the tribe. No additional consultation was requested.

As detailed in Section 5.5.1.1 of the DEIR, there are a number of federal and State regulations in place to protect TCRs within the EIR Study Area. Compliance with the State and federal regulations is intended to ensure that development would not result in adverse impacts to TCRs. In addition, the proposed General Plan policies and actions take a comprehensive approach to the protection of TCRs. The proposed Conservation, Open Space, and Working Lands Element includes policies and actions that would mitigate potential impacts on TCRs, including policies and actions under Goal COS-11, which aims to preserve, restore, and enhance TCRs. For example, Policy COS-P11.1 encourages respecting and protecting TCRs. Policies COS-P11.2, COS-P11.3, COS-P11.4, COS-P11.5, and COS-P11.8 promote establishing and maintaining collaborative relationships with local Native American tribal representatives as well as consulting with culturally affiliated tribes to identify and protect TCRs. In addition, Policies COS-P11.9 and COS-P11.10 require avoiding impacts of development on Native American TCRs whenever possible and consulting with culturally affiliated tribes when developing mitigation measures (e.g., cultural resources treatment agreement between a developer and the appropriate tribe[s] that address tribal monitoring during earth-disturbing activities).

The goals, policies, and actions in the proposed General Plan and mitigation measures requested by the Lisjan Tribe, in combination with existing federal and State regulations in place to protect TCRs within the EIR Study Area, would reduce impacts to a less-than-significant level. Without mitigation, though, impacts would be potentially significant.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could potentially impact TCRs in the EIR Study Area. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan, applicable provisions of the Contra Costa County Ordinance Code, and SB 18 and AB 52. Compliance with the aforementioned policies and regulations and Mitigation Measures would reduce potential impacts of the proposed CAAP on TCRs to a less-than-significant level, though impacts would be potentially significant before mitigation.

Mitigation Measures

- TCR-1 Prior to initiation of construction activities for discretionary projects that are not exempt from CEQA and would involve ground-disturbing activities on previously undisturbed sites, or as otherwise directed by the County, the project applicant may be required to enter into a cultural resources treatment agreement with the culturally affiliated tribe. If required, the agreement would address the treatment and disposition of cultural resources and human remains that may be impacted as a result of the development as well as provisions for tribal monitors. If an agreement is required, the applicant must provide a copy of the cultural resources treatment agreement to the County prior to issuance of a grading or building permit. Regardless of whether an agreement is required, if cultural resources are discovered during project construction, all work in the area shall cease and a qualified archaeologist and representatives of the culturally affiliated tribe shall be retained by the project sponsor to investigate the find and make recommendations as to treatment and mitigation.
- TCR-2 Tribal monitors from the culturally affiliated tribe shall be allowed to monitor all grading, excavation, and ground-breaking activities, including archaeological surveys, testing, and studies for discretionary projects that are not exempt from CEQA and that would involve ground-disturbing activities on previously undisturbed sites, or as otherwise directed by the County.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The Contra Costa County Board of Supervisors hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding:

Mitigation Measures TCR-1 through TCR-2 would ensure that tribal cultural resources would be properly handled if identified during development under the proposed project. Compliance with these measures would reduce impacts to tribal cultural resources to less than significant.

4. Geology and Soils

Impact 5.7-5: Development under the proposed project could directly or indirectly destroy a unique paleontological resource or unique geologic feature. [Threshold G-6].

Proposed General Plan

Unique Geologic Features

The most notable geological feature in the county is Mount Diablo, located between Clayton and Danville. At almost 4,000 feet tall, the mountain dominates the landscape in Contra Costa County and is a popular attraction for hiking in the region. Mount Diablo is also a State Park and there are varied types of protected lands on and around Mount Diablo that total more than 90,000 acres. The mountain has historically been an important landmark for navigation because of its presence and visibility throughout the Bay Area and beyond. While this geologic resource is already protected as a State Park, the proposed General Plan supports this protection by designating it Parks and Recreation and including Policy COS-P13.4, which requires applications for new or expanded quarrying operations adjacent to Mount Diablo State Park to include an analysis of potential impacts to the park's natural features.

Furthermore, any future development under the proposed project would need to follow the County's Ordinance Code. Section 814-2.1004, Environmental Design, of the County Code mandates that grading must consider the land's environmental characteristics, such as geological features, stream beds, and tree cover, and employ the best engineering practices to minimize erosion, slides, or flooding, ensuring minimal impact on the environment. Therefore, impacts would be less than significant.

Paleontological Resources

Contra Costa County is underlain by a number of distinct geologic rock units (i.e., formations) with varying paleontological sensitivities. According to the U.S. Geological Survey (USGS), 24 percent of the county is underlain by quaternary alluvium and marine deposits of the Pleistocene to Holocene eras, which generally have lower paleontological sensitivity due to their young age. Additionally, 18 percent of the county is underlain by Pleo-Pleistocene and Pliocene loosely consolidated deposits, 15 percent by Miocene marine rocks, and 14 percent by upper cretaceous marine rocks. These geologic units typically have higher paleontological sensitivity based on their rock type, which is primarily sandstone and shale.

Development under the proposed General Plan would occur in areas of varying levels of paleontological sensitivity and would require site-specific investigations by a professional archaeologist/paleontologist to determine the potential of such resources to be present on site. Excavations could occur in association with development of these sites that could affect paleontological resources buried at greater depths. Therefore, it is possible that project-related ground-disturbing activities associated with development allowed under the proposed General Plan could uncover previously unknown paleontological resources. Unanticipated discoveries during project implementation have the potential to affect significant paleontological resources. The proposed General Plan includes Policy COS-P10.7, which requires that significant paleontological resources be either preserved on-site or adequately documented as a condition of removal. In addition, Policy COS-P10.6 states that upon discovery of any significant fossils during project construction, ground-

disturbing activities must halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist and appropriate protection and preservation measures are developed. While adherence to these proposed policies would preserve or document a resource in the event of its discovery, it does not prevent ground-disturbing activities from occurring that could potentially impact paleontological resources. Therefore, this paleontological resource impact is potentially significant.

Proposed CAAP

The proposed CAAP aims to reduce GHG emissions from activities within the county. Although the proposed CAAP is a policy document that does not include specific projects, projects could be facilitated by proposed CAAP actions that include construction activity and ground disturbance, which could uncover and impact previously unknown paleontological resources, resulting in a potentially significant impact.

Mitigation Measures

GEO-1 Prior to initiation of construction activities for discretionary projects that are not exempt from CEQA and would involve ground-disturbing activities on previously undisturbed sites, or as otherwise directed by the County, the project applicant shall be required to retain a Qualified Professional Paleontologist to determine the project's potential to significantly impact paleontological resources according to Society of Vertebrate Paleontology standards. If necessary, the Qualified Professional Paleontologist shall recommend mitigation measures to reduce potential impacts to paleontological resources to a less-than-significant level.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The Contra Costa County Board of Supervisors hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding:

Mitigation Measure GEO-1 would require non-ministerial projects not exempt from CEQA that involve ground-disturbing activities on previously undisturbed sites to consult with a Qualified Professional Paleontologist to assess potential impacts on paleontological resources, and if necessary, recommend mitigation measures to minimize these impacts to a less-than-significant level. Therefore, impacts to paleontological resources would be reduced to less than significant.

5. Noise

Impact 5.13-3: Individual construction developments for future housing may expose sensitive uses to excessive levels of groundborne vibration. [Threshold N-2]

Proposed General Plan

Construction Vibration Impacts

Construction activity from projects within the EIR Study Area would generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures but can achieve the audible and perceptible ranges in buildings close to the construction site. Table 5.13-13, *Vibration Levels for Construction Equipment*, from the DEIR lists reference vibration levels for construction equipment.

As shown in Table 5.13-13 of the DEIR, vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (i.e., 0.12 inches per second [in/sec] PPV for fragile or historical resources, 0.2 in/sec PPV for nonengineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). Construction details and equipment for future project-level developments under the proposed General Plan are not known at this time but may cause vibration impacts. As such, this would be a potentially significant impact.

Operational Vibration Impacts

Operational vibration is typically associated with commercial and industrial uses, which can generate varying levels of groundborne vibration, depending on operational procedures and equipment. Other sources of groundborne vibration include rail traffic and subways. The proposed General Plan would allow for the future development of commercial and industrial land uses, which could generate significant levels of operational vibration. Therefore, impacts would be potentially significant.

Rail Vibration Impacts

Placement of new receptors near existing or future rail right-of-way could expose people to substantial vibration levels, depending on the proximity to rail alignments and depending on the type of rail and daily frequency of service. Regarding rail vibration, it is extremely rare for operations to cause substantial or even minor cosmetic damage to buildings. Proposed General Plan Policy HS-P14.11 provides guidance for evaluating new vibration-sensitive uses near an existing railroad or BART line. This policy directs the County to use Table HS-4 in the proposed General Plan to evaluate whether the sensitive uses could be exposed to excessive groundborne vibration. Projects with sensitive uses within the screening distances identified in the table would require preparation of a groundborne vibration and noise evaluation that is consistent with FTA-approved methodologies. However, due to the programmatic nature of this analysis, specific distances from transit types to future sensitive land

uses cannot be determined at this time because project-specific details are unknown. Therefore, this impact would be potentially significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions. While the proposed CAAP would not directly result in any new development, the implementation of its actions, which may indirectly result in new development (such as wind farms or battery storage projects), would be subject to the same County standards that apply to development under the proposed General Plan, as applicable. The 2024 CAAP does not include any strategies or actions that would otherwise result in new sources of vibration, so impacts would be less than significant.

Mitigation Measures:

- N-2 Prior to issuance of a grading or building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed FTA architectural damage thresholds (i.e., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.
- N-3 During the project-level CEQA process for industrial development projects or other projects that could generate substantial vibration levels near sensitive uses, such as residential uses, a noise and vibration analysis shall be conducted to assess and mitigate potential noise and vibration impacts related to the operations of that individual development. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The Contra Costa County Board of Supervisors hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Rationale for Finding:

With implementation of Mitigation Measures N-2 and N-3, coupled with adherence to associated performance standards, Impact 5.13-3 would be reduced to less-than-significant levels. Specifically, Mitigation Measure N-2 would reduce potential vibration impacts during construction below the pertinent thresholds, and Mitigation Measure N-3 (operations-related vibration) would reduce potential vibration impacts from proposed sensitive uses near existing railroads and facilities to less-than-significant levels. No significant and unavoidable vibration impacts would remain.

D. Significant and Unavoidable Impacts that Cannot Be Mitigated to Below the Level of Significance

The following describes the unavoidable adverse impacts of the proposed project where either mitigation measures were found to be infeasible, or the mitigation measures are under the control of another lead agency. The following impact would remain significant and unavoidable:

1. Agriculture and Forestry Resources

Impact 5.2-1: The proposed project could convert approximately 13,816 acres of Important Farmland to nonagricultural use. . [Threshold AG-1]

Proposed General Plan

Figure 5.2-2, *Farmland Classifications within Contra Costa County*, of the DEIR, shows that farmland is primarily located in the eastern portion of the county outside the ULL. Under the proposed General Plan land use map, the County would designate 11,904 acres of land as Agricultural Core (AC), 96,721 acres of land as Agricultural Lands (AL), and 59,180 acres of land as Resource Conservation (RC), as shown in Figure 3-3, *Proposed General Plan Land Use Map*, in Chapter 3, *Project Description*, of the DEIR. These designations allow for agricultural (AC and AL) and grazing (RC) uses of these lands and place limitations on urban development. However, approximately 13,816 acres of land in the EIR Study Area that are classified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance are designated for a use other than AC, AL, or RC in the proposed General Plan, as shown in Figure 5.2-4, *Potential Farmland Conversions*, of the DEIR. Of this land, 3,447 acres are within the ULL, while the remaining 10,369 acres are outside of the ULL. The acreages of the land with nonagricultural designations that overlie Important Farmland are shown in Table 5.2-3, *Nonagricultural General Plan Designations that Intersect with Important Farmland*, in the DEIR.

According to this analysis, the proposed General Plan could result in the conversion of 13,816 acres to nonagricultural uses in the EIR Study Area. However, this analysis is conservative and does not consider site-specific and other factors that could affect the potential conservation of agricultural land. For example, development of land outside the ULL is restricted to non-urban uses by the County's ULL, which would help to prevent conversion of the majority (75 percent) of the total potential 13,816 acres. Additionally, the FMMP data used in this analysis may not accurately represent current conditions on the land. For example, the proposed General Plan land use designation of Water is only applied to areas that are inundated by water (based on County staff knowledge of sites and satellite imagery); therefore, the 22.5 acres of land identified as an area of potential agricultural conversion are inundated and not suitable for farmland.

