



Wild Horse Multifamily Project
Draft Environmental Impact
Report

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Appendix B: Comment Letters on Notice of Preparation and Initial Study



Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
APN	Assessor's Parcel Number
Applicant	CCP-Contra Costa Investors, LLC
AQP	air quality plan
AWS	Alameda Whipsnake
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMPs	best management practices
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAPCOA report	CAPCOA Quantifying Greenhouse Gas Mitigation Measures report
CCCFPD	Contra Costa County Fire Protection District
CCR	California Code of Regulations
CCWD	Contra Costa Water District
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Antioch
CY	cubic yards
EIR	Environmental Impact Report
GHG	greenhouse gas
HB VMT	home-based vehicle miles traveled
ITE	Institute of Transportation Engineers
KBTU	kilo British thermal units
KW hr	kilowatt-hours
LOS	level of service
MLD	most likely descendant
MRZ	Mineral Resource Zone
NAHC	Native American Heritage Commission
NOC	Notice of Completion
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
OPR	Governor's Office of Planning and Research



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PG&E	Pacific Gas and Electric Company
PRC	Public Resources Code
proposed project	Wild Horse Multifamily Project
RTP/SCS	Regional Transportation Plan and Sustainable Communities Strategy
SB	Senate Bill
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
TAZ	traffic analysis zone
TDM	Transportation Demand Management Plan
USBR	US Bureau of Reclamation
VMT	vehicle miles traveled



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EXECUTIVE SUMMARY

This document is a draft environmental impact report (EIR) for the proposed Wild Horse Multifamily Project (proposed project). This section of the EIR provides a summary of the proposed project, the anticipated environmental impacts of the proposed project, the alternatives, and areas of known controversy to be resolved.

ES.1 PROJECT SUMMARY

CCP-Contra Costa Investors, LLC (Applicant) is seeking entitlements for development of the proposed project in the City of Antioch (City) in Contra Costa County, California. The proposed project involves the development of 126 multifamily units on an approximately 12-acre vacant site. The proposed project would also include parking, landscaping managed by a homeowner's association, and 1.6 acres of usable open space. The Applicant has also dedicated approximately 1.6 acres of the site for construction of Wild Horse Road, a paved road near the property's southern boundary, of which construction was started by another developer on September 1, 2020. As such, the project site consists of 10.4 net acres of developable area (12-acre site – 1.6 acre dedication = 10.4 net acres).

ES.1.1 Project Objectives

The Applicant has developed the following objectives for the proposed project:

- To help the City of Antioch provide its fair share of housing, and help alleviate a regional housing shortage, by providing an alternative housing type and sizes which can meet the needs of a variety of different and growing household sizes.
- To provide onsite amenities and recreational opportunities, such as a community park.
- To provide housing near major transportation and regional trails connections, with increased land use intensities near regional transportation connections.
- To create a community that is family friendly or that could accommodate senior residents.
- To implement the County's Growth Management Program by providing for urban development within the Contra Costa County Urban Limit Line.
- To contribute to the City of Antioch's economic and social viability by creating a community that attracts investment and positive attention.



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ES.1.2 Approvals

The proposed project requires the following approvals from the City of Antioch:

- EIR Certification
- General Plan Amendment
- Rezone to Planned Development District
- Design Review
- Vesting Tentative Map Approval
- Final Development Plan

All work related to improvements and project grading would be subject to the City of Antioch Municipal Code, including the Zoning Ordinance, Building Code, and Fire Code. Additionally, the proposed project would require a Conditional Use Permit(s) and Design Review from the City of Antioch in the future.

ES.2 SUMMARY OF IMPACTS AND MITIGATION MEASURES

This EIR analyzes the potential environmental effects of the proposed project. The Initial Study (Appendix A) determined that the following topics would have either no significant impacts or impacts that would be reduced to less than significant with mitigation:

- | | |
|--------------------------------------|--|
| • Aesthetics | • Mineral Resources |
| • Agriculture and Forestry Resources | • Noise |
| • Air Quality | • Population and Housing |
| • Biological Resources | • Public Services |
| • Cultural Resources | • Recreation |
| • Energy | • Tribal Cultural Resources |
| • Geology and Soils | • Transportation (except vehicle miles traveled [VMT]) |
| • Greenhouse Gas Emissions | • Utilities and Service Systems |
| • Hazards and Hazardous Materials | • Wildfire |
| • Hydrology and Water Quality | |
| • Land Use and Planning | |

The proposed project would be required to comply with all mitigation measures identified in the Initial Study. For a complete discussion of potential impacts identified in the Initial Study, please refer to the specific discussion within each resource section of the Initial Study, included in Appendix A of this EIR. Section 6.0, Effects Found Not to



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be Significant, also includes a summary of findings for each resource not discussed in the EIR.

The Initial Study identified impacts related to VMT requiring a more detailed evaluation, which is further discussed in Section 3.0, Environmental Impact Analysis, of this EIR.

Table ES-1, Summary of Mitigation Measures from the Initial Study, summarizes the environmental effects of the proposed project and the mitigation measures from the Initial Study. Table ES-2, Summary of Mitigation Measures from the EIR, has been organized to correspond with environmental issues discussed in Section 3.0, Environmental Impact Analysis, of this EIR. Tables ES-1 and ES-2 are arranged in four columns: (1) impacts; (2) level of significance without mitigation; (3) mitigation measures; and (4) level of significance with mitigation.

As indicated in Table ES-2 and discussed in detail in Section 3.0, Environmental Impact Analysis, the analysis conducted for this EIR determined that the proposed project would result in one significant and unavoidable impact to transportation. Specifically, the proposed project would exceed the applicable VMT threshold of significance, and no feasible mitigation measures are available to reduce this impact to a less than significant level. Refer to Section 3.0, Environmental Impact Analysis, of this EIR for additional discussion.



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Table ES-1: Summary of Impacts and Mitigation Measures from the Initial Study

Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Section 3.3 – Air Quality			
Impact AIR-1: The proposed project could conflict with or obstruct implementation of the applicable air quality plan.	Potentially Significant Impact	<p>MM AIR-1: Implement Construction Best Management Practices. The Applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the Bay Area Air Quality Management District (BAAQMD) to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures. Additional measures may be identified by the BAAQMD or contractor as appropriate:</p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day • All haul trucks transporting soil, sand, or other loose material off-site will be covered • All visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited 	Less Than Significant Impact



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour • All roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used • Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations (CCR); clear signage shall be provided for construction workers at all access points • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications • All equipment shall be checked by a certified visible emissions evaluator or checked by a certified mechanic and determined to be running in proper condition prior to operation • Post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person will respond and take corrective action within 48 	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		hours. The Bay Area Air Quality Management District's phone number will also be visible to ensure compliance with applicable regulations.	
Impact AIR-2: The proposed project could potentially result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.	Potentially Significant Impact	Implement Mitigation Measure AIR-1	Less Than Significant Impact
Impact AIR-3: The proposed project could expose sensitive receptors to substantial pollutant concentrations.	Potentially Significant Impact	Implement Mitigation Measure AIR-1	Less Than Significant Impact
Section 3.4 - Biological Resources			
Impact BIO-1: The proposed project could have a substantial adverse effect, either directly or through habitat modifications on any species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	Potentially Significant Impact	MM BIO-1: Avoid Disturbance of Nesting Birds and Pre-Construction Nesting Bird Surveys. If project activities occur during the nesting season for native birds (February 15 to August 31), the following measures shall be implemented to avoid or minimize the potential for adverse impacts on nesting migratory birds and raptors: <ul style="list-style-type: none"> Pre-construction nesting bird survey for species protected by the Migratory Bird Treaty Act and California Fish and Game 	Less Than Significant Impact



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Code shall be conducted by a qualified biologist within a 100-foot radius of proposed construction activities for passerines and a 300-foot radius for raptors no more than 14 days prior to the start of construction activities.</p> <ul style="list-style-type: none"> • If active nests are found, a qualified biologist shall determine the size of the buffers based on the nesting species and its sensitivity to disturbance. The size of the buffers may be reduced at the discretion of a qualified biologist, but no construction activities shall be permitted within the buffer if they are demonstrated to be likely to disturb nesting birds. Active nest sites shall be monitored periodically to determine time of fledging. <p>MM BIO-2: Pre-construction Swainson's Hawk Surveys. If project construction-related activities would take place during the nesting season (February through August), pre-construction surveys for nesting Swainson's hawks within 0.5-mile radius of the project shall be conducted within 14 days prior to construction activity. Surveys shall be conducted in a manner that maximizes the potential to observe the adult Swainson's hawks, as well as the nest/chicks second. To meet the California</p>	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Department of Fish and Game's recommendations for mitigation and protection of Swainson's hawks, surveys shall be conducted for a 0.5-mile radius around all project activities, and if active nesting is identified within the 0.5-mile radius, consultation is required. Methodology for surveys can be found in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley – Swainson's Hawk Technical Advisory Committee (2000).</p> <p>MM BIO-3: Pre-construction Burrowing Owl Surveys. A burrowing owl pre-construction survey shall take place before any construction activities commence. They shall be conducted whenever burrowing owl habitat or sign is encountered on or adjacent to (within 150 meters) of a project site. If a burrowing owl or sign is present on the Property, three additional protocol level surveys shall be initiated.</p> <p>Once these surveys have been completed to identify the owl's location, disturbance buffers shall be placed around each active burrow. No disturbance shall occur within 200 meters (approximately 655 feet) of occupied burrows during the breeding season (February 1 through August 31) and/or within 50 meters</p>	



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		<p>(approximately 165 feet) of occupied burrows during non-breeding season (September 1 through January 31). Preconstruction surveys shall be completed no more than 14 days prior to initiating ground disturbing activities.</p> <p>MM BIO-4: Avoidance and Minimization Measures for Alameda Whipsnake.</p> <p>In order to prevent Alameda Whipsnake (AWS) from entering construction areas during project development, a wildlife exclusion fence shall be placed along the property boundary prior to ground disturbing activities. The avoidance and minimization measures for AWS are as follows:</p> <ul style="list-style-type: none"> • The wildlife exclusion fence shall be at least three feet high and entrenched three to six inches into the ground. • Exclusion funnels shall be included in the fence design so that terrestrial species are able to vacate the project Site prior to disturbance. • Monofilament netting, which is commonly used in straw wattle and other erosion preventatives, shall <u>not</u> be used on the project site in order to prevent possible 	



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		<p>entrapment of both common and special status terrestrial wildlife species.</p> <ul style="list-style-type: none"> • Trenches shall be backfilled, covered, or left with an escape ramp at the end of each workday. Trenches left open overnight shall be inspected each morning for trapped wildlife species. • Immediately prior to initial ground disturbance (i.e., the morning of ground disturbance), a qualified biologist shall perform a preconstruction survey in order to ensure no AWS are present. The biologist shall remain on site for initial ground disturbance if suitable AWS refugia will be disturbed, i.e., small mammal burrows, foundations, large woody debris. • Prior to the initiation of work activities, the qualified biologist shall also provide worker education regarding AWS. The training shall cover identification of AWS and what to do if an AWS is discovered in the project site. <p>MM BIO-5: Pre-construction Surveys for San Joaquin Kit Fox. Pre-construction surveys shall be conducted no less than 14 days and no more than 30 days prior to the beginning of ground disturbance and/or construction activities or any</p>	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>project activity likely to impact the San Joaquin kit fox. Surveys shall identify kit fox habitat features on the project site and evaluate use by kit fox and, if possible, assess the potential impacts to the kit fox by the proposed activity. The status of all dens shall be determined and mapped (USFWS 2011). Written results of pre-construction surveys must be received by the Service within five days after survey completion and prior to the start of ground disturbance and/or construction activities. If a natal/pupping den is discovered within the project site or within 200-feet of the project boundary, the Service shall be immediately notified and under no circumstances shall the den be disturbed or destroyed without prior authorization. If the pre-construction survey reveals an active natal pupping or new information, the Applicant shall contact the Service immediately to obtain the necessary take authorization/permit.</p> <p>MM BIO-6: Pre-construction American Badger Surveys. A qualified biologist shall survey for American badger concurrent with the pre-construction survey for burrowing owl. If badgers are detected, the biologist shall passively relocate badgers out of the work area prior to construction if feasible. If an active den is detected within the work area, the project</p>	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		proponent shall avoid the den, if feasible, until the qualified biologist determines the den is no longer active. Dens that are determined to be inactive by the qualified biologist shall be collapsed by hand to prevent occupation of the burrow between the time of the survey and construction activities.	
Section 3.5 - Cultural Resources			
Impact CUL-2: Project construction activities could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	Potentially Significant Impact	MM CUL-1: Workers Awareness Training. Prior to the start of any ground disturbing activities, a cultural resources awareness training shall be provided for all construction personnel involved in project implementation. The training shall be provided by a qualified cultural resources specialist and if they choose to participate, a representative of the Indian Canyon Band of Costanoan Ohlone People. The training program shall include relevant information regarding sensitive cultural resources and tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The worker cultural resources awareness program shall also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and shall outline	Less Than Significant Impact



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>what to do and whom to contact if any potential archaeological resources or artifacts are encountered. The program shall also underscore the requirement for confidentiality and culturally appropriate treatment for any find of significance to Native Americans and behaviors, consistent with Native American tribal values. A sign-in sheet shall be distributed to all participants of the training program and submitted to the City within two weeks of program completion.</p> <p>MM CUL-2: Cultural Materials Discovered During Construction. If any cultural resource is encountered during ground disturbance or subsurface construction activities (e.g., trenching, grading), all construction activities within a 50-foot radius of the identified potential resource shall cease until a Secretary of the Interior-qualified archaeologist evaluates the item for its significance and records the item on the appropriate State Department of Parks and Recreation 523 series forms. All forms and associated reports will be submitted to the Northwest Information Center of the California Historical Resources Information System. The archaeologist shall determine whether the resource requires further study. If, after the qualified archaeologist conducts appropriate technical analyses, the resource is determined</p>	



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		to be eligible for listing on the California Register of Historical Resources as a unique archaeological resource as defined in Public Resources Code (PRC) Section 15064.5, the archaeologist shall develop a plan for the treatment of the resource. The plan shall contain appropriate mitigation measures, including avoidance, preservation in place, data recovery excavation, or other appropriate measures outlined in PRC Section 21083.2.	
Impact CUL-3: Project construction activities could disturb human remains, including those interred outside of formal cemeteries.	Potentially Significant Impact	MM CUL-3: Human Burials Encountered During Construction. If ground-disturbing activities uncover previously unknown human remains, Section 7050.5 of the California Health and Safety Code applies, and the following procedures shall be followed: There shall be no further excavation or disturbance of the area where the human remains were found or within 50 feet of the find until the County Coroner and the appropriate City representative are contacted. Duly authorized representatives of the Coroner and the City shall be permitted onto the project area and shall take all actions consistent with Health and Safety Code Section 7050.5 and Government Code Sections 5097.98, et seq. Excavation or disturbance of the area where the human remains were found or within 50 feet of the find shall not be	Less Than Significant Impact



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		permitted to re-commence until the Coroner determines that the remains are not subject to the provisions of law concerning investigation of the circumstances, manner, and cause of any death. If the Coroner determines that the remains are Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the MLD's recommendations, the owner or the MLD may request mediation by NAHC.	
Section 3.7 – Geology and Soils			
Impact GEO-1: The proposed project could directly or indirectly cause potential	Potentially Significant Impact	MM GEO-1: Implement Geotechnical Design Recommendations. Prior to issuance of grading permits, the Applicant shall incorporate	Less Than Significant Impact



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<p>substantial adverse effects, including the risk of loss, injury, or death involving:</p> <ul style="list-style-type: none"> ii. Strong seismic ground shaking iii. Seismic-related ground failure, including liquefaction 		<p>all design specifications and recommendations contained within the geotechnical investigation report into relevant project plans and specifications. These specifications pertain to but are not limited to expansive soils, building foundations, foundation drainage, and backfill of excavations. The project site plans shall be submitted to the City and reviewed as part of the building permit review process.</p> <p>MM GEO-2: Implement Potential Liquefaction Hazard Recommendations. Prior to the issue of building permits, the project Applicant shall submit to the City of Antioch Building Department, for review and approval, a design-level geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer. The design-level report shall include measures to address construction requirements to mitigate, at a minimum, slope stability, liquefiable soils, and ground shaking. Recommendations of adequate and appropriate measures will be implemented, including, but not limited to designing foundations in a manner that limits the effects of liquefaction; the placement of an engineered fill with low liquefaction potential; and the alternative siting of structures in areas with a lower liquefaction risk.</p>	



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Impact GEO-2: The proposed project could result in substantial soil erosion or the loss of topsoil.	Potentially Significant Impact	Implement Mitigation Measure HYD-1.	Less Than Significant Impact
Impact GEO-3: The proposed project may be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.	Potentially Significant Impact	Implement Mitigation Measures GEO-1 and GEO-2.	Less Than Significant Impact
Impact GEO-4: The proposed project may be located on expansive soil, as defined in Take 18-1-B if the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Potentially Significant Impact	Implement Mitigation Measure GEO-1.	Less Than Significant Impact
Impact GEO-6: The proposed project could potentially directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially Significant Impact	MM GEO-3: Procedures for Paleontological Resources Discovered During Construction. If any paleontological resources are encountered during ground-disturbing or subsurface construction activities (e.g., trenching, grading), all construction activities within a 50-foot radius of the identified resource shall cease. and the City shall immediately be notified. The Applicant shall retain a qualified paleontologist (as approved by the City) to evaluate the find and recommend appropriate	Less Than Significant Impact



Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		treatment of the inadvertently discovered paleontological resource. The appropriate treatment of an inadvertently discovered paleontological resource shall be implemented to ensure that impacts to the resource are avoided.	
Section 3.9 – Hazards and Hazardous Materials			
Impact HAZ-2: The proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Potentially Significant Impact	Implement Mitigation Measure HYD-1.	Less Than Significant Impact
Section 3.10 – Hydrology and Water Quality			
Impact HYD-1: The proposed project could potentially violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Potentially Significant Impact	MM HYD-1: Prepare and Implement a SWPPP. Prior to the issuance of any construction-related permits, the Applicant shall prepare and submit a Notice of Intent to the State Water Resources Control Board and prepare a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP shall include a detailed, site-specific listing of the potential sources of stormwater	Less Than Significant Impact



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>pollution; pollution prevention measures (erosion and sediment control measures and measures to control non-stormwater discharges and hazardous spills); description of the type and location of erosion and sediment control best management practices (BMPs) to be implemented at the project site; and a BMP monitoring and maintenance schedule to determine the amount of pollutants leaving the project site. A copy of the SWPPP must be current and remain onsite. Water quality BMPs identified in the SWPPP could include but are not limited to the following:</p> <ul style="list-style-type: none"> • Surface water runoff shall be controlled by directing flowing water away from critical areas and by reducing runoff velocity. Diversion structures, such as terraces, dikes, and ditches, shall collect and direct runoff water around vulnerable areas to prepared drainage outlets. • Surface roughening, berms, check dams, hay bales, or similar devices shall be used to reduce runoff velocity and erosion. • Sediment shall be contained when conditions are too extreme for treatment by surface protection. Temporary sediment traps, filter fabric fences, inlet protectors, vegetative filters and buffers, or settling basins shall be 	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>used to detain runoff water long enough for sediment particles to settle out. Construction materials, including topsoil and chemicals, shall be stored, covered, and isolated to prevent runoff losses and contamination of groundwater.</p> <ul style="list-style-type: none"> • Topsoil removed during construction shall be carefully stored and treated as an important resource. Berms shall be placed around topsoil stockpiles to prevent runoff during storm events. • Fuel and vehicle maintenance areas shall be established away from all drainage courses, and these areas shall be designed to control runoff. • Temporary erosion control measures, such as silt fences, staked straw bales, and temporary revegetation, shall be employed for disturbed areas. No disturbed surfaces will be left without erosion control measures in place during the winter and spring months. • A spill prevention and countermeasure plan shall be developed to identify proper storage, collection, and disposal measures for potential pollutants (such as fuel, fertilizers, pesticides, etc.) used onsite. The plan will 	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>also require the proper storage, handling, use, and disposal of petroleum products.</p> <ul style="list-style-type: none"> • Construction activities shall be scheduled to reduce land disturbance during peak runoff periods and to the immediate area required for construction. Soil conservation practices shall be completed during the fall or late winter to reduce erosion during spring runoff. Existing vegetation will be retained where possible. To the extent feasible, grading activities shall be limited to the immediate area required for construction. 	
<p>Impact HYD-3: The proposed project would substantially alter the existing drainage patten 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:</p> <ol style="list-style-type: none"> Result in substantial erosion or siltation on- or offsite; 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 	Potentially Significant Impact	Implement Mitigation Measure HYD-1.	Less Than Significant Impact



Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact HYD-5: The proposed project could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Potentially Significant Impact	Implement Mitigation Measure HYD-1.	Less Than Significant Impact
Section 3.13 – Noise			
Impact NOI-1: The proposed project could result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Potentially Significant Impact	MM NOI-1: Interior Traffic Noise Levels. Implement the requirements listed in Policy 11.6.2.d in the City of Antioch General Plan to reduce interior noise levels within the multifamily buildings to 45 dB(A) Ldn. Policy 11.6.2.d states the following: “Where new development (including construction and improvement of roadways) is proposed in areas exceeding the noise levels identified in the General Plan Noise Objective, or where the development of proposed uses could result in a significant increase in noise, require a detailed noise attenuation study to be prepared by a qualified acoustical engineer to determine appropriate mitigation and ways to incorporate such mitigation into project design and implementation.”	Less Than Significant Impact



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>MM NOI-2: Project Fixed-Source Noise. The noise from all mechanical equipment associated with the project shall comply with the requirements in Policy 11.6.2.e in the City of Antioch General Plan and the maximum noise level limits listed in Section 9-5.1901, Paragraph A in the City of Antioch Code of Ordinances. Policy 11.6.2.e in the City of Antioch General Plan states the following: “When new development incorporating a potentially significant noise generator is proposed, require noise analyses to be prepared by a qualified acoustical engineer. Require the implementation of appropriate noise mitigation when the proposed project will cause new exceedances of General Plan noise objectives, or an audible (3.0 dB(A)) increase in noise in areas where General Plan noise objectives are already exceeded as the result of existing development.”</p> <p>Section 9-5.1901, Paragraph A in the City of Antioch Code of Ordinances states “Uses adjacent to outdoor living areas (e.g., backyards for single-family homes and patios for multifamily units) and parks shall not cause an increase in background ambient noise which will exceed 60 CNEL.”</p>	



Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>MM NOI-3: Construction Activity. All construction activity shall follow the time and noise reduction measure requirements listed in Policies 11.6.2.i, j, k, m, and n in the City of Antioch General Plan and Sections 5-17.04 and 5-17.05 in the City of Antioch Code of Ordinances as follows:</p> <ul style="list-style-type: none"> i. Ensure that construction activities are regulated as to hours of operation in order to avoid or mitigate noise impacts on adjacent noise-sensitive land uses. j. Require proposed development adjacent to occupied noise sensitive land uses to implement a construction-related noise mitigation plan. This plan would depict the location of construction equipment storage and maintenance area, and document methods to be employed to minimize noise impacts on adjacent noise sensitive land uses. k. Require that all construction equipment utilize noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. l. Prior to the issuance of any grading plans, the City shall condition approval of 	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>subdivisions and non-residential development adjacent to any developed/occupied noise-sensitive land uses by requiring applicants to submit a construction-related noise mitigation plan to the City for review and approval. The plan should depict the location of construction equipment and how the noise from this equipment will be mitigated during construction of the project through the use of such methods as:</p> <ul style="list-style-type: none"> • The construction contractor shall use temporary noise-attenuation fences, where feasible, to reduce construction noise impacts on adjacent noise sensitive land uses. • During all project site excavation and grading on-site, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site. 	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. • The construction contractor shall limit all construction-related activities that would result in high noise levels to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday. No construction shall be allowed on Sundays and public holidays. <p>m. The construction-related noise mitigation plan required shall also specify that haul truck deliveries be subject to the same hours specified for construction equipment. Additionally, the plan shall denote any construction traffic haul routes where heavy trucks would exceed 100 daily trips (counting those both to and from the construction site). To the extent feasible, the plan shall denote haul routes that do not pass sensitive land uses or residential dwellings. Lastly, the construction-related noise mitigation plan shall incorporate any other restrictions imposed by the City.</p>	



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Section 5-17.04 “Heavy Construction Equipment Noise” and Section 5-17.05 “Construction Activity Noise” states it shall be unlawful for any person to operate heavy construction equipment or be involved in construction activity during the hours specified below:</p> <ol style="list-style-type: none"> 1) On weekdays prior to 7:00 a.m. and after 6:00 p.m. 2) On weekdays within 300 feet of occupied dwelling space, prior to 8:00 a.m. and after 5:00 p.m. 3) On weekends and holidays, prior to 9:00 a.m. and after 5:00 p.m., irrespective of the distance from the occupied dwelling. 	
Section 3.18 – Tribal Cultural Resources			
<p>Impact TRIB-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to California Native American tribe, and that is:</p>	<p>Potentially Significant Impact</p>	<p>Implement Mitigation Measures CUL-1, CUL-2, and CUL-3.</p>	<p>Less Than Significant Impact</p>



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Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<ul style="list-style-type: none"> a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision(c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision(c) of PRC 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 			



Table ES-2: Summary of Impacts and Mitigation Measures from the EIR

Environmental Impacts	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact TRANS-1: The proposed project would exceed applicable VMT thresholds of significance.	Significant Impact	There are no feasible mitigation measures to reduce this impact to a less than significant level.	Significant and Unavoidable Impact
Impact TRANS-2: The proposed project, in combination with cumulative projects, would exceed the existing VMT thresholds of significance.	Significant Impact	There are no feasible mitigation measures to reduce this impact to a less than significant level.	Significant and Unavoidable Impact



ES.3 ALTERNATIVES TO THE PROJECT

In accordance with California Environmental Quality Act (CEQA) and the *State CEQA Guidelines* (Section 15126.6), an EIR must describe a reasonable range of alternatives to the project, or to the location of the project, which could attain most of the project's basic objectives, while avoiding or substantially lessening any of the significantly adverse environmental effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a resonated choice. CEQA states that an EIR should not consider alternatives "whose effects cannot be ascertained and whose implementation is remote and speculative."

The following three alternatives to the proposed project are discussed and analyzed in Section 5.0, Alternatives:

- **No Project.** Under the No Project Alternative, the project site would continue to be undeveloped. No modifications to existing site access, easements, or infrastructure would occur.
- **General Plan Consistency Alternative.** Under the General Plan Consistency Alternative, the project site would be developed at a density of 4.0 units per acre in accordance with the General Plan. Given the 10.4 net acre site, the General Plan Consistency Alternative would result in development of 41 single-family residential lots.
- **Senior Housing Alternative.** Under the Senior Housing Alternative, total development of the project site would be the same as the proposed project, but the new residential units would be age-restricted and available to residents age 55 and above.

Each alternative is compared to the proposed project and discussed in terms of its mitigating of adverse effects on the environment. Analysis of the alternatives focuses on those topics for which adverse impacts would result from the proposed project. The Senior Housing Alternative is considered to be the environmentally superior alternative.

ES.4 AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

Section 15123 of the State CEQA Guidelines requires that a summary of an EIR identify areas of controversy known to the lead agency, including issues raised by agencies and the public. The City distributed a Notice of Preparation (NOP) of a Draft EIR for the proposed project beginning on May 21, 2021. The NOP was originally planned to circulate for a 30-day public review and comment period, ending on June 21, 2021. However, the California Department and Fish and Wildlife (CDFW) requested a 1.5 week extension of the public review and comment period. The public review and



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comment period was extended through the State Clearinghouse until July 2, 2021, resulting in a 41-day public review period. Six commenters submitted written responses to the NOP and Initial Study. Comments received are included in Appendix B.

Comments in response to the NOP and Initial Study generally identified the following areas of potential concern:

- Access related to US Bureau of Reclamation (USBR) owned lands located west of the project site on an adjacent parcel identified as Assessor's Parcel Number (APN) 052-490-066.
- Compliance with Assembly Bill (AB) 52.
- Biological Resources, including impacts to special-status species such as western burrowing owl, Swainson's hawk, and San Joaquin kit fox.
- Compliance with the 2019 California Fire Code, the 2019 California Building Code, the 2019 California Residential Code, and Local and County Ordinances and adopted standards.
- VMT, including preparation of a VMT demand analysis, implementation of mitigating strategies, equitable access, and payment of transportation impact fees.

This Draft EIR contains substantial evidence to support the conclusions presented herein. It is possible that there will be disagreement among various parties regarding these conclusions, although the City of Antioch is not aware of any disputed conclusions at the time of this writing. Both the CEQA Guidelines and case law clearly provide the standards for treating disagreement among experts. Where evidence and opinions conflict on an issue concerning the environment, and the lead agency knows of these controversies in advance, the EIR must acknowledge the controversies, summarize the conflicting opinions of the experts, and include sufficient information to allow the public and decision-makers to make an informed judgment about the environmental consequences of the proposed project.

ES.5 REVIEW OF THE DRAFT EIR

The Draft EIR will be available for public review for the statutory 45-day review period and will circulate from August 30, 2021 to October 13, 2021.

Agencies, organizations, and interested parties have the opportunity to comment on this Draft EIR during the 45-day public review period. If you wish to send written comments (including via e-mail), they must be received by 5 p.m. on October 13, 2021.



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Written comments on this Draft EIR should be addressed to:

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The EIR and supporting documents are available for review at the City of Antioch, Community Development Department, located at 200 H Street Antioch, CA 94509, Monday through Friday during normal business hours, and online at:
<https://www.antiochca.gov/community-development-department/planning-division/environmental-documents/>



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1.0 INTRODUCTION

This Draft EIR analyzes the potential environmental effects associated with the Wild Horse Multifamily Project in accordance with CEQA. CCP-Contra Costa Investors, LLC is seeking entitlements for development of 126 multifamily units on a 12-acre vacant site located at the end of Wild Horse Road in the City of Antioch, Contra Costa County, California. The proposed project would also include parking, landscaping managed by a homeowner's association, utility improvements, and approximately 1.6 acres of usable open space. The Applicant has dedicated approximately 1.6 acres of the project site to complete construction of Wild Horse Road along the southern boundary of the property. The construction of Wild Horse Road is part of a separate project and was started by another developer in September 2020. As such, the project site consists of 10.4 net acres of developable area (12-acre site – 1.6 acre dedication = 10.4 net acres).

1.1 PURPOSE OF THIS EIR

This Draft EIR has been prepared pursuant to the State CEQA Guidelines (14 CCR 15000 et seq.). CEQA requires that State and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects (California PRC 21000 et seq.).

According to CEQA Guidelines Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact. The purpose of this Draft EIR is to analyze the potential environmental impacts of the proposed project, to indicate ways to reduce or avoid potential environmental impacts associated with the proposed project, and to identify alternatives to the project that reduce or avoid significant environmental impacts. CEQA requires that each public agency mitigate or avoid the significant environmental effects of projects it approves or implements whenever feasible.

An EIR is an informational document used in state, regional, and local planning and decision-making processes to meet the requirements of CEQA. The purpose of the EIR is not to recommend approval or denial of a project. However, the City's decision whether to approve or to deny the project must take into consideration the information provided by the EIR. A public agency may approve a project even if it would result in significant and unavoidable environmental impacts, provided the agency adopts a statement of overriding considerations.

The Draft EIR must disclose the following: the proposed project's environmental effects, including those that cannot be avoided; the proposed project's growth inducing effects; the project-related effects found not to be significant; and cumulative impacts.



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1.1.1 Type of EIR

In accordance with CEQA Guidelines Section 15161, this document is a project EIR that examines the environmental impacts of a specific project. This type of EIR focuses on the changes in the environment that would result from a specific project. In accordance with CEQA Guidelines Section 15161, a project EIR must examine the environmental effects of all phases of the project, including construction and operation.

This EIR is also a focused EIR, pursuant to CEQA Guidelines Section 15063(c)(3). An Initial Study was prepared for the proposed project in accordance with Sections 15062 and 15082 (refer to Appendix A of this EIR). The Initial Study identifies the topics for which the proposed project would result in less than significant impacts or impacts that could be reduced to less than significant with implementation of the mitigation measures identified in the Initial Study, and therefore do not require further analysis in this EIR. Thus, this EIR focuses the environmental analysis on the topic identified in the Initial Study (i.e., impacts related to vehicle miles traveled only) with the potential to have significant environmental impacts.

1.1.2 Lead Agency Determination

The City of Antioch is designated as the lead agency for the proposed project. CEQA Guidelines Section 15367 defines the lead agency as, "...the public agency, which has the principal responsibility for carrying out or approving a project." Other public agencies may use this document in their decision making or permit processes (e.g., BAAQMD, California Department of Transportation [Caltrans], CDFW, etc.).

This Draft EIR was prepared by the City with technical assistance provided by Stantec Consulting Services Inc., an environmental consultant. Prior to public review, this Draft EIR was extensively reviewed and evaluated by the City staff and, as such, the Draft EIR reflects the independent judgment and analysis of the City, as required by CEQA.

1.2 SCOPE OF THE DRAFT EIR

CEQA Guidelines sections 15080 and 15097 set forth the EIR process, which includes multiple phases involving notification and input from responsible agencies and the public, as described below.

1.2.1 Notice of Preparation of an Environmental Impact Report

In accordance with CEQA Guidelines sections 15063 and 15082, the City distributed a NOP of a Draft EIR for the proposed project beginning on May 21, 2021. The NOP was originally planned to circulate for a 30-day public review and comment period, ending on June 21, 2021. However, CDFW requested a 1.5 week extension of the public review and comment period. The public review and comment period was extended through the State Clearinghouse until July 2, 2021, resulting in a 41-day public review period. The City received six written comments on the NOP and Initial Study. The NOP and Initial



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Study are included in Appendix A. The comment letters received on the NOP and Initial Study are summarized below in Table 1.2-1 and provided in Appendix B. The comments received were considered during the preparation of this Draft EIR.

Table 1.2-1: Summary of NOP Comment Letters

Affiliation	Signatory	Date	Comment Description	CEQA Document Where Comment is Addressed
Contra Costa Water District (CCWD)	Christine Schneider	March 3, 2020	<p>CCWD provided initial comments on the project development plans, and identified the CCWD's untreated water line (Lateral 7.3) that is within an easement owned by the USBR. This easement is located west of the project site, on the adjacent parcel identified as APN 052-490-066.</p> <p><i>CCWD's comments pertain to the easement owned by USBR. This easement is not located within the project site. Furthermore, the proposed project does not involve any off-site improvements on APN 052-490-066, which would cross this easement and require approval of an encroachment permit from CCWD. Discussion regarding the location of this easement has been added to the Project Description in Section 2.2.7, Utilities. However, this update does not change the impacts on utilities as determined in the Initial Study.</i></p>	<ul style="list-style-type: none">EIR Section 2.2.7, Utilities



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Affiliation	Signatory	Date	Comment Description	CEQA Document Where Comment is Addressed
Contra Costa Water District	Christine Schneider	June 4, 2021	CCWD provided comments on the project development plans and requested the EIR to clarify the agencies responsible for ownership and maintenance of the Contra Costa Canal. <i>Clarification regarding to the agencies responsible for ownership and maintenance of the Contra Costa Canal has been added to Section 2.1.3, Existing and Surrounding Land Uses of the EIR.</i>	<ul style="list-style-type: none"> EIR Section 2.1.3, Existing Setting and Surrounding Land Uses
NAHC	Nancy Gonzalez-Lopez	May 24, 2021	NAHC provided comments related to cultural resources and conducting consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project in accordance with AB 52 and the CEQA Guidelines. <i>NAHC comments are general in nature and do not change the impacts on cultural resources or tribal cultural resources determined in the Initial Study.</i>	<ul style="list-style-type: none"> EIR Section 6.0, Effects Found Not To Be Significant Initial Study Section 3.5, Cultural Resources (Appendix A) Initial Study Section 3.18, Tribal Cultural Resources (Appendix A)
Contra Costa County Fire Protection District (CCCFPD)	Todd Schiess	June 9, 2021	CCCFPD's comments indicated the proposed project would be required to comply with the 2019 California Fire Code, the 2019 California Building Code, the 2019 California	<ul style="list-style-type: none"> EIR Section 6.0, Effects Found Not To Be Significant Initial Study Section 3.15, Public Services



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Affiliation	Signatory	Date	Comment Description	CEQA Document Where Comment is Addressed
			<p>Residential Code, and Local and County Ordinances and adopted standards. CCCFPD also indicated the proposed project would be required to form or annex into a Community Facilities District to fund fire and emergency service operations.</p> <p><i>CCFPD's comments are general in nature and do not change the impacts on public services determined in the Initial Study.</i></p>	
Caltrans, Division 4	Mark Leong	June 21, 2021	<p>Caltrans provided comments related to conducting a VMT screening analysis and identified potential mitigation strategies per the California Air Pollution Control Officers Association (CAPCOA). Caltrans also provided comments related to obtaining an encroachment permit, equitable access, and transportation impact fees, if necessary.</p> <p><i>Caltrans comments are general in nature and the suggested approach was follow in the VMT Analysis (see Section 3.0, Environmental Impact Analysis)</i></p>	<ul style="list-style-type: none">• EIR Section 3.0, Environmental Impact Analysis



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Affiliation	Signatory	Date	Comment Description	CEQA Document Where Comment is Addressed
CDFW	Stacy Sherman	July 2, 2021	<p>CDFW provided comments to ensure sufficient information is provided to determine potential impacts on special-status plants and wildlife species and their habitat. CDFW also provided mitigation language for general construction impacts and potential impacts related to western burrowing owl, Swainson's hawk, and San Joaquin kit fox.</p> <p><i>CDFW comments are general in nature and do not change the impacts on biological resources determined in the Initial Study.</i></p>	<ul style="list-style-type: none">• EIR Section 6.0, Effects Found Not To Be Significant• Initial Study Section 3.4, Biological Resources

Based on a preliminary analysis provided in the Initial Study (Appendix A), consultation with City staff, and review of comments received, potential impacts related to VMT is the only topic studied in further detail in Section 3.0, Environmental Impact Analysis, of this EIR.

It has been determined that all other potential environmental effects of the proposed project would be less than significant or have no impact; therefore, these topics are not further studied in this EIR: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation (except impacts related to VMT), tribal cultural resources, utilities and service systems, and wildfire. Each of these resource areas is addressed in the Initial Study (Appendix A). Section 6.0, Effect Found Not to be Significant, of this EIR also provides a summary of analysis and conclusions for each environmental resource evaluated in the Initial Study and not further addressed in this EIR.



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1.2.2 Noticing Updates Since Circulation of the Notice of Preparation

Since publication of the NOP, the City identified the lone Band of Miwok Indians was not notified of the proposed project due to an oversight. The lone Band has previously requested notification of City projects under AB 52. AB 52 mandates consideration of Native American culture as part of the CEQA process. The goal of AB 52 is to promote involvement of California Native American tribes in the decision-making process when it comes to identifying resources of importance to their cultures and developing mitigation for impacts to these resources. To reach this goal, AB 52 establishes a formal role for tribes in the CEQA process. CEQA lead agencies are required to consult with tribes about potential tribal cultural resources in the project site, the potential significance of project impacts, the development of project alternatives, and the type of environmental document that should be prepared.

The City mailed a notification letter to the lone Band on June 17, 2021, in accordance with the requirements of AB 52. In addition, because the proposed project includes a request for a General Plan Amendment, the City's letter is also a Senate Bill (SB) 18 notification letter. Follow up phone calls were made to the lone Band office on July 1 and 14, 2021 and a voicemail was also left with a member of the lone Band's Cultural Committee on July 14, 2021. No response from the lone Band has been received to date, and therefore no changes to the impacts on tribal cultural resources as identified in the Initial Study is warranted. A complete discussion of tribal cultural resources impacts and applicable mitigation measures to reduce impacts to a less than significant level is provided in Section 3.17, Tribal Cultural Resources, of the Initial Study (Appendix A) and discussed in Section 6.0, Effects Found Not To Be Significant, of this EIR.

1.3 REVIEW OF THE DRAFT EIR

The City of Antioch has filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research (OPR) to begin the public review period (PRC, Section 21161). Concurrent with the NOC, this Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as to all parties requesting a copy of the Draft EIR in accordance with PRC, Section 21092(b)(3). The Draft EIR, including technical appendices, will be available for public review for the statutory 45-day review period and will circulate from August 30, 2021 to October 13, 2021.

Agencies, organizations, and interested parties have the opportunity to comment on this Draft EIR during the 45-day public review period. If you wish to send written comments (including via e-mail), they must be received by 5 p.m. on October 13, 2021.



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Written comments on this Draft EIR should be addressed to:

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The EIR and supporting documents are available for review at the City of Antioch, Community Development Department, located at 200 H Street Antioch, CA 94509, Monday through Friday during normal business hours, and online at: <https://www.antiochca.gov/community-development-department/planning-division/environmental-documents/>

Members of the public are invited to review and comment on the adequacy and completeness of this Draft EIR in describing the potential impacts of the proposed project, the level of severity of each impact, the mitigation measures being proposed to reduce or avoid those impacts, and the project alternatives being considered. The most effective comments are those that focus on the adequacy and completeness of the environmental analysis and that are supported by factual evidence. Comments that focus on whether the proposed project should be approved or denied are not comments on the adequacy of this Draft EIR.

1.4 FINAL EIR

After the end of the review period, the City will review the comments received, prepare written responses to those comments, make any related revisions to the Draft EIR, and publish the Final EIR, which will include the Draft EIR, comments on the Draft EIR, responses to comments, and any revisions to the Draft EIR.

