

# ANTIOCH HOUSING, ENVIRONMENTAL HAZARDS, AND ENVIRONMENTAL JUSTICE (EJ) ELEMENTS

Final Environmental Impact Report

State Clearinghouse No. 2021110146



Prepared for:  
City of Antioch

December 2022

URBAN  
PLANNING  
PARTNERS  
INC.



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State Clearinghouse No. 2021110146

Prepared for the City of Antioch

By:

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December 2022

The logo for Urban Planning Partners Inc. is located in the bottom right corner. It consists of an orange square with the text "URBAN PLANNING PARTNERS INC." in white, uppercase, sans-serif font, arranged in four lines.



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# **I. INTRODUCTION**

## **A. INTRODUCTION**

This Final Environmental Impact Report (Final EIR) has been prepared by the City of Antioch (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. This Final EIR contains responses to comments received on the Draft Environmental Impact Report (Draft EIR) for the Antioch Housing, Environmental Hazards, and Environmental Justice (EJ) Elements (collectively the Project). The Final EIR consists of the Draft EIR and this document (response to comments document), which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

## **B. PURPOSE OF THE FINAL EIR**

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the Project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR, including Project updates, made in response to these comments and as a result of the City's ongoing planning efforts. The Final EIR will be used to support the City's decision regarding whether to approve the Project.

This Final EIR will also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit Project elements over which they have jurisdiction. It may also be used by other State, regional, and local agencies that may have an interest in resources that could be affected by the Project or that have jurisdiction over portions of the Project.

Because the Project includes an update to the Housing Element, the updated Housing Element will be submitted to the State Department of Housing and Community Development (HCD) for certification. The update to the Hazards Element is required to be submitted to California Geological Survey of the Department of Conservation and the Central Valley Flood Protection Board for review; although, these agencies are advisory and do not have discretionary approval so neither is considered a Responsible Agency. Other than HCD's certification authority, there are

no agencies other than the City that have approval or permitting authority for the Project. However, implementation of the proposed Housing Element (i.e., approval of future projects) could involve many responsible agencies, depending on the details of a future project. The following are some of the agencies that could be required to act as responsible agencies for subsequent projects under the Housing Element and Environmental Justice Elements:

- California Department of Fish and Wildlife (CDFW)
- Contra Costa Water District (CCWD)
- Diablo Water District (DWD)
- Bay Area Air Quality Management District (BAAQMD)
- California Department of Toxix Substances Control (DTSC)

## **C. PROJECT LOCATION**

The city of Antioch is located in the East Bay region of the San Francisco Bay Area within Contra Costa County, California. Antioch is bordered by the San Joaquin-Sacramento River Delta to the north, the Diablo Mountains to the south, the city of Oakley to the east, and the city of Pittsburg to the west. California State Route (SR)-4, a major regional freeway, passes through the city diagonally in an east-west direction and connects Antioch to the Sierra foothills and neighboring city of Brentwood to the southeast, and to the rest of the San Francisco Bay Area to the west. Additionally, the city has its own Bay Area Rapid Transit (BART) station along the SR-4 corridor, further connecting the city to the rest of the Bay Area region to the west via a one-hour transit ride. California SR-160, another state roadway, also intersects Antioch, beginning in the northeastern portion of the city before it crosses the San Joaquin River and connects north to the city of Sacramento. The City's jurisdictional boundary serves as the geographic extent for the Project.

The city of Antioch encompasses approximately 30 square miles in total land area. While the predominate land use throughout the city is single-family residential uses, several areas throughout the city contain distinct land use patterns and development characteristics which contribute to the overall character of the city. These areas include the city's historic downtown, located in the northwestern part of the city along the San Joaquin River, and comprised of a diverse mix of land uses including commercial and retail storefronts and residential neighborhoods of varying historic architectural styles. This area is designated the Downtown Specific Plan Focus Area on the City's General Plan Land Use Map. Opposite of historic downtown, the eastern portion of the city's riverfront is primarily dedicated to heavy commercial and industrial uses, which provide a majority of the city's employment opportunities. This area is designated the Eastern Waterfront Employment Focus Area on the City's General Plan Land Use Map. Outside of downtown, commercial uses are concentrated along major roadway corridors including SR-4, Somersville Road, Lone Tree Way, and Hillcrest Avenue, which hosts the city's

BART Station. These areas are designated the Hillcrest Station Focus Area, Western Gateway Focus Area, and East Lone Tree Specific Plan Focus Area on the City's General Plan Land Use Map.

Additionally, a significant portion of the city is designated as and preserved for use as open space, including agricultural and recreational lands and open water. These lands make up over 50 percent of the city's land use area and include large portions of the areas designated Sand Creek Focus Area, Roddy Ranch Focus Area, and Ginocchio Property Focus Area on the city's General Land Use Plan.

## **D. EJ NEIGHBORHOODS**

In compliance with Senate Bill 1000 (SB 1000) (2016), as part of the Project, the City of Antioch was required to identify disadvantaged parts of the city which are 1) low income, and 2) disproportionately affected by environmental pollution and other hazards which can lead to negative health effects, exposure, or environmental degradation. These parts of the community are referred to as "Environmental Justice (EJ) neighborhoods." Per SB 1000, local jurisdictions are required to develop and adopt environmental justice policies that are to be integrated into the jurisdiction's General Plan to reduce the unique or compounded health risks experienced by disadvantaged communities, to encourage civic engagement in the public decision-making process within disadvantaged populations, and to prioritize improvements and programs that benefit disadvantaged populations.

EJ neighborhoods within the city of Antioch were identified through utilization of the California Office of Environmental Health Hazard Assessment's (OEHHA) CalEnviroScreen mapping tool. The mapping tool included census-tract level environmental, health, and socioeconomic information mapped to identify areas within the city most affected by sources of pollution, where people are especially vulnerable to the effects of pollution. The city of Antioch's EJ neighborhoods include census tracts 3050, 3060.03, 3071.02, 3072.02 and 3080.01, all of which scored above a 0.75 via the CalEnviroScreen tool. These neighborhoods are generally located in the northeastern and central parts of the city, spanning from the city's riverfront to the southeast, across SR-4.

## **E. PROPOSED PROJECT**

The Project is being proposed by the city to comply with California Government Code Section 65580-65589.8, which requires local jurisdictions to update the Housing Element of their General Plans every eight years to adequately plan for the regional housing needs of residents of all income groups. The Project includes the following components:

1. **Housing Element.** Adoption and implementation of the City's 6th Cycle Housing Element Update (2023-2031), including the adoption and implementation of rezoning and General Plan amendments to accommodate the City's Regional Housing Needs Allocation (RHNA). This component is referred to as the Housing Element throughout this Final EIR.
2. **Environmental Hazards Element.** Adoption and implementation of related updates to the City's Environmental Hazards Element. This component is referred to as the Environmental Hazards Element throughout this Final EIR.
3. **Environmental Justice (EJ) Element.** Adoption and implementation of associated EJ General Plan policies per SB 1000. This component is referred to as the EJ Element throughout this Final EIR.

For purposes of this EIR, these three actions are together considered a "Project" under CEQA regulations.

## F. REVISIONS TO THE DRAFT EIR

This Final EIR has been prepared to respond to comments received on the Draft EIR, which are addressed within *Chapter II, Response to Comments*, of this Final EIR; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR. These revisions, including project updates, made in response to comments on the Draft EIR, and as a result of the City of Antioch's ongoing planning efforts, are individually listed within *Chapter III, Revisions of the Draft EIR*, of this Final EIR.

A majority of these revisions are a result of modifications to the Draft EIR's Project Description which necessitate related revisions to the various other sections of the Draft EIR. These revisions to the Project Description are primarily a result of edits to the Housing Element Update component of the Project. These edits include:

- Revisions to the Housing Sites Inventory of the Draft EIR's Project Description to include pipeline units and projected accessory dwelling units (ADUs) in the overall total development potential under the project. While the pipeline units and ADUs were included within the RHNA Credits section of the Draft EIR, the unit counts were not included within the overall housing unit totals for the Project.
- Revisions to the Rezoning section of the Draft EIR's Project Description to reflect a decrease in the permitted minimum density allowed within the city's existing R-35 zoning district from 30 dwelling units per acre to 25 dwelling units per acre. Accordingly, the R-35 zoning district would allow for housing development between 25 and 35 dwelling units per acre.

Due to the realistic capacity of housing sites within the Housing Sites Inventory being calculated using the minimum permitted density of proposed zoning districts, these revisions result in an overall net decrease in the total realistic capacity of the Housing Sites Inventory. Additionally, due to a majority of the housing sites included within the Housing Site Inventory and planned to accommodate lower income housing units being rezoned to the R-35 zoning district, this decrease in minimum permitted density results in an overall decrease in the total number of lower income housing units that can be accommodated by the project's R-35 rezonings and Housing Sites Inventory.

- Revisions to the Rezonings section of the Draft EIR's Project Description to reflect revisions to the proposed rezoning districts included within the Draft EIR, specifically the city's existing R-25 zoning district. Whereas the Draft EIR reflected proposed revisions to the R-25 district, primarily renaming the district to "R-30", this Final EIR does not include those proposed revisions. The city's existing R-25 zoning district is no longer proposed to be modified as part of the project.
- Revisions to the Housing Sites Inventory section of the Draft EIR's Project Description to reflect the inclusion of a new housing site located in the southeastern portion of the project area, Site No. 183, Assessor's Parcel Number (APN) 056-120-098. This new housing site is approximately 6.4 acres in size and is proposed to accommodate a total of 134 above moderate-income units as part of the project. To accommodate development of these units, the new housing site would have its General Plan land use designation amended and be rezoned to the R-25 zoning district as part of the project.
- Revisions to the Housing Sites Inventory section of the Draft EIR's Project Description to reflect the inclusion of a new housing site located in the southeastern portion of the project area, Site No. 184, APN 053-060-063. This new housing site is approximately 10.2 acres in size and is proposed to accommodate a total of 216 above moderate-income units as part of the project. Following publishing of the Draft EIR the City of Antioch received a development application for the development of 216 above moderate-income housing units on Site No. 184, in conjunction with the development of housing sites No. 113, 114, and 115 which were already included within the Draft EIR's Housing Sites Inventory (see bullet below).
- Revisions to the RHNA Credits and Housing Sites Inventory sections of the Draft EIR's Project Description to reflect the re-classification of three multi-family housing sites (Sites No. 113, 114, 115), and inclusion of one new site (Site No. 184) as "pending units" as part of the project. Pending units are housing units proposed to be developed within the 6<sup>th</sup> cycle planning period, but which have not yet received certificate of occupancies. This revision is necessitated by the City of Antioch's receipt of an application for housing development on the four housing sites during the public comment review period of the Draft EIR. This application for development proposes the development of housing on the

four sites at approximately 11 dwelling units per acre, as permitted by the sites' existing zoning, for a total of 216 above moderate-income units.

Additionally, since the application for development received by the City proposes development consistent with the existing zoning of Housing Sites No. 113, 114, 115, these sites are no longer proposed to be rezoned as part of the Project. Accordingly, this revision also necessitates revisions to the Rezoning section of the Draft EIR's Project Description as well.

- Revisions to the Housing Sites Inventory and RHNA Credits sections of the Draft EIR's Project Description to reflect the reclassification of Housing Sites No. 123, APN 065-110-006, as "pending units" due to the City of Antioch receiving an application for housing development on the site during the public comment review period of the Draft EIR. Pending units are housing units expected to be developed during the 6<sup>th</sup> cycle planning period, but which have not yet received certificate of occupancies. This application for development proposes housing development on the site at approximately 25 dwelling units per acre, as permitted by the sites' existing zoning and State Density Bonus Law, for a total of 4 very low-income units and 70 above moderate-income units, totaling 74 units. Additionally, since the application for development received by the City proposes development consistent with the existing zoning of Housing Site No. 123, the site is no longer proposed to be rezoned as part of the Project. Accordingly, this revision also necessitates revisions to the Rezoning section of the Draft EIR's Project Description as well.
- Revisions to the Biological Resources section of the Draft EIR to reflect responses to Comment Letter A3 within this Final EIR.
- The Reduced VMT Alternative has been updated to account for the 2 new housing sites located in TAZs with a home-based VMT per resident that is above the significance threshold.

## **G. PROJECT OBJECTIVES**

In accordance with CEQA Guidelines Section 15124, an EIR must present a statement of project objectives, which in the case of General Plan elements, are often the same as the objectives of the element. For this EIR, the Project objectives include the City of Antioch's five housing goals contained within their 6th Cycle Housing Element Update (2023-2031), the eight objectives included in the Environmental Hazards Element, and the eight objectives associated with the EJ Element. These goals and objectives are detailed below.

## 1. Housing Element Goals and Policies

The updated Housing Element's goals are described below:

- **Goal 1, Housing Conservation and Improvement:** Conserve and improve the existing housing supply to provide adequate, safe, and decent housing for existing Antioch residents.
- **Goal 2, Housing Production:** Facilitate the development of a broad array of housing types to meet the City's fair share of regional housing needs and accommodate new and current Antioch residents of diverse ages and socioeconomic backgrounds.
- **Goal 3, Special Needs Housing:** Facilitate the development of special purpose housing to meet the needs of the elderly, persons with disabilities, large families, and the unhoused.
- **Goal 4, Elimination of Government Constraints:** Remove governmental constraints inhibiting the development of housing required to meet identified needs in Antioch.
- **Goal 5, Fair Housing:** Provide equal housing opportunities for all existing and future Antioch residents.

## 2. Environmental Hazards Element Objectives

The overall goal of the Environmental Hazards Element is to minimize the potential for loss of life, injury, property damage, and economic and social disruption resulting from natural and human-caused hazards in the community. The following are the specific hazards and related objectives provided within the updated Environmental Hazards Element:

- **Objective 11.4.1, Geology and Seismicity Hazards:** Ensure Antioch residents and businesses are better prepared and protected from the threat of seismic ground shaking and other geologic events.
- **Objective 11.5.1, Flood Protection:** Ensure flooding impacts in Antioch are minimized or eliminated wherever possible.
- **Objective 11.6.1, Fire Hazards:** Meet anticipated needs and demands that address hazards associated with wildland and urban fire.
- **Objective 11.7.1, Climate Change Adaptation:** Incorporate the changing risks associated with climate change into the protection of life, property, the economy, and the environment.
- **Objective 11.8.1, Noise:** Achieve and maintain exterior noise levels appropriate to planned land uses throughout Antioch.
- **Objective 11.9.1, Hazardous Materials:** Minimize the negative impacts associated with the storage, use, generation, transport, and disposal of hazardous materials.
- **Objective 11.10.1, Disaster Response:** Maintain a level of preparedness to adequately respond to emergency situations to save lives, protect property, and facilitate recovery with minimal disruption.

- **Objective 11.11.1, Evacuation:** Ensure Antioch staff, residents, and businesses can effectively respond and evacuate during hazard events.

### 3. EJ Element Objectives

The EJ Element would minimize pollution and its effects for all communities and strives to ensure that all people, regardless of race, ethnicity, or income, have equal protection from environmental hazards where they live, work, and play; this includes giving people equal ability to participate in, and influence, the decision-making process regarding environmental regulations. The primary objectives of the EJ Element include:

- Reduce pollution exposure.
- Promote public facilities.
- Promote food access.
- Promote safe and sanitary homes.
- Promote physical activity.
- Reduce unique or compounding health risks.
- Promote civic engagement.
- Prioritize the needs of disadvantaged communities.

The City of Antioch published and circulated a Notice of Preparation (NOP) on November 8, 2021. The public comment period for the scope of the EIR was from November 8, 2021, to December 8, 2021. The NOP was sent to the City of Antioch's website as well as to responsible and trustee agencies, organizations, and other interested individuals. A copy of the NOP was also sent to the State Clearinghouse.

A Project scoping session was held before the Planning Commission on November 17, 2021. NOP comments—received from public agencies and concerned citizens—were considered during the preparation of this EIR. Comments received included comments encouraging infill development in Antioch and to use applicable state regulations related to transportation and tribal consultation. The NOP and the written public review comments are included in Appendix A.

A Notice of Completion and a Notice of Availability for the Draft EIR was issued by the City on September 2, 2022, and the Draft EIR was released for public circulation and comment. The public comment period began on September 2, 2022 and ended on October 17, 2022. The Draft EIR, Notice of Availability, and other supporting documents, such as technical reports prepared as part of the EIR process, were made available for public review at the offices of the Antioch Planning Department, on the City's website, and on the State Clearinghouse website.



## H. CONTENTS AND ORGANIZATION OF THE FINAL EIR

The Final EIR is organized as follows:

*Chapter I – Introduction:* Describes the purpose of the Final EIR, summarizes the Project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of the Final EIR

*Chapter II – Comments and Responses:* Contains a list of all parties who submitted comments on the Draft EIR during the public review period, copies of the comment letters received, and responses to the comments.

*Chapter III – Revisions to the Draft EIR:* Presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by strikeouts where text is removed and by double underline where text is added

*Chapter IV – Mitigation Monitoring and Reporting Program:* This chapter contains the Mitigation Monitoring and Reporting Program (MMRP) to aid the City in its implementation and monitoring of measures adopted in the EIR, and to comply with the requirements of Public Resources Code Section 21081.6(a).

*Chapter V – Lists of Preparers:* identifies the lead agency contacts as well as the preparers of this Final EIR.

## II. RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Antioch Housing, Environmental Hazards, and Environmental Justice (EJ) Elements Draft Environmental Impact Report (Draft EIR), which concluded on October 17, 2022. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

### A. LIST OF COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

TABLE II-1 LIST OF COMMENTERS		
Letter No.	Commenter	Date
<b>Agencies</b>		
A1	Department of Toxic Substances Control Gavin McCreary, Project Manager	October 13, 2022
A2	Central Valley Regional Water Quality Control Board Peter Minkel, Engineering Geologist	October 17, 2022
A3	California Department of Fish and Wildlife No name	October 14, 2022

### B. COMMENTS AND RESPONSES

The written individual comments received on the Draft EIR and the responses to those comments are provided below. The comment letters are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter

## 1. Agencies



Yana Garcia  
Secretary for  
Environmental Protection



### Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



Gavin Newsom  
Governor

Letter  
A1

#### SENT VIA ELECTRONIC MAIL

October 13, 2022

Ms. Anne Hersch  
City of Antioch  
P.O. Box 5007  
Antioch, CA 94531  
[AHersch@antiochca.gov](mailto:AHersch@antiochca.gov)

DRAFT ENVIRONMENTAL IMPACT REPORT FOR CITY OF ANTIOCH HOUSING,  
ENVIRONMENTAL HAZARDS, AND ENVIRONMENTAL JUSTICE ELEMENTS –  
DATED SEPTEMBER 2022 (STATE CLEARINGHOUSE NUMBER: 2021110146)

Dear Ms. Hersch:






The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (EIR) for the City of Antioch Housing, Environmental Hazards, and Environmental Justice Elements (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the Hazards and Hazardous Materials section of the EIR:

1. A State of California environmental regulatory agency such as DTSC, a Regional Water Quality Control Board (RWQCB), or a local agency that meets the requirements of [Health and Safety Code section 101480](#) should provide regulatory concurrence that proposed project sites are safe for construction and the proposed use. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

A1-1

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October 13, 2022  
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- |  |   |
|--|---|
| <p>2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the EIR.</p> |  <p>A1-2</p>   |
| <p>3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 <a href="#">Abandoned Mine Land Mines Preliminary Assessment Handbook</a>.</p>  |  <p>A1-3</p>   |
| <p>4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 <a href="#">Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers</a>.</p>  |  <p>A1-4</p> |
| <p>5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 <a href="#">Information Advisory Clean Imported Fill Material</a>.</p>  |  <p>A1-5</p> |
| <p>6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 <a href="#">Interim Guidance for Sampling Agricultural Properties (Third Revision)</a>.</p>   |  <p>A1-6</p> |

Ms. Anne Hersch  
October 13, 2022  
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DTSC appreciates the opportunity to comment on the EIR. Should you choose DTSC to provide oversight for any environmental investigations, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website](#).

If you have any questions, please contact me at (916) 255-3710 or via email at [Gavin.McCreary@dtsc.ca.gov](mailto:Gavin.McCreary@dtsc.ca.gov).

Sincerely,



Gavin McCreary  
Project Manager  
Site Evaluation and Remediation Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

**Letter A1 Department of Toxic Substances Control**

Gavin McCreary, Project Manager

October 13, 2022

- A1-1 There are properties that should not require regulatory agency review and approval to ensure that they are safe for construction, such as properties where past land uses have included only residential or undeveloped open space (i.e., no previous agricultural, industrial, commercial, or transportation related use) and where placement of undocumented fill material has not occurred. Potential impacts related to soil and groundwater contamination are discussed under *Section IV.J.3.c.2, Accidental Release of Hazardous Materials (Criterion 2)*, on pages IV.J-34 to IV.J-36 of the Draft EIR. This section of the Draft EIR indicates that implementation of General Plan Policy 11.9.2: Hazardous Materials Policies, Hazardous Materials Contamination of the updated Environmental Hazards Element would ensure that the risk of hazardous materials being released into the environment under the Project due to soil or groundwater contamination would be less than significant. This General Plan Policy requires preparation of a Phase I Environmental Site Assessment (ESA) and a Phase II ESA, if necessary, to evaluate environmental concerns, and implementation of recommendations for additional investigation and/or remedial actions. The applicant must provide the City with evidence of approvals from the appropriate federal, State, or regional oversight agency(ies) for any proposed remedial action prior to the City issuing demolition, grading, or building permits, and following completion of the remedial action and prior to the City issuing a certificate of occupancy. In situations where very limited contamination and remedial actions are identified by environmental investigations, regulatory agency oversight/approval may not be necessary to ensure that project sites are safe for construction and the proposed use, and in such situations the City would hire a third party qualified environmental professional to review environmental investigations and proposed remedial actions and provide an opinion on whether a regulatory agency oversight is required.
- A1-2 The potential for aerially deposited lead (ADL) to be present in soil near roadways is discussed under *Section IV.J.1.b, Soil and Groundwater Contamination*, on page IV.J-5 of the Draft EIR. Preparation of Phase I and II ESAs as required by General Plan Policy 11.9.2: Hazardous Materials Policies, Hazardous Materials Contamination of the updated Environmental Hazards Element and discussed under *Section IV.J.3.c.2, Accidental Release of Hazardous Materials (Criterion 2)*, on pages IV.J-34 to IV.J-36 of the Draft EIR, would ensure that the potential for ADL to be present in soil would be evaluated prior to performing intrusive activities.