The analysis may also overstate the proposed General Plan's influence on potential agricultural land conversion. Some areas identified in Table 5.2-3 of the DEIR are already designated for urban use, so the proposed General Plan would not change the potential for conversion from what is currently allowed. Furthermore, as shown in Table 5.2-3, 96 percent of the acreage of potential conversion identified by this analysis is designated as Parks and Recreation and Public/Semi-Public; these areas are owned by public agencies such as the Department of Water Resources, East Bay Regional Park District, the East Contra Costa Habitat Conservancy, and Ironhouse Sanitary District. This land will very likely be preserved for non-urban uses. Furthermore, as public agencies that are independent from the County and may be subject to limited or no County land use authority, these agencies would be required to perform their own analysis of the environmental impacts of converting this land should they decide to do so.

Moreover, the intent of the proposed General Plan is to preserve this land. For example, Policy COS-P2.2 directs the County to preserve and protect productive agricultural land from urban conversion, particularly land designated as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland on the Important Farmland Map, land with Class 1 or Class 2 soils, and land designated Agricultural Core. This policy, along with others in the Land Use Element and Conservation, Open Space Open Space, and Working Lands Element, would help to preserve agricultural lands from future urban development.

Policy LU-P2.1 continues implementing the 65/35 Land Preservation Standard, using the County ULL to focus future development in the county's established urban and suburban communities while preserving agricultural land, rangeland, natural habitats, watersheds, and open space. Policy LU-P2.2 limits the development outside the ULL to non-urban uses, such as agriculture, mineral extraction, wind and solar energy production, natural carbon sequestration, other resource-based uses, and essential infrastructure. Policy LU-P2.3 prohibits the major subdivisions outside the ULL as well as successive minor subdivisions of lots outside the ULL that were created through previous subdivisions. Policy LU-P2.8 discourages the extension of water and sanitary sewer lines into areas outside the ULL, except to serve public and semi-public uses that are not growth inducing, or when such extension is necessary to address a declared public health emergency. When lines are extended outside the ULL, they should be designed to service the intended use only, and not allow for additional future service connections. Policy COS-P2.2 preserves and protect productive agricultural land from conversion to urban uses, especially land designated as Prime Farmland of Statewide Importance, or Unique Farmland on the Important Farmland Map prepared by the California Department of Conservation; land containing Class 1 or Class 2 soils; and land designated Agricultural Core.

Although the proposed General Plan includes policies that would minimize the conversion of farmland, the proposed land use plan designates approximately 13,816 acres of Important Farmland in the EIR Study Area for nonagricultural uses. As discussed previously, the majority of this land is not intended for urban development and will likely be preserved for agricultural use, but this analysis conservatively determines that farmland could be converted as a result of the proposed General Plan, resulting in a potentially significant impact.

Proposed CAAP

Projects facilitated by the proposed CAAP Strategy NI-4 could conserve agriculture lands or implement regenerative agricultural practices, which would result in a beneficial effect on Important

Farmland. For example, actions under Strategy NI-4 include establishing pilot programs for carbon sequestration on agricultural land and promoting restorative agricultural and landscaping techniques.

On the other hand, projects facilitated by proposed CAAP actions that involve ground disturbance could result in the conversion of farmland to nonagricultural use. In particular, public uses such as solar and wind farms could occur in areas outside the ULL. As stated in the proposed General Plan Policy LU-P2.3, wind and solar energy production, other resource-based uses, and essential infrastructure would be allowed outside the ULL, and although these projects would support agricultural infrastructure and limit urban development, they could still result in farmland conversion. Therefore, the proposed CAAP would result in a potentially significant farmland conversion impact.

Mitigation Measures

The criterion for mitigation under CEQA is feasible mitigation that lessens a project's impacts. Agricultural conservation easements are a possible mitigation measure under CEQA. Programs that establish agricultural conservation easements and in-lieu fees for mitigation banking are most effective when determined concurrent with project approval. However, the effectiveness and extent to which future projects would opt-in to agricultural conservation easements as mitigation measures cannot be determined in this analysis; therefore, this impact would remain significant and unavoidable.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide and statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.2-4: The proposed project would result in the loss of forest land or conversion of forest land to non-forest use. [Threshold AG-4]

Proposed General Plan

As shown in Table 5.2-2, *Forestland Acreages in Contra Costa County*, of the DEIR, there is a total of 63,806 acres of forestland within Contra Costa County. The proposed General Plan could result in the conversion of forested areas and other upland habitats for future development.

The proposed Conservation, Open Space, and Working Lands Element includes policies that aim to preserve forested areas:

- **Policy COS-P6.1:** Preserve natural woodlands and significant trees, particularly mature native species, intact coastal scrub and chaparral, and grasslands, especially those with native grass and wildflower populations.

- **Policy COS-P6.2:** Encourage planting and propagation of California native trees and habitat-supporting native shrubs, forbs, and grasses throughout the county to enhance the natural landscape, provide shade (especially in riparian areas), sustain wildlife, absorb stormwater, and sequester carbon.
- **Policy COS-P6.3:** Support protection of native trees, especially oaks, in foothill woodlands and agricultural areas by encouraging voluntary installation of fencing around individuals or clusters of trees to prevent grazing and promoting replanting of native species.
- **Policy COS-P6.5:** Encourage revegetation with local or regional ecotypes of native species in areas that were previously converted for agriculture but are no longer in production.

In addition to these policies, Chapter 816-6, *Tree Protection and Preservation*, of the County Ordinance Code enhances protection of specified protected trees and establishes requirements for tree removal. As stated in Section 816-6.8002, *Permit Requirement*, individuals must apply for a tree permit prior to any disturbance of a protected trees. The County sets factors that must be considered for approval of a tree permit, such as if the arborist report indicates the tree is in poor health, in danger of falling, damaging existing private improvements, or determined to be a fire hazard. Therefore, although future development could result in the loss of forest land or conversion of forest land to non-forest use, there are regulations in place that would consider an array of factors before the removal or alternation of these habitats.

Regardless, even applying a combination of these policies by the proposed General Plan and implementation of the tree protection provisions of the County Ordinance Code, woodland habitat will likely be impacted by future development. Therefore, impacts to forest land under the proposed General Plan would be potentially significant.

Proposed CAAP

Projects facilitated by the proposed CAAP would not likely be proposed on forest land because the characteristics of forest land make it unsuitable for the types of projects that would be facilitated by the CAAP. However, as mentioned above, a certain amount of woodland habitat will likely be impacted by future development. The resulting impacts would be potentially significant.

Mitigation Measures

There are no feasible mitigation measures applicable to Impact 5.2-4. Although policies in the proposed General Plan would help to minimize impacts to loss of woodland and other habitat types and result in the planting of new trees, the proposed project could potentially convert forested areas to non-forested uses to accommodate future demand. Therefore, this impact is significant and unavoidable.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide and statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

2. Air Quality

Impact 5.3-2: Short-term construction activities associated with the proposed project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under applicable federal or State ambient air quality standards. [Threshold AQ-2].

Proposed General Plan

Construction

Construction activities would temporarily increase criteria air pollutant emissions within the SFBAAB. The primary source of NO_x emissions is the operation of construction equipment. The primary sources of particulate matter (PM₁₀ and PM_{2.5}) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary sources of volatile organic compounds (VOC) emissions are the application of architectural coating and off-gas emissions associated with asphalt paving. A discussion of health impacts associated with air pollutant emissions generated by construction activities is included under “Air Pollutants of Concern” in Section 5.3.2.1 of the DEIR.

Construction activities associated with the proposed General Plan would occur over the forecast year, causing short-term emissions of criteria air pollutants. Information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. Due to the scale of development activity associated with the proposed General Plan, emissions would likely exceed the BAAQMD regional significance thresholds. In accordance with the BAAQMD methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SFBAAB. Emissions of VOC and NO_x are precursors to the formation of O₃. In addition, NO_x is a precursor to the formation of particulate matter (PM₁₀ and PM_{2.5}). Therefore, the proposed General Plan would cumulatively contribute to the nonattainment designations of the SFBAAB for O₃ and particulate matter (PM₁₀ and PM_{2.5}).

Future development under the proposed General Plan would be subject to separate environmental review pursuant to CEQA in order to identify and mitigate potential air quality impacts. Subsequent environmental review of development projects would be required to assess potential impacts under BAAQMD’s project-level thresholds based on site-specific construction phasing and buildout characteristics. For the proposed General Plan, which is a broad-based policy plan, it is not possible to determine whether the scale and phasing of individual projects would exceed the BAAQMD’s short-term regional or localized construction emissions thresholds. As a result, construction activities associated with implementation of the proposed General Plan could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Existing federal, State, and local regulations and the policies and programs of the proposed General Plan described throughout this section protect local and regional air quality. Continued compliance with these regulations would reduce construction-related impacts and proposed policies would help to reduce construction emissions even further. The following proposed General Plan policies and actions would serve to minimize potential adverse impacts related to particulate matter air pollution:

- **Policy HS-P1.5:** Require new sources of air pollution that will generate significant new air quality impacts or expose sensitive receptors to substantial increases in harmful emissions of TACs to prepare a Health Risk Assessment that identifies appropriate mitigation consistent with BAAQMD California Environmental Quality Act (CEQA) Air Quality Guidelines, based on the findings of the Health Risk Assessment.
- **Policy HS-P1.7:** Require construction activities that involve large grading operations to implement additional construction measures identified in BAAQMD's CEQA Guidelines to reduce air pollutant emissions.
- **Policy HS-P1.9:** Prohibit nonessential diesel engine idling countywide and nonessential idling of all vehicles within 100 feet of sensitive receptors.
- **Action HS-A1.4:** Consult with BAAQMD and community stakeholders and amend County Ordinance Code Title 7 – Building Regulations to include a clean construction ordinance that requires projects to implement extra measures to reduce emissions at construction sites in or near places that are already overburdened by air pollution, such as Impacted Communities.
- **Policy HS-P2.1:** When evaluating health risk impacts of projects in Impacted Communities, use an excess cancer risk of 6.0 per million and a non-cancer (acute and chronic) hazard index greater than 1.0 as thresholds for finding that the project could cause a cumulatively considerable contribution and a significant impact.

While these existing and proposed regulations, policies, and programs have the potential to reduce emissions, potential future development projects accommodated under the proposed General Plan (individually or cumulatively) could still exceed the BAAQMD significance thresholds for construction. Therefore, implementation of the proposed General Plan could result in potentially significant construction-related regional air impacts.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions. Since implementation of the proposed CAAP would not involve any land use changes that would result in indirect growth or change in building density or intensity, its implementation would not directly result in the generation of construction-related criteria air pollutant emissions. Furthermore, the proposed CAAP would be subject to the same County standards that apply to development under the proposed General Plan, such as the 2017 *Clean Air Plan*. The 2017 *Clean Air Plan* includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and TACs. It also includes control measures to reduce emissions of methane and other GHGs that are

potent climate pollutants in the near-term and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

Therefore, the proposed CAAP would contribute to reducing construction-phase criteria air pollutant emissions and result in beneficial air quality impacts. Implementation of the proposed CAAP would not result in a cumulatively considerable net increase of a criteria pollutant for which the project region is in nonattainment under applicable federal or State ambient air quality standard, and impacts would be less than significant.

Mitigation Measure

AQ-1 Prior to discretionary approval by the County for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), future development involving construction on 1 acre or more shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the County Department of Conservation and Development for review and approval. The evaluation shall be prepared in conformance with the Bay Area Air Quality Management District (BAAQMD) methodology for assessing air quality impacts identified in their CEQA Air Quality Guidelines. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD-adopted construction screening criteria and thresholds of significance, the Department of Conservation and Development shall require feasible mitigation measures to reduce air quality emissions. Potential measures may include:

Require implementation of the BAAQMD Best Management Practices for fugitive dust control, such as:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout 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 (mph).
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.

- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

Measures shall be incorporated into appropriate construction documents (e.g., construction management plans) submitted to the County and shall be verified by the Department of Conservation and Development.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that reduces the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide and statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.3-3: Development under the proposed project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under applicable federal or State AAQS. [Thresholds AQ-2].

Proposed General Plan

Operation

BAAQMD has identified thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, NO, PM₁₀ and PM_{2.5}. Development projects below the significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. According to BAAQMD's CEQA Guidelines, long-range plans, such as the proposed General Plan, present unique challenges for assessing impacts. Due to the SFBAAB's nonattainment status for ozone

and PM and the cumulative impacts of growth on air quality, these plans almost always have significant, unavoidable adverse air quality impacts.