The Final EIR will be considered by the City's Planning Commission and City Council when taking action on the proposed project. If the proposed project is approved, CEQA requires the City to adopt findings describing how each of the significant impacts identified in the EIR is being mitigated. The findings are required to describe the reasons why significant unavoidable impacts cannot be mitigated. The findings will also describe the project alternatives analyzed in the EIR and explain whether or not any alternative or portion of an alternative has been adopted.

Because the proposed project has significant and unavoidable impacts, the City is required to adopt a statement of overriding considerations describing the benefits of the proposed project that outweigh its environmental impacts. Finally, the City will adopt a mitigation monitoring and reporting plan that describes how it will ensure the mitigation measures being required of the proposed project will be carried out.



1.5 ORGANIZATION OF THE DRAFT EIR

This Draft EIR is organized as follows:

Section ES: Executive Summary. This section provides a summary of the proposed project and the project alternatives, including a summary of project impacts, recommended mitigation measures, and the level of significance after mitigation for each environmental issue.

Section 1.0: Introduction. This section provides an overview of the proposed project and the CEQA process and describes the purpose, scope, and components of this Draft EIR.

Section 2.0: Project Description. This section provides a detailed description of the proposed project, including the location and project characteristics, project objectives, and required project approvals.

Section 3.0: Environmental Impact Analysis. This section provides the analysis for the VMT impacts of the proposed project. It includes a description of the environmental setting, regulatory setting, significance criteria, project-level and cumulative impacts, and mitigation measures as applicable.

Section 4.0: Other CEQA Considerations. This section provides a summary of significant environmental effects, including unavoidable, irreversible, and growth-inducing impacts.

Section 5.0: Alternatives. This section provides an evaluation of three alternatives to the proposed project, including the CEQA-required No Project Alternative.

Section 6.0: Effects Found Not to Be Significant. This section provides a summary of project impacts that have been determined, through preparation of the NOP and Initial Study, to result in less than significant or less than significant impact with mitigation.

Section 7.0: List of Preparers. This section identifies the report preparers.

Section 8.0: References. This section provides a listing of the technical studies and other documents used to prepare this Draft EIR.



WILD HORSE MULTIFAMILY PROJECT

Draft Environmental Impact Report

Introduction

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WILD HORSE MULTIFAMILY PROJECT

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2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The proposed project would involve development of multifamily residences on an approximately 12-acre site at the terminus of Wild Horse Road in Antioch, California. The project site is currently vacant and consists of a single parcel identified as APN 041-022-003. The Applicant is proposing to develop 126 multifamily units within 25 detached buildings. Each building would contain 2 to 8 units, ranging from approximately 1,120 to 1,900 square feet. The Applicant is only seeking entitlements at this stage and will plan to market the site for future construction by a separate developer. The Applicant has also dedicated approximately 1.6 acres of the project site to complete construction of Wild Horse Road along the southern boundary of the property. The construction of Wild Horse Road is part of a separate project and was started by another developer on September 1, 2020. As such, the project site consists of 10.4 net acres of developable area (12-acre site – 1.6 acre dedication = 10.4 net acres).

2.1.1 Project Location

The proposed project is located in the southeastern portion of the City of Antioch in Contra Costa County, California (Figure 2-1). The approximately 12-acre project site is triangular in shape and identified as APN 041-022-003. It is located at the end of Wild Horse Road, between Le Conte Circle and State Route (SR) 4 (Figure 2-2).

2.1.2 General Plan and Zoning

Table 2.1-1 provides a summary of the current and proposed General Plan land use and zoning designations for the proposed project.

Table 2.1-1: Existing and Proposed General Plan Land Use Designation and Zoning District

Item	Current	Proposed
General Plan Land Use Designation	Low Density Residential	High Density Residential
Zoning District	P-D 86-3.1: Planned Development District	New Planned Development District



WILD HORSE MULTIFAMILY PROJECT

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Project Description

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Notes

1. Coordinate System: NAD 1983 StatePlane California III
FPS 0403 feet
2. Base features produced under license with the Ontario

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0 4 8 Miles
1:500,000 (at original document size of 8.5x11)



Project Location
Antioch, California

Prepared by BT on 2020-12-18
Technical Review by MK on 2020-12-18

Client/Project
City of Antioch
Wild Horse Multifamily Project
Draft EIR

Figure No.
2-1
Title

Regional Overview

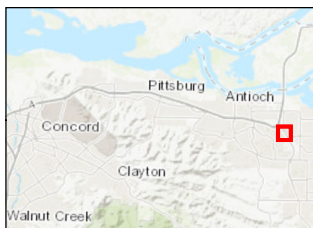
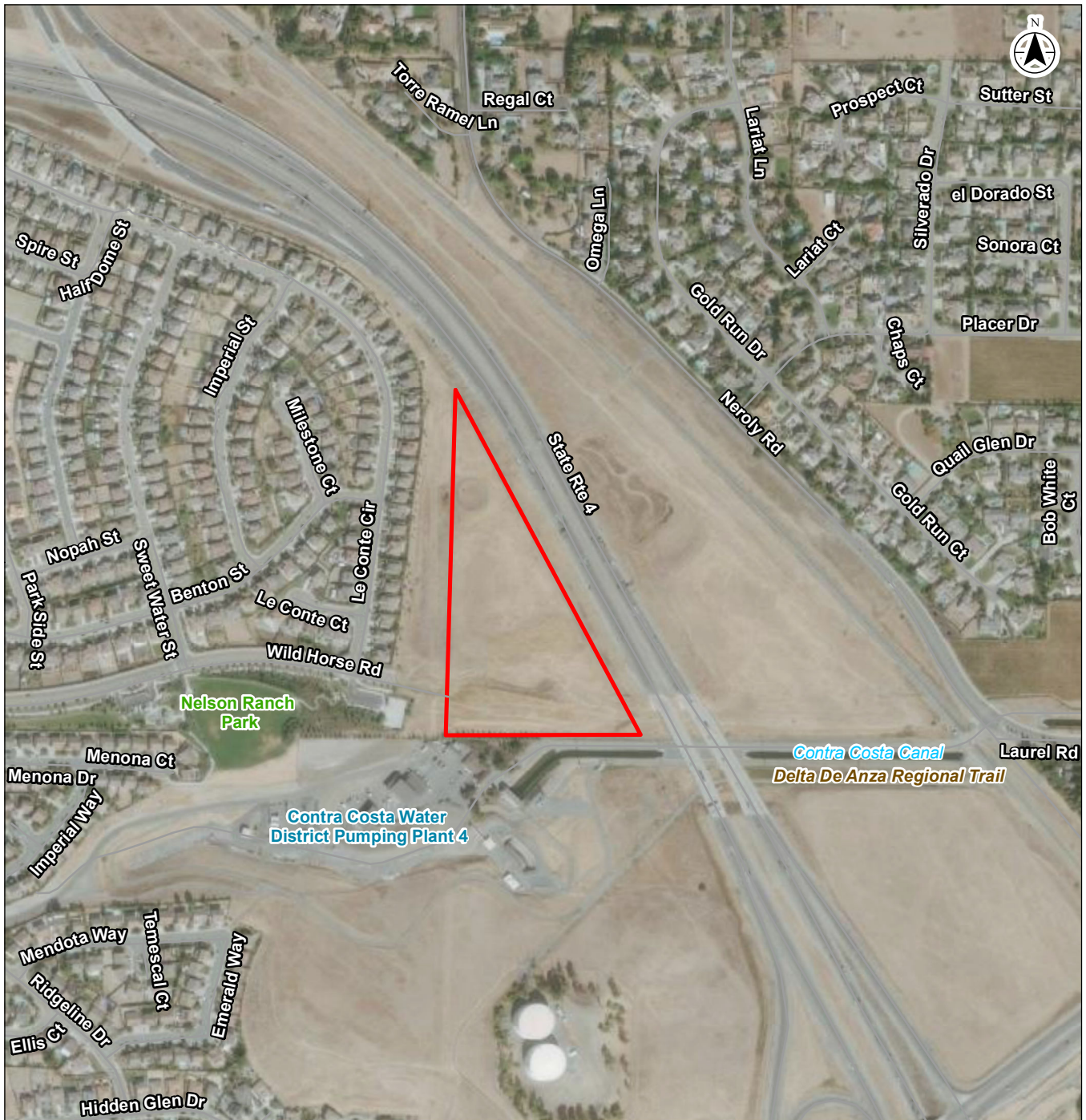
WILD HORSE MULTIFAMILY PROJECT

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 Project Site

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Feet
1:7,200 (at original document size of 8.5x11)



Project Location
Antioch, California

Prepared by KJ on 2020-07-16
Technical Review by AR on 2021-07-16

Client/Project
City of Antioch
Wild Horse Multifamily Project
Draft EIR

Figure No.

2-2

Title

Project Site Location

Notes

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FPS 0403 feet
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General Plan

The City's General Plan designates the parcel as Low Density Residential. The Applicant is requesting a General Plan Amendment to change the General Plan land use designation of the project site from Low Density Residential to High Density Residential. The City's General Plan defines these land uses as the following:

Low Density Residential

"These areas are generally characterized by single-family homes in traditional subdivisions. Areas designated Low Density Residential are typically located on gently rolling terrain with no or few geological or environmental constraints. The residential neighborhoods of southeast Antioch reflect this residential density."
(City of Antioch 2003a)

High Density Residential

"High Density Residential densities may range up to thirty-five (35) dwelling units per gross developable acre, with density bonuses available for age-restricted, senior housing projects. Two-story apartments and condominiums with surface parking typify this density, although structures of greater height with compensating amounts of open space would be possible. This designation is intended primarily for multi-family dwellings. As part of mixed-use developments within the Rivertown area and designated transit nodes, residential development may occur on the upper floors of buildings whose ground floor is devoted to commercial use. Permitted densities and number of housing units will vary, depending on topography, environmental aspects of the area, geologic constraints, existing or nearby land uses, proximity to major streets and public transit, and distance to shopping districts and public parks. The Zoning Ordinance will establish specific density limits at or below 35 units per acre for zoning districts that correspond with the High Density Residential designation. Higher densities will be allowed where measurable community benefit is to be derived (i.e., provision of needed senior housing or low and moderate income housing units). In all cases, infrastructure, services, and facilities must be available to serve the proposed density, and the proposed project must be compatible with surrounding land uses.

Appropriate Land Use Types: Medium Density Residential, High Density Residential, Rivertown Commercial, Mixed Use, and Mixed Use Medical Facility

Maximum Allowable Density: Thirty-five (35) dwelling units per gross developable acre (35 du/ac) and up to a Floor Area Ratio of 1.5 within areas designed for mixed use or transit-oriented development.



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Anticipated Population per Acre: Forty (40) to seventy (70) persons per acre.”
(City of Antioch 2003b)

Zoning

The project site is currently zoned P-D 86-3.1: Planned Development District by the City’s Zoning Ordinance. The Applicant is requesting to rezone the project site as a Planned Development District. The Planned Development District is described in the City’s Zoning Ordinance as follows:

“Planned Development Districts are intended to accommodate a wide range of residential, commercial and industrial land uses which are mutually supportive and compatible with existing and proposed development on surrounding properties. P-D Districts shall encourage the use of flexible development standards designed to appropriately integrate a project into its natural and/or man-made setting and shall provide for a mix of land uses to serve identified community needs. In addition, P-D Districts shall orient pedestrian and bicycle facilities to encourage non-auto oriented circulation within the development. Further-more, the P-D process may be used to implement the various Specific Plans adopted by the city. Once established, the P-D District becomes, in effect, the zoning code for the area within its respective boundaries.”
(City of Antioch 2003a)

2.1.3 Existing Setting and Surrounding Land Uses

The project site consists of a single vacant parcel located at the terminus of Wild Horse Road. The project site is primarily covered with annual grasslands. There are no trees or natural drainages present onsite; however, there is a man-made circular depressional area that makes up a detention basin located at the northern end of the site.

The project site is mostly flat with an elevation ranging from 70 feet above sea level at the north end to 108 feet above sea level at the southern end. The center of the constructed detention basin has an elevation of 66 feet above sea level. The topography outside the project site is elevated on both the eastern and western sides.

The project site is adjacent to SR-4 to the east, one- and two-story single-family residences part of the Monterra subdivision to the west, and Wild Horse Road to the south. Other nearby uses to the south of the project site include the Contra Costa Water District’s Pumping Plant 4; the Contra Costa Canal, which is owned by USBR and is operated and maintained by the Contra Costa Water District; Nelson Ranch Park; and the Delta De Anza Regional Trail.



2.2 PROJECT CHARACTERISTICS

The proposed project consists of a multifamily residential development with up to 126 units on approximately 10.4 acres of the site, resulting in a density of 12.1 dwelling units per acre. The proposed multifamily residential development would consist of 25 residential buildings each with 2 to 8 units. The units would range in size from approximately 1,120 to 1,900 square feet, and contain 2 to 4 bedrooms and 2 to 3.5 bathrooms. Each unit would also include a two car attached garage. The proposed buildings would be three stories tall with a maximum height of 45 feet.

The proposed project would also include onsite surface parking, landscaping managed by a homeowner's association, utility improvements, and approximately 1.6 acres of usable open space. The project site plan is shown in Figure 2-3.

2.2.1 Architectural Styles

The Applicant has developed design guidelines and development standards for the proposed project. The design guidelines are intended to assist the future developer with the design of the proposed project, including parking and landscaping within the project site. The project design guidelines have incorporated the requirements of the City of Antioch Citywide Design Guidelines Manual where applicable.

The proposed project would include one of four types of architectural styles: Spanish, Craftsman, Farmhouse, or Contemporary. Regardless of the architectural style chosen, unique architectural elements would be incorporated and would be required to meet the project's design guidelines, the City's architectural design requirements, and be subject to Design Review prior to the issuance of a building permit. The four potential architectural style options for the proposed project are described below:

- **Spanish Style.** Design characteristics are generally identified as low-pitched hipped or gable roof, S-tile or villa tile roof material, smooth finish or very little texture stucco, window shutters, and exposed wood posts and beams.
- **Craftsman Style.** Design characteristics are generally identified as low-pitched hipped or gable roof, wide-overhanging eaves, emphasis on horizontal lines, board and batten or clapboard siding with various course exposures, decorative beams or braces commonly added under gables, porches that cover the length of the front elevation and often wrap onto side elevations, and stone and/or brick veneer is often used at the lower portion of the elevation.
- **Contemporary.** Design characteristics are generally identified as minimal ornamentation, use of strong, organized, geometric forms and massing, juxtaposition of different, and sometimes contrasting materials, use of natural



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textures such as wood, metal and stone, and austere elevations with high contrast in areas of entry or interest.

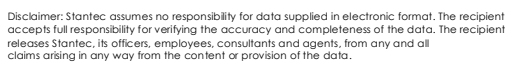
- **Farmhouse.** Design characteristics are generally identified as variable size entry porch with style specific detailing, prominent gable roof forms with occasional use of hip roof forms, horizontal siding with various exposures, vertical proportioned windows, steep gable roof pitches, and wide entry porch with separate shed roof and minimal detailing.

2.2.2 Landscaping

Landscaping for the proposed project would be subject to the City's Landscaping and Irrigation requirements outlined in Article 10 of the Antioch Municipal Code. The design guidelines developed for the proposed project also include landscaping development standards as it relates to the site entries, spacing and sizing, plant maintenance, and irrigation.

According to the preliminary landscape plan prepared for the proposed project, landscaped areas would generally incorporate plantings utilizing a three- tier system: (1) grasses and ground covers, (2) shrubs and vines, and (3) trees. All plant materials for the landscaping plan would be selected from the California Department of Water Resources "Water-Use Classification of Landscape Species" and would emphasize water-efficient plants. A bioretention basin would be located in the northern corner of the proposed project, trees would line the private streets and property boundaries, and the Paseos would include trees, shrub, and ground cover areas. Entrances, walls, and fences would be landscaped to provide buffers for security and privacy. Community features such as plazas, interactive water features, and community gardens would be included.





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2.2.3 Open Space Area

The proposed project would include approximately 1.6 acres of usable open space that would serve as a central gathering place for the community. Buildings would be oriented to create courtyards and usable open space areas. The shared open space would include both active and passive recreational opportunities including a lawn, green landscaped areas, children's play equipment, four pedestal picnic tables, including two pedestal picnic tables in compliance with the American Disabilities Act, and grills. The paseos would include entry arbors, paved pathways lined with trees, shrubs, and ground cover.

2.2.4 Vehicular Access

Primary site access would be via Wild Horse Road and onto two streets ("A" Street and "B" Street) within the project site. The proposed streets would be 26 feet wide to allow emergency vehicles to access the project site.

The Applicant has dedicated approximately 1.6 acres of the site for completion of Wild Horse Road along the southern boundary of the site. The construction of Wild Horse Road would be completed as part of a separate project that was started by another developer in September 2020.

2.2.5 Parking

The proposed units would have two car attached garages, totaling 256 private parking spaces. The proposed project would include an additional 45 on street pull-in parking spaces for guests. The proposed project would also include 10 common use bicycle racks for bicycle parking throughout the project site. Each bicycle rack would accommodate two bicycles.

2.2.6 Lighting and Security

Lighting is a safety feature and shall be used to light all streets, pathways, and open space areas. As discussed in the project design guidelines, street lighting would be installed within the site on both sides of the streets using a minimum 70-watt HPSV. All lighting in parking areas would also be arranged to provide safety and security for residents and visitors. The proposed project would also include pedestrian-scaled lighting and pathway lighting to light all pathways and open areas, including pathways from the parking lot to the building entrances. All site entrances would be visible from a public street and well lighted.

As required by the City, all developments must provide adequate lighting or illumination of parking areas with a minimum illumination at ground level of two foot-candles not exceeding one-half foot-candles and is subject to design review. All exterior lighting fixtures shall not shine directly onto an adjacent street or property, and is to be shielded Section 9-5.1715 of the Antioch Municipal Code.



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2.2.7 Utilities

Water and sewer would be provided by the City and gas and electric would be provided by Pacific Gas and Electric Company (PG&E). The proposed development plans would be required to meet the City criteria during the City's development review phase, prior to issuance of a building permit. The proposed project would also include curbs, gutters, catch basins, fire hydrants, flow lines, sidewalks, manholes, utility boxes.

Water

The proposed project is within the service boundary of the CCWD and is served water from the City of Antioch, which receives water from the CCWD through the Contra Costa Canal. The proposed project would construct new 8-inch and 6-inch water main lines along the proposed project streets to connect to the existing 10-inch water main located along Wild Horse Road on the southern perimeter of the project site.

There is also a CCWD untreated water line (referred as Lateral 7.3) located west of the project site on the adjacent parcel identified as APN 052-490-066. The water line is within an easement owned by USBR and does not cross any portion of the project site. Furthermore, the proposed project does not involve any off-site improvements which would cross the USBR-owned easement or require approval of an encroachment permit from CCWD.

Wastewater

The City maintains and owns the local wastewater collection system and is responsible for the collection and conveyance of wastewater for the project site. Delta Diablo Sanitation District is the agency physically treating the wastewater at their facility. The proposed project would construct lateral 8-inch diameter sewer lines to connect to the existing 8-inch public sanitary sewer main located along Wild Horse Road. All sewer distribution improvements would be constructed and designed in accordance with the City's Design Standards.

Stormwater

The proposed project would install new 18-inch and 24-inch storm drains and a storm drain outfall. The storm drains would connect to the bioretention basin and the existing 48-inch and 36-inch storm drain pipes along the western perimeter of the project site. The proposed project would create approximately 214,032 square feet of impervious surface. It would also include approximately 284,502 square feet of pervious surface consisting of landscaping and bioswale landscaping throughout the project site and a bioretention basin in the northern corner of the project site. This bioretention area would be used to treat runoff from the impervious roofs, roadways, and landscaped areas. The proposed project would also implement low impact development design strategies, such as optimizing site layout to limit development envelope, preserve natural drainage



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features, minimize impervious surfaces, use drainage as a design element, dispersal of runoff to pervious areas, and bioretention facilities.

Electricity

PG&E would provide electricity and natural gas services to the project site. The proposed project would connect to existing underground electric and natural gas lines on the project site and/or within adjacent roadways.

2.3 PROJECT CONSTRUCTION

2.3.1 Schedule

The Applicant is only seeking entitlements at this time. However, for purposes of this analysis, it is estimated project construction would take approximately 13 months to complete, starting in January 2023. It is estimated the proposed project would require up to 79 workers during the peak construction phase. Project construction activities would be consistent with the Antioch Municipal Code Section 5-17.05 and would occur on weekdays from 7:00 a.m. to 6:00 p.m., on weekdays within 300 feet of occupied dwellings, 8:00 a.m. to 5:00 p.m., and on weekends and holidays 9:00 a.m. to 5:00 p.m., irrespective of the distance from the occupied dwellings (City of Antioch 2020a). The construction worksite would be operated in accordance with applicable public health standards, including those required in response to COVID-19.