A1-3 As discussed under *Section IV.I.1.a.2, Historic Coal Mining* on page IV.I-2 of the Draft EIR, coal mining activities historically occurred in the southwestern portion of the city. None of the housing sites identified in the Draft EIR are in the southwestern portion of the city; therefore, potential soil contamination associated with past mining activities is not specifically discussed in *Section IV.J, Hazards and Hazardous Materials*, of the Draft EIR.

As discussed under *Section IV.I.2.c.1, General Plan* on page IV.I-19 of the Draft EIR, General Plan Policy 11.3.2. Geology and Seismicity Policies, Historic Mineral Evaluation of the updated Environmental Hazards Element requires that abandoned mines be placed in natural open space areas, with appropriate buffer areas to prevent unauthorized entry and protect public health and safety, and site-specific investigations be undertaken prior to approval of development within areas of known historic mining activities to determine necessary measures to protect public health and safety. Preparation of Phase I ESA and II ESAs as required by General Plan Policy 11.9.2: Hazardous Materials Policies, Hazardous Materials Contamination of the updated Environmental Hazards Element and discussed under *Section J.3.c.2, Accidental Release of Hazardous Materials (Criterion 2)*, on pages IV.J-34 to IV.J-36 of the Draft EIR, would also ensure that potential past mining activities would be investigated. Therefore, implementation of General Plan policies would ensure that the potential for mine waste contamination associated with past mining would be evaluated prior to performing intrusive activities.

A1-4 The potential for hazardous building materials to be released during demolition activities is evaluated in *Section IV.J.3.c.2, Accidental Release of Hazardous Materials (Criterion 2)*, on pages IV.J-32 to IV.J-33 of the Draft EIR, and indicates that implementation of General Plan Policy 11.9.2, Hazardous Materials Policies, Hazardous Building Materials of the updated Environmental Hazards Element and existing hazardous building materials regulations would ensure that hazardous building materials would be appropriately managed prior to demolition activities and the risk of hazardous building materials being released into the environment during construction under the Project would be less than significant. This General Plan policy requires the preparation of a comprehensive Hazardous Building Materials Survey (HBMS) and implementation of abatement specifications prior to demolition of structures.

Sampling near all current and/or former buildings in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers* should not be



necessary, as this guidance document is applicable to schools, which have a much lower risk tolerance than other developments for potential exposure to contaminants in soil.

A1-5 *Section IV.J.3.c.2, Accidental Release of Hazardous Materials (Criterion 2)*, shall be revised on pages IV.J-35 to IV.J-36 of the Draft EIR as follows:

"The updated Environmental Hazards Element includes the following new ~~policies~~ policy related ~~to~~ hazardous materials contamination.

- *Policy 11.7.2: Hazardous Materials Policies*
- *Hazardous Materials Contamination*

v. If any projects initiated under the Project would require the importation of soil to backfill any excavated areas, proper sampling of the soil shall be conducted to ensure that the imported soil is free of contamination according to DTSC's 2001 Information Advisory Clean Imported Fill Material, or more current guidance from DTSC.

Compliance with ~~this~~ these updated General Plan ~~policy~~ policies would ensure that the risk of hazardous materials being released into the environment under the Project due to soil or groundwater contamination would be less than significant."

A1-6 The potential for OCPs to be present in soil due to past agricultural use is discussed under *Section J.1.b, Soil and Groundwater Contamination*, on pages IV.J.-5 to IV.J-6 of the Draft EIR. Preparation of Phase I and II ESAs as required by General Plan Policy 11.9.2: Hazardous Materials Policies, Hazardous Materials Contamination of the updated Environmental Hazards Element and discussed under *Section J.3.c.2, Accidental Release of Hazardous Materials (Criterion 2)*, on pages IV.J-34 to IV.J-36 of the Draft EIR, would ensure that the potential for OCPs to be present in soil would be evaluated prior to performing intrusive activities.





Letter  
A2

## Central Valley Regional Water Quality Control Board

17 October 2022

Anne Hersch  
City of Antioch  
200 H Street  
Antioch, CA 94509  
[ahersch@antiochca.gov](mailto:ahersch@antiochca.gov)

### COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, ANTIOCH HOUSING, ENVIRONMENTAL HAZARDS, AND ENVIRONMENTAL JUSTICE (EJ) ELEMENTS PROJECT, SCH#2021110146, CONTRA COSTA COUNTY

Pursuant to the State Clearinghouse's 2 September 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Antioch Housing, Environmental Hazards, and Environmental Justice (EJ) Elements Project, located in Contra Costa County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

#### I. Regulatory Setting

##### Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has

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MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)

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adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

#### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_2018\\_05.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf)

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In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention

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Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

**Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml)

**Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration

<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality/certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

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Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation

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activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

*Peter Minkel*

Peter Minkel  
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento

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**Letter A2 Central Valley Regional Water Quality Control Board**

Peter Minkel, Engineering Geologist

October 17, 2022

A2-1 The *Section IV.K, Hydrology and Water Quality*, of the Draft EIR evaluates potential impacts to water quality under *Section IV.K.3.c.1*, on pages IV.K-27 to IV.K-31 of the Draft EIR. This section of the Draft EIR describes how exiting regulatory requirements and General Plan policies would protect water quality from potential degradation during both construction and operation of future development projects under the Project. Required compliance with the existing regulations and implementation of General Plan policies discussed would protect both surface water and groundwater quality. To clarify this, the conclusion statement of *Section IV.K.3.c.1, Construction* on pages IV.K-29 to IV.K-30 of the Draft EIR will be revised as follows:

"Compliance with State, regional, and local regulations and implementation of General Plan policies listed above regarding ~~stormwater and dewatering~~ water quality during construction would protect groundwater and receiving water quality. Therefore, impacts related to water quality during construction associated with development under the Project would be less than significant."

And the conclusion statement of *Section IV.K.3.c.1, Operation* on page IV.K-31 of the Draft EIR will be revised as follows:

"Compliance with State, regional, and local regulations and implementation of General Plan policies listed above regarding ~~stormwater~~ water quality during operation of developments under the Project would protect groundwater and receiving water quality. Therefore, impacts related to water quality during operation of developments under the Project would be less than significant."

A2-2 **The comment describes permitting requirements related to water quality and in-water work.**

Response: Many of the permits described in this comment and related regulations that would be applicable to future development projects under the Project are discussed in *Section IV.K.2, Regulatory Setting* on pages IV.K-13 to IV.K-20 of the Draft EIR, including the Construction General Permit, Municipal Regional Permit (referred to as Phase I MS<sub>4</sub> permit in the comment), Federal Clean Water Act of 1972, and National Pollutant Discharge Elimination System (NPDES) permit program. Permitting requirements related to construction dewatering are also discussed in Draft EIR *Section IV.K.3.c.1, Construction* on

pages IV.K-28 to IV.K-30 of the Draft EIR, including the potential need for Waste Discharge Requirements (WDRs) to be issued under NPDES regulations, which is also mentioned in the comment. The comment includes some permitting requirements that were not discussed in the Draft EIR, including: the Industrial Storm Water General Permit for storm water discharges associated with industrial sites; Section 404 permit for the discharge of dredged or fill material in navigable waters or wetlands; Section 401 permit for the disturbance of waters of the United States (such as streams and wetlands); State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004) for projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state; and general permits that could be applicable to construction dewatering including the State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Development of new industrial facilities and development within navigable waters or wetlands is not anticipated under the Project, and therefore permitting requirements related to such development were not discussed in the Draft EIR.

Draft EIR *Section IV.K.3.c.1* will be revised on pages IV.K-29 to IV.K-30 of the Draft EIR to include discussion of the general permits that could be applicable to construction dewatering as follows:

"The Construction General Permit allows the discharge of non-contaminated dewatering effluent if the water is properly filtered or treated, using appropriate technology. These technologies include, but are not limited to, retention in settling ponds (where sediments settle out prior to discharge of water) and filtration using gravel and sand filters (to mechanically remove the sediment). Small temporary construction dewatering projects that would discharge groundwater to land from excavation activities or dewatering of underground utility vaults may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Dischargers seeking coverage under the Low Threat General Order or Low Threat Waiver must file a Notice of Intent with the CVRWQCB prior to beginning the discharge.

If the dewatering activity is deemed by the Regional Water Board not to be covered by the Construction General Permit, Low Threat General Order, or Low Threat Waiver, then the discharger could potentially prepare a Report of Waste Discharge, and if approved by the Regional Water Board, be issued site-specific WDRs under the NPDES regulations. Site-specific WDRs contain rigorous monitoring requirements and performance standards that, when implemented, ensure that receiving water quality is not substantially degraded.

If the water is not suitable for discharge to the storm drain (receiving water), as discussed above, dewatering effluent may be discharged to the sanitary sewer system if Delta Diablo's special discharge criteria are met. These include, but are not limited to, application of pretreatment technologies which would result in achieving compliance with the wastewater discharge limits. Discharges to Delta Diablo's facilities must occur under a Special Discharge Permit. Delta Diablo manages the water it accepts into its facilities so that it can ensure proper treatment of wastewater at the treatment facility prior to discharge.

If it is infeasible to meet the requirements of the Construction General Permit, Low Threat General Order, Low Threat Waiver, acquire site-specific WDRs, or meet the Delta Diablo Special Discharge Permit requirements, the construction contractor would be required to transport the dewatering effluent off-site for treatment."



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**ANTIOCH HOUSING, ENVIRONMENTAL HAZARDS, AND ENVIRONMENTAL JUSTICE (EJ)  
ELEMENTS Draft EIR (SCH # 2021110146)**

CDFW has reviewed and would like to provide the following comments on the Antioch Housing, Environmental Hazards, And Environmental Justice (EJ) Elements EIR (SCH # 2021110146). CDFW is submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration regulatory authority (Fish and Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish and Game Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required. Pursuant to our jurisdiction, CDFW has provided concerns, comments, and recommendations regarding the Project herein.

**Lake and Streambed Alteration Agreement**

Please be advised that CDFW requires a Notification for Lake or Streambed Alteration (LSA), pursuant to Fish and Game Code § 1600 et seq., for any Project-related activities potentially affecting rivers, lakes, or streams, and their associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. CDFW, as a Responsible Agency, will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW cannot execute a final LSA Agreement until it has complied with CEQA as a Responsible Agency.

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**California Endangered Species Act and Native Plant Protection Act**

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in take<sup>1</sup> of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required to obtain a CESA ITP.

Please note that CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (CEQA Guidelines § 15380, 15064, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding

<sup>1</sup> Take is defined in Fish and Game Code section 86 as hunt, pursue, catch, capture, or kill, or attempt any of those activities.

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Consideration (FOC). The Lead Agency's FOC does not eliminate the project proponent's obligation to comply with CESA.

#### **Migratory or Nesting Birds and Raptors**

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Sections of Fish and Game Code placing protections on birds, their eggs, and nests include § 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird); § 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs); and § 3513 (regarding unlawful take of any migratory nongame bird).

Additionally, migratory birds are protected under the federal Migratory Bird Treaty Act

#### **Fully Protected Species**

Fully protected species, such as White-tailed kite and salt-marsh harvest mouse, may not be taken or possessed at any time, pursuant to Fish and Game Code § 3511, 4700, 5050, and 5155. All impacts to fully protected species must be avoided. Therefore, the Final EIR should include measures to ensure complete avoidance of these species.

#### **CEQA**

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the draft EIR incorporate a full project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description, as applicable:

- Footprints of permanent Project features and temporarily impacted areas, such as staging areas, access routes, and high fire risk zones targeted for vegetation treatment or removal.
- Encroachments into riparian habitats, wetlands, or other sensitive areas.
- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development.
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, vegetation treatment for fuel reduction, floodwalls or levees, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

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### **ENVIRONMENTAL SETTING**

The draft EIR should provide sufficient information regarding the environmental setting ("baseline") to understand the Project's, and its alternatives (if applicable), potentially significant impacts on the environment (CEQA Guidelines, § 15125 and 15360).

CDFW recommends that the EIR provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including but not limited to all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should also describe aquatic habitats, such as wetlands and/or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site. Sensitive natural communities can be found here: (<https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>).

Habitat descriptions and the potential for species occurrence should include information from multiple sources, such as aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System (<https://ipac.ecosphere.fws.gov/>); findings from "positive occurrence" databases such as the California Natural Diversity Database (CNDDDB; <https://www.wildlife.ca.gov/Data/BIOS>). Based on the data and information from the habitat assessment, the CEQA document can then adequately assess which special-status species are likely to occur in the Project vicinity.

A3-2

### **SPECIAL-STATUS SPECIES AND NESTING BIRDS**

CDFW is concerned regarding potential impacts to special-status species that may be present within the Project area, including, but not limited to, those listed below (CDFW 2022):

- California tiger salamander, central California DPS (*Ambystoma californiense* pop. 1) - State Threatened, Federal Threatened
- California red-legged frog (*Rana draytonii*) - State Species of Special Concern, Federal Threatened
- Alameda whipsnake (*Masticophis lateralis euryxanthus*) - State Threatened, Federal Threatened
- Western pond turtle (*Emys Marmorata*) - State Species of Special Concern
- Northern California legless lizard (*Anniella pulchra*) - State Species of Special Concern
- Salt-marsh harvest mouse (*Reithrodontomys raviventris*) - State Fully Protected, State Endangered, Federal Endangered

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- San Joaquin kit fox (*Vulpes macrotis mulica*) - State Threatened, Federal Endangered
- American badger (*Taxidea taxus*) - State Species of Special Concern
- Western red bat (*Lasiurus blossevillei*) - State Species of Special Concern
- California Ridgway's rail (*Rallus obsoletus obsoletus*) - State Fully Protected, State Endangered, Federal Endangered
- California black rail (*Laterallus jamaicensis coturniculus*) - State Fully Protected, State Threatened
- White-tailed kite (*Elanus leucurus*) - State Fully Protected
- Swainson's hawk (*Buteo swainsoni*) - State Threatened
- Tri-colored blackbird (*Agelaius tricolor*) - State Threatened, State Species of Special Concern
- Song sparrow ("Modesto" population) (*Melospiza melodia pop. 1*) - State Species of Special Concern
- Western burrowing owl (*Athene cunicularia*) - State Species of Special Concern
- Longfin smelt (*Spirinchus thaleichthys*) - State Threatened, Federal Candidate
- Antioch Dunes evening-primrose (*Oenothera deltoides ssp. howellii*) - State Endangered, Federal Endangered, Rare Plant rank 1B.1
- Large-flowered fiddleneck (*Amsinckia grandiflora*) - State Endangered, Federal Endangered, Rare Plant rank 1B.1
- Contra Costa goldfields (*Lasthenia conjugens*) Federal Endangered, Rare Plant rank 1B.1
- Big tarplant (*Blepharizonia plumosa*) Rare Plant rank 1B.1
- Mason's lilaeopsis (*Lilaeopsis masonii*) Rare Plant rank 1B.1
- Mount Diablo buckwheat (*Eriogonum truncatum*) Rare Plant rank 1B.1
- Showy golden madia (*Madia radiata*) Rare Plant rank 1B.1
- Brewer's western flax (*Hesperolinon breweri*) Rare Plant rank 1B.2
- Britblescale (San Atriplex depressa) Rare Plant rank 1B.2

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- Hall's bush mallow (*Malacothamnus hallii*) Rare Plant rank 1B.2
- San Joaquin spearscale (*Extriplex joaquinana*) Rare Plant rank 1B.2
- Shining Navarretia (*Navarretia nigelliformis* ssp. *radians*) Rare Plant rank 1B.2
- Suisun marsh aster (*Symphyotrichum lentum*) Rare Plant rank 1B.2
- Sensitive natural communities
- Crotch's bumble bee (*Bombus crotchii*) and western bumble bee (*Bombus occidentalis*) were recently determined to be afforded protection under CESA and the Department is currently evaluating their level of candidacy

A3-3

Surveys should be conducted for special-status species with potential to occur in project locations. These surveys shall be conducted by a Qualified Biologist and shall follow the recommended survey protocols and guidelines available at: <https://wildlife.ca.gov/Conservation/Survey-Protocols>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>), must be conducted for all species potentially impacted by the Project during the appropriate blooming period for each, individual species. This should include area within the Project area, as well as adjacent habitats, that may be directly or indirectly impacted and require the identification of reference populations. More than one year of surveys may be necessary given environmental conditions. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants, and survey report requirements (<https://wildlife.ca.gov/Conservation/Plants>).

#### **IMPACT ANALYSIS**

A3-4

Based on the data and information from the habitat assessment, the draft EIR should adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project. The draft EIR should also adequately analyze and discuss what measures are proposed to avoid, minimize, or mitigate for potential impacts. The draft EIR should include the reasonably foreseeable direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project (CEQA Guidelines, § 15126, 15126.2, and 15358). This includes, but is not limited to, evaluating, and describing impacts such as:

- Encroachments into and alterations to riparian habitats, wetlands, or other sensitive areas and habitats.
- Potential impacts to special-status species and/or sensitive natural communities. This may include:



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- Inadvertent entrapment or impingement;
  - Permanent and temporary habitat disturbance, fragmentation, or loss; and
  - Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alteration of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, rock outcrops, overhanging banks, etc.);
  - Loss of connectivity and/or obstruction of movement corridors, fish passage, or access to water sources and other core habitat features;
  - Decreased ability to reproduce or reduced reproductive/breeding success (loss or reduced health or vigor of eggs or young);
  - Interference with list-species recovery plan(s);
  - Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic, or human presence resultant from the project.
  - Direct mortality (aka "take").
- Indirect impacts from Project activities should also be considered. This might include, but is not limited to:
- Impacts arising from the need for new infrastructure to support Project activities, such as installation of new roads, water systems, sewage treatment facilities, or other utilities.
  - Reduced groundwater infiltration due to increased impermeability from the installation of new structures, which has the potential to impact both surface and subsurface stream flows, which can deteriorate riparian habitats that can no longer access subsurface flows; create an influx of runoff during heavy rain events, which can contribute to streambank erosion; and contribute to surface water pollution, which poses a multitude of concerns for riparian health and biodiversity.

A3-4

#### **AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES**

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, the CEQA Guidelines direct the Lead Agency to consider and describe all feasible measures to avoid potentially significant impacts in the draft EIR and mitigation of potentially significant impacts of the Project on the environment (CEQA Guidelines, § 15021, 15063, 15071, 15126.4, and 15370). This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early

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consultation with CDFW. These measures should be incorporated as enforceable Project conditions to reduce impacts to biological resources to less-than-significant levels.

A3-5

**COMMENT 1: Cumulative Impact Analysis**

The DEIR should also identify reasonably foreseeable future projects in the Project vicinity (which includes the future potential development sites), disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the project's contribution to the impact (CEQA Guidelines, Section 15355). Although a project's impacts may be less-than-significant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact, e.g., reduction of habitat for a special-status species should be considered cumulatively considerable.

A3-6

**COMMENT 2: Protocol-level Surveys for Special-status Animals and Plants**

CDFW recommends that protocol-level surveys for special-status animals and plants with potential to occur on or within a reasonable dispersal distance to the proposed project sites, be conducted by a qualified biologist following recommended survey protocols. Survey and monitoring protocols and guidelines for some species are available at: (<https://wildlife.ca.gov/Conservation/Survey-Protocols>). Where no protocols have been established, the surveys should be completed by a qualified biologist and the survey methodology should be approved by CDFW in advance of initiation.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>), should be conducted during the blooming period for all species potentially impacted by the Project within the planning area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrology, and require the identification of reference populations. More than one year of surveys may be necessary given environmental conditions. Please refer the "Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities," which can be found online at: (<https://wildlife.ca.gov/Conservation/Survey-Protocols>). This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. If a state-listed or state Rare<sup>2</sup> plant is identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, acquisition of take authorization through an Incidental Take Permit (ITP) issued by CDFW pursuant to Fish and Game Code Sections 2081(b) and/or Section 1900 et seq is necessary to comply with Fish and Game Code CESA and the Native Plant Protection Act.

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<sup>2</sup> In this context, "Rare" means listed under the California Native Plant Protection Act.

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**COMMENT 3: Impacts to Candidate, sensitive, or special-status species**

Issue: The substantial adverse effects to candidate, sensitive, or special-status species, impacts to these species arising from Project-related activities has the potential to be significant. Impacts to special status species arising from project activities should be fully mitigated under CESA. A CESA Incidental take Permit must be obtained if the project has the potential to result in take of species of plants or animals listed under CESA, either during construction or over the life of the project. Though the DEIR specifies mitigation measures and a resource monitoring plan (RMP), the measures still may not be sufficient to fully avoid take of a species. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

Resolution: The EIR should be revised to include the following Mitigation Measures shall be included in the Final EIR.

1. Full Mitigation for Impacts to Special Status Species. Prior to initiation of project activities, all sites selected for development will be evaluated on an individual, project-by-project basis. If the project cannot avoid impacts to sensitive or special-status, then each Project shall seek individual take coverage by applying to CDFW for an Incidental Take Permit.

**COMMENT 4: State Fully Protected Species**

Issue: Several State fully protected species have the potential to occur within the planning area. CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish pursuant to Fish and Game Code Section 3511, 4700, 5050, and 5515. Take, as defined by Fish and Game Code Section 86 is to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill", of any fully protected species is prohibited and CDFW cannot authorize their incidental take except under an NCCP. Without appropriate mitigation measures, Project activities conducted within occupied territories have the potential to significantly impact these species.

Specific Impact: Without appropriate avoidance and minimization measures for fully protected species, potentially significant impacts associated with Project activities may include, but are not limited to inadvertent entrapment, reduced reproductive success, reduced health and vigor, nest abandonment, loss of nest trees, and/or loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), and direct mortality.