Implementation and adoption of the proposed General Plan would result in an increase in development intensity in the county. Development under the proposed General Plan would result in direct and indirect criteria air pollutant emissions from transportation, energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment). Mobile-source criteria air pollutant emissions are based on the traffic analysis conducted by Fehr and Peers (see Appendix 5.16-1, *Transportation Data*, of the DEIR). The emissions forecast for the county under the proposed General Plan compared to existing conditions is shown in Table 5.3-10, *Scenario 1: Criteria Air Pollutant Emissions Forecast Compared to Existing Conditions*, of the DEIR, and Table 5.3-11, *Scenario 2: Criteria Air Pollutant Emissions Forecast Compared to the Future No Project Conditions*, of the DEIR. As shown in these tables, implementation of the proposed General Plan would result in an increase in criteria air pollutant emissions from existing conditions and the future no project conditions, respectively. As stated previously, Scenario 2 isolates the effects of the proposed General Plan because both the future with no project and future with project conditions include emissions reductions from federal and State regulations.

As shown in these tables, development under the proposed General Plan would generate an increase in criteria air pollutant emission from both existing conditions (Scenario 1) as well as the future no project conditions (Scenario 2). Compliance with applicable policies and programs would contribute towards minimizing long-term emissions. However, implementation of the proposed General Plan would still exceed the BAAQMD significance threshold (no net increase) for operation. Therefore, implementation of the proposed General Plan could result in potentially significant long-term regional air quality impacts.

Proposed CAAP

As discussed under Impact 5.3-2 of the DEIR, implementation of the proposed CAAP would not involve any land use changes that would result in indirect growth or change in building density or intensity; therefore, its implementation would not directly result in the generation of operation-related criteria air pollutant emissions. Furthermore, as discussed under Impact 5.3-2 of the DEIR, the proposed CAAP would be subject to the same County standards that apply to development under the proposed General Plan, including the 2017 *Clean Air Plan*, which includes a wide range of control measures designed to decrease emissions of air pollutants, potent climate pollutants, and carbon dioxide by reducing fossil fuel combustion.

Additionally, the proposed CAAP would have co-benefits with regard to operation-related criteria air pollutant emissions. Building energy efficiency improvements (e.g., proposed CAAP Strategies BE-1 through BE-3) would promote sustainable building practices and would result in a decrease in natural gas use and associated criteria air pollutants (i.e., VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}). Likewise, transportation strategies that reduce VMT (e.g., Strategy TR-1) would result in a reduction in criteria air pollutants from the transportation sector.

Therefore, the proposed CAAP would contribute to reducing operation-phase criteria air pollutant emissions and result in beneficial air quality impacts. Implementation of the proposed CAAP would not result in a cumulatively considerable net increase of a criteria pollutant for which the project region

is in nonattainment under applicable federal or State ambient air quality standard, and impacts would be less than significant.

Mitigation Measures

AQ-2 Prior to discretionary approval by the County for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the Department of Conservation and Development for review and approval. The evaluation shall be prepared in conformance with Bay Area Air Quality Management District (BAAQMD) methodology in assessing air quality impacts identified in their *CEQA Air Quality Guidelines*. If operation-related air pollutants are determined to have the potential to exceed the BAAQMD-adopted operational screening criteria and thresholds of significance, the Department of Conservation and Development shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- Implementing commute trip reduction programs.
- Unbundling residential parking costs from property costs.
- Expanding bikeway networks.
- Expanding transit network coverage or hours.
- Using cleaner-fueled vehicles.
- Exceeding the current Title 24 Building Envelope Energy Efficiency Standards.
- Establishing on-site renewable energy generation systems.
- Requiring all-electric buildings.
- Replacing gas-powered landscaping equipment with zero-emission alternatives.
- Expanding urban tree planting.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that reduce the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social,

technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.3-5: Operational-phase emissions associated with the proposed project could expose sensitive receptors to substantial pollutant concentrations. [Threshold AQ-3]

Proposed General Plan

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. These pockets have the potential to exceed the State 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. Since CO is produced in the greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

The CCTA Congestion Management Program (CMP) must be consistent with the ABAG/MTC's Plan Bay Area, which is updated periodically. An overarching goal of the Plan Bay Area 2050 is to concentrate development in areas where there are existing services and infrastructure rather than allocate new growth in outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle VMT and associated GHG emissions reductions.

The proposed General Plan would be consistent with the overall goals of the Plan Bay Area 2050. Additionally, the proposed General Plan would not hinder the capital improvements outlined in the CMP. Thus, the proposed General Plan would not conflict with the CCTA CMP. Furthermore, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact. The proposed General Plan would not increase traffic volumes at affected intersections to more than BAAQMD screening criteria of 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited. Therefore, overall, the proposed General Plan would not have the potential to substantially increase CO hotspots at intersections in the county and vicinity. Overall, these components of the proposed General Plan would contribute to reducing congestion and associated emissions. Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

Stationary (Permitted) Sources

Various industrial and commercial processes (e.g., manufacturing and dry cleaning) allowed under the proposed General Plan would be expected to release TACs. TAC emissions generated by stationary and point sources of emissions within the Air Basin are regulated and controlled by BAAQMD. Land

uses that would require a permit from BAAQMD for emissions of TACs include chemical processing facilities, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. Emissions of TACs from stationary sources would be controlled by BAAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under Regulation 2, *New Source Review*, as well as Regulation 11, Rule 18, *Reduction of Risk from Air Toxic Emissions at Existing Facilities*.

Review under New Source Review ensures that stationary source emissions (permitted sources) would be reduced or mitigated below BAAQMD community risk and hazards thresholds. Though these sources would incrementally contribute to emissions in the unincorporated county individually, they would be mitigated to BAAQMD standards.

The following proposed General Plan policies and actions would serve to minimize potential adverse impacts on air quality by increasing standards and promoting cooperation with outside agencies:

- **Policy HS-P1.4.** Require new industrial development to locate significant pollution sources at the maximum distance possible from sensitive receptors.
- **Action HS-A1.3.** Consult with BAAQMD and community stakeholders and amend County Ordinance Code Title 8 – Zoning to include an Industrial-Sensitive Receptor Interface Overlay Zone applied to areas where residential land uses and other sensitive receptors interface or directly abut heavy industrial land uses. In the overlay zone, require industrial uses to reduce pollution and employ strategies to mitigate air quality, noise, vibration, odor, light, visual, and safety impacts on nearby sensitive receptors. In addition, require new sensitive receptors to install enhanced ventilation systems and implement other strategies, paid for by neighboring sources of pollution to the extent possible, to protect residents from health and quality of life impacts.
- **Action HS-A2.4.** Coordinate with BAAQMD to determine where to focus a targeted permit inspection program in Impacted Communities to help ensure enforcement of air quality permits.

The policies and actions listed above would minimize potential health risk impacts to sensitive receptors. Though the proposed General Plan includes policies to reduce exposure of sensitive receptors to pollution, and BAAQMD would ensure that on a project-by-project basis emission achieve their permit thresholds, emissions cannot be determined or modeled until specific development projects are proposed. Therefore, implementation of the proposed General Plan may result in projects that emit TACs and PM_{2.5} throughout the unincorporated county and result in potentially significant localized air quality impacts.

Nonpermitted Sources

TACs and PM_{2.5} from mobile sources when operating at a property (e.g., truck idling) are regulated by statewide rules and regulations, not by BAAQMD, and have the potential to generate substantial concentrations of air pollutants. The primary mobile source of TACs within the unincorporated county includes truck idling and use of off-road equipment.

New warehousing operations could generate substantial DPM and PM_{2.5} emissions from off-road cargo-handling equipment use and truck idling. In addition, some warehousing and industrial facilities may include use of TRUs for cold storage. New land uses in the unincorporated county that would be

permitted under the proposed General Plan that use trucks, including trucks with TRUs, could generate an increase in DPM that would contribute to cancer and noncancer health risk in the Air Basin. Additionally, these types of facilities could also generate particulate matter (PM₁₀ and PM_{2.5}) that may cause an exceedance or contribute to the continuing exceedance of the federal and State AAQS. These new land uses could be near existing sensitive receptors. In addition, trucks would travel on regional transportation routes through the Bay Area, contributing to near-roadway DPM concentrations.

The proposed General Plan would potentially result in an increase of 5 million square feet of industrial land uses. The areas intended for industrial uses would be primarily associated with existing planned and/or permitted industrial development. Additionally, existing residences are close to existing and planned Industrial designations, and overlap with many of the Overburdened and Impacted Communities. As identified in the Figure 3-3, *Proposed General Plan Land Use Map*, in the DEIR, industrial areas are proximate to residential areas in several areas of the unincorporated county. These areas are proximate to sensitive receptors. Until specific future development projects are proposed, the associated emissions and concentrations cannot be determined or modeled.

The County will require project applicants to prepare project-specific analyses of qualifying projects and incorporate project-specific mitigation measures to reduce TACs, per the following policies:

- **Policy HS-P1.5.** Require new sources of air pollution that will generate significant new air quality impacts or expose sensitive receptors to substantial increases in harmful emissions of TACs to prepare a Health Risk Assessment that identifies appropriate mitigation consistent with BAAQMD California Environmental Quality Act (CEQA) Air Quality Guidelines, based on the findings of the Health Risk Assessment.
- **Policy HS-P2.1.** When evaluating health risk impacts of projects in Impacted Communities, use an excess cancer risk of 6.0 per million and a non-cancer (acute and chronic) hazard index greater than 1.0 as thresholds for finding that the project could cause a cumulatively considerable contribution and a significant impact.

If the results show that the incremental cancer risk exceeds ten in one million (or the risk thresholds in effect at the time a project is considered) or six in one million in Impacted Communities, the appropriate noncancer hazard index exceeds 1.0, or 0.3 µ/m³ of PM_{2.5}, or the thresholds as determined by the BAAQMD at the time a project is considered, the applicant is required to mitigate the potential cancer and noncancer risks to an acceptable level.

The following policy in the proposed General Plan would reduce the exposure of sensitive receptors in Impacted Communities and Overburdened Communities to TACs and PM_{2.5}:

- **Policy HS-P1.8.** Require new or expanded commercial and industrial projects resulting in 25,000 square feet or more of gross habitable floor area, such as warehouses and other large enclosed buildings, to be near zero-emission operations, including the facilities themselves and the associated fleets. Require all necessary measures, such as the following, to achieve near zero emissions:
 - (a) Reduce on-site energy consumption and increase on-site energy generation and energy storage.

- (b) Provide adequate on-site zero-emission vehicle parking for all anticipated truck traffic to prevent idling and off-site queuing.
- (c) Provide electrified loading docks with receptacles allowing plug-in of refrigerated trailers.
- (d) Use heavy-duty trucks that are model year 2014 or later and expedite a transition to zero-emission trucks by establishing a clear timeline for electrification of trucks as they become commercially available. Ensure contracts with motor carriers include air quality incentives or requirements, such as providing incentives to fleets that meet United States Environmental Protection Agency (EPA) SmartWay standards or requiring use of zero-emission or near-zero-emission trucks.
- (e) Use a “clean fleet” of delivery vehicles as they become commercially available, but no later than 2025.
- (f) Use zero-emission yard equipment, such as forklifts, pallet trucks and jacks, and stackers.
- (g) Implement practices to control and remove fugitive dust and other contaminants from paved areas.

Uses with fewer than five vehicles domiciled on-site are exempt from this policy.

The policies listed above aim to reduce pollution from industrial development to nearby sensitive receptors and would require more project-specific mitigation measures to reduce TACs, especially in Impacted Communities. Policy HS-P1.8 also pushes to reduce truck idling, promotes the replacement of older heavy-duty trucks, and supports near zero emissions operations.

Though the proposed General Plan includes policies and actions to reduce air pollutant emissions exposure within Impacted Communities, the proposed General Plan could result in specific development projects that could emit TACs and PM_{2.5}. The emissions associated with these facilities cannot be determined or modeled until specific development projects are proposed. Therefore, implementation of the proposed General Plan may result in projects that emit TACs and PM_{2.5} in the vicinity of Impacted Communities and sensitive receptors and result in potentially significant localized air quality impacts.

Therefore, without project-specific analysis health risk impacts from nonpermitted sources associated with development of industrial and commercial land uses are considered potentially significant.

Proposed CAAP

As discussed under Impact 5.3-2, implementation of the proposed CAAP would not involve any land use changes that would result in indirect growth or change in building density or intensity; therefore, its implementation would not directly result in the generation of operation-related criteria air pollutants, TAC and PM_{2.5} emissions, or generation of vehicle trips to produce CO hotspots. In addition, as stated under Impact 5.3-3, implementation of the CAAP could result in beneficial long-term air quality impacts from the increase in energy efficiency, usage of clean energy, and reduction in VMT. A reduction in vehicle trips would contribute to further minimizing the potential creation of CO hotspots. Therefore, implementation of the proposed CAAP would not expose sensitive receptors to substantial pollutant concentrations of TACs, and impacts would be less than significant.