2.3.2 Construction Equipment, Access, and Staging

The proposed project would require the use of heavy construction equipment for site work and construction of the multifamily residences. Construction equipment would include, but not be limited to, concrete/industrial saws, rubber tired dozers, tractors/loaders/backhoes, graders, scrapers, cranes, forklifts, generator sets, welders, air compressors, cement and mortar mixers, pavers, paving equipment, and rollers. Construction workers would access the project site from Wild Horse Road. Project construction equipment and materials would be stored within the project site. Construction materials and equipment would be delivered using trucks during the daytime hours (between 7:00 a.m. and 6:00 p.m.). Road closures are not anticipated during project construction.

2.3.3 Construction Activities

Construction activities associated with the proposed project would require demolition, grading, utility connections, building construction, construction of the new streets, and landscaping on the project site. Construction of the proposed project would involve approximately 11,600 cubic yards (CY) of cut and 86,000 CY of fill, of which approximately 74,400 CY of soil would be import fill, as deemed appropriate by the geotechnical engineer. The maximum depth of ground disturbance would be 15 feet.



2.4 PROJECT OBJECTIVES AND REQUIRED PROJECT APPROVALS

2.4.1 Objectives

The Applicant has developed the following objectives for the proposed project:

- To help the City of Antioch provide its fair share of housing, and help alleviate a regional housing shortage, by providing an alternative housing type and sizes which can meet the needs of a variety of different and growing household sizes.
- To provide onsite amenities and recreational opportunities, such as a community park.
- To provide housing near major transportation and regional trails connections, with increased land use intensities near regional transportation connections.
- To create a community that is family friendly or that could accommodate senior residents.
- To implement the County's Growth Management Program by providing for urban development within the Contra Costa County Urban Limit Line.
- To contribute to the City of Antioch's economic and social viability by creating a community that attracts investment and positive attention.

2.4.2 Approvals

The project requires the following approvals from the City of Antioch:

- EIR Certification
- General Plan Amendment
- Rezone to Planned Development District
- Design Review
- Vesting Tentative Map Approval
- Final Development Plan

All work related to improvements and project grading would be subject to the City of Antioch Municipal Code, including the Zoning Ordinance, Building Code, and Fire Code. Additionally, the proposed project would require a Conditional Use Permit(s) and Design Review from the City of Antioch in the future.



3.0 ENVIRONMENTAL IMPACT ANALYSIS

3.1 INTRODUCTION

This section provides an analysis of the physical environmental impacts of implementing the proposed project, as described in Section 2.0, Project Description. It describes the environmental setting, assesses impacts and cumulative impacts, and identifies mitigation measures (if any) to reduce or avoid identified significant environmental impacts.

3.1.1 Scope of Analysis

Initial Study

As described in Section 1.0, Introduction, the City determined an EIR is required for the proposed project in compliance with CEQA and published a NOP on May 21, 2021 (see Appendix A). The NOP included an Initial Study for the proposed project, which concluded that many of the physical environmental impacts of the proposed project would result in no impact or less than significant impacts, and that mitigation measures agreed to by the Applicant would reduce significant impacts to a less than significant level. CEQA does not require further assessment of a project's less than significant impacts or those that can be reduced to less than significant with mitigation; therefore, those issues are not included in this section. The issues addressed in the Initial Study are listed below.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation (except impacts related to VMT)
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire



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Environmental Impact Analysis

Refer to the Initial Study in Appendix A for a discussion and the impact analysis of the proposed project with respect to these environmental topics.

EIR Topic

The environmental topic addressed in this section of the EIR is listed below.

- Section 3.2, Transportation (VMT)

3.1.2 Organization of Issue Area

The environmental topic analyzed in this section includes the following subsections:

- **Introduction.** This subsection summarizes what will be discussed in the respective environmental topic section, states what informational documents are used as the basis for the section, and indicates what related comments, if any, were received during the NOP scoping.
- **Environmental Setting.** This subsection describes the existing, baseline physical conditions of the project site and in the surroundings at the time the NOP was issued. Conditions are described in sufficient detail and breadth to allow a general understanding of the environmental impacts of the proposed project.
- **Regulatory Setting.** This subsection describes the relevant federal, state, and local regulatory requirements that are directly applicable to the environmental topic being analyzed.
- **Environmental Impacts.** This subsection describes the physical environmental impacts (e.g., the changes to baseline physical environmental conditions) that could result from the proposed project, as well as any mitigation measures that could avoid, eliminate, or reduce identified significant impacts. This subsection lists the significance thresholds used in determining whether an impact is significant. It also identifies the environmental topics scoped out that were determined by the Initial Study to result in a less than significant impact or less than significant impact with mitigation. This subsection also discusses the methodology, including the parameters, assumptions, and data used in the analysis. The Project Impact Analysis includes discussion of the impacts analyzed and the findings.

3.1.3 Significance Determinations

A “significant effect” is defined by CEQA Guidelines section 15382 as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment [but] may be considered in determining whether the physical change is significant.”



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Draft Environmental Impact Report Environmental Impact Analysis

The level of significance for each impact examined in this Draft EIR is determined by considering the magnitude of the impact against the applicable threshold as defined in CEQA Guidelines and Appendix G Checklist. The level of significance of the impact is indicated at the end of the analysis based on the following terms:

- **No Impact:** No adverse physical changes (or impacts) to the environment are expected.
- **Less Than Significant Impact:** Impact that does not exceed the defined significance criteria or is eliminated or reduced to a less than significant level through compliance with existing local, state, and federal laws and regulations.
- **Less Than Significant Impact with Mitigation:** Impact that is reduced to a less than significant level through implementation of the identified mitigation measures.
- **Significant and Unavoidable Impact:** Impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less than significant level through compliance with existing local, state, and federal laws and regulations and for which there are no feasible mitigation measures.

Determining the severity of project impacts is fundamental to achieving the objectives of CEQA. CEQA Guidelines Section 15091 requires that decision makers mitigate, as completely as is feasible, the significant impacts identified in the Final EIR. If the EIR identifies any significant unmitigated impacts, CEQA Guidelines Section 15093 requires decision makers to adopt a statement of overriding considerations that explains why the benefits of the project outweigh the adverse environmental consequences identified in the EIR.

3.1.4 Cumulative Impacts

Cumulative impacts, as defined in CEQA Guidelines section 15355, refer to two or more individual effects that, when taken together, are “considerable” or that compound or increase other environmental impacts. A cumulative impact from several projects is the change in the environment that would result from the incremental impact of the project added to the impacts of other reasonably foreseeable future projects. Pertinent guidance for cumulative impact analysis is provided in CEQA Guidelines section 15130:

- An EIR shall discuss cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable” (e.g., the incremental effects of an individual project are considerable when viewed in connection with the effects of past, current, and probable future projects, including those outside the control of the lead agency, if necessary).
- An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.



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Environmental Impact Analysis

- A project's contribution is less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.
- The discussion of impact severity and likelihood of occurrence need not be as detailed as for effects attributable to the project alone.
- The focus of analysis should be on the cumulative impact to which the identified other projects contribute, rather than on attributes of the other projects that do not contribute to the cumulative impact.

The cumulative impact analysis is described immediately following discussion of the project impact analysis.

Approach to Cumulative Impact Analysis

The methodology used for assessing cumulative impacts typically varies depending on the specific topic being analyzed. CEQA requires cumulative impacts be discussed using either a list of past, present, and probable future projects producing related or cumulative impacts, or a summary of projections contained in an adopted local, regional, or Statewide plan, or related planning document that describes or evaluates conditions contributing to the cumulative effect.

A cumulative project list would not have a bearing on the VMT analysis since the cumulative condition VMT data would come from the regional traffic model's 2040 horizon. However, Table 3.1-1 and Figure 3-1 are included for informational purposes to show those projects that have occurred or are planned to occur (i.e., pending applications at the time of the NOP release) within the City, in the vicinity of the project site.

Table 3.1-1: List of Related Projects

Project	Jurisdiction	Address/APN	Description	Status
Laurel Ranch	Antioch	APN 053-060-031	SFR with 180 DU	Approved
Parkridge	Antioch	APN 053-060-037, 053-060-023, Canada Valley Road, Subdivision 8847	SFR with 525 DU	Under Construction
Oakley Knolls PD/TM	Antioch	APN 051-430-001 to 018	SFR with 29 DU	Under Construction
Quail Cove PD/TM	Antioch	APN 056-310-091; Prewett Ranch Dr. & Colchico Dr.	SFR with 32 DU	Under Construction



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Project	Jurisdiction	Address/APN	Description	Status
AMCAL Apartments	Antioch	APN 051-200-025 & -026	MFR with 394 DU	Under Construction
Nelson Ranch Unit 3 - Riverview	Antioch	Nelson Ranch Subdivision 8851	SFR with 100 DU	Under Construction
Mt Diablo Maintenance Facility	Antioch	APN 051-032-009	Truck maintenance facility on 10.28 acres	Approved
Radix Growth Cannabis	Antioch	APN 051-052-094; 3625 East 18 th Street	Commercial Cannabis Cultivation, Nursery, and Retail	Approved
Acorn Business Park	Antioch	APN 051-052-112, -113; NW 18 th St & Drive-In Way	Business Park on 19.75 acres	Approved
United Pacific Gas Station	Antioch	APN 056-270-059; Lone Tree Way & Vista Grande Dr.	Gas station, convenience store, attached car wash	Initial Review
Wildflower Station	Antioch	APN 053-140-003; N Hillcrest and Wildflower	10.45 acres of commercial use, 7 acres of condominiums (98 condos), 4.5 acres of single family (22 lots)	Under Construction
PG&E Spoils BLDG.	Antioch	APN 051-160-002	Spoils Buildings	Under Construction

Notes:

SFR – single-family residential

MFR – multi-family residential

DU – dwelling units

APN – Assessor's Parcel Number



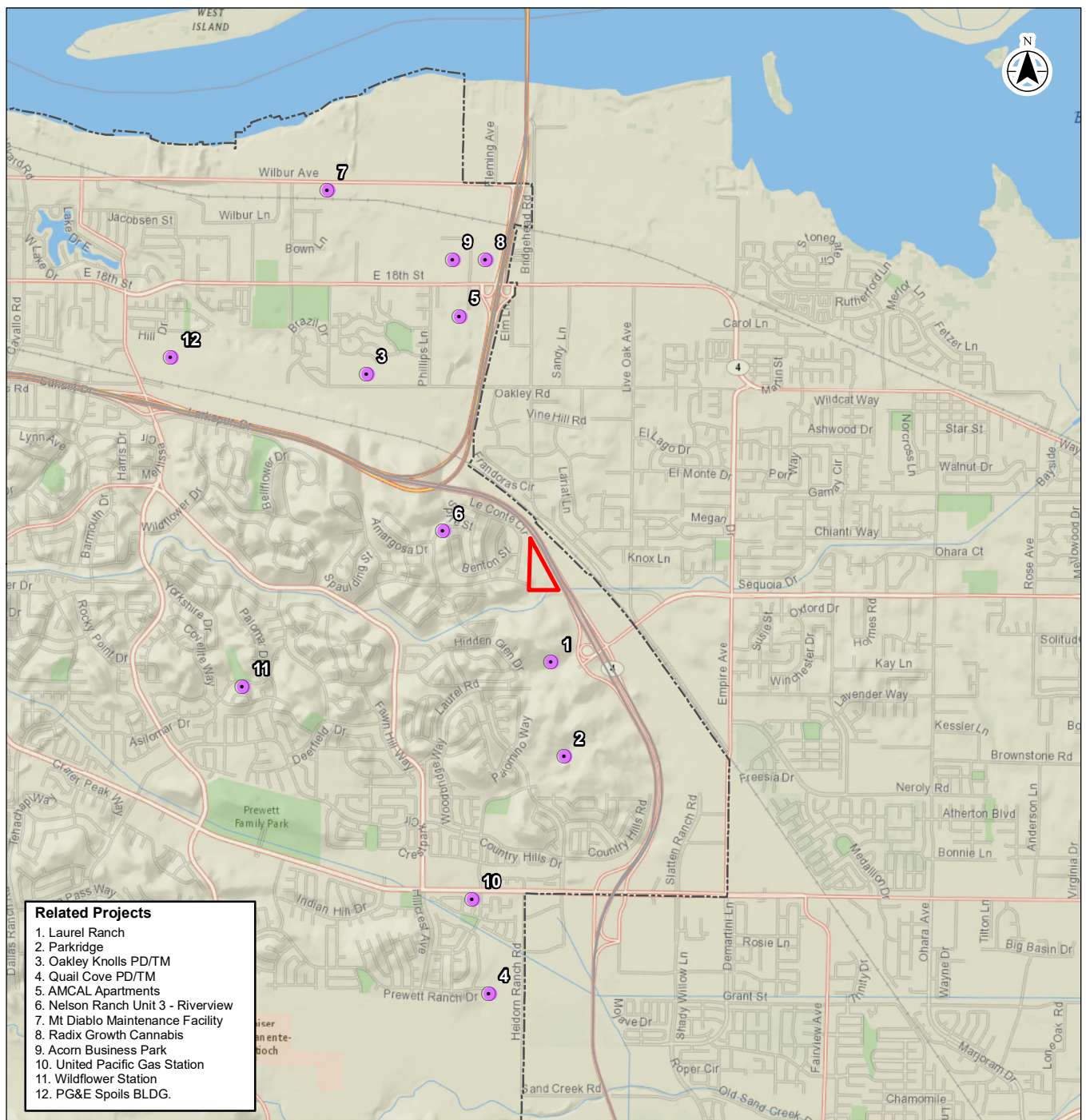
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Related Projects

1. Laurel Ranch
2. Parkridge
3. Oakley Knolls PD/TM
4. Quail Cove PD/TM
5. AMCAL Apartments
6. Nelson Ranch Unit 3 - Riverview
7. Mt Diablo Maintenance Facility
8. Radix Growth Cannabis
9. Acorn Business Park
10. United Pacific Gas Station
11. Wildflower Station
12. PG&E Spoils BLDG.



Notes

1. Coordinate System: NAD 1983 StatePlane California III FIPS 0403 feet
2. Base features produced under license with the Ontario

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.

- Cumulative Project
- Project Site
- City of Antioch

0 0.25 0.5
Miles
1:48,000 (at original document size of 8.5x11)



Project Location
Antioch, California

Prepared by KJ on 2021-07-15
Technical Review by AR on 2021-07-15

Client/Project
City of Antioch
Wild Horse Multifamily Project
Draft EIR

Figure No.
3-1
Title

Related Projects

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3.2 TRANSPORTATION

3.2.1 Introduction

This section assesses project impacts on transportation. Specifically, this section describes the environmental setting, outlines the regulatory setting, and evaluates potential direct and indirect impacts on VMT that could result from the proposed project. Project-related impacts on the circulation system, including transit, roadway, and bicycle pedestrian facilities; hazards due to a geometric design feature; and emergency access are addressed in the Initial Study (Appendix A). As described in Table 1.2-1, the following comment was received during the NOP scoping period related to VMT:

- Caltrans, District 4 (Travel Demand Analysis, Mitigation Strategies, Transportation Impact Fees, Equitable Access, and Encroachment Permit)

3.2.2 Environmental Setting

Existing Roadway System

The project site is located at the terminus of Wild Horse Road, between Le Conte Circle and SR 4. The following describes the local roadways that would serve the proposed project and surrounding area.

Freeways

The project is served by two freeways, SR 4 and SR 160, which are part of the state highway network. SR 4 is an east-west freeway that extends from the City of Hercules in the west to the City of Stockton and beyond in the east. In the project area, SR 4 has a northwest/southeast orientation between SR 160 and Wild Horse Road. SR 4 typically has two travel lanes in each direction, but transitions to an eight-lane freeway when connected with SR 160. SR 160 is a north-south highway and serves as a major route connecting the City of Antioch and the City of Oakley to the Antioch Bridge and Sacramento County to the north. SR 160 typically has two travel lanes in each direction and narrows to one lane per direction north of the Antioch Bridge toll plaza.

Arterials

The local street and roadway system within the City is composed of a hierarchy of streets with varying functions. Arterial roads range from two-lane arterials to six-lane arterials that link residential and commercial districts with the freeway network and provide intercity connections. Arterial roads near the project site include Hillcrest Avenue, a four-lane divided arterial, and Laurel Road, also a four-lane divided arterial.

These roadways are located south of the project site. Hillcrest Avenue provides access to SR 4, and Laurel Road will also provide access to SR 4 once fully constructed (City of Antioch 2003a).



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Collectors Streets

Collectors are designed to connect residential neighborhoods with arterials and have two travel lanes. Wild Horse Road is located immediately adjacent to the project site and is designated a major collector in the City's General Plan (City of Antioch 2003a). An eastward extension of Wild Horse Road is currently under construction as part of a separate on-going project. As shown in the General Plan, Wild Horse Road would extend east of SR 4 and connect with the future Slatten Ranch Road extension. Both extensions will be collectors in the vicinity of the project site. Once these roadways are fully constructed, they will provide more direct access from the project site to SR 4 and to the City of Oakley.

Bicycle Facilities

Existing bicycle facilities in the area consist of Class I trails and Class II lanes. In the General Plan Class I trails are defined as separate, multi-use trails or paths, and Class II lanes are defined as striped bicycle lanes on roadways (City of Antioch 2003a). Currently there are Class II lanes present on Wild Horse Road on both sides of the roadway, which connect to the wider bicycle network via Class II lanes on Hillcrest Avenue. The project site is also close to the Delta De Anza Regional Trail, which runs along the Contra Costa Canal through Antioch. The trail connects from Bay Point to the City of Oakley. The trail can be accessed via Ridgeline Drive or at the Hillcrest Avenue intersection. South of the project area, Class II lanes are provided on Laurel Road and a future eastward extension of Laurel Road will include Class II lanes connecting to existing Class II lanes at the SR 4 interchange. See Figure 3-2 for the existing and future bicycle facilities in the project vicinity.

Bus System

The Antioch Bay Area Rapid Transit (BART) station is located a travel distance of approximately 3 miles north from the project site. BART provides transit services throughout the San Francisco Bay Area. Antioch is the end of the line, and services operate approximately every 15 minutes in the AM and PM peaks, and every 30 minutes for the rest of the day.

Tri Delta Transit operates bus transit services in the region to connect to local hubs and BART railway stations. The closest transit stop is located approximately 1 mile west of the project site at the intersection of Hillcrest Avenue and Wild Horse Road. It provides access to three routes; Routes 380 (weekday only) and 392 (weekend and holiday only) which connects from Pittsburg BART to Antioch BART, and Route 385 which connects from Antioch BART to Brentwood Park & Ride (Tri Delta Transit 2020). Tri Delta Transit buses are all equipped with bicycle racks, which would allow commuters to ride from the project site to the transit stop and take the bus the remainder of the journey as an alternative to riding a bicycle the full distance to the BART station. See Figure 3-3 for transit facilities in the project vicinity.



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3.2.3 Regulatory Setting

State

California Department of Transportation

Caltrans is responsible for planning, designing, constructing, operating, and maintaining all state-owned roadways in Contra Costa County. The state facilities providing regional access to and from the project site is SR 4 and SR 160.

Senate Bill 743

On September 27, 2013, SB 743 was signed into law. The legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce VMT and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32). SB 743 started a process that will likely change transportation impact analysis as part of CEQA compliance. Changes include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts in many parts of California (if not statewide). The new criteria, “shall promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses” (PRC Section 21099(b)(1)). On January 20, 2016, the Governor’s Office of Planning and Research (OPR) released revisions to its proposed Draft CEQA guidelines for the implementation of SB 743. In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the Guidelines section implementing SB 743 (Section 15064.3). OPR developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which contains OPR’s technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The provisions of CEQA Guidelines Section 15064.3 shall apply prospectively as described in Section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.