Recommended Biological Resource Mitigation: To avoid impacts to fully protected species, CDFW recommends that a qualified biologist conduct species-specific surveys (using standard protocol or methodology, if available) of the Project site before Project implementation. If Project activities will take place when fully protected species are active or are breeding, CDFW recommends that additional pre-activity surveys for active nests or individuals be conducted by a qualified biologist no more than five (5) days prior to the start of Project activities.

A3-8

A3-9



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In the event a fully protected species is found within or adjacent to the Project site, CDFW recommends that a qualified biologist develops an appropriate no-disturbance buffer to be implemented. The qualified biologist should also be on-site during all Project activities to ensure that the fully protect species is not being disturbed by Project activities.

A3-9

**COMMENT 5: Evaluation of Impacts to Riparian Areas and Creeks**

Issue: The planning area has the potential to contain water features subject to CDFW's regulatory authority over activities that may affect streams, rivers, or lakes, pursuant to Fish and Game Code, Section 1600 et seq. Project implementation could potentially result in temporary and permanent impacts to these features. The DEIR's Biological Resources section does not adequately describe or address waterways that are present within the planning area and does not adequately evaluate the impacts to those resources arising from Project-related activities.

Many of the potential sites identified in the DEIR are located within or adjacent to creeks and/or riparian woodlands and will require individual site-specific impact evaluation and will likely require a Notification to CDFW. From a cursory review, CDFW has identified the following sites as highly likely to require a Notification:

- 111
- 112
- 123
- 124
- 138
- 154
- 156
- 157
- 158-161,
- 163
- 166
- 171

A3-10

The DEIR does not provide sufficient information for CDFW to determine if the impacts to creeks and riparian areas arising from Project-related activities would be considered significant, and if compensatory mitigation would be required. The Final EIR must disclose and evaluate potential temporary and permanent impacts to these areas. It will also need to include fully enforceable measures to minimize and mitigate potentially significant impacts and should not defer these measures to a future time, pursuant to CEQA Guidelines, Section 15126.4.

Specific impact: Project activities within wetland and riparian features have the potential to result in substantial diversion or obstruction of natural flows; substantial change or use of material from the bed, bank, or channel (including removal of riparian vegetation); and

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deposition of debris, waste, sediment, or other materials into water feature causing water pollution that is deleterious to fish and wildlife.

Evidence impact is potentially significant: Construction activities within these features has the potential to permanently impact wetland and riparian communities, as well as their downstream waters.

Recommended Biological Resource Mitigation Measures:

1. Habitat Assessment. A qualified biologist should conduct a habitat assessment in advance of Project implementation, to determine if the planning area or its immediate vicinity supports wetland and/or riparian communities. This survey should include all creeks, stream, rivers, lakes, and tributaries thereto, and other unnamed creeks/waterways, and drainage channels.
2. Wetland Delineation. CDFW recommends a formal wetland delineation be conducted by a qualified biologist prior to Project construction to determine the location and extent of wetlands and riparian habitat present. Please note that, while there is overlap, State and Federal definitions of wetlands, as well as which activities may require Notification pursuant to Fish and Game Code Section 1602.
3. Project-Specific Notification of Lake and Streambed Alteration for Future Development Sites. Fish and Game Code, Section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. Each site selected for development should be evaluated on an individual basis and will notify CDFW as required by law. CDFW retains sole discretion for determining whether a proposed activity is likely to substantially adversely affect an existing fish or wildlife resource [Fish and Game Code, Section 1603(a)]. The information provided to CDFW shall include a description of all of the activities associated with the proposed project, not just those closely associated with the streams and creeks. Information included in a complete Notification package shall include but is not limited to: an analysis and description of all temporary and permanent impacts; a description of all proposed avoidance, minimization and mitigation for the described impacts; and project-specific drainage and hydrology changes that will result from project implementation. Minimization and avoidance measures shall include species specific preconstruction surveys, reporting, identification and avoidance of ecologically sensitive areas, environmental awareness training, and restoration of disturbed areas.

Written verification of CDFW's determination whether notification is required should be made a condition of approval for any Project proposed for coverage under the Final EIR.

A3-10

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4. Compensatory Mitigation for Riparian Impacts. Impacts to creeks and riparian areas will require compensatory mitigation at a minimum ratio of 1:1 (conserved habitat to impacted habitat) for temporary impacts and a minimum of 3:1 (conserved habitat to impacted habitat) for permanent impacts. This shall be calculated in acres and linear distance. Temporary impacts to stream/riparian habitat should be restored in the same year as impacted.

A3-10

**COMMENT 6: Procedure or Checklist to Verify if Future Projects are Within Scope of EIR**

CDFW recommends creating a procedure or checklist for evaluating subsequent project impacts on biological resources to determine if they are within the scope of the Program EIR or if an additional environmental document is warranted.

CEQA Guidelines 15126.4 (a)(1)(B) states, in part, that formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. CDFW acknowledges that the DEIR is identified as a Program EIR. CDFW also recognizes that, pursuant to CEQA Guidelines, Section 15152, subdivision (c), if a Lead Agency is using the tiering process in connection with an EIR or large-scale planning approval, the development of detailed, site-specific information may not be feasible and can be deferred, in many instances, until such time as the Lead Agency prepares a future environmental document(s). This future environmental document(s) would cover a project of a more limited geographical scale and is appropriate if the deferred information does not prevent adequate identification of significant effects of the planning approval at hand.

A3-11

However, while Program EIRs have a necessarily broad scope, CDFW recommends providing as much additional information related to anticipated future residential and non-residential development, as possible (CEQA Guideline 15126.4(a)(1)(B) and recirculating the DEIR. The additional information may allow for further comment on the proposed Project to avoid and minimize potential impacts to species and habitat.

In addition, as subsequent projects will have site-specific impacts and require site-specific mitigation measures, CDFW still strongly recommends creating a procedure for evaluating these subsequent projects. CEQA Guidelines, Section 15168, subdivision (c)(4) states, "Where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the Program EIR." Based on CEQA Guidelines, Section 15183.3, and associated *Appendix N Checklist*, and consistent with other Program EIRs, CDFW recommends creating a procedure or checklist for evaluating subsequent project impacts on biological resources to determine if they are within the scope of

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the Program EIR or if an additional environmental document is warranted. This checklist should be included as an attachment to the FEIR. A procedure or checklist will be critical to ensuring adequate analysis of Project effects on biological resources. Future analysis should include all special-status species and sensitive natural communities including but not limited to species considered rare, threatened, or endangered pursuant to CEQA Guidelines, Section 15380. The checklist should also outline how habitat will be analyzed per species or habitat type, how impacts will be assessed, and whether any mitigation is necessary.

A3-11

When used appropriately, the checklist should be accompanied by enough relevant information and reasonable inferences to support a "within the scope" of the EIR conclusion. For subsequent Project activities that may affect sensitive biological resources, a site-specific analysis should be prepared by a qualified biologist to provide the necessary supporting information. In addition, the checklist should cite the specific portions of the EIR, including page and section references, containing the analysis of the subsequent Project activities' significant effects and indicate whether it incorporates all applicable mitigation measures from the DEIR.

#### COMMENT 7: Nesting Bird Protections

Issue: The City is responsible for ensuring that the project does not result in any violation of relevant Fish and Game Codes (such as Sections 3503 or 3503.5). The DEIR has no evaluation of potential impacts to nesting or migratory birds.

Specific impacts: Tree and vegetation removal or modification have the potential to impact nesting birds. In addition to direct impacts, nesting birds might be indirectly affected by noise, vibration, odors and movement of workers or equipment.

Evidence impact is potentially significant: Construction activities resultant from the housing rezoning decisions have the potential to directly and indirectly impact nesting or migratory birds.

Recommended Biological Resource Mitigation Measures: CDFW recommends including the following Mitigation Measures, if project activities might occur during nesting bird season:

A3-12

1. Nesting Birds. If project activities will occur during nesting bird season (February 15 to September 15 for raptors; March 15 to August 30 for non-raptors), the Qualified Biologist shall conduct a focused survey for active nests within **5 days** prior to the initiation of project-related activities. Surveys shall be conducted in all suitable habitat located at project work sites and in staging and storage areas. The minimum survey radii surrounding the work area shall be the following: (1) **250 feet** for non-raptors; (2) **1,000 feet** for raptors.
2. Active Nest Protections. If active nests are found, the Qualified Biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings. Once work commences, all active nests shall be regularly monitored by the Qualified Biologist for a minimum of **two (2)** consecutive days to detect any signs of disturbance and behavioral changes as a result of

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the project. In addition to direct impacts, such as nest destruction, nesting birds might be affected by noise, vibration, odors and movement of workers or equipment. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. If signs of disturbance and behavioral changes are observed, work shall halt, and the Qualified Biologist shall either halt work until the nest is no longer active and increase protective buffer zones (see Mitigation Measure 3 below).

3. Active Nest Buffers. Active nest sites and protective buffer zones shall be designated as Ecologically Sensitive Areas (ESAs), where no project-related activities may occur and no personnel may enter. These ESAs shall be maintained (while occupied, or longer for multi-clutch and annually returning species such as raptors) during project activities with the establishment of a fence barrier or flagging surrounding the nest site. Buffers shall remain in place throughout project activities or until the nest becomes inactive, whichever comes first.
4. Bird Protections During Vegetation Removal. To the maximum extent possible, vegetation within the stream or creeks shall not be removed between **February 15 to September 15** to avoid impacts to nesting birds. If any vegetation removal must occur during this time, vegetation will only be removed if the following requirement is met:
  - Within the 3 days prior to vegetation modification or removal activities, the Qualified Biologist will conduct a focused survey for nesting birds in the vegetation slated to be removed or modified and either determines no nesting birds are present or if present then the Qualified Biologist shall determine and demarcate an active nest buffer.

A3-12

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CDFW appreciates the opportunity to comment on the Draft EIR to assist the City of Antioch in identifying and mitigating Project impacts on biological resources. If you have questions or would like to discuss what has been provided, please let me know.

**Letter A3 California Department of Fish and Wildlife – Bay Delta Region**

Sabrina Dunn, Environmental Scientist

October 17, 2022

A3-1 The comment asserts that the Project may be subject to CDFW's regulatory authority as provided in the Fish and Game Code, including a Notification for Lake or Streambed Alteration, and in the California Endangered Species Act, including Incidental Take Permits. The comment's characterization of CDFW does specifically address the adequacy of the Draft EIR. Moreover, CDFW's comment is consistent with the information presented in *Section IV.H.2, Regulatory Setting*, beginning on page IV.H-17 of the Draft EIR, which provides a thorough summary of the existing State of California regulatory environment related to biological resources, including the jurisdiction of the CDFW.

The Draft EIR fulfills the City's obligation to complete a thorough review of the potential impacts of the project in accordance with the CEQA Guidelines based on the level of information currently available and commensurate with the programmatic nature of the project. It is important to note that although the project identifies opportunity sites where future housing may be accommodated, no specific development projects have been proposed, and there are currently no details about the specific physical characteristics individual projects may elect to propose. Once individual projects are proposed, further detailed review and assessment of Housing Inventory Sites would be conducted in compliance with CEQA, to confirm presence or absence of any sensitive resources and need for possible development restrictions, avoidance and minimization measures, and compensatory mitigation, if needed. To ensure that future development occurs consistent with the state's regulations with respect to biological resources, the City would enhance its existing policies addressing its process for subsequent analysis and protection of biological resources. Additional details on the contents of the required biological resource assessment is provided below under the response to Comment A3-3.

A3-2 *Section IV.H, Biological Resources*, of the Draft EIR provides baseline habitat assessments of the potential for occurrence of special-status species, regulated waters, sensitive natural communities, and wildlife movement opportunities, commensurate with the planning level of analysis warranted for a General Plan Update. As described in *Section IV.H, Biological Resources* on page IV.H-1, each of the Housing Inventory Sites was reviewed by the Draft EIR biologist against the available background information, which involved multiple sources including records from the CNDDB, the National Wetland Inventory, and data from the

East County Habitat Conservation Plan/Natural Community Conservation Plan, among other sources. The results of this background review were summarized as part of the assessment for each of the Significance Criteria discussed under *Section IV.H.3.c, Findings*, starting on page IV.H-23 in the Draft EIR. Based on the Draft EIR's analysis, there are numerous special-status plant and animal specials that are either known or are likely to occur in the Project area, including in or around the Housing Inventory Sites. To ensure that future development occurs consistent with the state's regulations with respect to sensitive-status species, the City would enhance its existing policies addressing its process for subsequent analysis and protection of such resources. Additional details on the contents of the required biological resource assessment that would be conducted in conjunction with subsequent projects proposed to implement the Project analyzed in the Draft EIR is provided below under the response to Comment A3-3.

A3-3 The concerns of CDFW over potential impacts on special-status species and nesting birds is noted. All of the special-status species listed are reviewed in the detailed Table 4.4.A of Appendix E of the Draft EIR, with information on status, preferred habitat, locational information and other data. Occurrences of such special status species are mapped in Figures IV.H-2 (page IV.H-11) and IV.H-3 (page IV.H-12) of the Draft EIR, and a discussion of the potential impacts of the project on special-status species is provided in *Section IV.H.3.c.(1), Sensitive or Special Status Species (Criterion 1)* of the Draft EIR.

As discussed in the Draft EIR, while the potential for adverse impacts on special-status species is relatively low, there remains a varying potential for loss or disruption to special-status species remaining in the Project Area due to conversion of areas of natural habitat, removal of trees and other vegetation, increases in light and noise, and other modifications and disturbances associated with future development that could occur as a result of subsequent projects proposed to implement the Project. Development in locations abutting or in the vicinity of open space lands or water resources, where special-status species are more likely to remain, could potentially result in a significant impact or inadvertent loss unless further review and adequate controls are implemented where a potential conflict could occur. As discussed further below, the City requires preparation of a Resource Management Plan (RMP) to identify and avoid impacts to biological resources, including all of the special-status species listed in the CDFW comment.

As explained on page IV.H-25 of the Draft EIR, the policies in the Resource Management Element of the City's General Plan call for avoidance of sensitive

resources such as special-status species and require that a RMP be prepared where potential impacts could occur. Where natural habitat remains that could support special-status species, wetlands, and other sensitive resources, further detailed studies and assessment would be performed to verify presence or absence. General Plan Policy 10.3.2 (e): Open Space Policies, requires that proposed development projects containing significant resources prepare an RMP to provide for their protection or appropriate mitigation. General Plan Policy 10.4.2 (d): Biological Resources Policies, requires the protection of sensitive resources and ensures the preservation of habitat occupied by State and federally protected species. General Plan Policy 10.4.2 (j): Biological Resources Policies, requires that surveys conducted to confirm presence or absence of special-status species be conducted in accordance with established protocols. General Plan Policy 10.5.2 (b): Open Space Transitions and Buffers Policies, addresses the need for buffers where development is proposed in proximity to open space or protected resources.

As concluded on page IV.H-25 of the Draft EIR, the location and nature of development considered under the Project would continue to be guided by the Antioch General Plan and Zoning Code. Future development projects allowed under the Project would continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan goals and policies intended to protect sensitive biological resources. Development under the Project would be performed in accordance with the General Plan policies discussed above, including compliance with applicable State and federal regulations, which should serve to ensure that potential impacts on special-status species would be less than significant.

However, to clarify the process the City will use for future RMPs and to provide additional detail on RMP requirements that will be used to avoid future impacts, the City is proposing to include additional provisions to the above described policies in the Resource Management Element of the General Plan, specifically to Policy 10.4.2, Biological Resources Policies. This additional detail will not only clarify the City's process and expectations for subsequent analysis that is required to be conducted with subsequent projects, but it will also incorporate input from CDFW to demonstrate when and how CDFW's specific concerns will be addressed as more site-specific information is developed in the future.

Specifically, the revisions to Policy 10.4.2 provide additional clarification on site-specific assessments and define additional performance standards to the required Resources Management Plan, consistent with the recommendations



made by CDFW in their comments. These additional provisions would serve to ensure that future development projects constructed under the Project adequately analyze and avoid biological and wetland resources as appropriate and that impacts would remain at a less-than-significant level as concluded in the Draft EIR. Where there remains a potential for presence of sensitive biological or wetland resources, detailed studies would be conducted, and results disclosed as part of the discretionary review of individual development applications.

General Plan Policy 10.4-2, Biological Resources Policies, in the Resource Management Element of the City's General Plan shall be revised as follows, with revisions to section (d) and a new section (k) shown in double underlined text and deletions shown in ~~overstrike~~ text below:

- d. Through the project approval and environmental review processes, require new development projects to protect sensitive habitat areas, including, but not limited to, essential habitat for special-status animals and plants, oak woodlands, riparian woodland, vernal pools, and native grasslands. Ensure the preservation in place of habitat areas found to be occupied by state and federally protected species.
- Require a biological resource assessment for proposed development on sites with natural habitat conditions that may support special-status species, sensitive natural communities, or regulated wetlands and waters; provided however that if a qualified biologist determines that past and/or existing development has eliminated natural habitat and the potential for presence of sensitive biological resources and regulated waters. The assessment shall be conducted by a qualified biologist to determine the presence or absence of any sensitive resources which could be affected by proposed development, shall provide an assessment of the potential impacts, and shall define measures for protecting the resource and surrounding buffer habitat, in compliance with City policy and State and federal laws.

The assessment shall include an analysis of appropriate direct and indirect impacts associated with the project and infrastructure or other development needed to support the project, such as, but not limited to:

- Inadvertent entrapment or impingement;
- Permanent and temporary habitat disturbance, fragmentation, or loss; and
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alteration of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, rock outcrops, overhanging banks, etc.);
- Loss of connectivity and/or obstruction of movement corridors, fish passage, or access to water sources and other core habitat features;
- Decreased ability to reproduce or reduced reproductive/breeding success (loss or reduced health or vigor of eggs or young);
- Interference with list-species recovery plan(s);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic, or human presence resultant from the project.

- Direct mortality (aka "take").
    - If impacts to sensitive habitat areas are unavoidable, appropriate compensatory mitigation shall be required off-site within eastern Contra Costa County. Such compensatory mitigation shall be implemented through the provisions of a Resource Management Plan ("RMP") as described in Policy 10.3.2.e, except where, in the discretion of the Community Development Director, an RMP is not necessary or appropriate due to certain characteristics of the site and the project. Among the factors that are relevant to determining whether an RMP is necessary or appropriate for a given project are the size of the project and the project site, the location of the project (e.g., proximity to existing urban development or open space), the number and sensitivity of biological resources and habitats on the project site, and the nature of the project (e.g., density and intensity of development).
    - Where preserved habitat areas occupy areas that would otherwise be graded as part of a development project, facilitate the transfer of allowable density to other, non-sensitive portions of the site.
- e. Limit uses within preserve and wilderness areas to resource-dependent activities and other uses compatible with the protection of natural habitats (e.g., passive recreation and public trails).
- f. Through the project review process, review, permit the removal of healthy, mature oak trees on a case-by-case basis only where it is necessary to do so.
- g. Preserve heritage trees throughout the Planning Area.
- h. Within areas adjacent to preserve habitats, require the incorporation of native vegetation and avoid the introduction of invasive species in the landscape plans for new development.
- i. Design drainage within urban areas so as to avoid creating perennial flows within intermittent streams to prevent fish and bullfrogs from becoming established within a currently intermittent stream.
- j. Whenever a biological resources survey is undertaken to determine the presence or absence of a threatened or endangered species, or of a species of special concern identified by the U.S. Fish and Wildlife Service or the California Department of Fish and ~~Wildlife Game~~, require the survey to follow established protocols for the species in question prior to any final determination that the species is absent from the site.
- k. Avoid nests of native birds when in active use to ensure compliance with the State Fish and Game Code and the federal Migratory Bird Treaty Act when construction is initiated on development sites. If initial vegetation removal and site disturbance can't be restricted outside the nesting season (September 1 through January 31), a preconstruction survey for nesting birds shall be conducted by a qualified biologist during the bird nesting season (February 1 through August 31). Where an active nest is found on the site, an adequate setback shall be established around any nest of a native bird species when it is in active use until the young have fledged and are no longer dependent on the nest. The nest setback distance shall be defined by a qualified biological consultant with input from the California Department of Fish and Wildlife, with the setback zone fenced or flagged and all construction disturbance restricted from this zone until the qualified biologist has confirmed the nest is no longer in use.

The analysis in the Draft EIR with respect to potential impacts and measures to avoid, minimize, and mitigate those impacts already corresponds to the degree of specificity in the underlying Project. The Project updates elements of the City's General Plan, and, consistent with the requirements of CEQA Guidelines Section 15168, the Draft EIR analyzes the Project's impacts at a programmatic level. Here,

the Housing Element creates programs to facilitate development on Housing Element Inventory Sites during the coming eight-year planning period, but specific development proposals for individual Housing Element Inventory Sites is not yet known. Therefore, sufficient detail is not yet known to make informed site-specific decisions regarding how to best preserve biological resources for each individual site. Accordingly, the City's RMP policy requires an additional detailed assessment to be provided as part of site-specific review once a development application is received by the City, which will allow the City, the public, and responsible agencies such as CDFW to review how the policies will maintain less than significant impacts to biological resources.

Although the RMP described in the Draft EIR, and as revised above, would require additional analysis, the presence of biological resources is not expected to reduce the potential for housing development assumed in the Project. The projected site capacity in the Housing Sites Inventory already assumes that Housing Inventory Sites will not develop at their full capacity due to the presence of biological resources, both the Housing Element and the Draft EIR assume that inventory sites will build out at [71%] of their maximum capacity. Therefore, the analysis in the Housing Element and the Draft EIR has already taken into account the likelihood that some portions of Housing Inventory Sites will remain undeveloped as necessary to avoid impacts to sensitive biological resources as required by the General Plan policies and State and federal regulations, and the level of development projected in the Housing Inventory Sites can occur without resulting in significant impacts to sensitive biological and wetland resources. Therefore, no further analysis is required in either the Housing Element or the Draft EIR.