Mitigation Measures

AQ-4 Prior to discretionary approval by the County, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes) or Impacted Community, as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the Department of Conservation and Development for review and approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District (BAAQMD). The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the cumulative and project-level incremental cancer risk, noncancer hazard index, and/or PM_{2.5} exceeds the respective threshold, as established by BAAQMD (all areas of the unincorporated county) and project-level risk of six in one million in Impacted Communities, BAAQMD's Overburdened Communities, and within 1,000 feet of a BAAQMD Overburdened Community; ten in a million in all other areas; PM_{2.5} emissions that exceed 0.3 µg/m³; or the appropriate noncancer hazard index exceeds 1.0, the project applicant will be required to identify best available control technologies for toxics (T-BACTs) and appropriate enforcement mechanisms, and demonstrate that they are capable of reducing potential cancer, noncancer risks, and PM_{2.5} to an acceptable level. T-BACTs may include but are not limited to:

- Restricting idling on-site beyond Air Toxic Control Measures idling restrictions
- Electrifying warehousing docks
- Requiring use of newer equipment
- Requiring near-zero or zero-emission trucks for a portion of the vehicle fleet based on opening year
- Truck Electric Vehicle (EV) Capable trailer spaces
- Restricting off-site truck travel through the creation of truck routes
- T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that reduce the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

3. Cultural and Tribal Cultural Resources

Impact 5.5-1: Implementation of the proposed project could cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5. [Threshold C-1].

Proposed General Plan

Section 15064.5 (b)(1) of the CEQA Guidelines defines a substantial adverse change in the significance of a historic resource to be the “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Implementation of the proposed General Plan could potentially result in impacts on historical resources in the EIR Study Area. Specifically, direct impacts could occur if buildings determined to be historic are demolished or significantly altered as a result of implementation of the proposed General Plan.

As detailed in Section 5.5.1.1 of the DEIR, there are a number of federal and State regulations in place to protect historical resources within the EIR Study Area. Currently known or future historic sites or resources listed in the National or California Registers or the Contra Costa County Historic Resources Inventory (HRI) would be protected through State and federal regulations restricting alteration, relocation, and demolition of historical resources. Compliance with the State and federal regulations is intended to ensure that development would not result in adverse impacts to identified historic and cultural resources. Historical resources are protected under the regulations of the Nation Historic Preservation Act (NHPA) when projects involve federal agencies. In addition, the proposed General Plan policies take a comprehensive approach to the protection of historical resources. The Conservation, Open Space, and Working Lands Element of the proposed General Plan includes policies and actions that would mitigate potential impacts on historical resources, including through the policies and actions under Goal COS-10, which aims to identify and preserve historic resources. For example, Policies COS-P10.1 and COS-P10.2 encourage the preservation and adaptive reuse of historic resources. This includes using the Secretary of the Interior’s Standards for the Treatment of Historic Properties, where possible. Policy COS-P10.11 seeks to incentivize preservation and adaptive reuse by establishing programs and funding mechanisms that support the preservation, restoration, and enhancement of cultural, historic, and archaeological sites. Policy COS-P10.5 requires applicants to engage a qualified consultant to prepare an evaluation of historic resources that may be present on a project site when a project involves a resource listed on the County’s HRI or as otherwise necessitated through the CEQA process. Policy COS-P10.7 requires significant historic resources to be either

preserved onsite or adequately documented as a condition of removal. Any documentation of historic resources shall be conducted in accordance with Historic American Building Survey (HABS) Level III standards, as defined by the US Secretary of the Interior. Actions COS-A10.1 through COS-A10.4 support these policies, ensuring that surveys of existing and as-yet unknown resources are performed and updated regularly, and that planning tools, such as ordinances, design guidelines, context statements, and management plans are put in place to support implementation of the policies.

The proposed General Plan would not substantially alter any policies regarding the significance of impacts on historical resources. In addition, the proposed General Plan would not alter the significance of impacts on historical resources compared to existing conditions. Furthermore, the proposed General Plan would not modify the procedures or policies regarding how historical resources are identified or evaluated for historical significance, nor would it change how impacts on historical resources are assessed or mitigated under the General Plan.

The goals, policies, and actions in the proposed General Plan, in combination with existing federal and State regulations in place to protect historical resources within the EIR Study Area, are intended to ensure that development would not result in adverse impacts to identified historic and cultural resources; however, it is always a potential. Under CEQA, conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties would normally mitigate impacts to a less-than-significant level. Because the proposed project is a program-level effort, it is not possible to determine whether individual future projects would be able to conform with the Secretary of Interior's Standards. However, CEQA would require that future projects with the potential to significantly impact historic resources be subject to project-level CEQA review wherein the project's potential to affect the significance of a surrounding historic resource would be evaluated and mitigated to the extent feasible. The requirement for subsequent CEQA review would minimize the potential for new development to indirectly affect the significance of historic resources to the maximum extent practicable.

Even with implementation of the proposed General Plan goals, policies, and actions, the regulations would not fully reduce potential impacts on historic resources at the programmatic level. Therefore, this is considered a potentially significant impact.

Proposed CAAP

The proposed CAAP is a policy document that does not include specific projects. However, projects that would implement the proposed CAAP strategies and actions could result in the construction of physical improvements and infrastructure in the county that is designed to help meet the emissions targets in the CAAP, which could adversely impact historic resources in the EIR Study Area through changes to accommodate adaptive use, removal, or reconstruction. Projects that would implement the proposed CAAP strategies and actions would be required to be consistent with the proposed General Plan as well as federal and State regulations in place to protect historical resources within the EIR Study Area. However, even with implementation of the proposed General Plan goals, policies, and actions, the regulations would not fully reduce potential impacts of the proposed CAAP on historic resources. Therefore, this is considered a potentially significant impact.

Mitigation Measures

No feasible mitigation measures are available. Policies and actions in the proposed General Plan, including Policy COS-P10.5 requiring evaluation of historic resources for projects that may impact a

resource listed in the County's Historic Resources Inventory, and Policy COS-P10.7 requiring significant historic resources to be either preserved on-site or adequately documented as a condition of removal (any documentation of historic resources shall be conducted in accordance with Historic American Building Survey Level III standards, as defined by the US Secretary of the Interior), in addition to federal and State regulations, would reduce impacts to the extent possible and additional project-specific mitigation measures would be incorporated pursuant to future project-specific review.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

4. Mineral Resources

Impact 5.12-1: Implementation of the proposed project could result in the loss of availability of a known mineral resource. [Thresholds M-1 and M-2].

Proposed General Plan

As shown in Figure 5.12-1, *County-Designated Mineral Resource Areas*, in the DEIR, the county's critical mineral resources are near Mount Zion and Clayton for diabase and Mount Diablo and Byron for domengine sandstone. As shown in Figure 5.12-3, *Operating Mines in the Unincorporated County*, in the DEIR, there are no other active mining operations in the EIR Study Area outside of these two mineral resource areas. However, per the latest available data from the DOC, several additional areas in the EIR Study Area overlie significant or potentially significant mineral resource areas designated by Surface Mining and Reclamation Act (SMARA), as shown in Figure 5.12-2, *Mineral Resource Zones and Resource Sectors*, in the DEIR. Under the proposed General Plan, development of non-mineral extraction uses would be allowed on land that overlies mapped MRZ-2 and MRZ-3 areas, including those in the communities of Rodeo, Vine Hill, and Bay Point. MRZ-2 designated areas are areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence. MRZ-3 designated areas are assumed to contain mineral deposits, the significance of which cannot be evaluated.

Development projects under the proposed General Plan would be required to comply with Chapter 88-11 of the County Ordinance Code, which implements SMARA. This chapter aims to protect significant mineral resources from the intrusion of incompatible land uses. However, because the General Plan would allow incompatible development in designated MRZ-2 and MRZ-3 areas, impacts would be potentially significant.

As shown in Figure 5.12-4, *Oil and Gas Resources*, in the DEIR, the county also contains gas and oil deposits that underlie portions of the EIR Study Area. Chapter 8-14 of the County Ordinance Code allows oil and gas drilling in specific agricultural zones and places restrictions on drilling within proximity to urban development. Proposed General Plan Action COS-A14.1 would further restrict oil and gas drilling operations from being established in sensitive ecological areas, areas subject to flooding and sea-level rise, and areas within 3,200 feet of sensitive receptors or urban land use designations. This action would also limit oil and gas drilling operations to agricultural zones and require a land use permit, reclamation plan, and performance standards related to surface water and groundwater quality and quantity, air quality, odors, noise, and aesthetics. Since the proposed land use plan would allow incompatible development in areas that overlie these resources and the proposed General Plan intends to limit new extraction uses, impacts would be potentially significant.

Proposed CAAP

As a policy document that aims to reduce greenhouse gas (GHG) emissions and adapt to changing climate conditions, the proposed CAAP is not expected to result in any impacts with regard to loss of aggregate mineral resources. In addition, while the intent of the CAAP is to provide a pathway for the county to achieve reductions in GHG emissions, which includes prioritizing the use of renewable energy sources, the CAAP does not include strategies and actions that prohibit the continuation of oil and gas extraction in the county, and the impact is less than significant.

Mitigation Measures

There are no feasible mitigation measures. The provisions of SMARA would reduce impacts to aggregate mineral resources to the extent possible by requiring site-specific evaluations to discover the presence of mineral resources. Subsequent review under CEQA for applicable projects would require the incorporation of measures that would reduce impacts as feasible.

Mineral and resource extraction could face reduced output due to development of incompatible uses on or near mineral resource areas. Aggregate mineral resource areas are in established communities, including Rodeo, Vine Hill, and Bay Point, all of which are Impacted Communities where the County finds it appropriate to promote community investment and development in support of environmental justice. Extraction of oil and gas deposits can pose health risks to nearby sensitive receptors and hazards to nearby sensitive ecological areas, so the General Plan includes an action directing the County to further regulate drilling operations near sensitive receptors and ecological areas that will have the effect of potentially reducing the ability to extract mineral resources. These are important policy objectives of the proposed project, and impacts are significant unavoidable.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits,

including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

5. Noise

Impact 5.13-1: Construction activities would result in temporary noise increases in the vicinity of the proposed project. [Threshold N-1].

Proposed General Plan

As part of implementing the proposed project, various individual future development projects would generate temporary noise level increases on and adjacent to construction sites in the EIR Study Area. Construction within the EIR Study Area would be limited to weekdays and non-holidays to the hours set forth in the proposed General Plan Policy HS-P14.7. The hours would be from 7:30 a.m. to 5:00 p.m. when construction occurs within 1,000 feet of a noise sensitive receptor; and 7:00 a.m. to 6:00 p.m. when construction occurs at distances greater than 1,000 feet from the nearest noise-sensitive receptor. Construction is performed in distinct steps, each of which has its own mix of equipment, and, consequently, its own noise characteristics. Table 5.13-9, *Reference Construction Equipment Noise Levels*, in the DEIR, lists typical construction equipment noise levels recommended for noise-impact assessments based on a distance of 50 feet between the equipment and noise receptor.

As shown, construction equipment generates high levels of noise, with maximums ranging from 76 to 101 dBA at a distance of 50 feet. Construction of individual development projects associated with implementation of the proposed project would temporarily increase the ambient noise environment and would have the potential to affect noise-sensitive land uses in the vicinity of an individual project.

Construction noise levels are highly variable and dependent upon the specific locations, site plans, construction details, and presence or absence of any natural or human-made barriers with potential acoustic dampening effects (e.g., the presence of vegetation, berms, walls, or buildings). Significant noise impacts may occur from operation of heavy earth-moving equipment and truck-haul operations that would occur with construction of individual development projects, which have not yet been developed, particularly if construction techniques, such as impact or vibratory pile driving, are proposed. The time of day that construction activity is conducted would also determine the significance of each project, particularly during the more sensitive nighttime hours. However, construction would be localized and would occur intermittently for varying periods of time.

Because specific project-level information is inherently not available at this time, it is not possible nor appropriate to quantify the construction noise impacts at specific sensitive receptors. In most cases, construction of individual development projects associated with implementation of the proposed project would temporarily increase the ambient noise environment in the vicinity of each individual project, potentially affecting existing and future nearby sensitive uses. Proposed General Plan Policy HS-P14.6 would help to mitigate County projects by requiring them to minimize short-term noise impacts on sensitive receptors by following best practices to minimize short-term impacts from construction noise. However, because construction activities associated with any individual development may occur near noise-sensitive receptors and because, depending on the project type, equipment list, time of day, phasing, and overall construction durations, noise disturbances may occur

for prolonged periods of time or during the more sensitive nighttime hours, construction noise impacts associated with implementation of the proposed project are considered potentially significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing greenhouse gas (GHG) emissions and adapting to changing climate conditions. While the proposed CAAP would not directly result in any new development, the implementation of its actions may indirectly result in construction activity. Similar to construction activity under the proposed General Plan, such activity could occur near noise-sensitive receptors. Depending on the project type, equipment list, time of day, phasing, and overall construction durations, noise disturbances may occur for prolonged periods of time or during the more sensitive nighttime hours. Therefore, construction noise impacts associated with implementation of the proposed project are considered potentially significant.