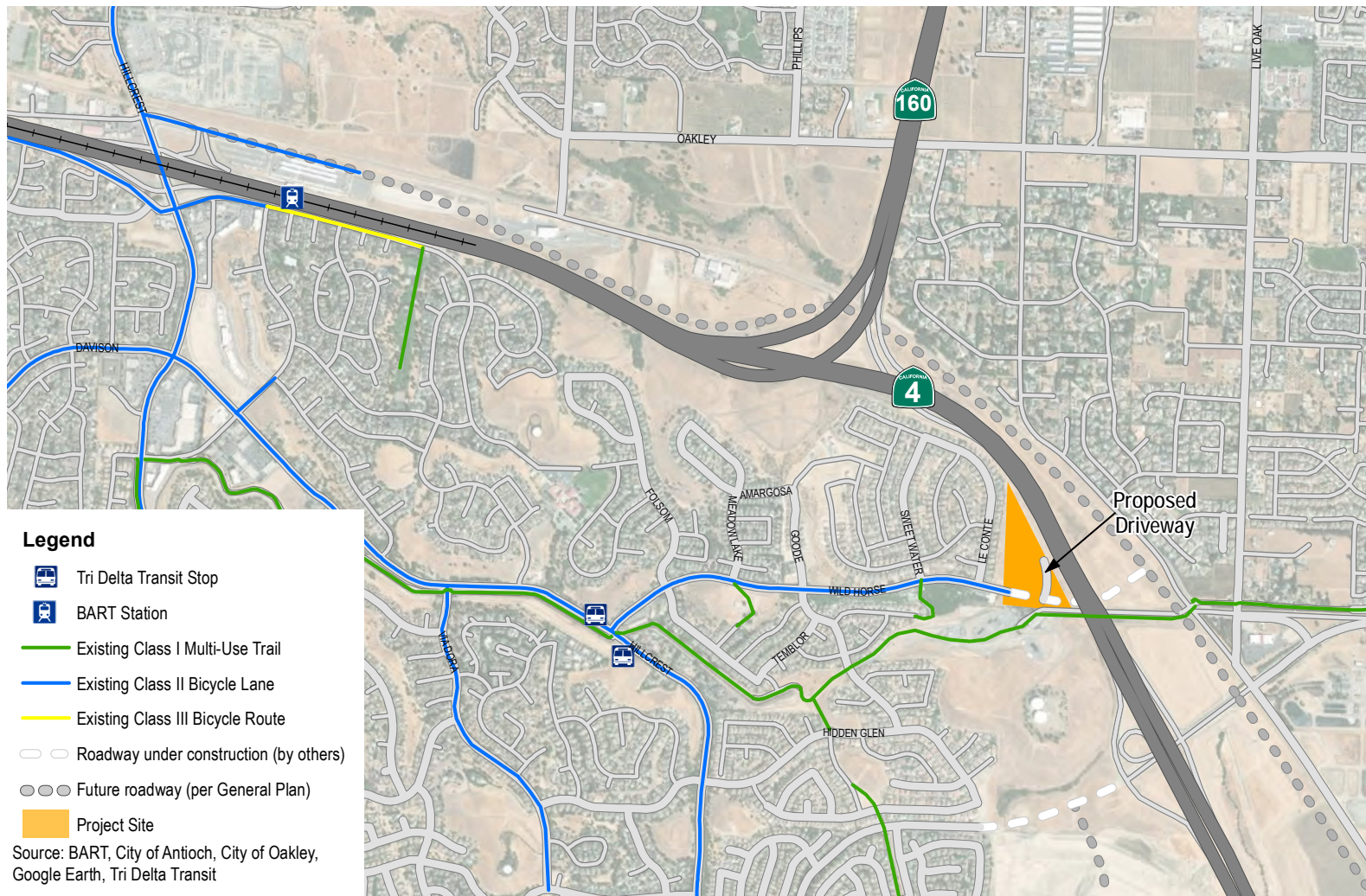
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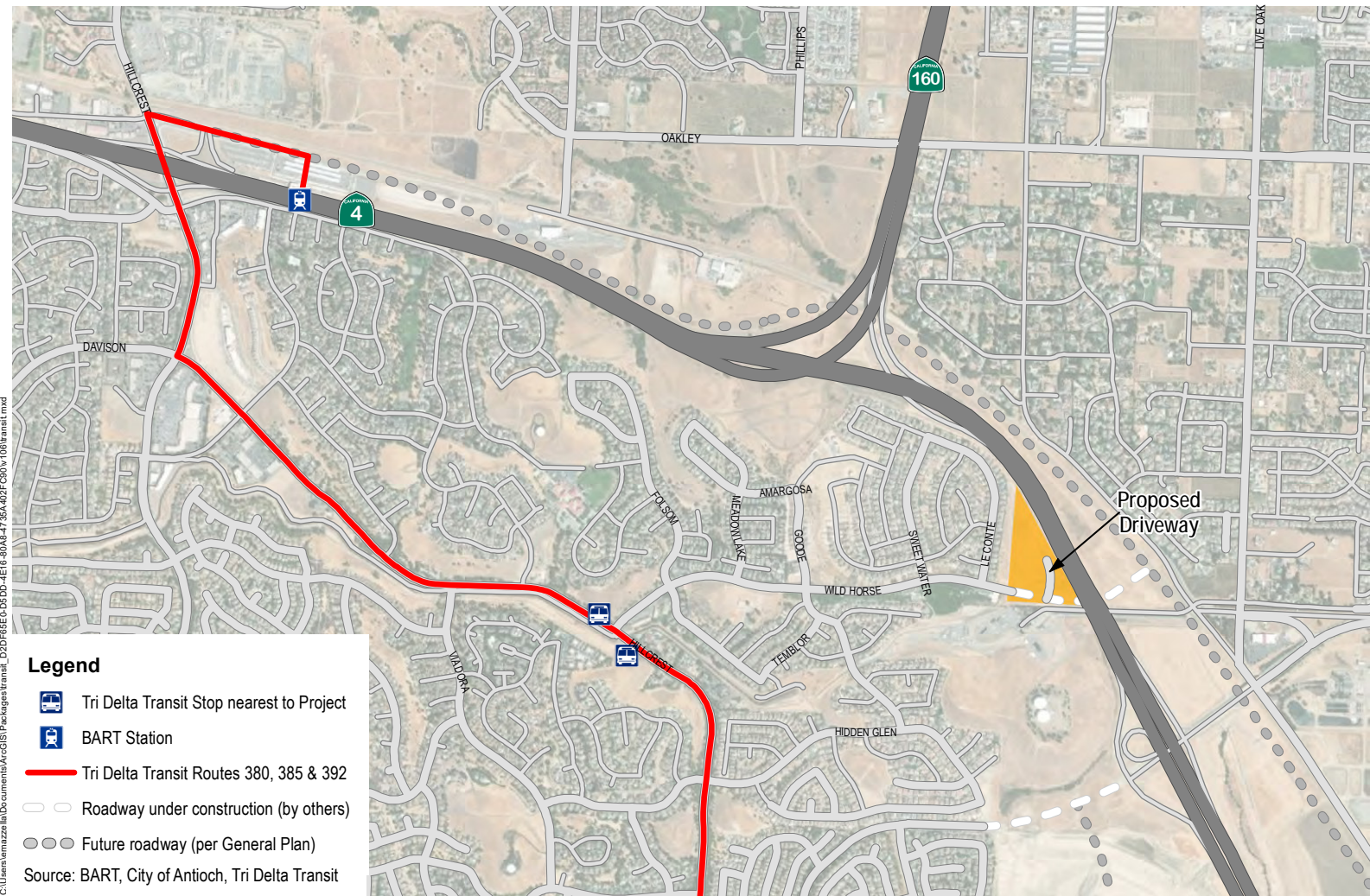
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Regional

Regional Transportation Plan and Sustainable Communities Strategy

The Final Bay Area 2040 is the long-range Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) for the nine-county San Francisco Bay Area. The RTP/SCS is prepared by the Metropolitan Transportation Commission and the Association of Bay Area Governments (ABAG) to guide the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities.

Per California State and federal law, the RTP/SCS is to be updated at least every four years to reflect changes to funding opportunities and respond to growth. Plan Bay Area 2050, an update to the RTP/SCS, is currently in progress. The preparation of the Final Bay Area 2040 RTP/SCS included an extensive public outreach program where members of the public and member agencies were engaged to provide input to the RTP/SCS. In addition, an EIR was prepared and certified and the comment period allowed for members of the public and member agencies to review and comment on the RTP/SCS assumptions. The City of Antioch is within the ABAG planning area and the City's General Plan assumptions have been considered and included in the RTP/SCS. Therefore, if the project is consistent with the City's General Plan the project is considered consistent with the RTP/SCS.

Local

City of Antioch General Plan

The General Plan Circulation Element includes policies relating to roadway and intersection LOS, which are not relevant to CEQA analysis due to the statewide change to VMT as the primary impact criteria for transportation. The City of Antioch's General Plan policies pertaining to circulation and transportation per the Circulation Element are as follows:

- | | |
|-----------------|---|
| Objective 7.3.1 | Provide adequate roadway capacity to meet the roadway performance standards set forth in the Growth Management Element. |
| Policy 7.3.2.c | Require the design of new developments to focus through traffic onto arterial streets. |
| Policy 7.3.2.g | Require traffic impact studies for all new developments that propose to increase the approved density or intensity of development or are projected to generate 50 peak hour trips or more at any intersection of Circulation Element roadways. The purpose of these studies is to demonstrate that: |



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- The existing roadway system, along with roads to be improved by the proposed project, can meet the performance standards set forth in Sections 3.4.1 and 3.4.2 of the Growth Management Element; and
- Required findings of consistency with the provisions of the Growth Management Element can be made.

Policy 7.3.2.k	Where single-family residences have no feasible alternative but to front on collector or arterial roadways, require, wherever possible, that circular driveways or onsite turnarounds be provided to eliminate the need for residents to back onto the street.
Policy 7.3.2.l	Locate driveways on corner parcels as far away from the intersection as is possible.
Policy 7.3.2.m	Avoid locating driveways within passenger waiting areas of bus stops or within bus bays. Locate driveways so that drivers will be able to see around bus stop improvements.
Policy 7.3.2.n	Use raised medians as a method for achieving one or more of the following objectives: access control, separation of opposing traffic flows, left turn storage, aesthetic improvement, and/or pedestrian refuge.
Policy 7.3.2.o	Where medians are constructed, provide openings at the maximum feasible intervals, typically no less than 1/8 mile.
Policy 7.3.2.v	Private streets, where permitted, shall provide for adequate circulation and emergency vehicle access. Private streets that will accommodate more than 50 vehicles per hour in the peak hour or that are designed for on-street parking shall be designed to public street standards. The design of other private streets shall be subject to the review and approval of the City Engineer. Private streets shall be improved to public street standards prior to acceptance of dedications to the City.
Policy 7.3.2.x	Require new development to construct all onsite roadways, including Circulation Element routes, and provide a fair share contribution for needed off-site improvements needed to maintain the roadway performance standards set forth in the Growth Management Element. Contributions for off-site improvements may be in the form of fees and/or physical improvements, as determined by the City Engineer. Costs associated with mitigating off-site traffic impacts should be allocated on the basis of trip generation, and should have provisions for lower rates for income-restricted lower



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	income housing projects needed to meet the quantified objectives of the General Plan Housing Element.
Objective 7.4.1	Maintenance of a safe, convenient, and continuous network of pedestrian sidewalks, pathways, and bicycle facilities serving both experienced and casual bicyclists to facilitate bicycling and walking as alternatives to the automobile.
Policy 7.4.2.a	Design new residential neighborhoods to provide safe pedestrian and bicycle access to schools, parks and neighborhood commercial facilities.
Policy 7.4.2.b	Design intersections for the safe passage of pedestrians and bicycles through the intersection.
Policy 7.4.2.c	Provide street lighting that is attractive, functional, and appropriate to the character and scale of the neighborhood or area, and that contributes to vehicular, pedestrian, and bicycle safety.
Policy 7.4.2.d	Maintain roadway designs that maintain mobility and accessibility for bicyclists and pedestrians.
Policy 7.4.2.e	Integrate multi-use paths into creek corridors, railroad rights-of-way, utility corridors, and park facilities.
Policy 7.4.2.f	Provide, as appropriate, bicycle lanes (Class II) or parallel bicycle/pedestrian paths (Class I) along all arterial streets and high volume collector streets, as well as along major access routes to schools and parks.
Policy 7.4.2.j	Permit the sharing or parallel development of pedestrian walkways with bicycle paths, where this can be safely accomplished, in order to maximize the use of public rights-of-way.
Policy 7.4.2.l	Require the construction of attractive walkways in new residential, commercial, office, and industrial developments, including provision of shading for pedestrian paths.
Policy 7.4.2.m	Maximize visibility and access for pedestrians, and encourage the removal of barriers for safe and convenient movement of pedestrians.
Policy 7.4.2.n	Ensure that the site design of new developments provides for pedestrian access to existing and future transit routes and transit centers.



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- Policy 7.4.2.o Pave walks and pedestrian pathways with a hard, all-weather surface that is easy to walk on. Walks and curbs should accommodate pedestrians with disabilities. Walks within open space areas should have specially paved surfaces that blend with the surrounding environment.
- Policy 7.4.2.p In general, design walks to provide a direct route for short to medium distance pedestrian trips, and to facilitate the movement of large numbers of pedestrians. Meandering sidewalks are appropriate in areas where the natural topography or low-density land uses lend themselves to informal landscapes.
- Policy 7.5.2.i Include Tri-Delta Transit in the review of new development projects, and require new development to provide transit improvements in proportion to traffic demands created by the project. Transit improvements may include direct and paved access to transit stops, provision of bus turnout areas and bus shelters, and roadway geometric designs to accommodate bus traffic.
- Objective 3.4.3 Maintain acceptable traffic levels of service on City roadways through implementation of Transportation Systems Management, Growth Management, and the City's Capital Improvement Program, and ensure that individual development projects provide appropriate mitigation for their impacts.
- Policy 3.4.4.a Place ultimate responsibility for mitigating the impacts of future growth and development, including construction of new and widened roadways with individual development projects. The City's Capital Improvements Program will be used primarily to address the impacts of existing development, and to facilitate adopted economic development programs.
- Policy 3.4.4.c Ensure that development projects pay applicable regional traffic mitigation fees and provide appropriate participation in relation to improvements for routes of regional significance (see also Circulation Element Policy 5.3.1f).
- Policy 3.4.4.d Consider level of service standards along basic routes to be met if 20-year projections based on the City's accepted traffic model indicate that conditions at the intersections that will be impacted by the project will be equivalent to or better than those specified in the standard, or that the proposed project has been required to pay its fair share of the improvement costs needed to bring operations at impacted intersections into conformance with the applicable performance standard.



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Environmental Impact Analysis

3.2.4 Environmental Impacts

This section discusses the thresholds of significance, methodology for analysis, and direct and indirect impacts on VMT with the implementation of the proposed project.

Thresholds of Significance

In accordance with the CEQA Guidelines' Appendix G Environmental Checklist, the following question is analyzed and evaluated in this EIR to determine whether VMT impacts are significant. Would the proposed project:

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

The Initial Study (Appendix A) determined the remaining CEQA Appendix G Checklist questions related to transportation were to have a less than significant impact:

- Conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?

These issues are summarized in Section 6.0, Effects Found Not to Be Significant, and are not discussed further in this section.

Methodology for Analysis

In accordance with the updated CEQA guidelines that incorporate the requirements of SB 743, this analysis is prepared using VMT as the primary performance metric to measure project impacts. Generally, SB 743 moves away from using delay-based LOS as the metric for identifying a project's significant impact to instead use VMT.

SB 743 required the Governor's Office of Planning and Research to establish recommendations for identifying and mitigating transportation impacts within CEQA, as outlined in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) (OPR 2018). OPR's Technical Advisory recommends methodologies for quantifying VMT, significance thresholds for identifying a transportation impact, and screening criteria to quickly identify if a project can be presumed to have a less than significant impact without conducting a full VMT analysis. Lead agencies are to adopt local guidelines appropriate for their jurisdiction. At this time, the City of Antioch has not formally adopted VMT guidelines. Therefore, this VMT analysis has been prepared in accordance with OPR's Technical Advisory guidance.



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OPR's Technical Advisory indicates that a lead agency may elect to use a traffic model to estimate a project's VMT. The City has elected to use the Contra Costa Transportation Agency's travel demand model to assess VMT resulting from land use projects. Since the proposed project is comprised of residential land use, it is evaluated based on home-based (HB) VMT per capita and a threshold of significance of 15 percent lower than the Countywide average HB VMT per capita.

Project Screening

Prior to undertaking a detailed VMT analysis, OPR's Technical Advisory recommends that lead agencies conduct a screening process. If a project satisfies one or more of the screening criteria, the project could be presumed to have a less than significant impact. OPR's Technical Advisory suggests that lead agencies may screen out VMT impacts using project size, maps depicting areas of low VMT, transit availability and provision of affordable housing screening criteria. The screening criteria is provided in Table 3.2-1 and indicates whether the proposed project would meet this criteria.

Table 3.2-1: Project Screening Criteria and Threshold

Category	Criteria/Screening	Threshold	Screened Out (Yes/No)
Trip generation screening	Small projects can be screened out from completing a full VMT analysis.	If the project generates less than 110 trips per day, the project is assumed to have a less than significant impact. Projects of 10,000 square feet or less of non-residential space or 20 residential units or less, or otherwise generating less than 836 VMT per day.	No
Map-based screening	Residential and employment-generating projects that are located in areas with low VMT and that are similar in character to the existing development can be screened out from completing a full VMT analysis.	If the project is in a low VMT area, the project is assumed to have a less than significant impact.	No
Transit Priority Area Screening	Projects within 0.5-mile of a major transit stop or a stop located along a high-quality transit corridor reduce VMT and therefore can be screened out	If the project is within 0.5-mile of a major or high-quality transit stop/corridor, the project is assumed to have a less than significant impact. The project should generally	No



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Category	Criteria/Screening	Threshold	Screened Out (Yes/No)
	from completing a full VMT analysis.	also meet the following criteria: <ul style="list-style-type: none">• Floor Area Ratio greater than 0.75• Would not provide more parking than required by City• Would be consistent with the Regional SCS• Would not result in a net reduction in multi-family housing units• Would not replace existing affordable units with a smaller number of moderate to high-income units	
Affordable residential development	Affordable housing in infill locations can be screened out from completing a full VMT analysis.	If the project is comprised 100% of affordable units and is located in an infill location, then the project is assumed to have a less than significant impact.	No

Notes:

FAR = Floor Area Ratio

SCS = Sustainable Community Strategy

Source: OPR's Technical Advisory 2018

Since the proposed project does not meet any of the screening criteria described above, a VMT analysis is required.

Project Impact Analysis

Impact TRANS-1 The proposed project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Impact Analysis

According to CEQA Guidelines Section 15064.3 Subdivision (b)(1), VMT exceeding an applicable threshold of significance may indicate a significant impact. Projects that



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decrease VMT in the project area compared to existing conditions should be considered to have a less than significant VMT impact.

As discussed, the proposed project would not meet any of the screening criteria outlined in OPR's Technical Advisory and a VMT analysis is required. The VMT analysis was conducted for the proposed project using guidance outlined in OPR's Technical Advisory. The VMT data was obtained from the Contra Costa Transportation Agency's travel demand model and used for analysis of the proposed project.

The project site is located in traffic analysis zone (TAZ) 30143 (see Figure 3-4), which includes residential land uses similar in nature to the proposed project. Since the project's land uses are comparable to the land use in TAZ 30143, the proposed project can be expected to exhibit trip generation and trip length characteristics similar to the other residential land uses in this TAZ.

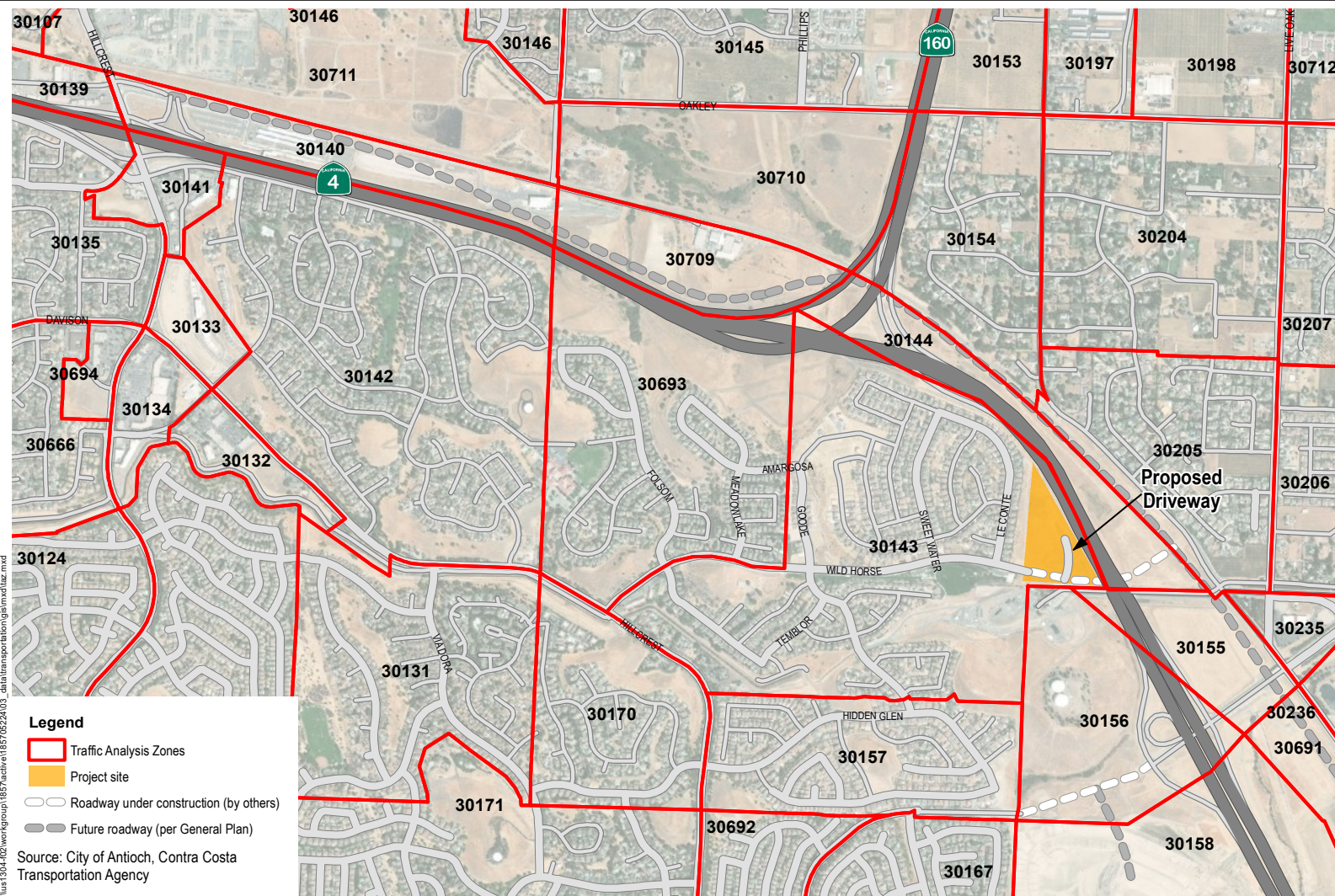
As shown in Table 3.2-2, the existing HB VMT per capita for the project TAZ is 24.8 HB VMT per capita. The Contra Costa Transportation Agency's VMT screening threshold for a residential development is 15 percent below the County average. The County average is 17.3 HB VMT per capita and 15 percent below the average results in a significance threshold of 14.7 HB VMT per capita.