- A3-4** See response to Comment A3-3. As described above, the Project's Draft EIR is a programmatic planning level assessment of new and revised General Plan policies and programs, not a specific development application for any of the Housing Inventory Sites. No conceptual plans have been prepared for any of the Housing Inventory Sites as no development plans or applications have yet to be prepared. The detailed assessment of potential direct and indirect impacts requested in the comment would be performed as part of future CEQA review if and when development plans are prepared for any of the Housing Inventory Sites. Furthermore, existing General Plan Policy 10.4.2, Biological Resources Policies, has been revised based on input from the commentor to provide further direction to ensure that any potential site-specific impacts would be identified and addressed as appropriate.

- A3-5** See response to Comment A3-4. Information on the general approach to mitigating adverse impacts on sensitive resources shared in the comment is understood. However, there is no way to know whether any significant adverse impacts would occur at any of the specific Housing Inventory Sites until detailed development plans are prepared, studies are conducted to document existing conditions and resources at a particular site, and an assessment is performed as part of future project-level review if development plans are ever prepared. As such, General Plan Policy 10.4.2 (d), Biological Resources Policies, has been revised to clarify that at time of preparation of a biological resources assessment, a qualified biologist shall define measures for protecting the resource and surrounding buffer habitat, in compliance with City policy and state and federal laws as appropriate. At that time, individual development projects would be required to comply with local, State, and federal regulations intended to mitigate impacts to sensitive communities or conduct further environmental review to ensure no project-specific impacts would occur or are adequately mitigated to a less-than-significant level. Furthermore, a new subpolicy has been added to General Plan Policy 10.4.2 (k), Biological Resources Policies, which provides further guidance related to avoidance of sensitive resources and requirements for preconstruction surveys.
- A3-6** *Section IV.H.3.d, Cumulative Biological Resource Impacts*, starting on page IV.H-28 of the Draft EIR does provide an assessment of cumulative impacts. As discussed in the Draft EIR, the adoption and anticipated development under the Project, as well as other future projects within the cumulative geographic context of the Project Area, would be required to comply with local, State, and federal laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on sensitive biological resources. As described above in responses A3-3 and A3-4, environmental review of specific development proposals through implementation of General Plan policies, and specifically General Plan Policy 10.4.2: Biological Resources Policies, within the Project Area would serve to ensure that important biological resources are identified, avoided, or adequately mitigated for where potential impacts are unavoidable, and would serve to prevent any significant adverse development-related impacts.
- A3-7** See response to Comment A3-3 and A3-4. As described in those responses, General Plan Policy 10.4.2, Biological Resources Policies, has been revised to clarify that at time of preparation of a biological resources assessment, a qualified biologist shall determine the presence or absence of any sensitive resources

which could be affected by proposed development consistent with the requests of the commentor.

**A3-8** See response to Comment A3-3 and A3-4. The need for an Incidental Take Permit or other authorization would depend on whether a listed species was present on a particular site. As noted above, consistency with existing and revised General Plan policies related to environmental review of specific development proposals within the Project Area should serve to ensure that important biological resources are identified, avoided, or adequately mitigated for where potential impacts are unavoidable, and would serve to prevent any significant adverse development-related impacts. In response to the commentor's suggested mitigation measures, the City has decided to revise General Plan Policy 10.4.2, Biological Resources Policies, to address concerns related to potential impacts. Specifically, the General Plan policy would address any potential impacts by requiring a qualified biologist to define measures for protecting identified resources and surrounding buffer habitat, in compliance with City policy and state and federal laws as appropriate. As described in prior comments, site-specific mitigation measures are not warranted for this programmatic planning level General Plan update and the requested evaluation of individual project sites would be performed if and when future development applications are submitted to the City. Depending on the results of the site-specific studies, the need for individual take coverage from CDFW would depend on whether any listed special-status species are present on the property and degree to which proposed development avoids essential habitat and the potential for incidental take.

**A3-9** See response to Comment A3-3 and A3-4. The concerns of CDFW over the potential presence of fully protected species in the Project Area is noted. Future environmental review of specific development proposals within the Project Area, consistent with existing and revised General Plan policies, should serve to ensure that important biological resources are identified, avoided, or adequately mitigated for where potential impacts are unavoidable, and would serve to prevent any significant adverse development-related impacts. As described in prior comments, site-specific mitigation measures are not warranted for this programmatic planning level General Plan update and the requested evaluation of individual project sites would be performed if and when future development applications are submitted to the City. Depending on the results of the site-specific studies, the need for avoidance of potential impacts on fully-protected species would be assessed and appropriate avoidance measures identified.

**A3-10**

The concerns of CDFW over the potential for adverse impacts on wetlands and riparian habitat in the Project Area is noted. A discussion of the potential impacts of the project on riparian habitat and creeks is provided in *Section IV.H.3.c.(2) Riparian habitat or other sensitive natural community (Criterion 2)*, and *Section IV.H.3.d.(3) Regulated Waters (Criterion 3)*, beginning on page IV.H-25 and IV.H-26 of the Draft EIR, respectively. Future development projects under the Project could result in direct or indirect impacts on riparian areas and regulated waters if these resources are not adequately identified and protected. Direct impacts would occur as a result of converting natural habitat to development, filling of wetlands, and culverting of natural drainages. Most of the parcels in the Housing Sites Inventory have been disturbed by past grading and development and do not appear to support well-developed wetlands or riparian habitat, based on the preliminary review conducted during preparation of the Draft EIR. However, a few of the parcels in the Housing Sites Inventory are located adjacent to creeks and other drainages, and there remains a potential for presence of seasonal wetlands, riparian habitat, or other regulated waters on these parcels and in other locations in the Project Area. This could include the 15 Housing Inventory Sites identified by CDFW in the comment.

As discussed in *Section IV.H.3.c.(1), Sensitive or Special Status Species (Criterion 1)* starting on page IV.H-24 of the Draft EIR, policies in the Resource Management Element of the City's General Plan call for avoidance of sensitive resources such as riparian habitat and regulated waters and require that a RMP be prepared where potential impacts could occur. Where necessary, further detailed studies and assessment would be performed to verify presence or absence of riparian habitat and regulated waters in accordance with General Plan Policies 10.3.2 (e): Open Space Policies and 10.4.2 (d) and (j): Biological Resources Policies. General Plan Policy 10.4.2: Biological Resources Policies calls for compliance with federal policy related to wetland and riparian habitat protection, and calls for avoidance, replacement, or restoration as necessary to ensure the value of impacted habitat is replaced. Future development projects under the Project would be performed in accordance with the General Plan policies discussed above, which would ensure that potential impacts on sensitive natural communities would remain less than significant.

No specific development projects are being proposed due to the programmatic nature of this project. Individual project details (such as building footprints, setbacks from resources, grading plans, etc.) required to analyze site-specific impacts on biological and wetland resources described by the commentor cannot be determined at this time. The Project will allow for new development, but the

details of precisely how and where on-site development would occur cannot be known at this time. To address this and other related comments, revisions to General Plan policies, as provided above, have been proposed to further ensure that future development proposals under the Project have a less-than-significant impact to biological resources. Depending on the results of the site-specific studies as required in General Plan Policy 10.4.2, Biological Resources Policies, the need for avoidance of potential impacts on riparian habitat and regulated waters would be assessed and appropriate avoidance measures identified.

**A3-11** The recommended procedure or checklist for evaluating potential impacts of future development applications is noted. The City has an established process for evaluating proposed developments that will also be utilized for any development applications associated with the Housing Inventory Sites. This allows the City to complete project discretionary and CEQA reviews in a consistent way. The City is open to considering any checklist template that CDFW would find useful in conducting site-specific reviews under CEQA, otherwise will continue to evaluate subsequent projects, incorporating information from this EIR and consistent with the CEQA guidelines.

As described by the commentor, due to the broad scope of the EIR, site-specific analysis and mitigation cannot be determined at this time for the various reasons discussed in previous responses. However, it is important to note that even subsequent proposals that are consistent with the Project will be required to comply with the relevant policies from the Resource Management Element of the City's General Plan. Because this level of detail cannot be determined until a specific proposal to develop a site listed in Housing Sites Inventory is submitted, additional details on the contents of the required biological resource assessment described in General Plan Policy 10.4.2, Biological Resources Policies, has been revised using recommendations from the commentor (the revised General Plan policy is described in further detail in Comment A3-3).

In summary, the City's RMP policy now clarifies the requirement for a detailed assessment to be provided as part of site-specific review once a development application is received by the City. This revised policy would ensure that any future development project sites are adequately surveyed, any resources identified, and if potential impacts are identified, recommendations for avoidance, take, or other compensatory measures are taken. This additional detail will not only clarify the City's process and expectations for subsequent analysis that is required to be conducted with subsequent projects, but it will also incorporate input from CDFW to demonstrate when and how CDFW's specific

concerns will be addressed as more site-specific information is developed in the future. These additional provisions would serve to ensure that future development projects constructed under the Project adequately analyze and avoid biological and wetland resources as appropriate and that impacts would remain at a less-than-significant level as concluded in the Draft EIR. Where there remains a potential for presence of sensitive biological or wetland resources, detailed studies would be conducted, and results disclosed as part of the discretionary review of individual development applications.

**A3-12**

The concerns of the potential inadvertent take of nesting birds is noted. *Section IV.H.2, Regulatory Setting*, starting on page IV.H-14 of the Draft EIR provides information on the Migratory Bird Treaty Act and relevant sections of the State Fish and Game Code, for which all future development applications must comply. However, the suggested mitigation measure is not warranted for this programmatic planning level General Plan update and the requested evaluation of the potential impacts of individual project sites on nesting birds would be performed if and when future development applications are submitted to the city. Depending on the results of the site-specific studies, the need for avoidance of potential impacts on nesting birds would be assessed and appropriate avoidance measures identified. Using recommendations from the commentor, revisions to General Plan Policy 10,4,2, Biological Resources Policies, recommended in the response to Comment A3-3 includes additional provisions under section (k) to ensure avoidance of any native bird nests in active use.



### III. REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~striketrough~~, and text additions are shown in double-underline.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation (see Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.).

#### A. REVISIONS TO THE EXECUTIVE SUMMARY

*To reflect revisions to the Project’s Housing Sites Inventory, the Executive Summary, page II-4, first bullet, of the Draft EIR is revised as follows:*

- **No Project Alternative:** Under this alternative, the city would continue to implement the adopted 2015-2023 Housing Element and Environmental Hazards Element adopted with the 2003 General Plan, and the proposed 2023-2031 Housing Element and Environmental Hazards Element would not be adopted. In addition, the proposed Environmental Justice Element and associated policies would not be adopted. Future housing development would be developed in accordance with the 2015-2023 Housing Element and would continue to have a development potential of 1,448 units. This alternative would result in a total net reduction in development potential by ~~3,127~~ 3,433 units when compared to the Project and a 1,568-unit shortfall of the City’s RHNA obligation.

*To reflect revisions to the Project’s Housing Sites Inventory, the Executive Summary, page II-4, third bullet, of the Draft EIR is revised as follows:*

- **Reduced RHNA Buffer Alternative:** This alternative would reduce the buffer above the City’s RHNA in comparison with the Project. Under this alternative, the overall RHNA buffer would be reduced from 62.0 percent under the Project, to 25.0 percent, which is still within the 15 to 30 percent buffer recommended by the California Department of Housing Community Development (HCD) to ensure that jurisdictions remain in compliance with the State Housing Law and the Not Net Loss Requirements Law. A 25.0 percent buffer was applied to the number of the City’s RHNA units in each income category, as well as the total unit count. This alternative would result in 3,770 development units in total, which would be a total net

reduction in ~~805~~ 1,111 units when compared to the Project but would continue to exceed the City's RHNA obligation by 754 units.

*After publication of the Draft EIR, it was determined that the decision to include General Plan policies in their entirety, including all sub-policies whether relevant or not, into Table II-1, Summary of Impacts, Mitigation Measures, and General Plan Policies, resulted in the table being extraneous and difficult to interpret. To increase clarity, Table II-1, Summary of Impacts, Mitigation Measures, and General Plan Policies, beginning on page II-6 of the Draft EIR has been renamed to "Table II-1, Summary of Impacts and Mitigation Measures" and replaced in its entirety to only include potentially significant impacts and any associated mitigation measures. This revision does not change any of the previous impact determinations and conclusions. General Plan policies referenced in each impact discussion throughout the Draft EIR would continue to remain applicable and future development projects would still be required to comply:*

**TABLE II-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impacts	Level of Significance Without Mitigation Measure	Mitigation Measures/General Plan Policies	Level of Significance After Implementation of Mitigation Measures or General Plan Policies
<b>A. Land Use and Planning</b>			
<i>Implementation of the Project would not result in any significant land use and planning impacts.</i>			
<b>B. Transportation</b>			
<b>TRANS-1:</b> Implementation of the Project would generate home-based VMT per resident that is greater than 85 percent of the Citywide average home-based CMT per resident.	S	<p><b>TRANS-1: Implement VMT Reduction Measures.</b> Individual housing project development proposals that do not screen out from VMT impact analysis shall provide a quantitative VMT analysis using the methods applied in this EIR, with modifications if appropriate based on future changes to City of Antioch practices and CCTA VMT analysis methodology guidelines. Projects which result in a significant impact shall include travel demand management measures and physical measures to reduce VMT to a less-than-significant level. Measures may include, but are not limited to, those described below, which have been identified as potentially VMT reducing in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Potential VMT reduction estimates are included below, but detailed requirements, calculation steps, and limitations are described in the CAPCOA Handbook. In addition, application of one or more measures is generally expected to result in a net VMT reduction of 10 percent or less for development projects in suburban settings such as Antioch.</p> <ul style="list-style-type: none"> <li>▪ Unbundle parking costs (i.e., sell or lease parking separately from the housing unit). Effectiveness: up to 15.7 percent reduction in GHG from VMT per the CAPCOA Handbook.</li> <li>▪ Provide car-sharing, bike sharing, or scooter sharing programs. Effectiveness: 0.15 to 0.18 percent reduction in GHG from VMT for car share, 0.02 to 0.06 percent for bike share, and 0.07</li> </ul>	SU (LTS if feasible)

**TABLE II-1      SUMMARY OF IMPACTS AND MITIGATION MEASURES**

III-4

TABLE II-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impacts	Level of Significance Without Mitigation Measure	Mitigation Measures/General Plan Policies	Level of Significance After Implementation of Mitigation Measures or General Plan Policies
		<p>Emissions Control Strategy (VDECS) certified by the California Air Resources Board (CARB). Quantified emissions and identified reduction measures shall be submitted to the City (and the Air District if specifically requested) for review and approval prior to the issuance of building permits and the approved criteria air pollutant reduction measures shall be implemented during construction.</p> <p>In addition, the project applicant shall prepare a Construction Emissions Minimization Plan (Emissions Plan) for all identified criteria air pollutant reduction measures (if any). The Emissions Plan shall be submitted to the City (and BAAQMD if specifically requested) for review and approval prior to the issuance of building permits. The Emissions Plan shall include the following:</p> <ul style="list-style-type: none"> <li>▪ An equipment inventory summarizing the type of off-road equipment required for each phase of construction, including the equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, and engine serial number. For all VDECS, the equipment inventory shall also include the technology type, serial number, make, model, manufacturer, CARB verification number level, and installation date.</li> <li>▪ A Certification Statement that the Contractor agrees to comply fully with the Emissions Plan and acknowledges that a significant violation of the Emissions Plan shall constitute a material breach of contract.</li> </ul>	
<b>AIR-2:</b> Construction of residential projects with more than 325 single-family units or 451 multi-family units has the potential to result in criteria air pollutant and precursor emissions above the Bay Area Air Quality	S	<b>AIR-2: Residential Operation Controls for Criteria Air Pollutants.</b> For operation of residential projects with more than 325 single-family units or 451 multi-family units, the project applicant shall retain a qualified air quality consultant to identify measures to reduce the project's criteria air pollutant and	LTS

**TABLE II-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impacts	Level of Significance Without Mitigation Measure	Mitigation Measures/General Plan Policies	Level of Significance After Implementation of Mitigation Measures or General Plan Policies
Management District's (BAAQMD's) recommended thresholds of significance for operations.		precursor emissions below the BAAQMD's recommended thresholds of significance. Emission reduction measures may include, but are not limited to, implementation of a transportation design management plan, compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2, or excluding natural gas appliances or natural gas plumbing in the building design. Quantified emissions and identified reduction measures shall be submitted to the City (and BAAQMD if specifically requested) for review and approval prior to the issuance of building permits.	
<b>AIR-3:</b> Future residential development within the City has the potential to generate TACs and PM2.5 emissions from vehicle trips and emergency generators (if required), which could substantially contribute to the existing poor air quality in the City and expose sensitive receptors to substantial pollutant concentrations.	S	<b>AIR-3a: Residential Construction Controls for Diesel Particulate Matter.</b> For construction of residential projects with a construction duration greater than 6 months that are located in an area defined as needing "Best Practices" or "Further Study" on the BAAQMD's Planning Healthy Places Map ( <a href="https://www.baaqmd.gov/plans-and-climate/planning-healthy-places">https://www.baaqmd.gov/plans-and-climate/planning-healthy-places</a> ), the project applicant shall apply <u>one</u> of the following two measures:  1. The project applicant shall retain a qualified air quality consultant to prepare a Health Risk Assessment (HRA) in accordance with current guidance from the Office of Environmental Health Hazard Assessment to determine the health risks to sensitive receptors exposed to diesel particulate matter (DPM) from project construction emissions. The HRA shall be submitted to the City (and BAAQMD if specifically requested) for review and approval. If the HRA concludes that the health risks are at or below acceptable levels, then DPM reduction measures are not required. If the HRA concludes that the health risks exceed acceptable levels, DPM reduction measures shall be identified to reduce the health risks to acceptable levels.	LTS

**TABLE II-1      SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impacts	Level of Significance Without Mitigation Measure	Mitigation Measures/General Plan Policies	Level of Significance After Implementation of Mitigation Measures or General Plan Policies
		<p>Identified DPM reduction measures shall be submitted to the City for review and approval prior to the issuance of building permits and the approved DPM reduction measures shall be implemented during construction.</p> <p>OR</p> <p>2. All off-road diesel equipment shall be equipped with the most effective VDECS available for the engine type (Tier 4 engines automatically meet this requirement) as certified by CARB. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications.</p> <p>In addition, the project applicant shall prepare a Construction Emissions Minimization Plan (Emissions Plan) for all identified DPM reduction measures (if any). The Emissions Plan shall be submitted to the City (and BAAQMD if specifically requested) for review and approval prior to the issuance of building permits. The Emissions Plan shall include the following:</p> <ul style="list-style-type: none"> <li>▪ An equipment inventory summarizing the type of off-road equipment required for each phase of construction, including the equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, and engine serial number. For all VDECS, the equipment inventory shall also include the technology type, serial number, make, model, manufacturer, CARB verification number level, and installation date.</li> <li>▪ A Certification Statement that the Contractor agrees to comply fully with the Emissions Plan and acknowledges that a significant violation of the Emissions Plan shall constitute a material breach of contract.</li> </ul>	

**TABLE II-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impacts	Level of Significance Without Mitigation Measure	Mitigation Measures/General Plan Policies	Level of Significance After Implementation of Mitigation Measures or General Plan Policies
		<b>AIR-3b: Residential Emergency Generators.</b> Require all emergency generators for new residential development projects (if required) to use best available control technology for air pollutant emissions, such as using engines that meet the Environmental Protection Agency's Tier 4 Final emission standards or are battery powered.	LTS
<b>D. Greenhouse Gas Emissions</b>			
<i>Implementation of the Project would not result in any significant greenhouse gas impacts. Implementation of General Plan policies described in Section IV.D, Greenhouse Gas Emissions, would ensure no significant impacts would occur.</i>			
<b>E. Energy</b>			
<i>Implementation of the Project would not result in any significant energy impacts. Implementation of General Plan policies described in Section IV.E, Energy, would ensure no significant impacts would occur.</i>			
<b>F. Cultural and Tribal Resources</b>			
<i>Implementation of the Project would not result in any significant cultural or tribal resources impacts. Implementation of General Plan policies described in Section IV.F, Cultural and Tribal Resources, would ensure no significant impacts would occur.</i>			
<b>G. Aesthetics</b>			
<i>Implementation of the Project would not result in any significant aesthetic impacts. Implementation of General Plan policies described in Section IV.G, Aesthetics, would ensure no significant impacts would occur.</i>			
<b>H. Biological Resources</b>			
<i>Implementation of the Project would not result in any significant biological resources impacts. Implementation of General Plan policies described in Section IV.H, Biological Resources, would ensure no significant impacts would occur.</i>			
<b>I. Geology and Soils</b>			
<i>Implementation of the Project would not result in any significant geology and soils impacts. Implementation of General Plan policies described in Section IV.I, Geology and Soils, would ensure no significant impacts would occur.</i>			
<b>J. Hazards and Hazardous Materials</b>			



**TABLE II-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impacts	Level of Significance Without Mitigation Measure	Mitigation Measures/General Plan Policies	Level of Significance After Implementation of Mitigation Measures or General Plan Policies
<i>Implementation of the Project would not result in any significant hazards and hazardous materials impacts. Implementation of General Plan policies described in Section IV.J, Hazards and Hazardous Materials, would ensure no significant impacts would occur.</i>			
<b>K. Hydrology and Water Quality</b>			
<i>Implementation of the Project would not result in any significant hydrology and water quality impacts. Implementation of General Plan policies described in Section IV.K, Hydrology and Water Quality, would ensure no significant impacts would occur.</i>			
<b>L. Noise</b>			
<i>Implementation of the Project would not result in any significant noise impacts. Implementation of General Plan policies described in Section IV.L, Noise, would ensure no significant impacts would occur.</i>			
<b>M. Population and Housing</b>			
<i>Implementation of the Project would not result in any significant population and housing impacts. Implementation of General Plan policies described in Section IV.M, Population and Housing, would ensure no significant impacts would occur.</i>			
<b>N. Public Services and Recreation</b>			
<i>Implementation of the Project would not result in any significant public services and recreation impacts. Implementation of General Plan policies described in Section IV.N, Public Services and Recreation, would ensure no significant impacts would occur.</i>			
<b>O. Utilities and Service Systems</b>			
<i>Implementation of the Project would not result in any significant utilities and service systems impacts. Implementation of General Plan policies described in Section IV.O, Utilities and Service Systems, would ensure no significant impacts would occur.</i>			
<b>P. Wildfire</b>			
<i>Implementation of the Project would not result in any significant wildfire impacts. Implementation of General Plan policies described in Section IV.P, Wildfire, would ensure no significant impacts would occur.</i>			
<b>Q. Agriculture and Forestry Resources</b>			
<i>Implementation of the Project would not result in any significant agriculture and forestry resources impacts. Implementation of General Plan policies described in Section IV.Q, Agriculture and Forestry Services, would ensure no significant impacts would occur.</i>			

## B. REVISIONS TO THE PROJECT DESCRIPTION

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-11, last paragraph, of the Draft EIR is revised as follows:*

.... Accordingly, the ~~city~~ City has identified sites in excess of its RHNA obligation to accommodate a buffer or at least ~~30-10~~ percent in all income categories. Table III-2 shows the level of buffer for each income category. The Housing Element demonstrates that the City has capacity to accommodate ~~1,559~~ 1,865 housing units beyond its RHNA obligation of 3,016 housing units for a total of ~~4,575~~ 4,881 units, which is equivalent to an approximately 62 percent buffer. Implementation of the Project is conservatively assumed to then result in ~~4,575~~ 4,881 units. This level of buildout is unlikely but, in order to be conservative, this EIR uses the maximum buildout in order to fully identify and mitigate potential environmental impacts.