Mitigation Measures

N-1 Require construction contractors to implement the following measures for construction activities. Demolition, grading, and construction plans submitted to the County shall identify these measures and the County Department of Conservation and Development shall verify that the submitted plans include these notations prior to issuance of demolition, grading, and/or construction permits:

- During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds) available.
- Impact tools (e.g., jack hammers and breakers) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary equipment, such as generators and air compressors, shall be as far as feasible from nearby noise-sensitive uses.
- Stockpiling shall be as far as feasible from nearby noise-sensitive receptors.
- Construction traffic shall be limited, to the extent feasible, to approved haul routes approved by the County Conservation and Development and Public Works Departments.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the County's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, they shall investigate, take appropriate corrective action, and report the action to the County.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.
- Erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier.

Finding:

Changes or alterations have been required in, or incorporated into, the proposed project that reduce the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The County finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.13-2 Project implementation would generate a substantial traffic noise increase on local roadways and could locate sensitive receptors near rail in areas that exceed established noise standards. [Threshold N-1].

Proposed General Plan

Transportation Noise

Land use development that results in traffic increases can also result in long-term traffic noise increases on roadways and freeways in the county. New development and associated traffic noise increases could

result in exposure of existing receptors or future planned development to substantial permanent noise increases. Depending on the proximity of future projects to other land use types and existing major freeways and roadways, traffic noise increases could expose sensitive receptors to substantial traffic noise levels that would exceed applicable noise standards. Future CNEL noise levels at 50 feet along local roadways for existing and future conditions provided by Illingworth & Rodkin are shown below in Table 5.13-10, *Existing and Future Modeled Noise Levels Along Surrounding Roadways*, of the DEIR.

As shown in Table 5.13-10, significant traffic noise increases are estimated along numerous study roadway segments from implementation of the proposed project when analyzed using FAA thresholds, which are identified in the proposed General Plan Policy HS-P14.5. The traffic noise increase is the difference between the projected future noise level and the existing noise level. The modeling also shows that along several roadway segments, a decrease in traffic noise levels is anticipated from implementation of the proposed project. Implementation of proposed General Policies HS-P14.5, HS-P14.6, and HS-P14.9 would help reduce impacts by utilizing best practices and requiring mitigation as feasible for roadways that exceed the thresholds in Policy HS-P14.5 in order to reduce long-term (traffic) impacts to adjacent noise sensitive land uses. However, traffic noise increases would still be potentially significant.

Table 5.13-11, *Proposed General Plan Traffic Noise Contour Distances*, of the DEIR, presents the future distances from the 60, 65, and 70 dBA CNEL contours along the local roadways. With the implementation of proposed General Plan Policies HS-P14.1 and HS-P14.2, noise-sensitive land uses would either be located in areas where existing noise levels are normally acceptable for the specific land use (as shown in Table HS-3 of the proposed General Plan), or a detailed acoustical analysis would be required to identify appropriate mitigation to meet the noise compatibility standards. In addition, future noise-sensitive land use projects that are exposed to a DNL of 60 dB or greater are required to provide a detailed acoustical analysis demonstrating how the project would provide an interior DNL of 45 dB or less.

Rail and Airport Noise

Table 5.13-12, *Future Railroad Noise Levels*, of the DEIR, contains the calculated distances to the 65 dBA L_{dn} /CNEL contours from future railroad noise. The same methodology that was used to estimate existing railroad noise contours was used for future railroad activity. Though implementation of the proposed project would not cause a direct increase in rail activity, future residential development could be placed located within distances to rail that could expose them to noise levels that exceed the applicable noise standard for the respective land use type.

In addition, future noise-sensitive land uses could be in areas that exceed the “Normally Acceptable” noise standards due to airport operations (see Figure 5.13-7, *Buchanan Field Airport Noise Contours* and 5.13-8, *Byron Airport Noise Contours*, of the DEIR). Implementation of proposed General Plan Policy HS-P14.4 would require that new residential development in areas exposed to a DNL in excess of 65 dB due to single events, such as train operation (which can also extend to airport activity), provide an acoustical analysis describing how indoor noise levels from these single events will not exceed a maximum A-weighted noise level of 35 dB in bedrooms and 55 dB in other habitable rooms. In areas exposed to a DNL in excess of 65 dB, an indoor residential noise-level threshold of 45 dB CNEL is required. However, impacts would still be potentially significant.

Proposed CAAP

The proposed CAAP is a policy document that provides strategies for reducing GHG emissions and adapting to changing climate conditions. While the proposed CAAP would not directly result in any new development, the implementation of its actions, which may indirectly result in new development, would be subject to the same County standards that apply to development under the proposed General Plan, as applicable. The proposed CAAP does not include any strategies or actions that would otherwise result in permanent noise increases (e.g., rail, or traffic noise) and other items such as power windmills would be subject to County noise standards, so impacts would be less than significant.

Mitigation Measures Considered

The following measures were considered for mitigating or avoiding Impact 5.13-2.

Special Roadway Paving

Notable reductions in tire noise have been achieved via the implementation of special paving materials, such as rubberized asphalt or open-grade asphalt concrete overlays. For example, the California Department of Transportation conducted a study of pavement noise along Interstate 80 in Davis and found an average improvement of 6 to 7 dBA compared to conventional asphalt overlay.

Although this amount of noise reduction from rubberized/special asphalt materials would be sufficient to avoid the predicted noise increase due to traffic in some cases, the potential up-front and ongoing maintenance costs are such that the cost versus benefits ratio² may not be feasible and reasonable and would not mitigate noise to a level of less than significant in all cases. In addition, the study found that noise levels increased over time due to pavement raveling, with the chance of noise-level increases higher after a 10-year period.

Sound Barrier Walls

Some, if not most, residences in the EIR Study Area have direct access via driveways to the associated impacted roadways. Barrier walls would prevent access to individual properties and would be infeasible. Further, these impacted homes are on private property outside of the control of future project developers, so there may be limited admittance onto these properties to construct such walls. Lastly, the costs versus benefits ratio in relation to the number of benefitted households may not be feasible and reasonable in all cases.

Sound Insulation of Existing Residences and Sensitive Receptors

Exterior-to-interior noise reductions depend on the materials used, the design of the homes, and their conditions. To determine what upgrades would be needed, a noise study would be required for each house to measure exterior-to-interior noise reduction. Sound insulation may require upgraded windows, upgraded doors, and a means of mechanical ventilation to allow for a “windows closed” condition. There are no funding mechanisms and procedures that would guarantee that the implementation of sound insulation features at each affected home would offset the increase in traffic

² Cost versus benefit considerations are in terms of the number of households benefitted, per the general methodology employed by Caltrans in the evaluation of highway sound walls.

noise to interior areas and ensure that the State's 45 dBA CNEL standard for multiple-family residences would be achieved.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081 (a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

6. Transportation

Impact 5.16-2: Implementation of the proposed project would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). [Threshold T-2]

Proposed General Plan

CEQA Guidelines Section 15064.3(b) states that a land use project would have a less-than-significant impact if the VMT in the project area are expected to be less than that of existing conditions. As discussed under Section 5.16.2.1, *Contra Costa County Thresholds*, of the DEIR, VMT can be measured in different ways. For the purpose of this analysis, the metric of total VMT per service population was determined to be the most appropriate, as it captures all trip purposes from all types of development. This approach aligns with the guidance provided by OPR and follows the methodology described in the County's Transportation Analysis Guidelines.

VMT Assessment

As described in Section 5.16.1.1 and Section 5.16.2.1 of the DEIR, the County has adopted VMT thresholds for land use development projects. For the purposes of this evaluation, and based on the VMT thresholds described above, the impact would be significant if the implementation of the project would generate total VMT per service population that is higher than 85 percent of the Contra Costa countywide average total VMT per service population. It is important to note that, while the OPR guidance recommends that project-level impacts be evaluated against baseline conditions, for this analysis the total VMT per service population of the proposed project is being evaluated under both baseline (2020) and future (2045) conditions, as described in Section 5.16.2.1 of the DEIR. This is because a General Plan is a long-range, large-scale planning document that will be implemented over many years, so a comparison to both baseline and future conditions can provide relevant and meaningful information to project reviewers.

A summary of the two CCTA model scenarios (baseline and cumulative) are shown in Table 5.16-1, *Summary of VMT Results*, of the DEIR.

This analysis shows that VMT rates in the EIR Study Area are projected to decline between the 2020 Baseline and the 2045 Cumulative Plus Project scenario with implementation of the proposed General Plan, from 33.2 in the baseline to 29.6 in the cumulative scenario. This Cumulative Plus Project scenario VMT per service population is slightly higher than the countywide average VMT per service population of 29.5 in the 2020 Baseline; it is also higher than the countywide average of 28.3 in the Cumulative Plus Project scenario. These results indicate that, despite the projected per capita VMT reduction in the EIR Study Area between the 2020 baseline and the future 2045 scenario, implementation of the proposed project would result in VMT per service population that exceeds the 85-percent threshold values of 25.1 (baseline) and 24.1 (cumulative).

Figures 5.16-5a, *VMT Map 2020 Baseline*, and 5.16-5b, *VMT Map 2045 Cumulative Plus Project*, of the DEIR show the areas of the EIR Study Area that have relatively higher and lower values of VMT. Areas of relatively lower VMT tend to be areas with higher density residential development, good proximity to high-quality transit, and a mix of land uses so that residents need to travel shorter distances to visit shops, essential businesses, and places of employment, for both modeled scenarios.

Policy Considerations

As future development projects proceed under the proposed General Plan, those projects that do not screen out from a VMT impact analysis will be required to provide a quantitative VMT analysis consistent with the methods outlined in the County Guidelines, with modifications if appropriate based on future changes to County practices. Projects that result in a significant impact may be required to implement TDM strategies and other specific project design strategies to reduce VMT.

The County's TDM Ordinance and guidelines encourage project developers to use creative and effective ways to reduce motor vehicle trips and their associated impacts. The Ordinance requires that all residential projects containing 13 or more dwelling units provide information to the residents about public transit, ridesharing, and active transportation options available in the vicinity of the project. Both residential and non-residential project developers are required to consult with the local transit provider about any needed infrastructure to connect the project with nearby transit services. Further, the guidelines present a range of potential TDM measures that project developers can consider, ranging from physical improvements that would be incorporated into the project's design (such as bike racks, traveler information kiosks, or pedestrian facilities linking the project site to a nearby transit stop) to operational programs that would be implemented once the project is occupied (such as providing transit or rideshare incentives).

Other strategies that may be implemented on a project-level to reduce VMT, consistent with the California Air Pollution Control Officers Association's (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, are as follows:

- Increase building density.
- Integrate a higher number of affordable and below-market rate housing units.
- Increase the mix of uses by adding retail or services within a residential site or within convenient walking distance.
- Reduce the number of parking spaces provided.

- Unbundle parking costs (i.e., sell or lease parking separately from the housing unit or the commercial enterprise).
- Provide car-sharing, bike-sharing, or scooter-sharing programs.
- Subsidize transit passes, with particular emphasis on transit passes for residents of affordable housing that is located in proximity to high-quality transit services.
- Consider participation in a future VMT mitigation program, such as a fee program, bank, or exchange, to provide funding for actions that operate at a scale larger than an individual development site, such as constructing bicycle facilities, operating shuttle services around employment centers, or increasing the frequency of existing transit services. No local or regional VMT mitigation program currently exists; however, should such a program be implemented, development projects could participate in the program to purchase mitigation credits to achieve needed VMT mitigation instead of, or in addition to, on-site TDM measures.

The potential effectiveness of each strategy should be evaluated based on the calculation steps, recommendations, and limitations described in the CAPCOA Handbook.

In addition to VMT-reducing strategies that can be implemented on a project level, the proposed General Plan includes numerous policies that target the reduction of VMT through County planning efforts, including prioritizing the construction of active transportation infrastructure and safety improvements to existing infrastructure (i.e., Policy TR-P1.2, Action TR-A3.1, Action TR-A2.2, all policies and actions under Goal TR-2, TR-4, and TR-5); expanding transit access (i.e., Policies TR-P1.8, TR-P1.9, TR-P1.10, TR-P1.11, and TR-P4.2 and Actions TR-A1.5, TR-A1.6, TR-A1.7, TR-A1.8, TR-A1.9); encouraging high-density, infill, and mixed-use development where feasible (i.e., Policies LU-P2.1, LU-P2.5, LU-P2.6, LU-P3.3); encouraging efforts to put jobs near housing and housing near transit (i.e., Policies LU-P3.1, LU-P3.2, LU-P5.2, LU-P7.2, and LU-P7.5); evaluating reductions to parking minimums (i.e., Action LU-A5.1); and the requirement for all projects to support these VMT-reducing efforts (i.e., Policy LU-P3.4). Many of these policies and actions overlap with the CAPCOA handbook strategies listed above.