Table 3.2-2: VMT Analysis Summary

Description	Residential HB VMT per Capita
Project	
Zonal Home-Based VMT per Capita (2020)	24.8 VMT per capita
% VMT reduction due to Project Characteristics	6.1%
Project VMT	23.3 VMT per capita
Threshold	
Contra Costa County Average Baseline Home-Based VMT per Capita (2020)	17.3 VMT per capita
Threshold of Significance (15% reduction from baseline)	14.7 VMT per capita
Difference (project minus Threshold of Significance)	8.6 VMT per capita
Is project above or below Threshold of Significance	Above Threshold of Significance
Significant Transportation Impact	Yes

Source: Contra Costa Transportation Authority 2021





Project Location
Antioch, California

Client/Project
City of Antioch
Wild Horse Multifamily Project
Draft EIR

Figure No.

3-4

Title

Contra Costa Transportation
Agency Traffic Analysis Zones

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As shown in Table 3.2-2, the VMT analysis refined the HB VMT per capita for TAZ 30143 based on specific project characteristics. The VMT analysis utilized quantification methodologies from CAPCOA to estimate the VMT reduction from these project characteristics. The project characteristics are described below.

Project Characteristic-1: The proposed project would increase density. CAPCOA describes that designing a project with increased densities reduces VMT, and thereby GHG emissions associated with travel in several ways. Density is generally measured in terms of persons, jobs, or dwellings per unit area. Increasing a project's density will affect the distance people travel and provide greater options to choose for the mode of travel. The project's proposed net density is 12.1 dwelling units per acre, which is greater than the General Plan specified 4.0 dwelling units per acre, and greater than the number of housing units per acre for Institute of Transportation Engineers (ITE)-typical residential development (CAPCOA 2018). To calculate the estimated VMT reductions from this measure, CAPCOA's quantification methodology was utilized. This measure would result in a project VMT reduction of approximately 4.14 percent (rounded to 4.1 percent in this analysis).

Table 3.2-3 below shows the estimated VMT reduction based on CAPCOA's LUT-1 Land Use/Location Transportation-Increase Density methodology:

Table 3.2-3: VMT Reduction Based on LUT-1

Mitigation Method
% VMT Reduction = A X B [not to exceed 30%]
where A = Percentage increase in housing units per acre
= (the project's number of housing units per acre – number of housing units per acre for typical ITE development) / (number of housing units per acre for typical ITE development)
*Per CAPCOA Table C-1 housing units per acre for typical ITE development = 7.6
= (12.1 - 7.6) / 7.6
= 0.59
B = Elasticity of VMT with respect to density
= 0.07
% VMT Reduction = 0.59 x 0.07 = 4.14% (rounded to 4.1% in this analysis)

Source: CAPCOA 2018

Project Characteristic-2: The proposed project would improve pedestrian connectivity by constructing an onsite pedestrian network. The proposed project would construct pedestrian pathways that would facilitate pedestrian movements throughout the project site and connect to new off-site pedestrian improvements along the project frontage. The proposed project would construct onsite pedestrian pathways that connect to Wild Horse Road, facilitating connectivity with the wider pedestrian



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network. To quantify the VMT reductions related to this site design feature, SDT-1: Neighborhood/Site Enhancements- Provide Pedestrian Network Improvements from CAPCOA is utilized. This measure would result in a project VMT reduction of 2.0 percent. Table 3.2-4 below shows the estimated VMT reduction based on this method.

Table 3.2-4: VMT Reduction Based on SDT-1

Estimated VMT Reduction	Extent of Pedestrian Accommodations	Context
Mitigation Method		
2%	Within project site and connecting off-site	Urban/Suburban
1%	Within project site	Urban/Suburban
<1%	Within project site and connecting off-site	Rural

Source: CAPCOA 2018

The VMT reductions associated with the project characteristics are summarized in Table 3.2-5. A reduction of 6.1 percent was calculated using the reduction formula contained in the CAPCOA guidelines as noted in Table 3.2-5.

Table 3.2-5: VMT Reductions from Project Characteristics Summary

Description	Residential VMT Reduction (HB VMT)	Source
Project Characteristics		
PC-1. The project will increase density.	4.1%	CAPCOA Land Use/ Location LUT-1
PC-2. The project will improve pedestrian connectivity by constructing an onsite pedestrian network.	2.0%	CAPCOA Neighborhood / Site Enhancement SDT-1
Total VMT Reductions from Project Components	6.06%¹	--

Notes:

HB VMT = home-based vehicle miles traveled

¹ The calculated reductions do not sum up to the total since individual strategies are multiplicative and not additive. e.g., overall % VMT Reduction = $1 - (1-A) * (1-B) * (1-C)$ where A, B, C equals reductions for individual strategies

The 6.1 percent VMT reduction due to project components results in a HB VMT of 23.3 per capita. The proposed project's 23.3 HB VMT per capita is approximately 58.5 percent above the Countywide threshold of significance of 14.7 HB VMT per capita, resulting in a significant impact.



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The estimated VMT and project characteristics do not account for the implementation of a potential transportation demand management (TDM) plan, which could be used to further reduce the project VMT. The TDM plan would need to achieve a minimum 58.5 percent reduction in VMT to reduce the project impacts to a less than significant level.

The range of effectiveness for VMT reductions is based on information included in the CAPCOA *Quantifying Greenhouse Gas Mitigation Measures* report (CAPCOA report). The CAPCOA report identifies the global maximum reduction for all VMT as 75 percent for projects in urban areas, 40 percent for compact infill projects, 20 percent for suburban center projects (or suburban with a neighborhood electric vehicle network), and 15 percent for suburban projects.

The proposed project most closely resembles a suburban project as defined by CAPCOA, which is characterized by dispersed, low-density, single-use, automobile dependent land use patterns, usually outside of the central city (a suburb) (CAPCOA 2018). According to the CAPCOA report, an aggressive TDM plan for a suburban project would be expected to achieve a maximum 15 percent reduction in per capita VMT. Applying a 15 percent reduction to the proposed project's 23.3 HB VMT per capita would result in 19.8 HB VMT per capita, which is approximately 34.7 percent above the 14.7 threshold.

The CAPCOA report includes measures that a project could apply to achieve a maximum reduction in VMT. These measures were reviewed in relation to the project's characteristics and potential CAPCOA measures were identified. Table 3.2-6 includes potential CAPCOA measures to reduce project VMT.

Table 3.2-6: Potential CAPCOA Measures for the Proposed Project

Strategy	CAPCOA Measure	Potential VMT Reduction
Commute Trip Reduction Program: HOA or property management provides transportation coordination services including: <ul style="list-style-type: none">• Assistance with ride matching for commuter carpooling.• Providing information on commute options and assistance with purchasing transit passes.	TRT-1	Up to 5.2%
Implement Subsidized or Discounted Transit Program: Provide subsidized/discounted daily or monthly public transit passes.	TRT-4	0.3-20.0%
School Pool Program: HOA or property management assists with ride matching for school-related trips.	TRT-10	7.2-15.8%



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Strategy	CAPCOA Measure	Potential VMT Reduction
Expand Transit Network: Expand the local transit network by adding or modifying existing transit service to enhance the service near the project site.	TST-3	0.1 – 8.2%
Increase Transit Service Frequency/Speed: Reduce transit-passenger travel time through more reduced headways and increased speed and reliability.	TST-4	0.02 – 2.5%
Provide Local Shuttles: Provide local shuttle service through coordination with the local transit operator or private contractor. The local shuttles will provide service to transit hubs, commercial centers, and residential areas.	TST-6	0.02 – 2.5%
Unbundle Parking Costs from Property Cost: Unbundling would separate parking from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost.	PDT-2	2.6 – 13%

Source: CAPCOA 2018

Notes:

TRT – Trip Reduction Program

TST – Transit System Improvements

PDT – Parking Policy/Pricing

CAPCOA Measures TRT-1 and TRT-10

National Highway Travel Survey Data for 2017 indicates approximately 30 percent of total VMT generated per household is attributable to commuting to and from work, and up to 5 percent of total VMT is attributable to school-related trips. If the maximum potential VMT reduction was achieved with implementation of CAPCOA measures TRT-1 and TRT-10 listed in Table 3.2-6, this would provide a reduction of 0.55 HB VMT per capita, resulting in a project HB VMT per capita of 22.8. Therefore, even with the implementation of these CAPCOA measures, the project's VMT would be approximately 54.8 percent above the threshold of significance of 14.7 HB VMT per capita.

CAPCOA Measures TST-3, TST-4, TST-6, and TRT-4

Options for improving access to transit including providing local shuttles (CAPCOA Measure TST-6) or coordinating transit routes near the project site (CAPCOA Measures TST-3 & TST-4) would not provide substantial improvements to VMT unless headways were frequent. Options for improving access to transit would be economically infeasible; furthermore, the VMT reduction would likely be reduced approximately 0.1 percent if a low-frequency route was provided near the project site.



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Implementing transit subsidies (CAPCOA Measure TRT-4) was also considered; however, since the cost would be covered by HOA fees paid by project residents, it would not be a true subsidy, and would be difficult for a HOA to manage.

Therefore, TST-3, TST-4, TST-6, and TRT-4 were considered to reduce the project's VMT impact, but ultimately were determined to be economically infeasible or not a true subsidy.

CAPCOA Measure PDT-2

CAPCOA Measure PDT-2 was considered to reduce the project's VMT impact by unbundling parking cost from the property purchase cost. This option would be ineffective in reducing VMT, as free parking is readily available on public streets in the vicinity of the project site and could be utilized by residents instead of purchasing parking onsite.

Conclusion

There are no feasible CAPCOA measures currently available that would reduce the project's VMT below the 14.7 per capita threshold. Even with implementation of CAPCOA measures TRT-1 and TRT-10, the project's VMT would be reduced to 22.8 per capita and would remain 54.8 percent above the threshold. Furthermore, given the project's location within a suburban setting, implementation of an aggressive TDM plan would be expected to achieve a maximum 15 percent reduction in per capita VMT. Applying a 15 percent reduction to the project's 23.3 HB VMT per capita would result in 19.8 HB VMT per capita, which would remain 34.7 percent above the threshold.

Therefore, there are no feasible CAPCOA measures that would reduce the project's VMT below the threshold of significance of 14.7 HB VMT per capita. This impact would be significant and unavoidable.

Level of Significance Before Mitigation

Significant Impact.

Mitigation Measures

There are no feasible mitigation measures to reduce this impact to a less than significant level.

Level of Significance After Mitigation

Significant and Unavoidable Impact.



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Cumulative Impact Analysis

Impact TRANS-2: The proposed project, in combination with cumulative projects, would exceed the existing VMT thresholds of significance.

Impact Analysis

According to OPR's Technical Advisory on *Evaluating Transportation Impacts in CEQA*, a project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects." As discussed, the related projects listed in Table 3.1-1 would not have a bearing on the VMT analysis since the cumulative condition VMT data would come from the regional traffic model's 2040 horizon. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Since the proposed project would exceed the Countywide VMT threshold of significance and result in a significant and unavoidable impact, the proposed project would have a cumulatively considerable impact with respect to VMT and result in a significant and unavoidable impact.

Level of Significance Before Mitigation

Significant Impact.

Mitigation Measures

There are no feasible mitigation measures to reduce this impact to a less than significant level.

Level of Significance After Mitigation

Significant and Unavoidable Impact.



4.0 OTHER CEQA CONSIDERATIONS

This section describes the other statutorily required topics including growth inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and mandatory findings of significance.

4.1 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the growth-inducing impacts of a proposed action:

Discuss the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, to reach the conclusion that a project is growth-inducing as defined by CEQA, the EIR must find that it would foster (i.e., promote, encourage, or allow) additional growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with Section 15126.2(d) of the State CEQA Guidelines. If the analysis conducted for the EIR results in a determination that a project is growth-inducing, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth (i.e., growth-induced effects) fit the CEQA definition of “indirect” effects in Section 15358(a)(2) of the State CEQA Guidelines. These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Growth-inducing impacts can occur when development of a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional development in the project area. Also included in this category are projects that would remove physical obstacles to population growth, such as the



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construction of a new roadway into an undeveloped area or a wastewater treatment plant with excess capacity to serve additional new development. Construction of these types of infrastructure projects cannot be considered isolated from the immediate development that they facilitate and serve. Projects that physically remove obstacles to growth or projects that indirectly induce growth are those that may provide a catalyst for future unrelated development in the area (such as a new residential community that requires additional commercial uses to support residents). The growth-inducing potential of a project could also be considered significant if it fosters growth in excess of what is assumed in the local master plans and land use plans, or in projections made by regional planning agencies.

4.1.1 Direct Population Growth

The decision to allow/approve projects that result from induced growth (e.g., new commercial areas, new housing) is the subject of separate discretionary processes by individual lead agency (or agencies) responsible for considering such projects, in this case, the City Planning Commission and the City Council. Projects resulting from induced growth would themselves be discretionary and subject to CEQA. Therefore, the following discussion is intended to disclose the potential for environmental effects that could occur more generally because of the project rather than the site-specific impacts of induced growth. Its purpose is to inform the City decision-making body that additional environmental effects may be a possibility if growth-inducing projects are approved. However, the decision of whether projects are approved, and the impacts associated with them still rests with the City decision-making body at such times as complete applications for development are submitted.

The proposed project would develop 126 multifamily residences, thereby directly inducing population growth in the project site. As of January 1, 2020, the California Department of Finance estimated the City of Antioch had an average household size of 3.28 persons per household (Department of Finance 2020). Based on the Department of Finance estimate of 3.28 persons per household, the projected population of the proposed project is approximately 413 residents. In January 2020, the City had a population of 112,520 (California Department of Finance 2020). According to the City's General Plan, the City is projected to have a total population of 118,800 by 2025 (City of Antioch 2015).

The addition of the 413 new residents from the proposed project would increase the City's January 2020 population to 112,933, resulting in a 0.36 percent increase. The proposed project would require a General Plan Amendment to allow for the development of multifamily units. The proposed project would result in 279 additional residents compared to the existing Low Density Residential General Plan land use designation, which would generate approximately 134 residents (3.28 persons per household x 41 single-family residential lots = 134 residents). The proposed project would be consistent with the High Density Residential land use designation with approval of the General Plan Amendment. Additionally, the 413 new residents would



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increase the City's total population by 0.36 percent and would be within the City's 2025 population projections anticipated under the City's General Plan. Therefore, the proposed project would not substantially induce population growth.

4.1.2 Removal of Barrier to Growth

The proposed project would not result in the extension of urban infrastructure into an area that is currently not serviced, which could indirectly increase population growth. As discussed in Section 2.0, Project Description, the proposed project would be served by existing water, wastewater, electricity, natural gas, and telecommunications facilities. The proposed project would also be constructed within the City's Planning Area and Contra Costa County's Urban Limit Line, and would not increase growth beyond what is already contemplated by the City's General Plan. Therefore, the proposed project would not remove a barrier to growth or create an indirect increase in population.

4.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(b) requires an EIR to "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

The proposed project would result in a significant and unavoidable impact related to VMT, and no feasible mitigation measures are available to reduce this impact to a less than significant level. Refer to Section 3.2, Transportation, of this EIR for additional discussion.

4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

As mandated by the CEQA Guidelines, the EIR must address any significant irreversible environmental change that would result from implementation of the proposed project. Specifically, pursuant to the CEQA Guidelines (Section 15126.2[c]), such an impact would occur if:

- The project would involve a large commitment of nonrenewable resources;
- Land area committed to new project facilities;
- Irreversible damage from environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

The proposed project involves the construction and operation of a multifamily residential development with 126 units and related onsite amenities on a 12-acre vacant site (10.4



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net acres of developable land). As discussed in Section 3.6, Energy, of the Initial Study (Appendix A), project construction would require the use of fuels for equipment which would deplete supplies of nonrenewable resources. Project construction activities would require approximately 21,467.12 gallons of diesel fuel for construction off-road equipment and approximately 69,837 gallons of gasoline and diesel for on-road vehicles. The use of fuels for construction would be considerably higher than under existing conditions. However, project construction activities would be temporary and would not represent a significant irreversible use of resources.

Operation of the proposed project would require use of water, electricity, natural gas, and fossil fuels. As discussed in Section 3.6, Energy, of the Initial Study (Appendix A), the proposed project is estimated to demand 1,222,632 kilowatt-hours (KWhr) of electricity per year and 2,359,099.26 kilo British thermal units (KBTU) of natural gas per year. This would represent an increase in demand for electricity and natural gas. The proposed project would comply with CCR Titles 20 and 24, including the California Green Building Standards Code (CALGreen), which require new residential buildings to implement design features that would reduce energy demand, water consumption, wastewater generation, and solid waste generation. Compliance with these regulatory requirements would ensure nonrenewable resources are conserved to the maximum extent possible. Therefore, while the proposed project would result in an irretrievable commitment of nonrenewable resources, the commitment of these resources would not be significantly inefficient, unnecessary, or wasteful.

Residential uses do not handle large quantity of hazardous materials or involve the regular use, storage, transport, or disposal of hazardous materials that would have the potential to result in serious environmental accidents. As discussed in the Initial Study (Appendix A), project construction and operation activities would involve limited use of common hazardous materials, including paints, solvents, fuels, oils, cleaners, and pesticides. The use of these substances is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset or accident. Furthermore, the proposed project would be required to with all applicable federal, state, and local laws related to the transport, use, or disposal of hazardous materials, as overseen by the California Environmental Protection Agency and Department of Toxic Substances Control. As such, the proposed project would not have the potential to cause serious environmental accidents.

4.4 MANDATORY FINDINGS OF SIGNIFICANCE

Public Resources Code Section 21083 requires lead agencies to make a finding of a “significant effect on the environment” if one or more of the following conditions exist:

- A proposed project has the potential to degrade the quality of environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare, or endangered plant or



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animal or eliminate important examples of the major periods of California history or prehistory.

- The possible effects of a project are individually limited but cumulatively considerable.
- The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

Finding No. 1: The proposed project would not have the potential to significantly affect biological or cultural resources.

The proposed project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. As identified in Table ES-1 of the Draft EIR and Section 3.4, Biological Resources, of the Initial Study the proposed project would be required to implement Mitigation Measures BIO-1 through BIO-5 to reduce impacts on biological resources to a less than significant level. As discussed in Section 3.5, Cultural Resources, and Section 3.17, Tribal Cultural Resources, of the Initial Study the proposed project would also be required to implement Mitigation Measures CUL-1 through CUL-3 to reduce impacts on cultural and tribal cultural resources. Therefore, impacts under this criterion would be reduced to less than significant levels with mitigation.

Finding No. 2: The proposed project would have cumulatively considerable impacts.

As discussed in Section 3.2.4, Environmental Impacts, since the proposed project would exceed the Countywide VMT threshold of significance and result in a significant and unavoidable impact, it would also have a cumulatively considerable impact with respect to VMT.

Finding No. 3: The proposed project would not cause substantial adverse effects on human beings.

The proposed project would not directly or indirectly cause substantial adverse effects on human beings. Air quality, hazardous materials, and/or noise would have the only potential effects through which the proposed project could have a substantial effect on human beings. However, the Initial Study determined all potential effects of the proposed project related to air quality, hazardous materials, and noise would be less than significant or less than significant with mitigation. The applicable mitigation measures are identified in Table ES-1 of this Draft EIR and the Initial Study (Appendix A). Therefore, impacts under this criterion would be reduced to less than significant levels with mitigation.



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5.0 ALTERNATIVES

5.1 INTRODUCTION

The purpose of an alternatives analysis pursuant to CEQA is to identify feasible options that would attain most of the basic objectives of a proposed project while reducing its significant effects. Provisions of CEQA Guidelines (Section 15126.6) that address the number of project alternatives required in an EIR state the following:

The range of alternatives required in an EIR is governed by a “rule of reason;” the EIR must evaluate only those alternatives necessary to permit a reasonable choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of a proposed project while meeting most of the underlying project objectives.