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-12, Table III-2, of the Draft EIR is revised as follows:*

**TABLE III-2 RHNA BUFFER BY INCOME CATEGORY**

Income Category	RHNA Units	Sites Inventory Units	Buffer Percentage
Very Low Income (0-50% AMI)	792	<del>967</del> <u>882</u>	<del>22%</del> <u>11%</u>
Low Income (51%-80% AMI)	456	<del>548</del> <u>760</u>	<del>20%</del> <u>67%</u>
Moderate Income (81%-120% AMI)	493	<del>947</del> <u>845</u>	<del>92%</del> <u>71%</u>
Above Moderate Income (>120% AMI)	1,275	<del>2,113</del> <u>2,394</u>	<del>66%</del> <u>88%</u>
<b>Total</b>	<b>3,016</b>	<b><del>4,575</del> <u>4,881</u></b>	<b><del>52%</del> <u>62%</u></b>

Source: City of Antioch and Urban Planning Partners, 2022.

*To reflect revisions to the Project's Housing Sites Inventory, RHNA Credits, page III-12 to III-13, of the Draft EIR is revised as follows:*

Existing development projects that can count as a credit towards a jurisdiction's RHNA obligation include pipeline and pending projects, which are projects proposed, approved, or under construction and have not received a Certificate of Occupancy as of June 30, 2022. The Housing Element identifies 394 units of housing that are under construction and anticipated to be completed during the 2023-2031 planning period. Another 290 housing units are proposed to be constructed during the 2023-2031 planning period.

In addition, the Housing Element uses past building permit data to project Accessory Dwelling Unit (ADU) development during the planning period. The Housing Element conservatively estimates that 136 ADUs would be constructed over the course of the eight-year planning period based on the annual average of 17 building permits the City issues between 2019 and 2021. The Housing Element utilized regional ADU affordability data<sup>1</sup> to project the affordability categories for the 136 anticipated ADUs.

As shown in Table III-3, when the pipeline and pending projects and projected ADUs are credited towards the RHNA obligation, there is a remaining need to accommodate 2,196 units through the Sites Inventory.

**TABLE III-3 PIPELINE, PENDING, AND PROJECTED UNITS**

	Very Low- Income Units	Low- Income Units	Moderate- Income Units	Above Moderate- Income Units	Total Units
<b>RHNA</b>	<b>792</b>	<b>456</b>	<b>493</b>	<b>1,275</b>	<b>3,016</b>
Pipeline Units	91	299	0	4	394
Pending Projects	<u>4</u>	<u>=</u>	<u>=</u>	<u>286</u>	<u>290</u>
Projected ADUs	41	41	41	13	<del>316</del> <u>136</u>
<b>RHNA Credit Subtotal</b>	<u>136</u>	<u>340</u>	<u>41</u>	<u>303</u>	<u>820</u>
<b>Remaining RHNA Obligation</b>	<del>660</del> <b>656</b>	<b>116</b>	<b>452</b>	<del>1,258</del> <b>972</b>	<del>2,306</del> <b>2,196</b>

Source: Urban Planning Partners and City of Antioch, 2022.

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-13, second paragraph of the Draft EIR is revised as follows:*

Antioch's Site Inventory is comprised of ~~182~~ 184 sites totaling ~~230~~ 46 acres. Of these ~~182~~ 184 sites, 125 (~~69~~ 68 percent) are nonvacant and underutilized, and 579 (~~31~~ 30 percent) are vacant. These sites are anticipated to accommodate the potential future development of up to ~~4,575~~ 4,881 residential units, including ~~967~~ 882 units affordable for very low-income households, ~~548~~ 760 for low-income, ~~947~~ 845 for moderate-income, and ~~2,113~~ 2,394 for above moderate-income.

<sup>1</sup> Association of Bay Area Governments, 2021. Draft Affordability of Accessory Dwelling Units, September 8.

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-13, paragraph 3 of the Draft EIR is revised as follows:*

The Housing Element and Sites Inventory assume that the city will rezone ~~169~~ 166 sites to allow residential development or more intense residential development. All ~~169~~ 166 sites would be rezoned to Medium Density Residential (R-20) or High Density Residential (R-~~25~~ 30<sup>4</sup> and R-35) Zoning Districts before the 6<sup>th</sup> cycle housing element planning period in January 2023.

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<sup>4</sup>The R-25 zone (20-25 units per acre) under the existing Antioch zoning regulations, would be amended to become the R-30 zone (20-30 units per acre) as a part of the Project.

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-13, last paragraph, of the Draft EIR is revised as follows:*

Figure III-12 and Table III-5 outline the sites that would be rezoned in conjunction with the Housing Element. It is anticipated these rezonings will allow for the realistic development of up to ~~3,437~~ 2,804 housing units. A total of 114 sites, totaling 77 acres of land throughout the city, will be rezoned to the R-20 Zoning District which allows for residential development at up to 20 dwelling units per acre. It is anticipated these rezonings will allow for the development of up to 412 housing units. A total of ~~five~~ six sites, totaling 13 acres, will be rezoned to the R-~~30~~ 25 Zoning District which allows for residential development up to ~~30~~ 25 units per acre. It is anticipated these rezonings will allow for the development of up to ~~266~~ 400 housing units. Finally, a total of ~~50~~ 46 sites, totaling 96 acres of land, will be rezoned to the R-35 zoning district which allows for residential development up to 35 dwelling units per acre. Per State guidance, sites can only count towards a jurisdiction's affordable housing RHNA if the density allowed by underlying zoning is 30 dwelling units per acre or greater. Both the R-~~30~~ 25 and R-35 Zoning Districts permit residential development at this threshold density, and therefore have the potential to accommodate affordable housing. However, for purposes of calculating realistic capacity of rezoned sites, the minimum density threshold of each new Zoning District is utilized. Therefore, only the sites proposed to be rezoned to the R-35 Zoning District are identified to accommodate affordable housing.

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-14, Table III-4, of the Draft EIR is revised as follows:*

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>1</u>	051-061-001	1650 Viera Avenue	94509	Nonvacant	0.42	0	0	1	1	2
<u>2</u>	051-061-002	1700 Viera Avenue	94509	Nonvacant	0.92	0	0	2	2	4
<u>3</u>	051-061-003	1730 Viera Avenue	94509	Nonvacant	0.92	0	0	2	2	4
<u>4</u>	051-062-004	1839 Stewart Lane	94509	Nonvacant	0.26	0	0	0	0	0
<u>5</u>	051-062-005	1829 Stewart Lane	94509	Nonvacant	0.29	0	0	0	0	0
<u>6</u>	051-062-006	1705 Viera Avenue	94509	Nonvacant	0.42	0	0	1	1	2
<u>7</u>	051-062-010	1853 Stewart Lane	94509	Nonvacant	1.65	0	0	4	4	8
<u>8</u>	051-071-001	1524 Viera Avenue	94509	Nonvacant	0.93	0	0	2	2	4
<u>9</u>	051-071-002	1550 Viera Avenue	94509	Nonvacant	0.51	0	0	1	1	2
<u>10</u>	051-071-003	1560 Viera Avenue	94509	Nonvacant	0.41	0	0	1	1	2
<u>11</u>	051-071-004	1574 Viera Avenue	94509	Nonvacant	0.47	0	0	1	1	2
<u>12</u>	051-071-005	1600 Viera Avenue	94509	Nonvacant	0.12	0	0	0	0	0
<u>13</u>	051-071-006	1606 Viera Avenue	94509	Nonvacant	0.82	0	0	2	2	4
<u>14</u>	051-071-008	1588 Viera Avenue	94509	Nonvacant	0.46	0	0	1	1	2
<u>15</u>	051-071-011	1636 Viera Avenue	94509	Nonvacant	0.46	0	0	1	1	2
<u>16</u>	051-071-012	1628 Viera Avenue	94509	Nonvacant	0.44	0	0	1	1	2
<u>17</u>	051-072-005	1537 Viera Avenue	94509	Nonvacant	0.46	0	0	1	1	2
<u>18</u>	051-072-006	1540 Walnut Avenue	94509	Nonvacant	0.40	0	0	1	1	2
<u>19</u>	051-072-007	1554 Walnut Avenue	94509	Nonvacant	0.51	0	0	1	1	2
<u>20</u>	051-072-013	1549 Viera Avenue	94509	Nonvacant	0.49	0	0	1	1	2
<u>21</u>	051-072-014	1565 Viera Avenue	94509	Nonvacant	0.87	0	0	2	2	4
<u>22</u>	051-072-015	1863 Bown Lane	94509	Nonvacant	0.23	0	0	0	0	0

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>23</u>	051-072-016	1877 Bown Lane	94509	Nonvacant	0.23	0	0	0	0	0
<u>24</u>	051-072-017	1568 Walnut Avenue	94509	Nonvacant	0.23	0	0	0	0	0
<u>25</u>	051-072-018	1580 Walnut Avenue	94509	Nonvacant	0.22	0	0	0	0	0
<u>26</u>	051-073-001	1605 Viera Avenue	94509	Nonvacant	0.3	0	0	0	0	0
<u>27</u>	051-073-002	1601 Viera Avenue	94509	Nonvacant	0.22	0	0	0	0	0
<u>28</u>	051-073-003	1837 Vine Lane	94509	Nonvacant	0.21	0	0	0	0	0
<u>29</u>	051-073-004	1845 Vine Lane	94509	Nonvacant	0.21	0	0	0	0	0
<u>30</u>	051-073-005	1859 Vine Lane	94509	Nonvacant	0.21	0	0	0	0	0
<u>31</u>	051-073-006	1867 Vine Lane	94509	Nonvacant	0.21	0	0	0	0	0
<u>32</u>	051-073-007	1881 Vine Lane	94509	Nonvacant	0.21	0	0	0	0	0
<u>33</u>	051-073-008	1897 Vine Lane	94509	Nonvacant	0.85	0	0	0	0	0
<u>34</u>	051-073-009	1905 Vine Lane	94509	Nonvacant	0.30	0	0	0	0	0
<u>35</u>	051-073-011	1965 Vine Lane	94509	Nonvacant	0.46	0	0	0	0	0
<u>36</u>	051-073-012	1585 Walnut Avenue	94509	Nonvacant	0.86	0	0	2	2	4
<u>37</u>	051-073-014	1537 Walnut Avenue	94509	Nonvacant	0.51	0	0	1	1	2
<u>38</u>	051-073-015	1523 Walnut Avenue	94509	Nonvacant	0.34	0	0	1	1	2
<u>39</u>	051-073-016	1551 Walnut Avenue	94509	Nonvacant	0.39	0	0	1	1	2
<u>40</u>	051-073-017	1927 Vine Lane	94509	Nonvacant	0.24	0	0	0	0	0
<u>41</u>	051-073-018	1945 Vine Lane	94509	Nonvacant	0.26	0	0	0	0	0
<u>42</u>	051-073-019	1567 Walnut Avenue	94509	Nonvacant	0.23	0	0	0	0	0
<u>43</u>	051-073-020	1559 Walnut Avenue	94509	Nonvacant	0.23	0	0	0	0	0
<u>44</u>	051-074-001	1966 Vine Lane	94509	Nonvacant	0.20	0	0	0	0	0

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>45</u>	051-074-002	1954 Vine Lane	94509	Nonvacant	0.23	0	0	0	0	0
<u>46</u>	051-074-003	1936 Vine Lane	94509	Nonvacant	0.22	0	0	0	0	0
<u>47</u>	051-074-005	1898 Vine Lane	94509	Nonvacant	0.22	0	0	0	0	0
<u>48</u>	051-074-006	Vine Lane & Viera Avenue	94509	Nonvacant	0.22	0	0	0	0	0
<u>49</u>	051-074-007	1870 Vine Lane	94509	Nonvacant	0.22	0	0	0	0	0
<u>50</u>	051-074-008	1854 Vine Lane	94509	Nonvacant	0.36	0	0	0	0	0
<u>51</u>	051-074-009	1836 Vine Lane	94509	Nonvacant	0.29	0	0	0	0	0
<u>52</u>	051-074-010	1633 Viera Avenue	94509	Nonvacant	0.53	0	0	0	0	0
<u>53</u>	051-074-011	1908 Vine Lane	94509	Nonvacant	0.22	0	0	0	0	0
<u>54</u>	051-074-012	1920 Vine Lane	94509	Nonvacant	0.22	0	0	0	0	0
<u>55</u>	051-081-001	1400 Viera Avenue	94509	Nonvacant	0.17	0	0	0	0	0
<u>56</u>	051-081-002	1410 Viera Avenue	94509	Nonvacant	0.78	0	0	2	2	4
<u>57</u>	051-081-003	1428 Viera Avenue	94509	Nonvacant	0.90	0	0	2	2	4
<u>58</u>	051-081-004	1452 Viera Avenue	94509	Nonvacant	0.45	0	0	1	1	2
<u>59</u>	051-081-006	1470 Viera Avenue	94509	Nonvacant	0.95	0	0	2	2	4
<u>60</u>	051-081-007	1490 Viera Avenue	94509	Nonvacant	0.46	0	0	1	1	2
<u>61</u>	051-081-008	1500 Viera Avenue	94509	Nonvacant	0.91	0	0	2	2	4
<u>62</u>	051-082-002	1497 Walnut Avenue	94509	Nonvacant	0.85	0	0	2	2	4
<u>63</u>	051-082-003	1473 Walnut Avenue	94509	Nonvacant	0.43	0	0	1	1	2
<u>64</u>	051-082-004	1957 Santa Fe Avenue	94509	Nonvacant	0.64	0	0	1	1	2
<u>65</u>	051-082-005	1915 Santa Fe Avenue	94509	Nonvacant	0.75	0	0	2	2	4
<u>66</u>	051-082-006	1887 Santa Fe Avenue	94509	Nonvacant	0.81	0	0	2	2	4

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>67</u>	051-082-007	1859 Santa Fe Avenue	94509	Nonvacant	0.45	0	0	1	1	2
<u>68</u>	051-082-008	1831 Santa Fe Avenue	94509	Nonvacant	0.74	0	0	2	2	4
<u>69</u>	051-082-009	1429 Viera Avenue	94509	Nonvacant	0.77	0	0	2	2	4
<u>70</u>	051-082-010	Walnut Avenue & Santa Fe Avenue	94509	Vacant	0.43	0	0	1	1	2
<u>71</u>	051-082-011	1939 Santa Fe Avenue	94509	Nonvacant	0.39	0	0	1	1	2
<u>72</u>	051-082-012	Santa Fe Avenue & Viera Avenue	94509	Nonvacant	0.38	0	0	1	1	2
<u>73</u>	051-082-013	1503 Walnut Avenue	94509	Nonvacant	0.42	0	0	1	1	2
<u>74</u>	051-082-014	1515 Walnut Avenue	94509	Nonvacant	0.43	0	0	1	1	2
<u>75</u>	051-083-001	1528 Walnut Avenue	94509	Nonvacant	0.91	0	0	2	2	4
<u>76</u>	051-083-002	1506 Walnut Avenue	94509	Nonvacant	0.45	0	0	1	1	2
<u>77</u>	051-083-004	1866 Santa Fe Avenue	94509	Nonvacant	1.38	0	0	4	4	8
<u>78</u>	051-083-005	1834 Santa Fe Avenue	94509	Nonvacant	0.46	0	0	1	1	2
<u>79</u>	051-083-006	1471 Viera Avenue	94509	Nonvacant	0.46	0	0	1	1	2
<u>80</u>	051-083-009	1509 Viera Avenue	94509	Nonvacant	0.91	0	0	2	2	4
<u>81</u>	051-083-010	1487 Viera Avenue	94509	Nonvacant	0.16	0	0	0	0	0
<u>82</u>	051-083-012	1495 Viera Avenue	94509	Nonvacant	0.75	0	0	2	2	4
<u>83</u>	051-100-022	2101 E 18th Street	94509	Nonvacant	8.00	0	0	24	24	48
<u>84</u>	051-120-020	1650 Trembath Lane	94509	Nonvacant	1.48	0	0	0	8	8
<u>85</u>	051-120-021	1710 Trembath Lane	94509	Nonvacant	1.25	0	0	0	7	7
<u>86</u>	051-120-024	1450 Trembath Lane	94509	Nonvacant	1.01	0	0	0	6	6
<u>87</u>	051-120-025	1550 Trembath Lane	94509	Nonvacant	1.02	0	0	0	6	6



**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>88</u>	051-130-001	1305 St Claire Drive	94509	Nonvacant	1.01	0	0	0	6	6
<u>89</u>	051-130-002	1277 St Claire Drive	94509	Nonvacant	1.01	0	0	0	6	6
<u>90</u>	051-140-001	1705 Trembath Lane	94509	Nonvacant	1.69	0	0	0	10	10
<u>91</u>	051-140-003	1625 Trembath Lane	94509	Nonvacant	1.23	0	0	0	7	7
<u>92</u>	051-140-006	1501 Trembath Lane	94509	Nonvacant	0.98	0	0	0	5	5
<u>93</u>	051-140-007	1425 Trembath Lane	94509	Nonvacant	0.98	0	0	0	5	5
<u>94</u>	051-140-012	1613 St Claire Drive	94509	Nonvacant	1.00	0	0	0	6	6
<u>95</u>	051-140-013	1525 St Claire Drive	94509	Nonvacant	1.00	0	0	0	6	6
<u>96</u>	051-140-014	1423 St Claire Drive	94509	Nonvacant	0.65	0	0	0	3	3
<u>97</u>	051-140-015	1420 St Claire Drive	94509	Nonvacant	0.98	0	0	0	5	5
<u>98</u>	051-140-019	88 Mike Yorba Way	94509	Nonvacant	0.36	0	0	0	2	2
<u>99</u>	051-140-020	1675 Trembath Lane	94509	Nonvacant	0.39	0	0	0	2	2
<u>100</u>	051-140-025	1620 ST Claire Drive	94509	Nonvacant	1.11	0	0	0	6	6
<u>101</u>	051-140-026	1520 ST Claire Drive	94509	Nonvacant	1.87	0	0	0	11	11
<u>102</u>	051-140-027	1651 ST Claire Drive	94509	Nonvacant	0.48	0	0	0	2	2
<u>103</u>	051-140-028	1715 ST Claire Drive	94509	Nonvacant	0.49	0	0	0	2	2
<u>104</u>	051-140-035	1575 Trembath Lane	94509	Nonvacant	0.98	0	0	0	5	5
<u>105</u>	051-200-076	Holub Lane & E 18 <sup>th</sup> Street	94509	Vacant	1.08	8	4	5	13	30
<u>106</u>	051-200-037	1841 Holub Lane	94509	Nonvacant	4.40	34	19	21	55	129
<u>107</u>	051-200-038	Holub Lane	94509	Vacant	4.99	39	22	24	63	148
<u>108</u>	051-200-039	Holub Lane	94509	Vacant	5.71	44	25	28	72	169
<u>109</u>	051-230-028	3200 E 18 <sup>th</sup> Street	94509	Vacant	1.29	10	5	6	16	37

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>110</u>	051-400-027	Wilson Street & E 18 <sup>th</sup> Street	94509	Vacant	1.20	0	0	9	9	18
<u>111</u>	052-042-044	3901 Hillcrest Avenue	94509	Nonvacant	1.62	12	7	7	20	46
<u>112</u>	052-342-010	Wildflower Drive & Hillcrest Avenue	94531	Vacant	3.77	29	17	18	47	111
<u>113*</u>	053-060-055	Neroly Road & Country Hills Drive	94509	Vacant	0.53	<u>4 0</u>	<u>2 0</u>	<u>3 0</u>	<u>7 0</u>	<u>16 0</u>
<u>114*</u>	053-060-056	Neroly Road & Country Hills Drive	94509	Vacant	0.61	<u>5 0</u>	<u>3 0</u>	<u>3 0</u>	<u>8 0</u>	<u>19 0</u>
<u>115*</u>	053-060-057	Neroly Road & Country Hills Drive	94509	Vacant	7.22	<del>66-000</del>	<del>380</del>	<del>410</del>	<del>1060</del>	<del>2510</del>
<u>116</u>	055-071-106	Lone Tree Way & Country Hills Drive	94509	Vacant	3.63	28	16	17	46	107
<u>117</u>	055-071-107	Lone Tree Way & Country Hills Drive	94509	Vacant	2.32	18	10	11	29	68
<u>118</u>	055-071-108	Lone Tree Way & Deer Valley Road	94509	Vacant	9.54	75	43	46	120	284
<u>119</u>	055-071-113	Lone Tree Way & Country Hills Drive	94509	Vacant	0.96	0	0	5	5	10
<u>120</u>	056-130-014	5200 Heidorn Ranch Road	94509	Nonvacant	1.95	15	8	9	24	56
<u>121</u>	056-130-011	5320 Heidorn Ranch Road	94509	Nonvacant	5.04	39	22	24	63	148
<u>122</u>	065-071-020	1205 A Street	94509	Nonvacant	0.31	0	0	1	1	2
<u>123</u>	065-110-006	810 Wilbur Ave	94509	Vacant	2.86	<u>0 4</u>	0	0	<del>74-70</del>	74
<u>124</u>	065-110-007	701 Wilbur Ave	94509	Nonvacant	2.50	19	11	12	31	73
<u>125</u>	065-161-025	301 E 18 <sup>th</sup> Street	94509	Nonvacant	0.31	0	0	1	1	2
<u>126</u>	065-262-026	E 18 <sup>th</sup> Street & Blossom Drive	94509	Vacant	1.30	0	0	10	10	20
<u>127</u>	065-262-035	1015 E 18 <sup>th</sup> Street	94509	Vacant	0.68	0	0	5	5	10