Summary

The proposed General Plan will guide long-range development over a broad geographic area; therefore, it is not possible to predict with precision which strategies may be implemented at specific locations and at specific times. Further, the CCTA Model does not readily account for many of these measures, particularly those related to site-specific physical improvements, pedestrian and bicycle facilities, and ongoing operational or incentive programs. For those reasons, the potential effects of the TDM and VMT reduction strategies outlined in this discussion are not included in the VMT estimates presented in this analysis.

Since there is considerable uncertainty about the feasibility of any particular TDM measure for any specific future development project, as well as uncertainty about the timing of implementation and about whether a program to fund off-site mitigation options might be implemented at some point in the future, it would not be possible to conclude that adding the strategies listed above would definitely bring the future EIR Study Area VMT down to the 15 percent threshold level. Because the proposed project would exceed the countywide average total VMT per service population under both the baseline and cumulative scenarios, impacts are considered significant and unavoidable.

Proposed CAAP

The proposed CAAP is a policy document that aims to reduce GHG emissions in the unincorporated county and provide guidance to the County for adapting to changing climate conditions; therefore, it is consistent with the intent of CEQA Guidelines Section 15064.3(b) to reduce VMT. As shown in Table 4, *Proportion of GHG Emissions, 2005 to 2019*, of the proposed CAAP, transportation-related emissions have accounted for the highest share of emissions across all sectors and all years in the unincorporated county. To address this, the proposed CAAP includes the “Clean Transportation Network” group of strategies, which includes Strategy TR-1 that provides actions for reducing VMT. As discussed under Impact Discussion 5.16-1 in the DEIR, this strategy supports the County’s existing plans to ensure accessibility and safety for alternative transportation options, in addition to a suite of other actions that reflect OPR and CAPCOA guidance. These also include actions consistent with proposed General Plan policies and actions like establishing a micro-mobility program per Policy TR-P5.10, maximizing jobs and housing near transit similar to Policies LU-P3.3 and LU-P7.2, and encouraging “last mile” connections for transit per Policy TR-P1.9.

Mitigation Measures

No feasible mitigation measures are available. As discussed above, the proposed project is a programmatic General Plan and CAAP and considerable uncertainty exists with regard to the implementation and feasibility of mitigation for individual development projects. A combination of the County’s TDM program, proposed General Plan policies and actions, proposed CAAP strategies and actions, as well as additional mitigation strategies may mitigate impacts to less than significant for future development projects under the proposed project. However, while such measures are likely to result in less-than-significant VMT impacts when considered at an individual project level, they cannot be guaranteed and are not possible to fully quantify or mitigate at a countywide level as part of this programmatic analysis, particularly given the reduction needed to reach the applied significance threshold. As a result, the VMT impacts associated with the proposed project would be considered significant and unavoidable.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081 (a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

7. Wildfire

Impact 5.18-2: Development under the proposed project in or near SRAs or lands classified as Very High FHSZs could exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant

**concentrations from a wildfire or the uncontrolled spread of wildfire.
[Threshold W-2]**

Proposed General Plan

As discussed in Section 5.18.1.2, *Existing Conditions*, of the DEIR, Contra Costa County is prone to Diablo Winds that are erratic in movement and have high speeds. These winds are often accompanied by low humidity and can shift suddenly due to temperature changes and interactions with steep slopes. This creates dangerous conditions by drying out vegetation and enabling wildfire to spread more quickly. Implementation of the proposed General Plan would not change or affect wind patterns in the county, but wildfires and wildfire smoke hazards could be spread by prevailing or Diablo Winds.

Section 5.18.1.1, *Regulatory Background*, of the DEIR describes plans, policies, regulations, and procedures that help to reduce wildfire risks. The 2018 Strategic Fire Plan for California, 2021 California Wildfire and Forest Resilience Action Plan, Fire Risk Reduction Community designation for EBRPD and EBMUD, Contra Costa County LHMP, and Contra Costa County CWPP, in addition to the proposed General Plan, are intended to reduce wildfire hazards and respond to these hazards on a statewide and regional scale. In addition, the Bay Area Air Quality Management District provides air quality alerts, advisories, and provides resources for an interactive online map to view current air quality conditions in the region. However, future development under the proposed General Plan in wildfire prone areas could exacerbate wildfire risks by adding more residents to wildfire prone areas, thereby exposing people in the county and surrounding jurisdictions to pollutant concentrations from a wildfire. A wildfire combined with Diablo Winds could expose residents in the county to the uncontrolled spread of wildfire.

Slope Impacts

As discussed in Section 5.18.1.2 of the DEIR, the topography in the EIR Study Area varies between steeply sloped mountains to flat valleys and shorelines. Construction of future development projects may require grading and site preparation activities that could change the slope of a single parcel or site. Potential future development under the proposed General Plan could increase development density in both flat and steeper areas of the county. However, proposed Land Use Element Policy LU-P5.6 directs the County to allow for decreased residential density below the minimum density requirement in hazard-prone areas, including those with slopes that exceed 15 percent.

All potential future residential development within the EIR Study Area would be required to comply with the CBC, SRA and Very High FHSZ Fire Safe Regulations, and Contra Costa County Ordinance Code grading requirements, which include standards to minimize the ignition and spread of wildfire due to slopes. Furthermore, the proposed Health Safety Element includes several policies and actions that would address potentially significant impacts with regard to development within FHSZs. For example, Policy HS-P7.1 would require denial of entitlements for projects creating additional residential units (i.e., units not allowed by-right) in Very High FHSZs in the LRA or SRA, as well as to and discourage such projects in High FHSZs in the SRA and discourage them in the LRA unless adequate fire protection services are provided. Other potential housing types including below-market-rate housing are discouraged in the WUI and FHSZ areas per Policy HS-P4.3. All development in High and Very FHSZs in the LRA or SRA, or in areas that may be designated as the WUI must incorporate fire-safe design features that meet the State Fire Safe Regulations and Fire Hazard Reduction Around

Buildings and Structures Regulation for road ingress and egress, fire equipment access, and adequate water supply, as stated in Policy HS-P7.2. Policy HS-P7.4 outlines the requirements for fire protection plans that must be implemented for subdivisions and projects requiring a land use permit in High and Very High FHSZs. The proposed Health and Safety Element includes several other policies and actions under Goal HS-7, as shown in Section 5.18.3, *Proposed General Plan Goals, Policies and Actions*, of the DEIR that would improve fire safety in the county.

However, due to vegetation and slope, wildfires and associated smoke could potentially travel up a slope. Therefore, even with existing and proposed regulatory requirements, potential future development under the proposed General Plan could expose people to the uncontrolled spread of wildfire or pollutant concentrations due to slope.

Vegetation Impacts

Other factors, such as vegetation, have the potential to exacerbate wildfire risks. The grassland, brush, and woodland areas throughout the county are easily ignited, especially during summer and fall when temperatures are high, relative humidity is low, and wind speeds can be high. During these conditions, woodlands and brush vegetation can dry out, particularly in areas with unirrigated vegetation, becoming extremely flammable and increasing wildfire risks. As described in Section 5.18.1.1 of the DEIR, the Contra Costa County LHMP and CWPP contain several vegetation management and fuel reduction projects to reduce the uncontrolled spread of wildfire due to vegetation. Additionally, all potential future development within wildfire-prone areas in the EIR Study Area would be required to comply with SRA and Very High FHSZ Fire Safe Regulations, Public Resources Code Section 4291, and the California Fire Code. These regulations have specific requirements for new development to create defensible space and extensive fuel reduction within 100 feet of a structure, an ember resistant zone within five feet of a structure, and the overall maintenance of properties to reduce the risk of uncontrolled fires or the spread of fires to other properties. However, even with existing regulatory requirements, potential future development under the proposed General Plan could expose people to the uncontrolled spread of wildfire or pollutant concentrations due to other factors such as vegetation.

With adherence to the above building practices and wildfire management requirements, development associated with the proposed project would reduce the potential for exacerbating wildfire risks. However, due to the programmatic nature of this analysis, the unknown details and potential impacts of specific future potential development projects under the proposed project, and the possibility of potential future development being located in wildfire prone areas, impacts would be potentially significant.

Proposed CAAP

As previously noted, the proposed CAAP would primarily result in beneficial impacts with regard to climate change-related hazards, including wildfire risk and exposure. In addition to including a suite of strategies that would reduce GHG emissions and thereby potentially reduce wildfire impacts related to increasing temperatures and changing climate patterns, the proposed CAAP's Chapter 5, *Climate Adaptation Strategy*, specifically addresses and outlines strategies related to improving the resiliency of the county's population and resources and protecting future development from wildfire hazards. Many of these strategies and actions reiterate policies and actions included within the proposed Health and Safety Element, including the actions under Strategy NI-2, like denying new entitlements for projects

creating additional residential units in Very High FHSZs, discouraging such projects in High FHSZs, and requiring fire-safe designs and materials in addition to preparing, maintaining, and regularly implementing a fire protection plan for development in High and Very High FHSZs or areas that may be designated as the WUI. Therefore, the proposed CAAP would have no environmental impact on wildfire exposure.

Mitigation Measure:

There are no feasible mitigation measures. Existing federal, State, and local regulations, in addition to the policies, strategies, and actions in the proposed General Plan and proposed CAAP cover the best available wildfire hazards reduction measures for new development and redevelopment in the county. Adherence to these regulations and policies would reduce significant impacts associated with wildfire hazard exposure to the extent possible, outside of prohibiting all development in High to Very High FHSZs and WUI areas.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081 (a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.18-5: Development in designated High or Very FHSZs could expose structures and/or residences to fire danger. [Threshold H-7]

Proposed General Plan

As shown in Figure 5.18-1 in the DEIR, the EIR Study Area includes land mapped within High and Very FHSZs, which are concentrated in areas with high slopes. Including the Briones Hills and Diablo Range. While much of this land is outside of the County's ULL, limiting development potential, approximately 15,913 acres of land within the ULL are classified as a High FHSZ, and approximately 2,764 acres of land within the ULL are classified as a Very High FHSZ. However, approximately 7,420 acres of this land within the ULL that is in the High FHSZ or Very High FHSZ is designated as Public and Semi-Public, Parks and Recreation, and Resource Conservation under the proposed General Plan. This land is largely owned by public agencies who intend to conserve the land. Additionally, some of this land within FHSZs has already been developed under the existing General Plan that will be replaced by the proposed General Plan.

As discussed in Impact 5.18-2, the county is subject to strong easterly winds, also known as Diablo Winds, in the fall. These winds have high speeds and can shift suddenly, and they are often accompanied by low humidity. They create dangerous conditions for starting and spreading wildfires during the drier months of the year, and they also spread wildfire smoke hazards, as can prevailing

winds. Future development under the proposed General Plan could exacerbate wildfire risks by adding people to wildfire-prone areas in the EIR Study Area and exposing people to pollutant concentrations from a wildfire. A wildfire combined with Diablo Winds could expose residents in the area to the uncontrolled spread of wildfire. In addition, the topography in wildfire-prone areas of the county is steeply sloped. Construction of future development projects and activities under the proposed General Plan in these areas may require grading and site preparation activities that could change the slope of a single parcel or site. Other factors, such as vegetation, have the potential to exacerbate wildfire risks. The grassland and woodland areas of inland valleys in central Contra Costa are easily ignited, especially during late summer and fall when temperatures and winds are high and relative humidity is low. During these conditions, woodland vegetation can dry out, particularly in areas with unirrigated vegetation, becoming extremely flammable and increasing wildfire risks.

Though all urban development would occur within the ULL, outside the majority of the most wildfire-prone and inaccessible areas, the proposed General Plan land use map would continue to allow residential and commercial development in FHSZs where topography is steeper and evacuation access is limited per Figure 5.9-4 in the DEIR. However, the proposed Health and Safety Element includes several policies and actions that would address potentially significant impacts from development within FHSZs. For example, Policy HS-P7.1 would require denial of entitlements for projects creating additional residential units (i.e., units not allowed by-right) in Very High FHSZs in the LRA or SRA, as well as to discourage such projects in High FHSZs in the SRA and discourage them in the LRA unless adequate fire protection services are provided. Other potential housing types including below-market-rate housing are discouraged in the WUI and FHSZ areas per Policy HS-P4.3. All development in High and Very FHSZs in the LRA or SRA, or in areas that may be designated as the WUI, must incorporate fire-safe design features that meet the State Fire Safe Regulations and Fire Hazard Reduction Around Buildings and Structures Regulation for road ingress and egress, fire equipment access, and adequate water supply, as stated in Policy HS-P7.2. Policy HS-P7.4 outlines the requirements for fire protection plans that must be implemented for subdivisions and projects requiring a land use permit in High and Very High FHSZs. The proposed Health and Safety Element includes several other policies and actions under Goal HS-7 that would improve fire safety in the county.