5.2 REQUIREMENTS FOR THE CONSIDERATION OF ALTERNATIVES

An important aspect of EIR preparation is the identification and assessment of alternatives to the proposed project that have the potential to avoid or substantially lessen potentially significant impacts. In addition to mandating consideration of the no project alternative, CEQA Guidelines (Section 15126.6(e)) emphasize the selection of a reasonable range of feasible alternatives and adequate assessment, which allows decision-makers to use a comparative analysis. CEQA Guidelines (Section 15126.6(a)) states:

An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

In accordance with CEQA Guidelines 15126.6, this EIR contains a comparative impact assessment of alternatives to the proposed project. The primary purpose of this assessment is to provide decision-makers and the public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives while avoiding or reducing any of the project’s significant adverse environmental effects. Important considerations for these alternatives’ analyses are provided below:



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- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic project objectives
 - Infeasibility
 - Inability to avoid significant environmental effects

5.2.1 No Project Alternative

CEQA Guidelines require that the alternatives be compared to the project's environmental impacts and that the "no project" alternative be considered (CEQA Guidelines Section 15126.6(d)(e)). Section 15126.6(d)(e)(1) states:

The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline.

The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

5.2.2 Consistency with Project Objectives

A project's statement of objectives describes the purpose of the project and the reasons for undertaking the project. To be considered for detailed analysis in the EIR, an alternative must meet most of the project objectives. Among the suite of project objectives identified by the applicants, the City as lead agency has identified the following as the basic objectives for purposes of screening potential alternatives to the proposed project:

- To help the City of Antioch provide its fair share of housing, and help alleviate a regional housing shortage, by providing an alternative housing type and sizes which can meet the needs of a variety of different and growing household sizes.
- To provide onsite amenities and recreational opportunities, such as a community park.



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- To provide housing near major transportation and regional trails connections, with increased land use intensities near regional transportation connections.
- To create a community that is family friendly or that could accommodate senior residents.
- To implement the County's Growth Management Program by providing for urban development within the Contra Costa County Urban Limit Line.
- To contribute to the City of Antioch's economic and social viability by creating a community that attracts investment and positive attention.

5.2.3 Feasibility

According to CEQA Guidelines (Section 15126.6(f)(1):

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

Based on CEQA Guidelines, “feasible” is defined as, “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (CEQA Guidelines Section 15364). CEQA does not require that an EIR determine the ultimate feasibility of a selected alternative, but rather that an alternative be potentially feasible.

For the screening analysis, the potential feasibility of potential alternatives was assessed using the following considerations:

Technological Feasibility: Is the alternative feasible from a technical perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?

Legal Feasibility: For example, do legal protections on lands or financing strategies preclude or substantially limit the feasibility of constructing the alternative?

Economic Feasibility: Is the alternative so costly that its costs would prohibit its implementation?



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In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, an EIR must contain a discussion of "potentially feasible" alternatives, the ultimate determination whether an alternative is feasible or infeasible is made by the lead agency's decision-making body (See PRC Section 21081[a][3]).

5.2.4 Potential to Avoid or Lessen Significant Environmental Effects

CEQA requires that alternatives to a proposed project have the potential to avoid or substantially lessen one or more significant effects of the project (CEQA Guidelines Section 15126.6). At the project and/or cumulative level, the Draft EIR has identified the following environmental issues that may result in significant impacts. This list only includes those impacts that were determined to be significant and unavoidable.

Transportation

- The proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

5.3 METHODOLOGY AND SCREENING CRITERIA

A range of potential alternatives was developed and subjected to the screening criteria. Several representative alternatives were considered. There was no attempt to include every conceivable alternative. The following criteria were used to screen potential alternatives:

- Does the alternative meet most of the project objectives?
- Is the alternative potentially feasible?
- Would the alternative substantially reduce one or more of the significant impacts associated with the project?

5.4 ALTERNATIVES CONSIDERED

Section 15126 of CEQA Guidelines requires an EIR to identify and discuss a no project alternative, as well as a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and would avoid or substantially lessen any of the significant environmental impacts.



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Alternatives to the proposed project considered for analysis in this EIR are:

- No Project Alternative
- General Plan Consistency Alternative
- Senior Housing Alternative

5.4.1 No Project Alternative

Under the No Project Alternative, the project site would remain in its existing condition and no new development would occur.

Impact Analysis

The project site would remain vacant, and no new development would occur. The No Project Alternative would not generate VMT or result in any project-level impacts. Therefore, the No Project Alternative would avoid the significant and unavoidable impact on VMT.

Conclusion and Ability to Meet Project Objectives

The No Project Alternative would avoid the significant and unavoidable impact on VMT. However, this alternative would not achieve any of the project objectives, promote economic vitality, assist the City in meeting its housing needs, or provide alternative housing types and sizes.

5.4.2 General Plan Consistency Alternative

The General Plan Consistency Alternative assumes the project site would be developed at a density of 4.0 units per acre in accordance with the General Plan. Given the 10.4 net acre site, the General Plan Consistency Alternative would result in development of 41 single-family residential lots. The General Plan Consistency Alternative would still dedicate approximately 1.6 acres of the site for completion of Wild Horse Road, however, would not provide the approximately 1.6 acres of open space. This alternative would also include onsite parking, utility improvements, and landscaping.

Impact Analysis

Under the General Plan Consistency Alternative, the project would result in the development of 41 single-family residential units. The General Plan Consistency Alternative would require implementation of the same mitigation measures as those required for the proposed project (identified in Table ES-1 in this EIR and as further detailed in Appendix A, Initial Study) as the General Plan Consistency Alternative would also include development of the site with residential uses and associated improvements. However, construction-related impacts would be slightly reduced given



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that construction activities on the project site would be reduced with fewer residential units, as compared to the proposed project.

VMT is calculated based on the land use and location of a proposed project and largely depends on the surrounding land uses as opposed to the overall level of development or number of units. Any residential use located on the project site that is not accompanied by a significant increase in transit availability would be expected to have the same VMT as it would not result in a reduction of the distance residents would need to travel for goods or services or change in the mode of travel.

The VMT for the General Plan Consistency Alternative would be 24.8 HB VMT per capita (i.e., the existing HB VMT per capita for the project TAZ). The General Plan Consistency Alternative would not qualify for a VMT reduction based on Project Characteristic-1 since it would decrease the density at the site from 12.1 dwelling units to 4.0 dwelling units as compared to the proposed project. However, this alternative would retain the reduction applicable to Project Characteristic-2, which would reduce VMT by approximately 2 percent. As such, applying the 2 percent VMT reduction would result in a 24.3 HB VMT per capita which is approximately 65.3 percent above the Countywide threshold of significance of 14.7 HB VMT per capita, resulting in a significant impact.

Like the proposed project, the General Plan Consistency Alternative most closely resembles a suburban project as defined by CAPCOA. According to the CAPCOA report, implementation of an aggressive TDM plan for a suburban project would be expected to achieve a maximum 15 percent reduction in per capita VMT. As such, applying a 15 percent reduction to the General Plan Consistency Alternative's 24.3 HB VMT per capita would result in a 20.7 HB VMT per capita, which is approximately 40.8 percent above the 14.7 HB VMT per capita threshold.

The CAPCOA report includes measures that a project could apply to achieve a maximum reduction in VMT. The CAPCOA measures listed in Table 3.2-6 were reviewed in relation to the General Plan Consistency Alternative. As with the proposed project, CAPCOA measures TRT-1 and TRT-10 would reduce the General Plan Consistency Alternative by 0.55 HB VMT per capita, resulting in a 23.8 HB VMT per capita, which would remain approximately 61.9 percent above the threshold.

Consistent with the proposed project, implementation of CAPCOA measures for improving access to transit (CAPCOA Measure TST-6) or coordination of transit routes near the project site (CAPCOA Measures TST-3 and TST-4) would not provide substantial improvements to VMT unless headways were frequent. Options for improving access to transit would be economically infeasible; furthermore, the VMT reduction would likely be reduced approximately 0.1 percent if a low-frequency route was provided near the project site.



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Like the proposed project, implementing transit subsidies (CAPCOA Measure TRT-4) was also considered for the General Plan Consistency Alternative. However, since the cost would be covered through the property purchase cost, it would not be a true subsidy.

Lastly, like the proposed project, CAPCOA Measure PDT-2 was considered to reduce this alternative's VMT impact by unbundling parking cost from the property purchase cost. This option would be ineffective in reducing VMT, as free parking is readily available on each of the 41 single-family residential lots and would be utilized by residents instead of purchasing parking within the project site.

Therefore, there are no feasible CAPCOA measures that would reduce the General Plan Consistency Alternative's VMT below the threshold of significance of 14.7 HB VMT per capita. Like the proposed project, this impact would be significant and unavoidable.

Conclusion and Ability to Meet Project Objectives

Although the General Plan Consistency Alternative's VMT would be slightly less than the proposed project, it would not eliminate the significant and unavoidable impact on VMT. Additionally, the General Plan Consistency Alternative would meet some of the project objectives with exception to the following:

- To help the City of Antioch provide its fair share of housing, and help alleviate a regional housing shortage, by providing an alternative housing type and sizes which can meet the needs of a variety of different and growing household sizes.
- To provide onsite amenities and recreational opportunities, such as a community park.
- To provide housing near major transportation and regional trails connections, with increased land use intensities near regional transportation connections.

5.4.3 Senior Housing Alternative

The Senior Housing Alternative assumes the project site would be developed with age restricted units that would be available to residents ages 55 and above. This alternative would be the same as the proposed project and develop 126 units within 25 detached buildings. Similar to the proposed project, each building would contain 2 to 8 units, ranging from approximately 1,120 to 1,900 square feet. This alternative would also include the same amount of onsite surface parking, landscaping, utility improvements, and approximately 1.6 acres of usable open space as the proposed project. The Senior Housing Alternative would still dedicate approximately 1.6 acres of the site for completion of Wild Horse Road. Construction of this alternative would involve the same amount of earth movement as the proposed project, requiring approximately 11,600 CY of cut and 86,000 CY of fill, of which approximately 74,400 CY of soil would be import fill.



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Impact Analysis

The Senior Housing Alternative would require implementation of the same mitigation measures as those required for the proposed project (identified in Table ES-1, of this EIR and as further detailed in Appendix A, Initial Study). The Senior Housing Alternative would include a similar level of development intensity and the same number of units on the project site as the proposed project and would therefore include similar construction activities and similar operations associated with residential development of the project site.

Age-restricted senior housing development typically has a lower rate of vehicle ownership, and therefore could decrease VMT per capita. The project site is not located in a transit priority area that would reduce VMT. However, senior communities typically include managed shuttle programs for use by residents, which could reduce the need for a car. The Senior Housing Alternative is estimated to generate approximately 13.1 VMT per capita (calculation shown in Table 5.4-1) and would be below the Countywide significance threshold of 14.7 HB VMT per capita. Therefore, the Senior Housing Alternative would result in a less than significant impact related to VMT.

Table 5.4-1: Senior Housing Alternative VMT

Proposed Land Use Category	ITE Trip Rate per Unit	VMT per household (with assumed 20% trip length reduction for senior trips)	Assumed occupancy	VMT per capita
Senior Adult Housing (Attached)	3.7	19.60	1.5	13.06

Source: City of Antioch VMT data, ITE Trip Generation 10th Edition, Census Bureau

Conclusion and Ability to Meet Project Objectives

The Senior Housing Alternative would be below the Countywide significance threshold of 14.7 HB VMT per capita, resulting in a less than significant impact on VMT. The Senior Housing Alternative would achieve all project objectives.

5.5 ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1165-1167.)



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In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-makers. (See PRC, § 21081(a)(3).) At the time of action on the project, the decision-makers may consider evidence beyond that found in this EIR in addressing such determinations. The decision-makers, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-makers adopt a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* [2009] 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered by the City but are not evaluated further in this Draft EIR for the reasons discussed below.

5.5.1 Affordable Housing Alternative

The Affordable Housing Alternative would be the same as the proposed project except it would consist of 126 affordable multifamily units. OPR's Technical Advisory suggests that lead agencies may screen out VMT impacts using project size, maps depicting areas of low VMT, transit availability and provision of affordable housing screening criteria (OPR 2018). Based on OPR's Technical Advisory, it is presumed that a project comprised of 100 percent affordable housing and is located in an infill location would have a less than significant impact and can be screened out from completing a full VMT analysis. According to OPR's Technical Advisory, "adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT. Further, low-wage workers in particular would be more likely to choose a residential location close to their workplace, if one is available. In areas where existing jobs-housing match is closer to optimal, low income housing nevertheless generates less VMT than market-rate housing. Therefore, a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less than significant impact on VMT" (OPR 2018).

This alternative would consist of 100 percent affordable units; however, the project site does not meet the definition of an urban infill site as defined by SB 743. As such, even with providing affordable housing units, this alternative would not meet OPR's screening threshold and a full VMT analysis would still be required.



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As discussed, VMT is calculated based on the land use and location of a proposed project and largely depends on the surrounding land uses as opposed to the overall level of development or number of units. Any residential use located on the project site that is not accompanied by a significant increase in transit availability would be expected to have the same VMT as it would not result in a reduction of the distance residents would need to travel for goods or services or change in the mode of travel. Therefore, VMT generated under this alternative would be similar to the proposed project.

In addition to the CAPCOA measures considered for the proposed project, this alternative would consider CAPCOA measure LUT-6 because it would include affordable housing. CAPCOA measure LUT-6 estimates the inclusion of affordable housing would reduce a project's VMT by approximately 0.04 to 1.2 percent. While this CAPCOA measure would slightly reduce this alternative's VMT, it would not eliminate the significant and unavoidable impact on VMT. Therefore, this alternative was ultimately not selected for further analysis in the EIR.

5.5.2 Increased Density Affordable Housing Alternative

Under this alternative, the project site would be developed with affordable housing units to the maximum density allowed under the High Density Residential land use designation (35 dwelling units per acre). The project site is approximately 10.4 net acres, which would allow a maximum 364 units with the approval of a General Plan Amendment.

This alternative would result in a greater number of units compared to the proposed project; therefore, this alternative would result in greater construction-related impacts and impacts related to air quality, energy, GHG, and noise. As with the Affordable Housing Alternative, the inclusion of affordable housing would not eliminate the significant and unavoidable impact on VMT.

This alternative would be considered for a VMT reduction based on Project Characteristic-1 since it would increase the density of the project site. Based on CAPCOA's LUT-1 Land Use/Location Transportation-Increase Density methodology as outlined in Table 3.2-3, this alternative would achieve a 25 percent VMT reduction for Project Characteristic-1. This alternative would also achieve a 2.0 percent reduction for Project Characteristic-2 by providing pedestrian and frontage improvements. These project characteristics would reduce the 24.8 HB VMT per capita to 18.1 HB VMT per capita, which is approximately 23.1 percent above the Countywide significance threshold of 14.7 HB VMT per capita. Therefore, even with the increased density this alternative would not eliminate the significant and unavoidable VMT impact. This alternative was ultimately not selected for further analysis in the EIR.



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5.5.3 Land Swap Alternative

Offsite alternatives are generally considered in EIRs when one of the means to avoid or eliminate the significant impacts of a project is to develop it in a different available location. Such alternatives are especially appropriate where a project would put a site to uses different than those contemplated in the governing general plan or zoning district, which presumably reflect land use policies reached after much deliberation and public involvement, and also in instances where there is an ample supply of similarly situated land that could be developed for a project.

The Applicant owns APN 041-022-004 located east of the project site between SR 4 and the Union Pacific Railroad that parallels Neroly Road. This landlocked site is approximately 14.5 acres; however, due to the shape of the parcel only approximately 12.1 acres of the site would be developable. A portion of the site would also be dedicated to complete construction of Wild Horse Road. This site is comparable in size to the proposed project. It is also designated Low Density Residential and zoned Planned Development. This site is within the same TAZ as the proposed project, which is not a low VMT area or within a transit priority area. As such, VMT impacts would be the same as under the proposed project and would not eliminate the significant and unavoidable impact on VMT. Relocation of the proposed project to an area with low VMT could avoid or reduce the less than significant VMT impact of the project. However, the Applicant does not own or would not feasibly otherwise be able to gain control of a suitable vacant site within the city. Therefore, this alternative was ultimately not selected for further analysis in the EIR.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an “environmentally superior alternative.” The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 5.6-1. To quantitatively identify an environmentally superior alternative a value has been applied to each environmental effect. Additionally, Table 5.6-2 provides a comparison of the alternatives with the project objectives. Accordingly, the alternative with the fewest amounts of impacts and the ability to achieve the most project objectives is the environmentally superior alternative.

Table 5.6-1: Project Alternative Impacts Comparison

Environmental Resource Topic	Proposed Project	No Project Alternative	General Plan Consistency Alternative	Senior Housing Alternative
Transportation (VMT)	Significant and Unavoidable	Less Impact than the proposed project	Equivalent impact to the proposed project	Less Impact than the proposed project



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Table 5.6-2: Project Alternatives Comparison to Project Objectives

Project Objectives	Proposed Project	No Project Alternative	General Plan Consistency Alternative	Senior Housing Alternative
To help the City of Antioch provide its fair share of housing, and help alleviate a regional housing shortage, by providing an alternative housing type and sizes which can meet the needs of a variety of different and growing household sizes.	X			X
To provide onsite amenities and recreational opportunities, such as a community park.	X			X
To provide housing near major transportation and regional trails connections, with increased land use intensities near regional transportation connections.	X			X
To create a community that is family friendly or that could accommodate senior residents.	X		X	X
To implement the County's Growth Management Program by providing for urban development within the Urban Limit Line.	X		X	X
To contribute to the City of Antioch's economic and social viability by creating a community that attracts investment and positive attention.	X		X	X

The Senior Housing Alternative would eliminate the significant and unavoidable impact on VMT. It would also meet all project objectives. Therefore, the Senior Housing Alternative is the environmentally superior alternative.



6.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Pursuant to CEQA and the CEQA Guidelines, the discussion of the potential effects on the physical environment is focused on those impacts that may be significant or potentially significant. CEQA allows a lead agency to limit the details of discussion of the environmental effects that are not considered potentially significant (CEQA Guidelines Section 15126.2[a] and 15128). CEQA requires that the discussion of any significant effects on the environment be limited to substantial or potentially substantial adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5 (statutory definition of “environment”).

Effects determined to be insignificant or unlikely to occur need not be discussed further in the Draft EIR unless the lead agency subsequently receives information inconsistent with the finding (CEQA Guidelines Section 15143).

As discussed in more detail in the Initial Study (Appendix A), the following topics are not addressed in this EIR because impacts related to these topics either would not occur, would be less than significant, or would be less than significant with the implementation of identified mitigation measures. The proposed project would be required to comply with all applicable mitigation measures identified in the Initial Study prepared for this proposed project. A summary of the conclusions provided in the Initial Study analysis for each of the resources scoped out of the EIR is provided below.

Aesthetics

The proposed project would consist of 126 multifamily residences with a maximum building height of 45 feet and would not adversely affect important scenic views within the vicinity of the project site. As noted in the Initial Study, there are no state designated scenic highways near the project site and the proposed project would not substantially damage scenic resources within a state scenic highway. The proposed project would be required to meet the project’s design guidelines and the City’s architectural design requirements. The proposed project would also be subject to the City’s design review process to ensure that the project design is compatible with the surrounding land uses. All exterior lighting fixtures would be directed downward and shielded in accordance with the of Section 9-5.1715 of the Antioch Municipal Code; therefore, the proposed project would not create any significant impacts related to light and glare. The proposed project would require a rezone and a General Plan Amendment which would result in an increase in density allowed. However, the project site would continue to be zoned and designated for residential uses and would not conflict with regulations governing scenic quality. Therefore, the project’s impacts related to aesthetics would be less than significant and this resource is not further analyzed in this Draft EIR.



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Agriculture and Forestry Resources

The proposed project is located in an existing urban environment and is mostly surrounded by existing single-family residences. The project site is not designated for uses involving agriculture, forestry, or timberland uses and would not convert or result in a loss of important farmland or forestland. The project site is not contracted under the Williamson Act. The proposed project is also not adjacent to or located within any lands that are zoned for forestland, timberlands, or agricultural uses. Therefore, no impacts to agricultural and forestry resources would occur and this resource is not further analyzed in this Draft EIR.

Air Quality

The BAAQMD's 2017 Clean Air Plan is the regional air quality plan (AQP) for the City and the AQP identifies strategies to bring regional emission into compliance with federal and state air quality standards. The proposed project would implement Mitigation Measure AIR-1 which would require all construction contractors to implement the basic construction measures recommended by the BAAQMD to reduce fugitive dust emissions. Implementation of Mitigation Measure AIR-1 would ensure the proposed project would not conflict or obstruct the implementation of an applicable air quality plan and impacts would be less than significant. Mitigation Measure AIR-1 would also ensure that the proposed project would not significantly contribute to cumulative nonattainment pollutant violations or expose sensitive receptors to substantial pollutant concentrations.