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>128</u>	067-093-022	A Street& Park Ln	94509	Vacant	0.32	0	0	2	2	4
<u>129</u>	067-103-017	A Street	94509	Vacant	1.77	0	0	10	10	20
<u>130</u>	068-051-015	1805 Cavallo Road	94509	Vacant	0.47	0	0	3	3	6
<u>131</u>	068-051-049	1801 Cavallo Road	94509	Vacant	0.47	0	0	3	3	6
<u>132</u>	068-051-050	504 E 18 <sup>th</sup> Street	94509	Vacant	0.088	0	0	0	0	0
<u>133</u>	068-082-057	Terrace Drive & E 18 <sup>th</sup> Street	94509	Vacant	0.66	0	0	3	3	6
<u>134</u>	068-252-041	2721 Windsor Drive	94509	Vacant	1.57	12	7	7	19	45
<u>135</u>	068-252-042	Windsor Drive & Iglesia Court	94509	Vacant	0.00	0	0	0	0	0
<u>136</u>	068-252-043	Windsor Drive & Iglesia Court	94509	Vacant	0.00	0	0	0	0	0
<u>137</u>	068-252-045	2709 Windsor Drive	94509	Vacant	0.00	0	0	0	0	0
<u>138</u>	071-370-026	3351 Contra Loma Boulevard	94509	Nonvacant	1.00	0	0	8	8	16
<u>139</u>	072-400-036	Cache Peak Drive & Golf Course Road	94531	Vacant	2.01	15	9	9	25	58
<u>140</u>	072-400-039	4655 Golf Course Road	94531	Nonvacant	2.00	15	9	9	25	58
<u>141</u>	072-400-040	Cache Peak Drive & Golf Course Road	94531	Vacant	0.21	0	0	3	3	6
<u>142</u>	072-450-013	Dallas Ranch Road	94509	Vacant	1.50	11	6	7	19	43
<u>143</u>	074-080-026	Delta Fair Boulevard & Belle Drive	94509	Nonvacant	12.26	96	55	60	155	366
<u>144</u>	074-080-028	Delta Fair Boulevard & E Leland Road	94565	Vacant	0.49	0	0	7	7	14
<u>145</u>	074-080-029	Delta Fair Boulevard	94509	Nonvacant	1.12	8	5	5	14	32
<u>146</u>	074-080-030	Delta Fair Boulevard	94565	Vacant	5.50	43	24	26	69	162

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>147</u>	074-122-016	Delta Fair Boulevard	94509	Vacant	0.60	0	0	4	4	8
<u>148</u>	074-123-004	Delta Fair Boulevard & Fairview Drive	94509	Vacant	1.75	13	7	8	22	50
<u>149</u>	074-123-005	Fairview Drive	94509	Vacant	1.45	11	6	7	18	42
<u>150</u>	074-343-034	2100 L Street	94509	Vacant	1.50	0	0	9	9	18
<u>151</u>	075-460-001	James Donlon Boulevard & Contra Loma Boulevard	94509	Vacant	3.13	0	0	31	31	62
<u>152</u>	076-010-039	Somersville Road & Buchanan Road	94509	Vacant	4.77	0	0	38	38	76
<u>153</u>	052-061-053	4325 Berryessa Court	94509	Nonvacant	5.00	39	22	24	63	148
<u>154</u>	071-130-026	3195 Contra Loma Boulevard	94509	Nonvacant	2.90	22	13	14	36	85
<u>155</u>	068-251-012	620 E Tregallas Road	94509	Nonvacant	0.86	6	3	4	10	23
<u>156</u>	052-061-014	4215 Hillcrest Avenue	94509	Nonvacant	0.99	7	4	4	12	27
<u>157</u>	052-042-037	4201 Hillcrest Avenue	94509	Nonvacant	4.39	34	19	21	55	129
<u>158</u>	052-140-013	Wildflower Drive	94531	Vacant	4.18	0	0	41	41	82
<u>159</u>	052-140-014	Wildflower Drive	94531	Vacant	3.95	0	0	39	39	78
<u>160</u>	052-140-015	Wildflower Drive	94531	Vacant	0.91	0	0	9	9	18
<u>161</u>	052-140-016	Wildflower Drive	94531	Vacant	1.31	0	0	13	13	26
<u>162</u>	056-120-096	2721 Empire Ave	94513	Nonvacant	3.30	25.00	14.00	16.00	41.00	96.00
<u>163</u>	072-011-052	3950 Lone Tree Way	94509	Nonvacant	4.20	33.00	19.00	20.00	53.00	125.00
<u>164</u>	051-200-065	3415 Oakley Road	94509	Nonvacant	4.00	31.00	18.00	19.00	50.00	118.00
<u>165</u>	068-091-043	1018 E 18 <sup>th</sup> Street	94509	Nonvacant	0.84	6.00	3.00	4.00	10.00	23.00
<u>166</u>	076-231-007	1919 Buchanan Road	94509	Nonvacant	1.50	11.00	6.00	7.00	19.00	43.00

**TABLE III-4 HOUSING ELEMENT SITES INVENTORY**

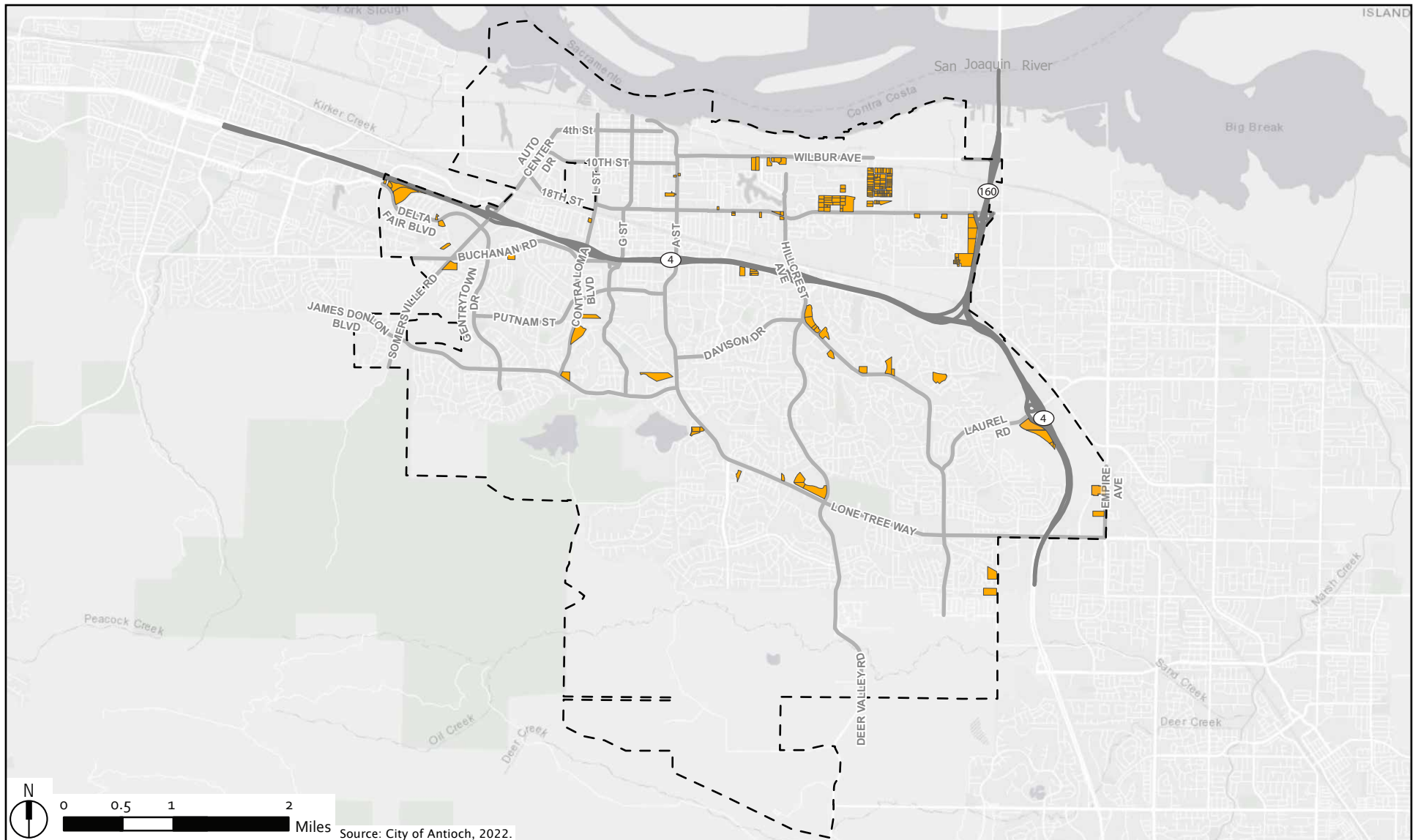
Site No.	APN	Site Address/Intersection	ZIP Code	Vacancy	Parcel Size (Gross Acres)	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Total <sup>a</sup>
<u>167</u>	065-122-023	Apollo Court	94509	Vacant	1.60	12	7	7	20	46
<u>168</u>	061-122-029	Apollo Court	94509	Vacant	1.70	13	7	8	21	49
<u>169</u>	061-122-030	Apollo Court	94509	Vacant	2.10	16	9	10	26	61
<u>170</u>	061-122-028	Apollo Court	94509	Vacant	0.60	4	2	2	7	15
<u>171</u>	052-370-009	Hillcrest Avenue	94531	Vacant	2.13	16	9	10	27	62
<u>172</u>	051-390-006	3301 Jessica Court	94509	Vacant	2.98	23	13	14	37	87
<u>173</u>	051-390-005	3305 Jessica Court	94509	Vacant	0.20	0.00	0.00	0.00	0.00	0.00
<u>174</u>	051-390-004	3309 Jessica Court	94509	Vacant	0.22	0.00	0.00	0.00	0.00	0.00
<u>175</u>	051-390-003	3313 Jessica Court	94509	Vacant	0.13	0.00	0.00	0.00	0.00	0.00
<u>176</u>	051-390-002	3317 Jessica Court	94509	Vacant	0.14	0.00	0.00	0.00	0.00	0.00
<u>177</u>	051-390-001	3321 Jessica Court	94509	Nonvacant	0.76	0.00	0.00	0.00	0.00	0.00
<u>178</u>	051-390-016	3325 Jessica Court	94509	Vacant	0.17	0.00	0.00	0.00	0.00	0.00
<u>179</u>	051-390-011	3329 Jessica Court	94509	Vacant	0.17	0.00	0.00	0.00	0.00	0.00
<u>180</u>	051-390-010	3333 Jessica Court	94509	Vacant	0.16	0.00	0.00	0.00	0.00	0.00
<u>181</u>	051-390-009	3345 Oakley Road	94509	Vacant	0.20	0.00	0.00	0.00	0.00	0.00
<u>182</u>	--	Jessica Court Roundabout	94509	Vacant	0.63	0.00	0.00	0.00	0.00	0.00
<u>183</u>	<u>056-120-098</u>	<u>Empire Avenue</u>	<u>94509</u>	<u>Vacant</u>	<u>6.40</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>134.00</u>	<u>134.00</u>
<u>184*</u>	<u>053-060-063</u>	<u>Laurel Road</u>	<u>94509</u>	<u>Vacant</u>	<u>10.2</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>216.00</u>	<u>216.00</u>

<sup>a</sup> Some Housing Inventory Sites show a development potential of "0" because they do not meet the size requirements by HCD. As such, they're included in the Housing Inventory Sites as potentially re-developable but are not counted towards the City's RHNA obligation requirements. The City's RHNA obligation is met through the other listed sites.

\*Housing Sites No. 113-115 and 184 are planned for consolidated development of 216 above moderate-income units. Units are listed solely on Site No. 184 within this table.

Source: City of Antioch and Urban Planning Partners, 2022.

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-22, Figure III-5, of the Draft EIR is revised as follows:*

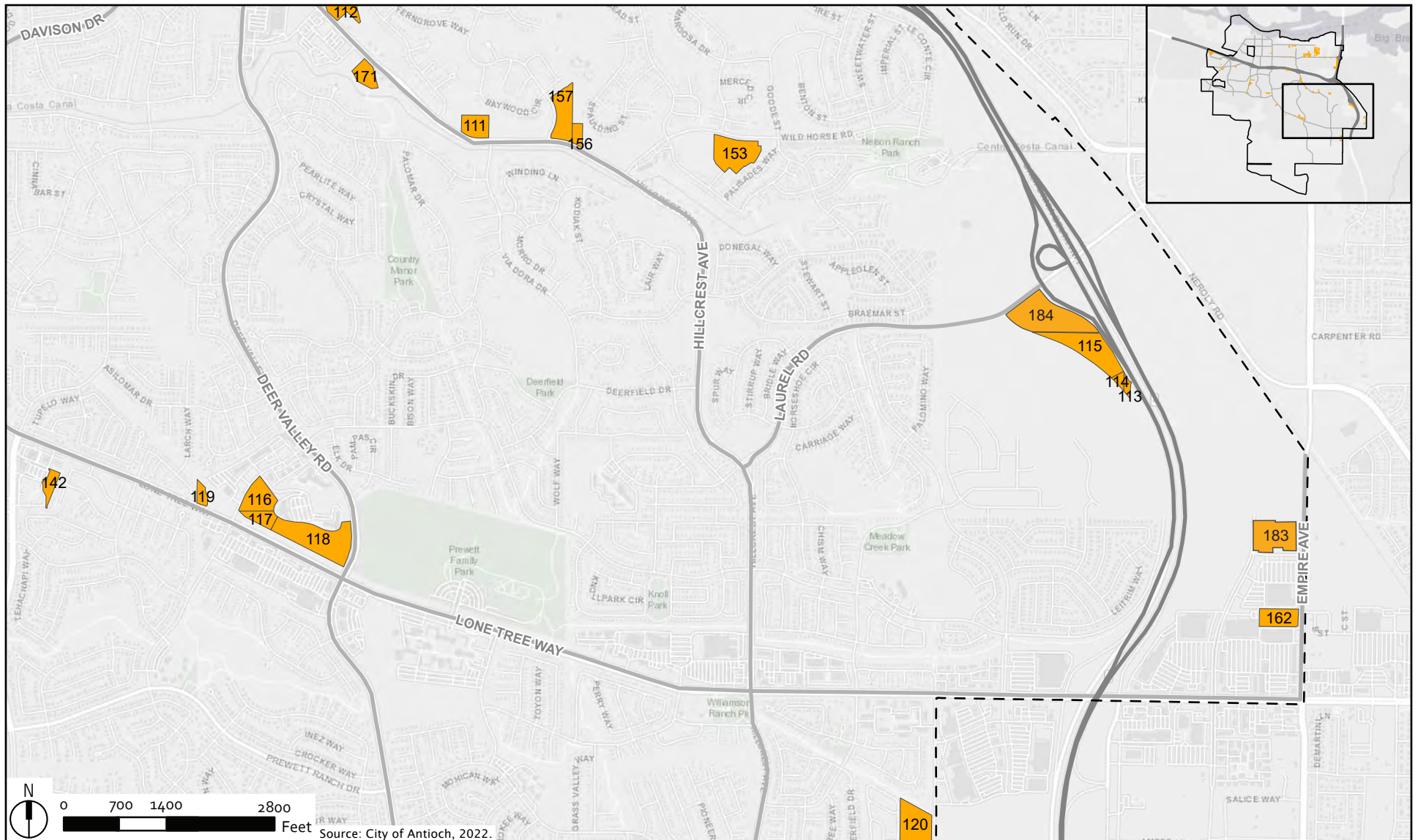


- City Boundary
- Highways
- Major Roads
- Housing Sites

Figure III-5  
Housing Element Sites Inventory

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-26, Figure III-9, of the Draft EIR is revised as follows:*





- City Boundary
- Highways
- Major Roads
- Housing Sites

Figure III-9  
Housing Element Sites Inventory: Detail 4

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-29, Figure III-12, of the Draft EIR is revised as follows:*

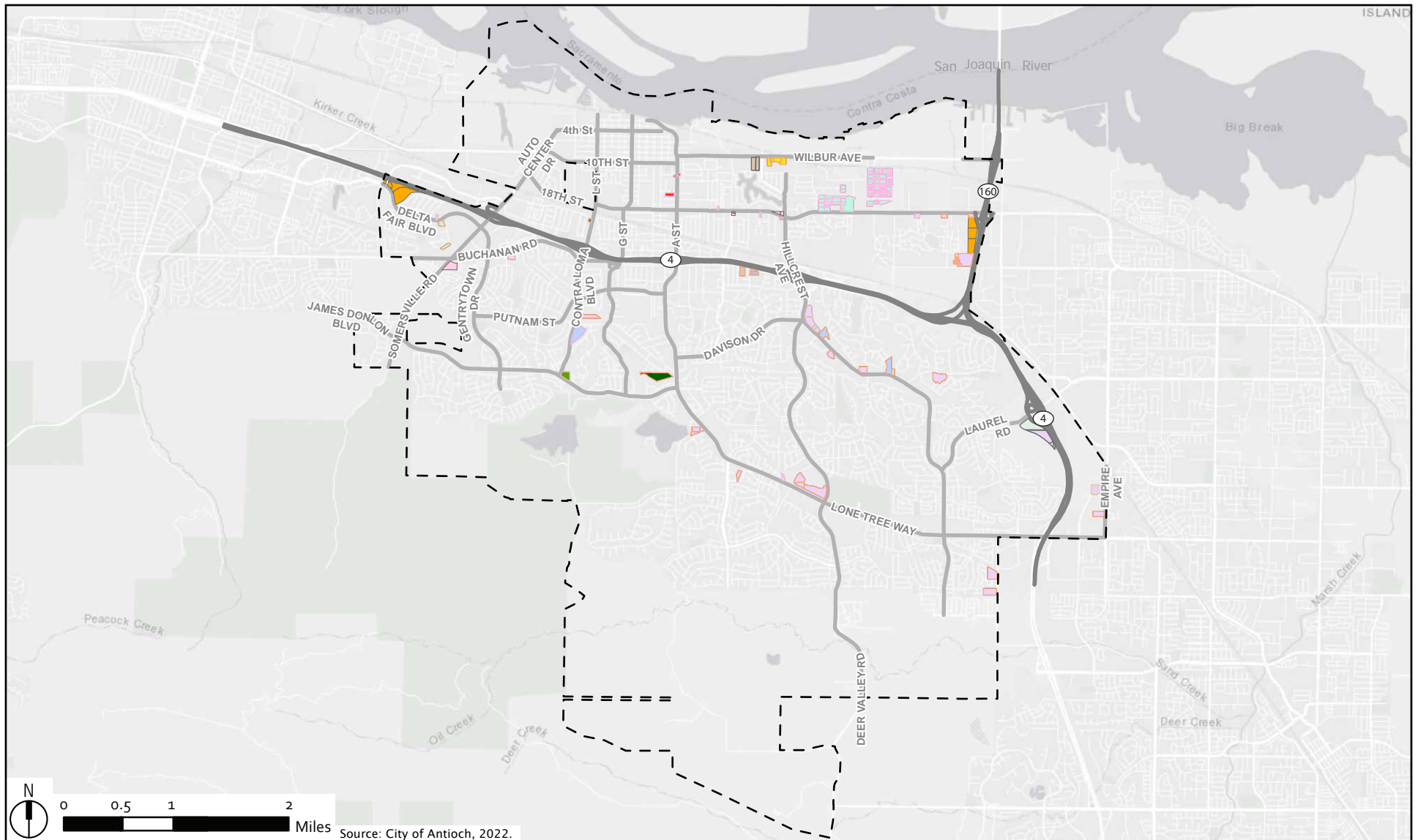


Figure III-12  
Sites Inventory Existing and Proposed Zoning

To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-30, Table III-5, of the Draft EIR is revised as follows:

**TABLE III-5 SITES FOR REZONING**

APN	Address	Acreage	Current General Plan	Proposed General Plan	Current Zoning	Current Max. Density (du/ac)	Proposed Zoning
	Multiple Sites in Viera & Trembath Areas	68.9	Medium Low Density Residential and Medium-Density Residential	Medium-Density Residential	S	--	R-20
051-200-076	Holub Ln & E 18 <sup>th</sup> St	1.08	Convenience Commercial	High-Density Residential	P-D	--	R-35
051-230-028	3200 E 18 <sup>th</sup> St	1.286	Eastern Waterfront Employment Focus Area - Business Park	High-Density Residential	P-D	--	R-35
051-400-027	Wilson St & E 18 <sup>th</sup> St	1.204	Eastern Waterfront Employment Focus Area - Business Park	Medium-Density Residential	P-D	--	R-20
052-042-044	3901 Hillcrest Ave	1.62	Open Space	High-Density Residential	P-D	6	R-35
052-342-010	Wildflower Dr & Hillcrest Ave	3.77	Low Density Residential	High-Density Residential	R-6		R-35
<del>053-060-055</del>	<del>Neroly Rd &amp; Country Hills Dr</del>	<del>0.525</del>	<del>East Lone Tree Specific Plan Focus Area</del>	<del>High-Density Residential</del>	<del>S-P</del>		<del>R-35</del>
<del>053-060-056</del>	<del>Neroly Rd &amp; Country Hills Dr</del>	<del>0.606</del>	<del>East Lone Tree Specific Plan Focus Area</del>	<del>High-Density Residential</del>	<del>S-P</del>		<del>R-35</del>
<del>053-060-057</del>	<del>Neroly Rd &amp; Country Hills Dr</del>	<del>7.219</del>	<del>East Lone Tree Specific Plan Focus Area</del>	<del>High-Density Residential</del>	<del>S-P</del>	--	<del>R-35</del>
055-071-106	Lone Tree Way & Country Hills Dr	3.628	Business Park	High-Density Residential	P-D	--	R-35
055-071-107	Lone Tree Way & Country Hills Dr	2.322	Business Park	High-Density Residential	P-D	--	R-35
055-071-108	Lone Tree Way & Deer Valley Rd	9.54	Business Park	High-Density Residential	P-D	--	R-35
055-071-113	Lone Tree Way & Country Hills Dr	0.96	Business Park	Medium-Density Residential	P-D	--	R-20
056-130-014	5200 Heidorn Ranch Rd	1.95	Medium Low Density Residential	High-Density Residential	P-D	--	R-35
056-130-011	5320 Heidorn Ranch Rd	5.04	Medium Low Density Residential	High-Density Residential	P-D	--	R-35
065-071-020	1205 A St	0.31	A Street Interchange Focus Area - Residential	Medium-Density Residential	C-0	25	R-20

**TABLE III-5 SITES FOR REZONING**

APN	Address	Acreage	Current General Plan	Proposed General Plan	Current Zoning	Current Max. Density (du/ac)	Proposed Zoning
<del>065-110-006</del>	<del>810 Wilbur Ave</del>	<del>2.86</del>	<del>High-Density Residential</del>	<del>High-Density Residential</del>	<del>R-30</del>	<del>25</del>	<del>R-35</del>
065-110-007	701 Wilbur Ave	2.5	High-Density Residential	High-Density Residential	R-30	0	R-35
065-161-025	301 E 18 <sup>th</sup> St	0.31	Medium Low Density Residential	Medium-Density Residential	C-0	0	R-20
067-093-022	A St & Park Ln	0.32	A Street Interchange Focus Area – Commercial and Residential	Medium-Density Residential	C-0	0	R-20
067-103-017	A St	1.774	A Street Interchange Focus Area – Commercial and Residential	Medium-Density Residential	C-0	0	R-20
068-082-057	Terrace Dr & E 18 <sup>th</sup> St	0.659	Neighborhood Community Commercial	Medium-Density Residential	C-2	6	R-20
068-252-041	2721 Windsor Dr	1.57	Medium Low Density Residential	High-Density Residential	R-6	6	R-35
068-252-042	Windsor Dr & Iglesia Ct	0	Medium Low Density Residential	High-Density Residential	R-6	6	R-35
068-252-043	Windsor Dr & Iglesia Ct	0	Medium Low Density Residential	High-Density Residential	R-6	6	R-35
068-252-045	2709 Windsor Dr	0	Medium Low Density Residential	High-Density Residential	R-6	6	R-35
071-370-026	3351 Contra Loma Blvd	1	Public/Institutional	Medium-Density Residential	R-6	--	R-20
072-400-036	Cache Peak Dr & Golf Course Rd	2.01	Convenience Commercial	High-Density Residential	P-D	--	R-35
072-400-039	4655 Golf Course Rd	2	Convenience Commercial	High-Density Residential	P-D	--	R-35
072-400-040	Cache Peak Dr & Golf Course Rd	0.212	Convenience Commercial	High-Density Residential	P-D	--	R-35
072-450-013	Dallas Ranch Rd	1.5	Office	High-Density Residential	P-D	0	R-35
074-122-016	Delta Fair Blvd	0.6	Western Antioch Commercial Focus Area – Regional Commercial	Medium-Density Residential	C-3	0	R-20
074-123-004	Delta Fair Blvd & Fairview Dr	1.75	Western Antioch Commercial Focus Area – Regional Commercial	High-Density Residential	C-3	0	R-35
074-123-005	Fairview Dr	1.45	Western Antioch Commercial Focus Area – Regional Commercial	High-Density Residential	C-3	0	R-35

**TABLE III-5 SITES FOR REZONING**

APN	Address	Acreage	Current General Plan	Proposed General Plan	Current Zoning	Current Max. Density (du/ac)	Proposed Zoning
074-343-034	2100 L St	1.5	Convenience Commercial	Medium-Density Residential	C-1	0	R-20
075-460-001	James Donlon Blvd & Contra Loma Blvd	3.13	Office	High-Density Residential	C-1	--	<del>R-30</del> <u>R-25</u>
052-061-053	4325 Berryessa Ct	5	Low Density Residential	High-Density Residential	P-D	20	R-35
071-130-026	3195 Contra Loma Blvd	2.9	High-Density Residential	High-Density Residential	R-20	25	R-35
068-251-012	620 E Tregallas Rd	0.86	High-Density Residential	High-Density Residential	R-30	--	R-35
052-061-014	4215 Hillcrest Ave	0.998	Open Space	High-Density Residential	S	6	R-35
052-042-037	4201 Hillcrest Ave	4.39	Open Space	High-Density Residential	R-6	--	R-35
052-140-013	Wildflower Dr	4.18	Mixed Use	High-Density Residential	P-D	--	<del>R-30</del> <u>R-25</u>
052-140-014	Wildflower Dr	3.95	Mixed Use	High-Density Residential	P-D	--	<del>R-30</del> <u>R-25</u>
052-140-015	Wildflower Dr	0.91	Mixed Use	High-Density Residential	P-D	--	<del>R-30</del> <u>R-25</u>
052-140-016	Wildflower Dr	1.31	Mixed Use	High-Density Residential	P-D	--	<del>R-30</del> <u>R-25</u>
056-120-096	2721 Empire Ave	3.3	East Lone Tree Focus Area	High-Density Residential	P-D	--	R-35
072-011-052	3950 Lone Tree Way	4.2	Medium-Density Residential	High-Density Residential	P-D/S-H	--	R-35
051-200-065	3415 Oakley Rd	4	Public/Institutional	High-Density Residential	P-D	6	R-35
068-091-043	1018 E 18 <sup>th</sup> St	0.84	Neighborhood Community Commercial	High-Density Residential	R-6	--	R-35
076-231-007	1919 Buchanan Rd	1.5	Public/Institutional	High-Density Residential	P-D	0	R-35
065-122-023	Apollo Ct	1.6	Eastern Waterfront Employment Focus Area	High-Density Residential	PBC/Cannabis Overlay	0	R-35
061-122-029	Apollo Ct	1.7	Eastern Waterfront Employment Focus Area	High-Density Residential	PBC/Cannabis Overlay	0	R-35

**TABLE III-5 SITES FOR REZONING**

APN	Address	Acreage	Current General Plan	Proposed General Plan	Current Zoning	Current Max. Density (du/ac)	Proposed Zoning
061-122-030	Apollo Ct	2.1	Eastern Waterfront Employment Focus Area	High-Density Residential	PBC/ Cannabis Overlay	0	R-35
061-122-028	Apollo Ct	0.6	Eastern Waterfront Employment Focus Area	High-Density Residential	PBC/ Cannabis Overlay	--	R-35
052-370-009	Hillcrest Ave	2.13	Office	High-Density Residential	P-D	--	R-35
051-390-006, 051-390-005, 051-390-004, 051-390-003, 051-390-002, 051-390-001, 051-390-016, 051-390-011, 051-390-010, 051-390-009	3301-3333 Jessica Ct & 3345 Oakley Rd	2.98	Medium-Density Residential	High-Density Residential	P-D	--	R-35
076-010-039	Somersville Rd & Buchanan Rd	4.77	Western Antioch Commercial Focus Area – Regional Commercial	Medium-Density Residential	R-20	20	No Change <sup>a</sup>
<u>056-120-098</u>	<u>Empire Ave</u>	<u>6.4</u>	<u>East Lone Tree – Regional Retail</u>		<u>P-D</u>	<u>NA</u>	<u>R-25</u>

Notes: Rezoning of these sites will take place prior to January 31, 2023.

<sup>a</sup> This parcel currently has a mismatch between its General Plan designation and zoning. The zoning is not proposed to change but cleanup is needed to make the General Plan consistent with the zoning.  
Source: City of Antioch, 2022.

To reflect revisions to the Project's Housing Sites Inventory to the Project Alternatives, page III-36, Table III-7, of the Draft EIR is revised as follows:

**TABLE III-7 SITES IN FOCUSED PLANNING AREAS**

Map Number	APN	Site Address/Intersection	Zip Code	Parcel Size	Existing General Plan	Existing Zoning	Proposed Zoning
109	051-230-028	3200 E 18 <sup>th</sup> St	94509	1.286	Eastern Waterfront Employment Focus Area - Business Park	P-D	R-35
110	051-400-027	Wilson St & E 18 <sup>th</sup> St	94509	1.204	Eastern Waterfront Employment Focus Area - Business Park	P-D	R-20
113	053-060-055	Neroly Rd & Country Hills Dr	94509	0.525	East Lone Tree Specific Plan Focus Area	S-P	R-35
114	053-060-056	Neroly Rd & Country Hills Dr	94509	0.606	East Lone Tree Specific Plan Focus Area	S-P	R-35
115	053-060-057	Neroly Rd & Country Hills Dr	94509	7.219	East Lone Tree Specific Plan Focus Area	S-P	R-35
122	065-071-020	1205 A St	94509	0.31	A Street Interchange Focus Area - Residential	C-O	R-20
128	067-093-022	A St & Park Ln	94509	0.32	A Street Interchange Focus Area - Commercial and Residential	C-O	R-20
129	067-103-017	A St	94509	1.774	A Street Interchange Focus Area - Commercial and Residential	C-O	R-20
147	074-122-016	Delta Fair Blvd	94509	0.6	Western Antioch Commercial Focus Area - Regional Commercial	C-3	R-20
148	074-123-004	Delta Fair Blvd & Fairview Dr	94509	1.75	Western Antioch Commercial Focus Area - Regional Commercial	C-3	R-35
149	074-123-005	Fairview Dr	94509	1.45	Western Antioch Commercial Focus Area - Regional Commercial	C-3	R-35
152	076-010-039	Somersville Rd & Buchanan Rd	94509	4.77	Western Antioch Commercial Focus Area - Regional Commercial	R-20	--
162	056-120-096	2721 Empire Ave	94513	3.3	East Lone Tree Focus Area	P-D	R-35
167	065-122-023	Apollo Ct.	94509	1.6	Eastern Waterfront Employment Focus Area - Business Park	PBC/Cannabis Overlay	R-35
168	061-122-029	Apollo Ct	94509	1.7	Eastern Waterfront Employment Focus Area - Business Park	PBC/Cannabis Overlay	R-35
169	061-122-030	Apollo Ct	94509	2.1	Eastern Waterfront Employment Focus Area - Business Park	PBC/Cannabis Overlay	R-35
170	061-122-028	Apollo Ct	94509	0.6	Eastern Waterfront Employment Focus Area - Business Park	PBC/Cannabis Overlay	R-35
<u>183</u>	<u>056-120-098</u>	<u>Empire Ave</u>	<u>94509</u>	<u>6.4</u>	<u>East Lone Tree - Regional Retail</u>	<u>P-D</u>	<u>R-25</u>



**TABLE III-7      SITES IN FOCUSED PLANNING AREAS**

<b>Map Number</b>	<b>APN</b>	<b>Site Address/Intersection</b>	<b>Zip Code</b>	<b>Parcel Size</b>	<b>Existing General Plan</b>	<b>Existing Zoning</b>	<b>Proposed Zoning</b>
<u>184</u>	<u>053-060-063</u>	<u>Laurel Road</u>	<u>94509</u>	<u>10.2</u>	<u>East Lone Tree – Residential Open Space</u>	<u>P-D</u>	<u>=</u>
<b>Total</b>				<del>31.11</del> <u>47.71</u>			

Source: City of Antioch and Urban Planning Partners, 2022.

*To reflect revisions to the Project's Housing Sites Inventory, the Project Description, page III-37, Figure III-13, of the Draft EIR is revised as follows:*

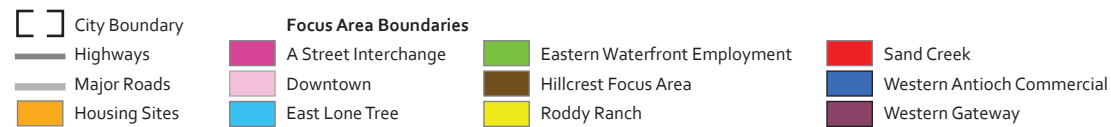
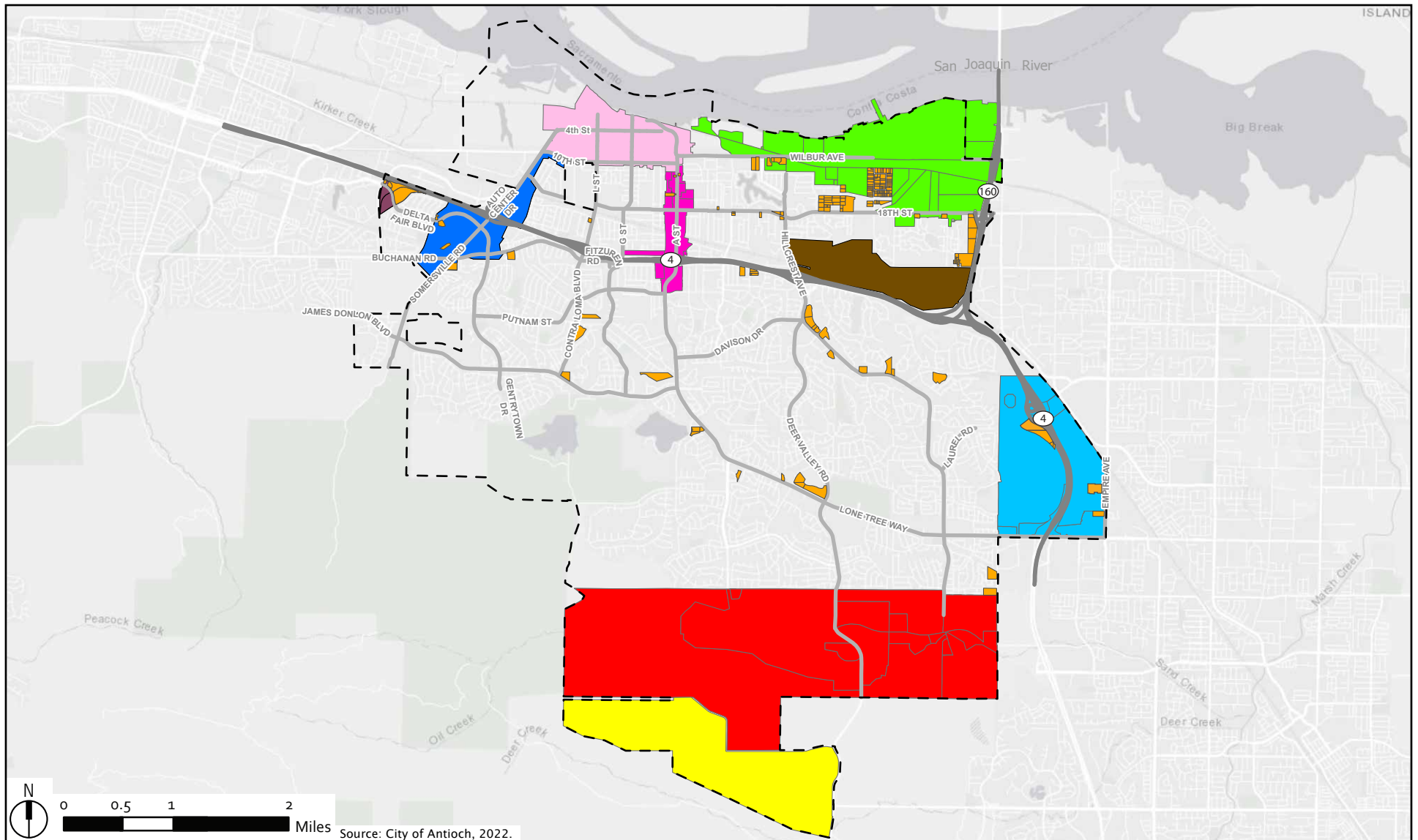


Figure III-13  
Sites in Focused Planning Areas

## C. REVISIONS TO LAND USE AND PLANNING

*To reflect revisions to the Project's Housing Sites Inventory, Land Use and Planning, page IV.A-30, second paragraph under heading (1), of the Draft EIR is revised as follows:*

Implementation of the Project would include the rezoning of ~~169~~ 166 sites to allow residential development or more intense residential development. ....

*To reflect revisions to the Project's Housing Sites Inventory, Land Use and Planning, page IV.A-31, first paragraph under heading (1), of the Draft EIR is revised as follows:*

... The Project is a policy and planning document that, if adopted, would identify ~~182~~ 184 sites in the city, rezoning ~~169~~ 166 of them, for future development with market-rate and affordable housing. ...

*To reflect revisions to the Project's Housing Sites Inventory, Land Use and Planning, page IV.A-32, last bullet and following paragraph, of the Draft EIR is revised as follows:*

- Rezoning approximately ~~378~~ parcels zoned Planned Development (P-D) or Specific Plan (S-P) to allow higher-density residential development.

The Project would include the rezoning of ~~169~~ 166 parcels to residential districts or to higher-density residential districts. ....

*To reflect revisions to the Project's Housing Sites Inventory, Land Use and Planning, page IV.A-36, first full paragraph, of the Draft EIR is revised as follows:*

The Project has been developed specifically to pave the way for the city to meet its RHNA obligation as assigned to it by ABAG. In fact, the proposed Housing Element demonstrates that the city has capacity to accommodate ~~4,575~~ 4,881 housing units, which is ~~1,559~~ 1,865 housing units beyond its RHNA obligation of 3,016 housing units, a buffer of approximately ~~52~~ 62 percent. The Project is inherently consistent with RHNA, as explained above, and is consistent with Plan Bay Area 2050.

## D. REVISIONS TO TRANSPORTATION

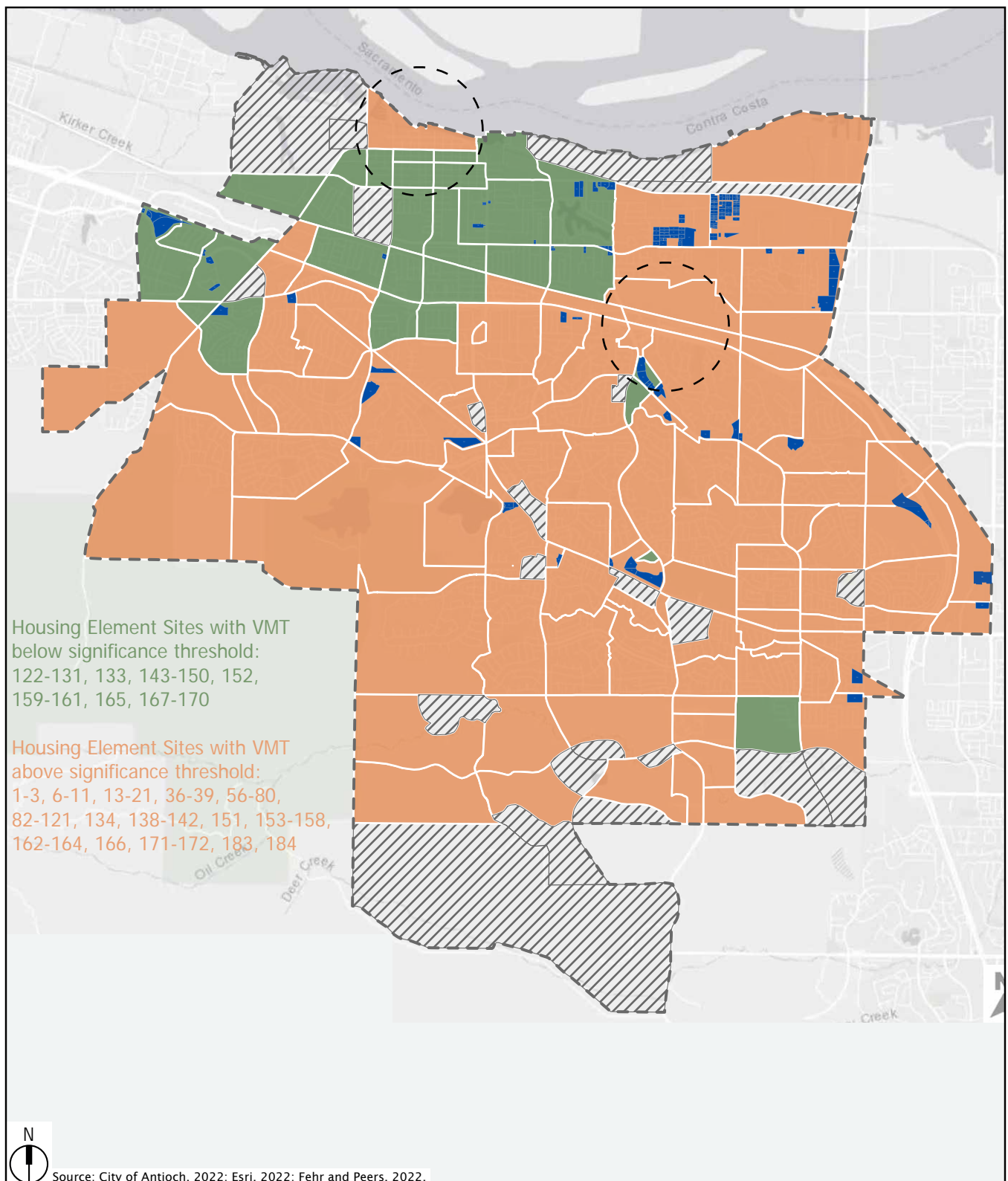
*To reflect revisions to the Project's Housing Sites Inventory, Transportation, page IV.B-26, second full paragraph of the Draft EIR is revised as follows:*

.... Under the 2020 Baseline Plus Project Conditions, the Project would result in the development of ~~4,575~~ 4,881 multi-family units within the associated sites. ....