Additionally, the proposed General Plan land use plan would reduce the capacity for residential development on agricultural lands, including land within FHSZs and the WUI, by requiring at least a 10-acre minimum lot size, an increase from the 5-acre minimum lot size required by the existing General Plan. This change would further reduce the number of people and structures that would be exposed to wildfire under the proposed General Plan when compared to the existing General Plan.

Even with existing regulatory requirements and proposed General Plan goals, policies, actions, and land use changes, implementation of the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas beyond those that exist today. The introduction of additional humans (through new development and redevelopment) and human activities (including the use of construction equipment) to fire-prone areas inherently exacerbates existing fire hazards. Though proposed General Plan goals, policies, actions, and land use changes and mandatory State wildfire hazard reduction measures reduce risks in wildfire-prone areas, they would not reduce impacts to a less-than-significant level. Due to the programmatic nature of this analysis, the unknown details and potential impacts of specific future potential development projects under the proposed project, and

the potential for future development to be in wildfire-prone areas, out of an abundance of caution impacts are considered to be potentially significant.

Proposed CAAP

As previously noted, the proposed CAAP would primarily result in beneficial impacts with regard to climate change-related hazards, including wildfire risk and exposure. In addition to including a suite of strategies that would reduce GHG emissions and thereby potentially reduce wildfire impacts related to increasing temperature and changing climate patterns, the proposed CAAP's Chapter 5, *Climate Adaptation Strategy*, specifically addresses and outlines strategies related to improving the resiliency of the county's population and resources and protecting future development from wildfire hazards. Many of these strategies and actions reiterate and add detail to the policies and actions included within the proposed Health and Safety Element, including the actions under Strategy NI-2, like denying new entitlements for projects creating additional residential units in Very High FHSZs, discouraging such projects in High FHSZs, and requiring fire-safe designs and materials in addition to preparing, maintaining, and regularly implementing a fire protection plan for development in High and Very High FHSZs or areas that may be designated as the WUI. Therefore, the proposed CAAP would have no significant impact on wildfire exposure.

Mitigation Measures

There are no feasible mitigation measures. Existing federal, State, and local regulations, in addition to the policies, strategies, and actions in the proposed General Plan and proposed CAAP cover the best available wildfire hazards reduction measures for new development and redevelopment in the county. Adherence to these regulations and policies would reduce significant impacts associated with wildfire hazard exposure to the extent possible, outside of prohibiting all development in High to Very High FHSZs and WUI areas.

Finding:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological, or other factors, that would substantially lessen or mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, make infeasible the alternatives identified in the EIR (Public Resources Code §§ 21081 (a)(1), (3); Guidelines §§ 15091(a)(1), (3)).

As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

IV. ALTERNATIVES TO THE PROPOSED PROJECT

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible, and therefore, merit in-depth consideration, and which are infeasible.

A. Alternatives Considered and Rejected During the Scoping/Project Planning Process

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the DEIR.

1. Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that can avoid or substantially lessen any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). Given the nature of the proposed project (adoption of a General Plan and CAAP for the entire unincorporated county), it is not possible to consider an offsite alternative. For this reason, an offsite alternative was considered infeasible pursuant to State CEQA Guidelines Section 15126.6(c) and was rejected as a feasible project alternative.

2. Reduced Density Alternative

A reduced density/intensity alternative that would result in development of fewer residences and less commercial and industrial square footage would theoretically reduce traffic and thereby reduce community impacts such as air quality, GHG emissions, traffic, noise, and demand for utilities and public services. However, such an alternative would not achieve or would only partially achieve the project objectives of accommodating growth in the county, including the objective to increase density within the existing community cores and provide more employment opportunities within the county. Additionally, because the proposed General Plan would implement the land use changes needed to meet the County's Regional Housing Needs Allocation (RHNA) for its 2023-2031 6th Cycle Housing Element, this alternative conflicts with the goals of the adopted Housing Element and State housing law. Moreover, the proposed General Plan provides additional housing capacity that can be used to meet future RHNAs for the County beyond the 6th Cycle. This Alternative could result in the need for the County to redesignate and rezone additional land to be able to meet future RHNAs. As a reduced development density conflicts with regional plans to increase housing, and would not meet the project objectives, this option was not evaluated in the EIR.

3. Reduction of Industrial Uses Near Impacted Communities Alternative

This alternative would prohibit warehousing uses with heavy-duty trucks (as discussed in Section 5.3, *Air Quality*, of the DEIR) within 1,000 feet of an Impacted Community.³ As discussed in Section 5.3, development allowed by the proposed project could result in new sources of TACs or PM_{2.5} near existing or planned sensitive receptors, resulting in significant and unavoidable impacts to cumulative health risk in the Bay Area. Under Mitigation Measure AQ-4, new industrial or warehousing development projects that either 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use or Impacted Community must submit a health risk assessment to the County for review and approval. However, since emissions associated with these facilities cannot be determined or modeled until specific development projects are proposed, the potential impacts cannot be determined.

As shown in Table 3-2, *2045 Horizon-Year Growth Projections*, in DEIR Chapter 3, *Project Description*, the proposed project could result in development of approximately 5 million square feet of new industrial uses within the proposed General Plan's horizon year of 2045. Of these 5 million square feet, approximately 4 million square feet are within 1,000 feet of Impacted Communities. Approximately 3 million square feet of this projected square footage would result from approved and pending projects, 1.8 million square feet of which are within 1,000 feet of Impacted Communities. Therefore, while this Alternative would result in a reduction of industrial uses within proximity to Impacted Communities, reducing the associated health risk impacts, it would not prevent the development of the projects that have been approved by the County or are pending approval. As such, warehousing uses with heavy-duty trucks could still be developed within 1,000 feet of Impacted Communities.

The proposed General Plan includes policy guidance that addresses impacts from heavy-duty trucks, including Policy HS-P1.8, which requires industrial projects resulting in 25,000 square feet or more of gross habitable floor area to be near zero-emission operations, including from the associated fleet, by providing zero-emission vehicle parking for all anticipated truck traffic to prevent idling and off-site queuing, providing electrified loading docks with receptacles allowing plug-in of refrigerated trucks, using heavy-duty trucks that are model year 2014 or later and expediting a transition to zero-emission trucks, and using a clean fleet of delivery vehicles. In addition, Policy SC-P1.6 directs the County to pursue community benefits agreements (CBAs) for projects with potential to negatively affect an Impacted Community. The CBAs would address the community's expressed needs, with the primary objective to mitigate project impacts to the greatest extent possible, including by exceeding the mitigation requirements of CEQA. This policy also directs the County to secure community benefits that exceed the inherent project benefits and support the community's objectives, especially as identified in the Community Profiles found in the Stronger Communities Element. Furthermore, future warehousing projects would be subject to the Bay Area Air Quality Management District's CEQA Air Quality Guidelines, which require an analysis of consistency of the proposed project with applicable Community Emission Reduction Plans (CERPs) and local Environmental Justice policies.

³ "Impacted Communities" refers to census tracts in the unincorporated county that are disproportionately burdened by pollution. As discussed further in Section 5.3, *Air Quality*, of the DEIR, this designation has been applied to census tracts that score at or above the 72nd percentile for various pollution and population indicators in the California Office of Environmental Health Hazard Assessment's CalEnviroScreen program.

In addition, the County established a moratorium on new or expanded warehousing uses in the North Richmond area, an Impacted Community, pursuant to Ordinance 2023-19, adopted in 2023.

Meanwhile, this Alternative would not meet an important objective of the project to locate jobs closer to Impacted Communities to support economic empowerment and reduced commute costs for Impacted Community members, while also reducing VMT. Given that a substantial amount of warehousing development would still be constructed near Impacted Communities and any proposed warehousing in this area would be subject to the health risk assessment and good neighbor policies described above, and because this Alternative would not meet a key project objective, this Alternative is rejected from further consideration.

B. Alternatives Selected for Further Analysis

Based on the criteria listed above, the following alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project but may avoid or substantially lessen any of the significant effects of the proposed project.

1. No Project/Existing Plans Alternative

The No Project Alternative is required to discuss the existing conditions at the time the notice of preparation is published and evaluate what would reasonably be expected to occur in the foreseeable future if the proposed project is not approved (CEQA Guidelines, Section 15126.6[e]). Pursuant to CEQA, this Alternative is also based on current plans and consistent with available infrastructure and community services. Therefore, the No Project/Existing Plans (Existing General Plan and CAAP) Alternative assumes that the proposed project would not be adopted, and the development intensity assumed in the existing General Plan would be followed. Additionally, all new goals, policies, strategies, and actions under the proposed General Plan and CAAP would not be adopted.

The proposed project would not significantly expand the footprint of development potential beyond the capacity identified in the No Project Alternative. Most changes under the proposed project involve increased density/intensity within community cores and as such, footprint-related impacts (e.g., biological resources and cultural resources) under this Alternative would be similar to the proposed project. The proposed project would result in an increase in population and housing units, as well as employment and commercial and industrial square footage; therefore, this Alternative would result in a reduction in intensity-related impacts. For example, this Alternative would generate fewer auto trips, traffic noise would be less, and impacts on services and utilities would be less.

Additionally, this Alternative would prevent adoption and implementation of the new policies, strategies, and actions under the proposed General Plan and CAAP that would reduce impacts associated with development in the county. For example, Policy HS-P7.1 in the proposed Health and Safety Element would deny entitlements for projects creating additional residential units (i.e., units not allowed by right) in Very High FHSZs in the LRA or SRA, which would reduce impacts associated with wildfire hazards when compared to the policy guidance under the existing General Plan. Policies and actions in the proposed Land Use and Transportation Elements, in addition to the strategies and actions provided in the proposed CAAP, incorporate numerous vehicle miles traveled (VMT) and GHG-reducing measures that would likely lead to increased use of alternative modes of transportation

and other types of reductions in VMT and GHGs. When compared to this Alternative, the proposed project would increase densities in community cores, resulting in further reductions in VMT.

This Alternative would result in increased impacts with respect to aesthetics, agriculture and forestry resources, biological resources, cultural and tribal cultural resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, transportation, and wildfire. This Alternative would result in similar impacts to geology and soils, mineral resources, noise, population and housing, and utilities and service systems. This Alternative would result in decreased impacts to air quality and public services and recreation.

Finding:

This Alternative is rejected because it would not meet any of the proposed project's objectives such as increasing density for residential uses. This Alternative would not adopt the updated General Plan and CAAP and each plans' respective policies/actions and strategies that reduce impacts from development. Therefore, this Alternative is eliminated from further consideration.

2. Increased Density Near Transit Priority Areas

As discussed in DEIR Section 5.16, *Transportation*, the EIR Study Area includes two Transit Priority Areas (TPAs), as defined by California Public Resource Code, Section 21099, along a Bay Area Rapid Transit (BART) line. This includes one in Contra Costa Centre and one in Pittsburg/Bay Point. Senate Bill (SB) 743 (2013) (see Section 5.16) declared that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. SB 743 also provides streamlining opportunities for projects in TPAs under the assumption that development in these areas would result in less overall environmental impacts. This Alternative proposes a policy to increase the minimum allowed density of all new development and redevelopment within these two TPAs, which include all potential development sites within a half-mile of the BART stations in Contra Costa Centre and Bay Point. Under this Alternative, all projects within these boundaries would be required to achieve at least 90 percent of their sites' maximum allowed density.

As noted in Chapter 3, Section 3.7.5, *Estimate Buildout*, in the DEIR, the planning horizon projections developed for the proposed General Plan and analyzed in the EIR assume that 75 percent of the maximum allowed density will be built in the Residential Very-Low, Low, and Low-Medium Density designations. In the remaining residential designations, the EIR assumes that 80 percent of the maximum allowed density will be built. As such, this Alternative evaluates the potential impacts of requiring a higher minimum density in the TPAs that extends beyond the development potential assumed in the EIR.

As shown in Table 7-2, *Increased Density Near TPAs Alternative Comparison to Proposed Project*, in the DEIR, this Alternative would result in 23,400 new housing units, 1.2 million square feet of new commercial space, and 5 million square feet of new industrial space, overall contributing 66,300 new residents within the unincorporated county by 2045. When compared to the proposed project's development projections, this Alternative would result in 200 additional new housing units while commercial and industrial space would remain the same. These growth estimates are based on an assumption that sites that are currently vacant or underutilized would develop. Because many of the sites within the TPA

are already developed, the growth projection is relatively modest. While more redevelopment could occur and result in higher growth, such redevelopment is speculative and not included in the estimate.

This Alternative would result in increased impacts to population and housing, public services and recreation, and utilities and service systems. This Alternative would result in similar impacts to aesthetics, agriculture and forestry resources, biological resources, cultural and tribal cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. This Alternative would result in decreased impacts to air quality, energy, greenhouse gas emissions, land use and planning, noise, and transportation.

Finding:

This Alternative would meet all project objectives but would not reduce any identified significant and unavoidable impacts of the proposed project to less than significant. This Alternative is rejected because it would not considerably reduce impacts when compared to the proposed project. Therefore, this Alternative is eliminated from further consideration.