Construction activities associated with the proposed project could result in short-term odors from diesel exhaust associated with construction equipment. However, these emissions would be intermittent and would dissipate rapidly from the source. In addition, diesel-powered equipment would only be present onsite temporarily during construction activities. The proposed project would result in a residential use; therefore, it is not anticipated to produce odorous emissions. Therefore, construction and operation of the proposed project would not create objectionable odors affecting a substantial number of people, and the impact would be less than significant.

Implementation of Mitigation Measure AIR-1 would ensure that any significant impacts related to air quality from the proposed project would be reduced to a less than significant level. Therefore, all impacts related to air quality resulting from the proposed project would be less than significant and this resource is not further analyzed in this Draft EIR.

Biological Resources

The project site is vacant and dominated by non-native annual grassland. As discussed in the Initial Study, the project site does not provide suitable potential habitat for special-status plant species and no impacts to special-status plants would occur. Based on the habitats present within and adjacent to the project site, the following 14 special-status



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wildlife species may occur on the project site: burrowing owl (*Athene cunicularia*), Swainson's hawk (*Buteo swainsoni*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus*), pallid bat (*Antrozous pallidus*), Townsend's Big-eared bat (*Corynorhinus townsendii*), Western red bat (*Lasiurus blossevillei*), hoary bat (*Lasiurus cinereus*), little brown bat (*Myotis lucifugus*), Yuma myotis (*Myotis yumanensis*), American Badger (*Taxidea taxus*), Alameda whipsnake (*Masticophis lateralis euryxanthus*), and San Joaquin Kit Fox (*Vulpes macrotis mutica*). The proposed project would implement Mitigation Measures BIO-1 through BIO-5 which would require pre-construction surveys for nesting birds, Swainson's Hawk, burrowing owl, San Joaquin kit fox, and American badger. Mitigation Measure BIO-4 would also require implementation of avoidance and minimization measures to prevent Alameda whipsnake from entering the project site during construction. The implementation of Mitigation Measures BIO-1 through BIO-5 would ensure impacts on special-status wildlife species would be reduced to a less than significant level.

The project site does not contain any riparian habitat, federally protected wetlands or jurisdictional waters, or wildlife corridors. Additionally, the project site does not contain any trees that would require removal, which would conflict with any local policies or ordinances protecting biological resources. The project site is not within the jurisdiction of any adopted habitat conservation plans, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. Therefore, all impacts to biological resources would be less than significant with the implementation of Mitigation Measures BIO-1 through BIO-5 and this resource is not further analyzed in this Draft EIR.

Cultural Resources

No historic resources (eligible or likely eligible under state, federal, or local historic preservation criteria) were identified within or adjacent to the project site that would be impacted by the proposed project. Therefore, the proposed project is not anticipated to have an impact on any known or potential historical resources.

There are no known archaeological resources or human remains within the project site and no indications that the project site has been used for burial purposes in the past. However, ground disturbance and subsurface construction activities associated with the proposed project could potentially damage or destroy previously undiscovered archeological resources or human burial sites. The proposed project would be required to implement Mitigation Measures CUL-1, CUL-2, and CUL-3 to reduce impacts on previously unknown archaeological resources or human remains to a less than significant level. Therefore, all impacts related to cultural resources would be less than significant and this resource is not further analyzed in this Draft EIR.



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Energy

As discussed in the Initial Study, it is estimated project construction activities would use approximately 21,467.12 gallons of diesel fuel for construction off-road equipment and approximately 69,837 gallons of gasoline and diesel for on-road vehicles. While construction activities would increase use of energy resources, activities would be temporary and would not result in the inefficient, wasteful, or unnecessary use of resources and impacts would be less than significant.

Operation of the proposed project would demand approximately 1,222,632 kWhr of electricity per year and 2,359,099.26 KBTU of natural gas per year which would represent an increase in demand for electricity and natural gas. The proposed project would be built in accordance with CALGreen and Title 24 standards that would increase efficiency and reduce energy demand. Compliance with the CALGreen and Title 24 standards would ensure the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation and impacts would be less than significant. Additionally, the Initial Study identified that the proposed project would not conflict with the energy objectives of the City's General Plan or the strategies in the City's Climate Action Plan (CAP). Therefore, all impacts related to energy would be less than significant and this resource is not further analyzed in this Draft EIR.

Geology and Soils

The Initial Study determined the project site is not located within an Alquist-Priolo Earthquake Fault Zone, or landslide zone. As required by Mitigation Measures GEO-1 and GEO-2, the proposed project would be required to implement the geotechnical design and liquefaction recommendations into the project design to reduce impacts related to strong seismic ground shaking, ground failure, and unstable or expansive soils to a less than significant level.

The Initial Study determined construction of the proposed project could result in substantial soil erosion or the loss of topsoil. However, the proposed project would implement Mitigation Measure HYD-1, which would require the proposed project to prepare a SWPPP and identify BMPs to control the discharge of sediment and other pollutants during construction. The proposed project would connect directly to the City's sewer system and would have no impacts related to the use or construction of septic systems within the project site. The General Plan does not identify any paleontological resources on the project site. However, the proposed project would include ground disturbance during construction which could potentially directly or indirectly destroy an unknown unique paleontological or unique geologic feature. If unknown unique paleontological resources are discovered onsite during construction, all activities would be stopped within a 50-foot radius of the identified resource until a qualified paleontologist evaluates the finding as required by Mitigation Measure GEO-3. Therefore, all impacts to geology and soils would be less than significant with



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implementation of Mitigation Measures GEO-1 through GEO-3 and this resource is not further analyzed in this Draft EIR.

Greenhouse Gases

The Initial Study determined that the proposed project's construction and operational GHG emissions would be below the BAAQMD's recommended significance threshold and therefore, impacts would be less than significant. Additionally, the Initial Study determined that the proposed project would not conflict with any applicable plan, policy or regulations adopted for the purpose of reducing GHG emissions. The proposed project would not conflict with the City's Community CAP or regulations adopted by the State of California to reduce GHG emissions. Therefore, all impacts related to GHGs would be less than significant and this resource is not further analyzed in this Draft EIR.

Hazards and Hazardous Materials

The Initial Study determined that the proposed project would not include the routine transport, use, or disposal of significant quantities of hazardous materials. Project construction activities would involve use of common hazardous materials such as paints, fuels, cleaners, and pesticides. Project construction activities would be required to comply with all applicable federal, state, and local laws related to the transport, use, or disposal of hazardous materials, as overseen by the California Environmental Protection Agency and Department of Toxic Substances Control. Furthermore, the proposed project would implement Mitigation Measure HYD-1 which requires implementation of a SWPPP to prevent contaminated runoff from leaving the project site during construction. Operation of the project would result in the development of a residential use. Residential uses do not handle large quantity of hazardous materials or involve the regular use, storage, transport, or disposal of hazardous materials that would have the potential to result in serious environmental accidents. Therefore, impacts related to the release of hazardous materials during construction and operation would be less than significant with implementation of Mitigation Measure HYD-1.

The project site is not located within 0.25-mile of an existing or proposed school, nor is it included on a list of hazardous materials sites. The project site is not located within an airport land use plan or within 2 miles of any airport. Construction of the proposed project is anticipated to be confined to the project site and would not involve permanent modification of existing roadways, which would interfere with an emergency evacuation or response plan. The project site is not located within an area mapped as being in a high wildfire hazard severity zone and any dry, potentially flammable vegetation currently onsite would be removed with development of the proposed project further reducing potential fire hazards. Therefore, all impacts related to hazards and hazardous materials would be less than significant with implementation of Mitigation Measure HYD-1 and this resource is not further analyzed in this Draft EIR.



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Hydrology and Water Quality

Construction of the proposed project would disturb over 1 acre of land and would be required to comply with the NPDES General Construction Permit. The proposed project would also be required to comply with the County C.3 Stormwater Standards adopted by the City. The proposed project would construct new stormwater infrastructure on the project site to connect to the existing stormwater facilities along the western perimeter of the project site.

The NPDES General Construction Permit requires the preparation of a SWPPP and incorporation of BMPs to control sedimentation, erosion, and hazardous materials from contacting stormwater, with the intent of keeping all products of erosion from moving off-site into receiving waters. The SWPPP and applicable BMPs have been incorporated into Mitigation Measure HYD-1 to reduce potential water quality impacts to a less than significant level.

The Initial Study identified project construction activities could result in erosion related impacts and could contribute to an increase in runoff water which could provide substantial additional sources of polluted runoff. Implementation of Mitigation Measure HYD-1 would reduce the potential for erosion and polluted runoff to occur at the project site. Additionally, the proposed project would connect storm drains to the bioretention basin and existing storm drainpipes along the western perimeter of the project site and create approximately 284,502 square feet of pervious surfaces consisting of landscaping and bioswales along the project site boundary. Stormwater at the project site would be diverted to the landscaped areas and bioswales to reduce volume of stormwater runoff and provide treatment, retention, and/or detention for runoff at the project site.

The proposed project would not conflict with groundwater recharge and is not located in a flood hazard, tsunami, or seiche zone. The proposed project would comply with policies and objectives of the Water Quality Control Plan for the Central Valley Regional Water Quality Control Board and implementation of HYD-1 would ensure that the proposed project would not conflict with implementation of the plan. Therefore, all impacts related to hydrology and water quality would be less than significant with implementation of Mitigation Measure HYD-1 and this resource is not further analyzed in this Draft EIR.

Land Use and Planning

The project site is located on a vacant lot bordered by single-family residences to the west, SR-4 to the east, and Wild Horse Road and the Contra Costa Water District's Pumping Plant 4 to the south. The project site is entirely vacant and would be accommodated by existing roadways, and therefore would not physically divide an established community. The project site is designated Low Density Residential and is zoned P-D 86-3.1: Planned Development District. The Applicant is requesting a General



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Plan Amendment to designate the site High Density Residential. Additionally, the Applicant is requesting to rezone the project site Planned Development District. The General Plan Amendment would allow development of multifamily residences. With the approval of the General Plan Amendment, the proposed project would be consistent with the High Density Residential land use designation. Rezoning of the project site to Planned Development District would require establishment of new development standards. The proposed project would implement all proposed development standards and guidelines and would not conflict with the City's Zoning Code. Therefore, all impacts related to land use and planning would be less than significant and this resource is not further analyzed in this Draft EIR.

Mineral Resources

As discussed in the Initial Study, the California Department of Conservation Division of Mine Reclamation identifies the project site within Mineral Resource Zone-3 (MRZ-3). MRZ-3 zones are areas containing mineral deposits the significance of which cannot be evaluated from available data. The City's General Plan does not identify any mineral resources of value on or near the project site and no mineral extraction activities exist on or near the site. Additionally, the project site has not been delineated as a locally important mineral resource recovery site by the General Plan, General Plan EIR, or any specific plan or other land use plan. The proposed project would not result in the loss of availability of a known mineral resource of value, or loss of an important mineral resource recovery site. Therefore, the proposed project would have no impact on mineral resources and this resource is not further analyzed in this Draft EIR.

Noise

The Initial Study identified that due to the proximity of surrounding roadways and SR-4, traffic noise levels may affect the interior of the residential units. The proposed project would be implement Mitigation Measure NOI-1, which requires compliance with General Plan Policy 11.6.2.d by conducting a detailed noise attenuation study to determine appropriate measures that would reduce interior noise levels within the residential buildings to a less than significant level.

Typical multifamily residential buildings commonly involve new mechanical equipment, such as air conditioning units and exhaust fans, which may generate fixed-source noise that impacts neighboring properties. The proposed project would be required to implement Mitigation Measure NOI-2, which requires compliance with Policy 11.6.2.e in the City's General Plan and the maximum noise level limits listed under Section 9-5.1901, Paragraph A, of the Antioch Municipal Code. The implementation of Mitigation Measure NOI-2 would ensure impacts from fixed source-noise to the neighboring properties would be less than significant.

Project construction activities would result in a temporary or periodic increase in noise levels. The proposed project would be required to implement Mitigation Measure NOI-3,



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which includes noise reduction requirements listed in General Plan Policies 11.6.2.i, j, k, m, and n and Sections 5-17.04 and 5-17.05 of the Antioch Municipal Code. The implementation of Mitigation Measure NOI-3 would reduce construction noise impacts to a less than significant level.

The project's construction activities would not generate excessive groundborne vibration and impacts would be less than significant. Additionally, the project site is not located within an airport land use plan or within 2 miles of an airport and would not expose people residing or working in the area to excessive noise levels caused by nearby airports. Therefore, all impacts related to noise would be less than significant with implementation of Mitigation Measures NOI-1 through NOI-3 and this resource is not further analyzed in this Draft EIR.

Population and Housing

The proposed project would develop 126 multifamily residences and would directly induce population growth at the project site. In January 2020, the City had a population of 112,520 (California Department of Finance 2020). According to the City's General Plan, the City is projected to have a total population of 118,800 by 2025 (City of Antioch 2015). The proposed project would generate 413 new residents, which would increase the City's January 2020 population to 112,933, resulting in a 0.36 percent increase.

The proposed project would require a General Plan Amendment to allow for the development of multifamily units. The proposed project would result in 279 additional residents compared to the existing Low Density Residential General Plan land use designation, which would generate approximately 134 residents ($3.28 \text{ persons per household} \times 41 \text{ single-family residential lots} = 134 \text{ residents}$). The proposed project would be consistent with the High Density Residential land use designation with approval of the General Plan Amendment. The addition of 413 new residents would also be within the City's 2025 population projections as anticipated under the General Plan. Therefore, the increase in population would not be substantial and the proposed project would not directly or indirectly induce substantial unplanned growth in the area. Impacts to population growth would be less than significant.

The project site is vacant and does not contain any existing residential dwellings or residences. Therefore, the proposed project would not result in the displacement of people or housing that would necessitate the construction of replacement housing elsewhere. All impacts related to population and housing would be less than significant and this resource is not further analyzed in this Draft EIR.

Public Services

The CCCFPD would provide fire protection services to the project site. As required by the CCCFPD, the proposed project would be conditioned to form or annex into a Community Facilities District. Additionally, the proposed project would be required to



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pay the fire protection facilities fee in accordance with Section 3-7 of the Antioch Municipal Code. The establishment of the Community Facilities and payment of the fire protection facilities fee would ensure impacts related to fire protection would be less than significant. The proposed project would represent less than 1 percent of the overall projected growth for the City; therefore, the proposed project would not require the construction or expansion of new police protection facilities to serve the site. The proposed project would be required to pay the police facilities fee in accordance with Section 9-3, Development Impact Fees, of the Antioch Municipal Code to offset impacts on police protection services. Therefore, the impact to police protection services would be less than significant.

The proposed project would increase demand for school facilities and services. The Antioch Unified School District collects development fees for new residential developments and payment of the fee would offset facility costs associated with new students resulting from the proposed project; therefore, impacts would be less than significant.

The proposed project would increase the population at the project site and would create a demand for park and recreation facilities. However, the proposed project includes 1.6 acres of usable open space for the community and would provide both passive and active recreational opportunities. The proposed project would also be required to pay a parks and recreation facilities fee under Section 9-3, Development Impact Fees, of the Antioch Municipal Code which would reduce impacts on existing parks and recreational facilities.

The addition of up to 413 new residents would create an incremental increase in the demand for other public facilities. Payment of the development impact fees would offset any additional service needs and reduce any impacts to other public facilities. Therefore, all impacts related to public services would be less than significant and this resource is not further analyzed in this Draft EIR.

Recreation

The proposed project could increase the demand for parks; however, the proposed project itself would include 1.6 acres of usable open space that will provide both active and passive recreational opportunities. The onsite open space would alleviate the demand on existing park and recreational facilities generated by project residents. The proposed project would also be required to pay a park and recreation facilities fee under Section 9-3, Development Impact Fees, of the Antioch Municipal Code which would further offset impacts to park and recreation facilities. The proposed project would not involve the construction or expansion of off-site park and recreational facilities. Therefore, the proposed project's impacts on recreation would be less than significant and this resource is not further analyzed in this Draft EIR.



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Effects Found Not To Be Significant

Transportation

The proposed project would not conflict with the General Plan Circulation Element, any program plan, ordinance, or policy addressing the circulation system. The project does not propose to amend or adjust roadway classifications, the roadway network, transit routes, or bicycle network as identified in the General Plan. Pedestrian movement will be enhanced by providing pedestrian access from Wild Horse Road along the project frontage in accordance with City requirements. This will facilitate connections to nearby amenities and public transit when the roadway network is built out per the General Plan. Pedestrian amenities to be constructed by the project include accessibility in compliance with the American Disabilities Act and an internal network of sidewalks which connect to public facilities offsite. Site access improvements would not cause any conflicts with other improvements planned for the area, including the Wild Horse Road extension which is currently under construction south of the project.

Construction of the proposed project would generate traffic through the transport of workers, equipment, and materials to and from the project site. It is currently anticipated that project construction would take approximately 13 months to complete, starting in January 2023 and ending in February 2024. Construction equipment and materials would be stored onsite, or on the undeveloped area north of the project site adjacent to New Horizons Way. Construction activities are anticipated to be confined to the project site, and no road closures or detours are anticipated. Tri Delta Transit provides public transit service to a stop located approximately 1 mile from the project. The proposed project would not modify or interfere with the bicycle or bus facilities adjacent to the project site during construction or operation. Therefore, the impact would be less than significant.

During construction, the proposed project would generate traffic through the transport of workers, equipment, and materials to and from the project site. The use of roadways by heavy construction equipment can increase the risk to drivers and cyclists in the vicinity of the project site; however, construction equipment and materials would be stored onsite. Construction activities are anticipated to be confined to the project site, and no road closures or detours are anticipated; therefore, there would be no substantial increase in hazards. The project will comply with the City of Antioch's Traffic Control Plan Requirements for work area traffic control for work performed in the City's right-of-way. Also, there would be no incompatible uses introduced to the project area which could cause vehicle conflicts (e.g., farm equipment). Therefore, the impact would be less than significant.

The project driveways are designed to comply with turning radius requirements for emergency vehicles and would not cause hazardous driving conditions. The project's detailed design would be completed in compliance with California Fire Code requirements and not impair emergency vehicle access in the vicinity of the project during construction or operation. Compliance with the California Fire and Building Codes would be mandated through the plan check and approval process. Therefore, the



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proposed project would not result in inadequate emergency access. The project's VMT impact is discussed in Section 3.0, Environmental Impact Analysis.

All other impacts related to transportation would be less than significant and these questions are not further analyzed in this Draft EIR.

Tribal Cultural Resources

Tribes contacted for consultation did not identify any tribal cultural resources within or adjacent to the project site. No known tribal cultural resources were identified in the project site or within 0.25-mile during the archival records search and literature review performed as part of the cultural resources inventory. A field survey of the project site was also conducted and did not identify any archaeological tribal cultural resources on the project site. However, the proposed project would involve subsurface construction activities that could potentially damage or destroy previously undiscovered tribal cultural resources. The proposed project would be required to implement Mitigation Measures CUL-1 through CUL-3 to reduce potentially impacts to a less than significant level. Therefore, impacts on tribal cultural resources would be less than significant with implementation of Mitigation Measures CUL-1 through CUL-3, and this resource is not further analyzed in this Draft EIR.

Utilities and Service Systems

The Initial Study determined the proposed project would be adequately served by existing wastewater, water, stormwater, electric power and gas, and telecommunication facilities and would not require or result in the relocation or construction of new or expanded facilities. Additionally, there would be sufficient water supplies available to serve the project and future developments during normal, dry, and multiple dry years. The proposed project would not substantially increase wastewater treatment capacity needs or generate substantial amounts of solid waste. The proposed project would also comply with all applicable local, state, and federal statutes and regulations related to solid waste. Therefore, all impacts to utilities and service systems would be less than significant and this resource is not further analyzed in this Draft EIR.



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Wildfire

The project site is not in a state responsibility area and does not contain lands classified as being within a very high fire hazard severity zone. The Initial Study identified that given the characteristics of the project site, construction of the proposed project would not exacerbate fire risk beyond what currently exists in the vicinity of the project site; therefore, development of the proposed project and installation of associated infrastructure would not expose people to impacts from wildfire. The proposed project would be constructed in accordance with the requirements of the California Fire Code, the California Building Code, the California Residential Code, and City of Antioch Municipal Code. The proposed project does not involve permanent modification to the existing roadways and road closures are not anticipated during the construction phase. There are no identified evacuation routes that would be potentially impacted by the construction of the project. The Traffic Control Plan would identify all detours, appropriate traffic controls, and ensure adequate circulation and emergency access are provided during the construction phase. Therefore, the proposed project would not impair an adopted emergency response plan or emergency evacuation plan. All impacts related to wildfire would be less than significant and this resource is not further analyzed in this Draft EIR.



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List of Preparers

7.0 LIST OF PREPARERS

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Principal Traffic Engineer Daryl Zerfass
Transportation Planner..... Kelsey Carton
Planner..... Jennifer Webster
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