3. No Urban Development within High or Very High Fire Hazard Severity Zone Alternative

This Alternative would prohibit new urban development (i.e., housing, commercial, and industrial space) within High or Very High FHSZs, as designated by the Office of the State Fire Marshal and the California Department of Forestry and Fire Protection (CAL FIRE). As discussed in DEIR Section 5.18, *Wildfire*, the EIR Study Area contains 163,524 acres of land mapped within CAL FIRE's High or Very High FHSZs. Approximately 18,677 acres of this land is within the County's Urban Limit Line (ULL), although approximately 7,420 acres of this land is designated as Public and Semi-Public, Parks and Recreation, and Resource Conservation under the proposed General Plan, and largely owned by public agencies who intend to conserve the land. Nevertheless, urban development under the proposed General Plan could occur in FHSZs. These areas are subject to increased risk of wildfire hazards and as concluded in DEIR Section 5.18, impacts associated with wildfire hazard risk would be significant and unavoidable under the proposed project.

This Alternative would ensure that no urban development under the proposed General Plan would occur within High or Very High FHSZ, thereby reducing Impact 5.18-2 and Impact 5.18-5 to less than significant. However, it should be noted that the Office of the State Fire Marshal/CAL FIRE has adopted new FHSZ maps for the State Responsibility Areas which became effective on April 1, 2024, and is currently in the process of updating its FHSZ map for the Local Responsibility Areas. The map updates for Local Responsibility Areas are likely to be adopted by CAL FIRE within the planning horizon of the proposed project. These revisions may result in either expansion or contraction of the ability to build in order to remain consistent with State FHSZ mapping.

Other changes to project impacts associated with this Alternative would largely be associated with the reduction of available sites for urban development within the county. As shown in Table 7-4, *No Urban Development with a Fire Hazard Severity Zone Alternative Comparison to Proposed Project*, in the DEIR, this Alternative would result in 19,500 new housing units, 1.2 million square feet of new commercial space, and 4.8 million square feet of new industrial space, overall contributing 55,200 new residents within the unincorporated county by 2045. When compared to the proposed project's development

projections, this Alternative would result in 3,700 fewer new housing units, 6,400 fewer square feet of new commercial space, and 177,300 fewer new square feet of new industrial space.

This Alternative would result in similar impacts to land use and planning and decreased impacts to all other resources topics (aesthetics, agriculture and forestry resources, air quality, biological resources, cultural and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, public services and recreation, transportation, utilities and service systems, and wildfire).

Finding:

This Alternative is rejected because it would limit opportunities for economic development within communities with large overlaps of High and Very High FHSZ lands, thereby meeting the project objectives to a lesser extent than the proposed project. Therefore, this Alternative is eliminated from further consideration.

4. Increased TPA Density and No Urban FHSZ Development Combined Alternative

This Alternative would combine the two proposed actions in the “Increased Density Near Transit Priority Areas” and “No Urban Development within a High or Very High FHSZ” Alternatives. As such, this Alternative would involve requiring residential development within the county’s two TPAs to achieve at least 90 percent of the sites’ maximum allowed density in addition to prohibiting new urban development within High and Very High FHSZs. This Alternative would have the benefit of increasing density near transit, thereby reducing VMT and related impacts, in addition to reducing wildfire impacts to less than significant.

As shown in Table 7-6, *Increased TPA Density and No Urban FHSZ Development Combined Alternative Comparison to Proposed Project*, in the DEIR, this Alternative would result in 19,700 new housing units, 1.2 million square feet of new commercial space, and 4.8 million square feet of new industrial space, overall contributing 55,800 new residents within the county by 2045. When compared to the proposed project’s development projections, this Alternative would result in 3,500 fewer new housing units, 6,400 fewer square feet of new commercial space, and 177,300 fewer new square feet of new industrial space.

This Alternative would result in increased impacts to land use and planning and decreased impacts to all other resource topics (aesthetics, agriculture and forestry resources, air quality, biological resources, cultural and tribal cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, public services and recreation, transportation, utilities and service systems, and wildfire).

This Alternative would meet most of the objectives of the proposed project. It would focus more housing development within the community cores and would adopt the proposed General Plan and CAAP, like the proposed project, with the exceptions of density increases in the TPAs and prohibiting new urban development within High and Very High FHSZs. Like the FHSZ Alternative, this Alternative would however decrease the overall development capacity of the county, resulting in fewer economic opportunities for the communities affected by this prohibition of new urban development. This Alternative would reduce the most impacts and meets the most project objectives when compared

to the other alternatives. Therefore, this Alternative is considered the “environmentally superior alternative.”

Finding

This Alternative would reduce the most impacts and meets the most project objectives when compared to the other alternatives. Therefore, this Alternative is considered the “environmentally superior alternative.” However, this Alternative would not meet the project objectives to the extent of the proposed project. Therefore, this Alternative is rejected.

V. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the proposed project. If the benefits of the proposed project outweigh the unavoidable adverse effects, those effects may be considered “acceptable” (State CEQA Guidelines § 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines § 15093[b]). The agency’s statement is referred to as a Statement of Overriding Considerations.

The following provides the justification for adopting a statement of overriding considerations.

A. Project Benefits in Support of the Statement of Overriding Considerations

The following section describes the benefits of the proposed project that outweigh the proposed project’s unavoidable adverse effects and provides specific reasons for considering the proposed project acceptable. Accordingly, the County has prepared this Statement of Overriding Considerations regarding potentially significant adverse environmental impacts resulting from the proposed project, as set forth below. Pursuant to CEQA Guidelines § 15093(c), the Statement of Overriding Considerations is included in the record of the project approval and will be noted in the Notice of Determination. Each of the benefits identified below provides a separate and independent basis for overriding the significant environmental effects of the proposed project.

Having reduced the potential effects of the proposed project through feasible mitigation measures as described previously herein, and balancing the benefits of the proposed project against its potential unavoidable adverse impacts on agricultural and forestry resources, air quality, cultural and tribal cultural resources, mineral resources, noise, transportation, and wildfire, the County finds that the legal requirements and benefits of the proposed project individually and collectively outweigh the potentially significant unavoidable adverse impacts for the following reasons:

1. Implements the Objectives Established for the Proposed Project

The proposed project would meet each of the objectives identified in Section II.F, above.

- 1) The proposed project would extend the planning horizon for the General Plan to 2045 and is in itself a General Plan and CAAP that meet State requirements.

- 2) The proposed General Plan includes updates to the County's land use map to align with existing uses and create more opportunities for mixed-use development and higher density housing within community cores, where infrastructure and services are available.
- 3) The proposed General Plan contains policy guidance for individual communities within the county to facilitate community-scale planning efforts.
- 4) The proposed General Plan includes policy guidance throughout all elements that supports environmental justice, community health, economic development, and sustainability, as demonstrated through Appendix A of the General Plan, which compiles the policies and actions for each of these themes. These themes are further supported in the CAAP.

2. Identifies and Provides Resources for Impacted Communities

The proposed General Plan promotes environmental justice within the county consistent with the goals of SB 1000. In particular, the proposed Stronger Communities Element provides goals, policies, and actions that aim to improve community health and safety in Impacted Communities, including by reducing exposure to pollution and other hazards and increasing access to healthy food, physical activities, healthcare, safe housing, and living wage jobs. It also addresses the specific disadvantages and burdens experienced by Impacted Communities in the county. For example, Policy SC-P1.1 supports transition from highly polluting industries to a net-zero emission economy based on renewable and sustainable industries, promoting living-wage jobs and reducing pollution; Policy SC-P1.3 promotes walkable districts offering retail and service uses, public amenities, and essential infrastructure for residents of Impacted Communities within walking distance of their homes; Policy SC-P3.1 would provide sufficient and equitable access to appropriate healthcare and behavioral health facilities and services for all communities; and Policy SC-P6.1 ensures that future improvements in Impacted Communities will not result in a net loss of affordable housing or significant preventable displacement of residents. In addition, the proposed Health and Safety Element includes policies and actions to improve air quality in Impacted Communities by requiring new or expanded industries to mitigate pollutants at the source (see Policy HS-P1.6) and locate sources of pollution far from vulnerable populations as possible (see Policy HS-P1.4).

3. Implements the Climate Action and Adaptation Plan

The proposed project includes an update to the County's Climate Action Plan, which is a comprehensive plan for the reduction of GHG emissions through a series of actions and strategies that would be undertaken by the County. The proposed CAAP identifies strategies and measures to meet the State's GHG reductions targets. CAAP strategies target reductions in a variety of sectors in the county. For example, Strategy BE-1 requires new buildings or additions built in unincorporated Contra Costa County to be low-carbon or carbon neutral; Strategy BE-2 focuses on retrofitting buildings and facilities to reduce energy use and transition to low-carbon or carbon-free fuels; Strategy TR-2 increases the use of zero-emission vehicles by transitioning to a zero-emission County fleet by 2035 and a community fleet that is at least 50 percent zero-emission by 2030; and Strategy NI-4 commits to sequester carbon on natural and working lands in the county.

4. Includes Sustainability Features

The proposed Land Use Element includes policies and actions that support sustainable development patterns by focusing on infill development, directing housing and jobs in close proximity, and encouraging high-density, mixed-use development near transit centers (see Goals LU-2 and LU-3 and associated policies and actions). In addition, the Transportation Element includes policy guidance to increase access to zero-emission vehicles, as well as to reduce dependence on personal vehicles by prioritizing investments in bicycle and pedestrian infrastructure and supporting the expansion of transit (see Goal TR-1 and associated policies and actions).

The proposed project also includes policies and strategies that would improve energy efficiency. For example, Strategy BE-3 would increase the amount of electricity used and generated from renewable sources in the county, Policy TR-P2.3 would provide or require new projects to install energy-efficient street lighting, and policies and actions under Goal COS-14 would increase generation of and reliance on renewable, sustainable, and carbon-free energy and reduce energy use.

In addition, the proposed Conservation, Open Space, and Working Lands Element includes policies and actions to preserve open spaces and agricultural lands and ensure the health and viability of natural and working lands is prioritized when there are potential conflicts with urban uses. The Land Use Element also includes policies that support the 65/35 Land Preservation Standard and Urban Limit Line (see Goal LU-2 and associated policies and actions), which limit urban development to no more than 35 percent of the land area of the county and define where such uses can occur.

5. Supports Regional Goals

Plan Bay Area 2050 (described in Section 5.11, *Land Use and Planning*, of the DEIR) provides guidance to local jurisdictions, including Contra Costa County, on how future development can be consistent with the State's GHG and VMT reduction goals, including by constructing more infill development in downtowns and centers near jobs and services. As discussed in Project Benefits 3 and 4 above, the Contra Costa County 2045 General Plan and CAAP share these goals and support them by implementing policies, actions, and strategies to support sustainable development patterns that reduce GHG emissions and VMT, and conserve open space and agricultural land.

6. Supports Job Growth and the Economy

The proposed 2045 General Plan includes policies and actions that work to sustain a resilient and diversified economy that will support existing businesses, attract new businesses, and encourage investment and innovation while fostering economic opportunities for all residents. In particular, policies and actions under Goal SC-9 would implement the Northern Waterfront Economic Development Initiative, a regional strategy to create 18,000 new jobs along the Northern Waterfront by 2035; policies and actions under this goal would also promote expansion of clean manufacturing and development of Priority Production Areas, areas that the County and regional agencies will prioritize for investments and protection from competing land uses. Numerous policies in the Stronger Communities and Land Use Elements support and encourage local businesses. The proposed 2045 General Plan further supports local workers and businesses through policy guidance under Goal SC-8 that helps to develop and enhance local workforce skills through schools, training programs, the Workforce Development Board, and other institutions.

B. Conclusion

The County has balanced the proposed project's benefits against the significant unavoidable impacts. The Board of Supervisors finds that the proposed project's benefits, which aim to meet the goals and policies of the 2045 General Plan and CAAP, outweigh the proposed project's significant and unavoidable impacts, and these impacts, therefore, are considered acceptable in the light of the proposed project's benefits. The County finds that each of the benefits described above is an overriding consideration, independent of the other benefits, that warrants approval of the proposed project notwithstanding the proposed project's significant unavoidable impact.

VI. FINDINGS ON RESPONSES TO COMMENTS ON THE DEIR AND REVISIONS TO THE FINAL EIR

The Final EIR contains responses to comments, revisions, clarifications, and corrections to the DEIR. The focus of the response to comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Sections 15088(a) and 15088(b). The County provided written responses to each comment made by a public agency, as set forth in Section 2 of the Final EIR, pursuant to State CEQA Guidelines Section 15088(b).

County staff has reviewed this material and determined that none of this material constitutes the type of significant added information that requires recirculation of the DEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the proposed project will result in a significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5 of the CEQA Guidelines.