*To reflect revisions to the Project's Housing Sites Inventory, Transportation, page IV.B-27, third paragraph of the Draft EIR is revised as follows:*

Figure IV.B-6 and Figure IV.B-7 present the VMT results by site and TAZ for 2020 Plus Project and 2040 Plus Project, respectively. As shown on these figures, most sites—~~106~~ 108 out of the 135 HE sites with proposed capacity greater than zero—are located in TAZs with a home-based VMT per resident that is above the significance threshold.

*To reflect revisions to the Project's Housing Sites Inventory, Transportation, page IV.B-28, Figure IV.B-6, of the Draft EIR is revised as follows:*









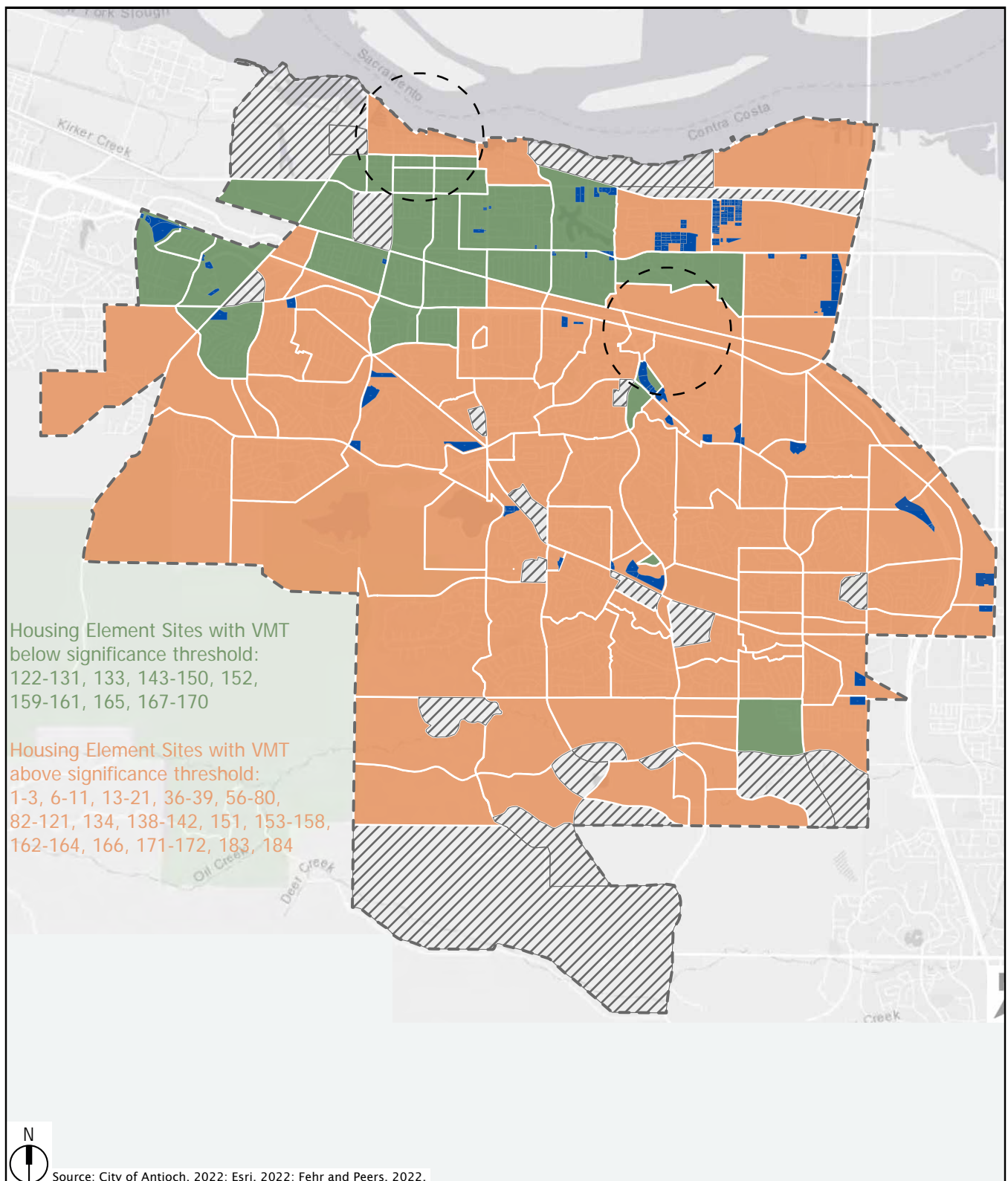
-  City Boundary
-  Transit Priority Area 0.5-mile radius
-  Housing Element Sites
-  TAZs with no Residents
-  TAZ Below Home-Based VMT Threshold
-  TAZ Above Home-Based VMT Threshold

Figure IV.B-6  
Housing Element Home-Based VMT (2020)

*To reflect revisions to the Project's Housing Sites Inventory, Transportation, IV.B-29, Figure IV.B-7, of the Draft EIR is revised as follows:*











-  City Boundary
-  Transit Priority Area 0.5-mile radius
-  Housing Element Sites
-  TAZs with no Residents
-  TAZ Below Home-Based VMT Threshold
-  TAZ Above Home-Based VMT Threshold

Figure IV.B-7  
Housing Element Home-Based VMT (2040)

## E. REVISIONS TO AIR QUALITY

*To reflect revisions to the Project's Housing Sites Inventory, Air Quality, page IV.C-19, paragraph 1 of the Draft EIR is revised as follows:*

According to the Housing Inventory Sites, there are about ~~123~~ sites where construction of single-family housing could exceed 114 units and about three sites where construction of multi-family housing could exceed 240 units.

*To reflect revisions to the Project's Housing Sites Inventory, Air Quality, page IV.C-7, Figure IV.C-1, of the Draft EIR is revised as follows:*

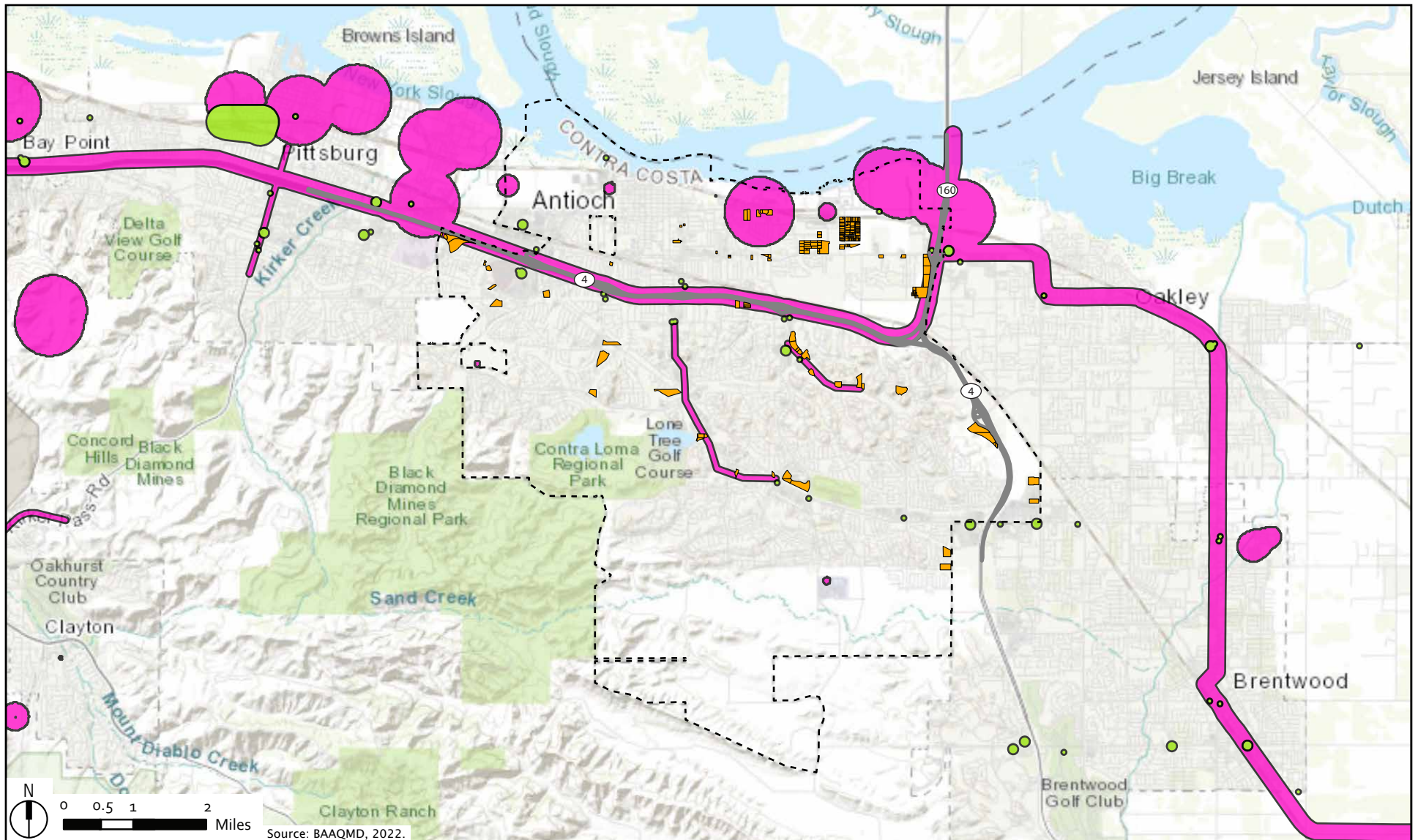


Figure IV.C-1  
Localized Areas of Elevated Air Pollution

## F. REVISIONS TO GREENHOUSE GAS EMISSIONS

*To reflect revisions to the Environmental Hazards Element, page IV.D-16, of the Draft EIR is revised as follows:*

Policy 11.7.2 (c): Climate Action Design Elements. Require new residential, commercial, and retail land use developments to demonstrate compliance with the Bay Area Air Management District's recommended design elements to support long-term climate action goals, as feasible or modify the city's climate action plans to meet the criteria under State CEQA Guidelines Section 15183.5(b) and identify community-wide measures that can be implemented to achieve the statewide GHG emissions targets of 40 percent below 1990 levels by 2030 and support the State's goal of achieving carbon neutrality by 2045. The updated climate action plans should include a checklist to help future development projects demonstrate how they will support long-term climate action goals. The GHG reduction measures identified in the updated climate action plans would supersede the Bay Area Air Management District's recommended design elements described below:

- The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
- Achieve a reduction in project-generated vehicle miles travelled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
  - Residential projects: 15 percent below the existing VMT per capita.
  - Office projects: 15 percent below the existing VMT per employee.
  - Retail projects: no net increase in existing VMT.
- Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

*To reflect revisions to the Environmental Hazards Element, page IV.D-17, of the Draft EIR is revised as follows:*

~~Policy 11.7.2 (d): Climate Action Plans. Consider updating the City's climate action plans to meet the criteria under State CEQA Guidelines Section 15183.5(b) and identify community-wide measures that can be implemented to achieve the statewide GHG emissions targets of 40 percent below 1990 levels by 2030 and support the State's goal of achieving carbon neutrality by 2045. The updated climate action plans should include a checklist to help future development projects demonstrate how they will support long-term climate action goals. The GHG reduction measures identified in the updated climate action plans would supersede the Bay Area Air Management District's recommended design elements described in Policy 11.7.2 (c).~~

*To reflect revisions to the Environmental Hazards Element, page IV.D-17, of the Draft EIR is revised as follows:*

Policy 11.7.2 (ed): Climate Action and Resilience Plan. Require new development to incorporate strategies identified in the City's current Climate Action and Resilience Plan to increase community resiliency to increasing natural hazard events associated with climate change, such as flooding, drought, and extreme heat.

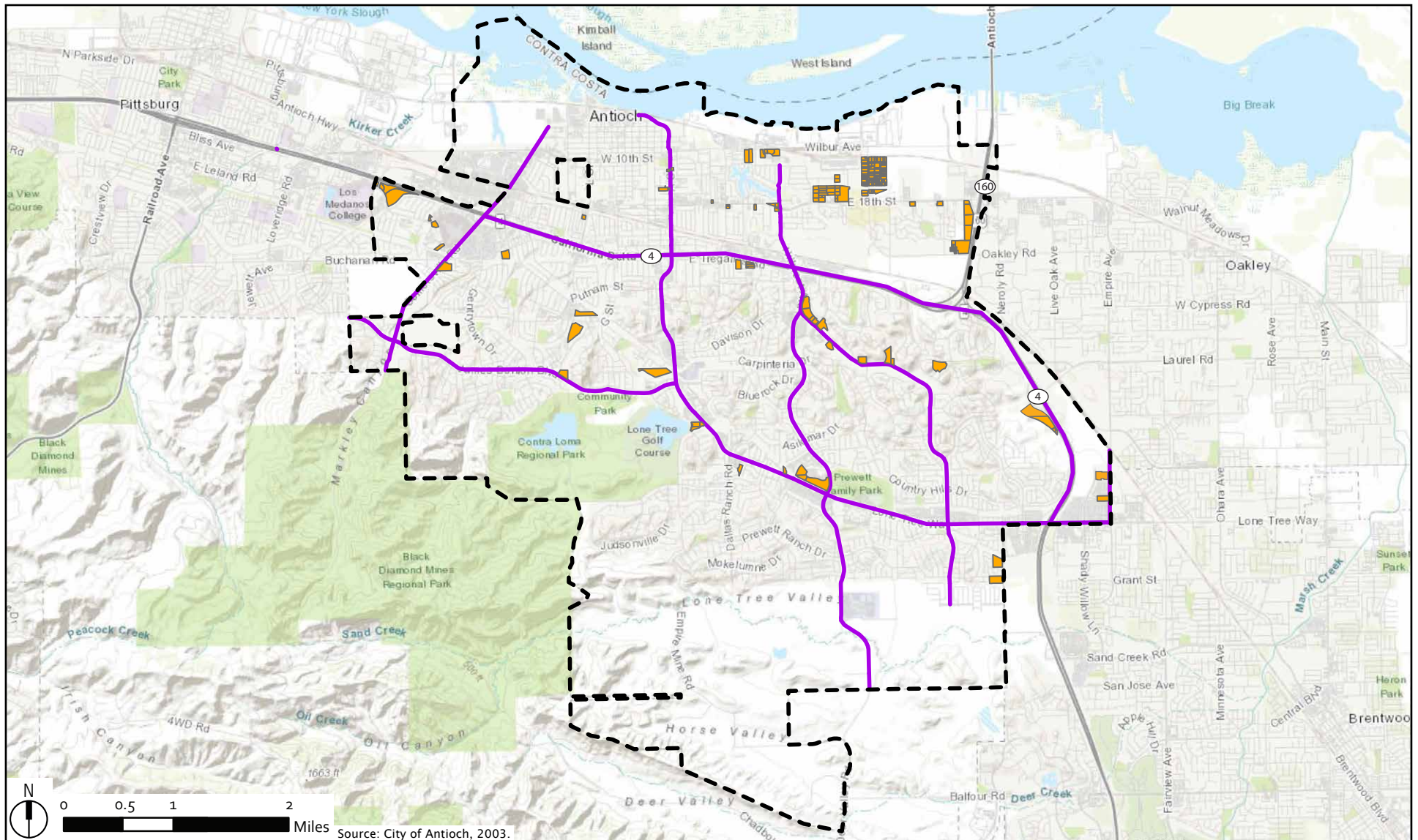
*To reflect revisions to the Environmental Hazards Element, page IV.D-17, of the Draft EIR is revised as follows:*

The 2017 Climate Change Scoping Plan identifies numerous regulations and programs the State will use to achieve its 2030 climate action goal, and substantially advance toward its 2050 climate action goal. As discussed above, implementation of updated General Plan Policies 11.7.2 (c) ~~and 11.7.2 (d)~~ would ensure that future development under the Project supports the State's long-term climate action goals. In addition, implementation of updated General Plan Policy 11.7.2 (e~~d~~) and existing Policies 7.4.2, 10.6.2, 10.7.2, 10.8.2, and Housing Element Policy 4.1 would help to reduce GHG emissions associated with transportation, energy use, and water use. As a result, future development under the Project would be consistent with, and would not hinder, the 2017 Scoping Plan and associated regulations and programs to achieve statewide climate action goals. The Project would have a less-than-significant impact on applicable plans and regulations adopted for the purposes of reducing the emissions of GHGs.

## **G. REVISIONS TO AESTHETICS**

*To reflect revisions to the Project's Housing Sites Inventory, Aesthetics, page IV.G-23, Figure IV.G-1 of the Draft EIR is revised as follows:*





- City Boundary
- Housing Sites
- View Corridor

Figure IV.G-1  
City of Antioch View Corridors

## H. REVISIONS TO POPULATION AND HOUSING

*To reflect revisions to the Project's Housing Sites Inventory, Population and Housing, page IV.M-10, Figure IV.M-1, of the Draft EIR is revised as follows:*



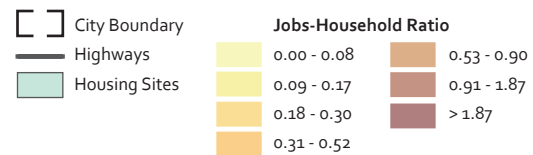
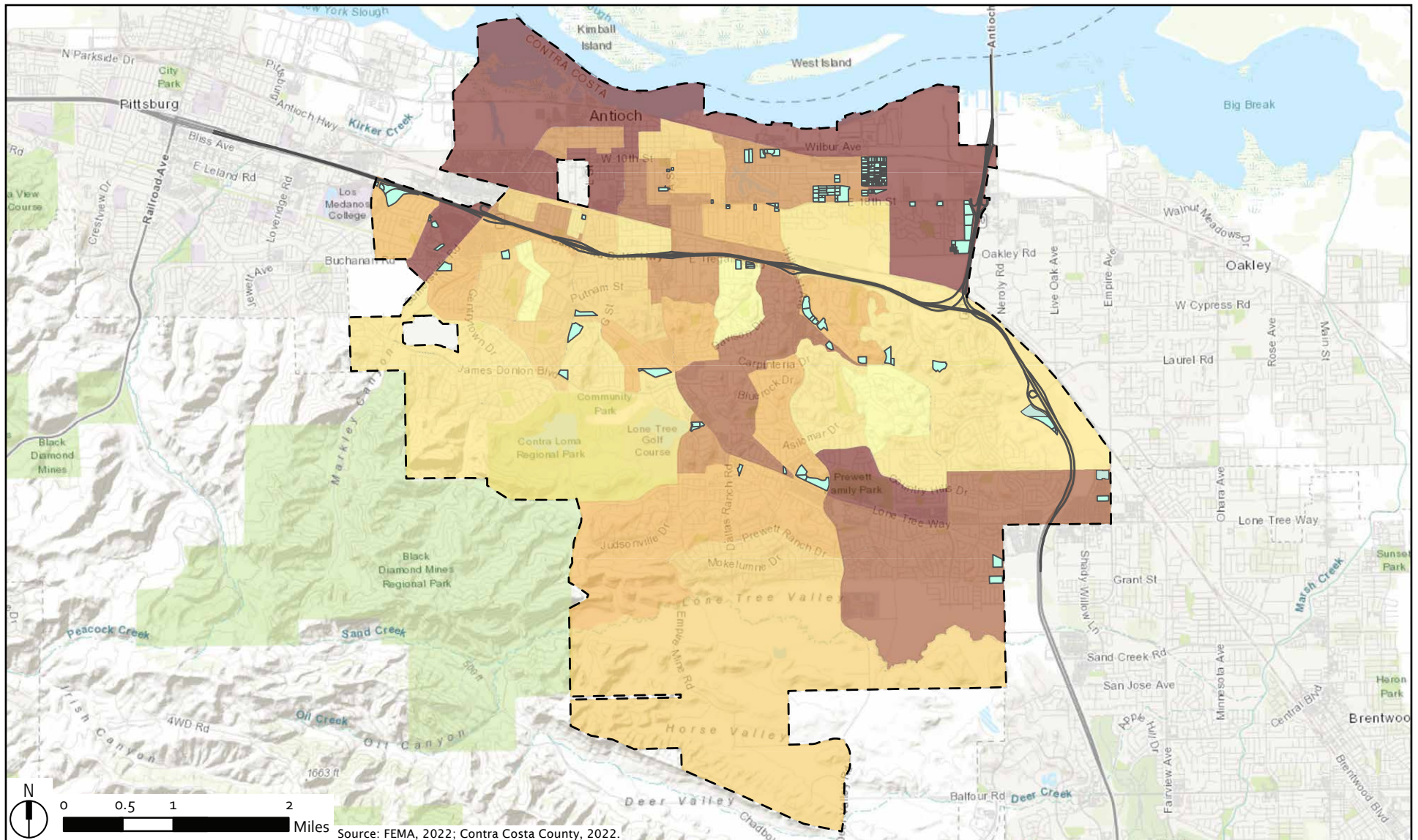


Figure IV.M-1  
Antioch Jobs-Household Ratio



*To reflect revisions to the Project's Housing Sites Inventory, Population and Housing, page IV.M-15, text under heading (1), of the Draft EIR is revised as follows:*

Implementation of the proposed Housing Element could result in the creation of ~~4,575~~ 4,881 new housing units in Antioch by 2031 or later if all of the ~~182~~ 184 identified Sites Inventory were developed at the maximum allowable density. Although Antioch's RHNA share for the 2023-2031 6<sup>th</sup> Cycle Housing Element Update is 3,016 housing units, the HCD recommends that each jurisdiction provides a buffer of at least 15 to 30 percent above the capacity required by the RHNA. The capacity provided by Antioch's proposed Sites Inventory at maximum density would provide an approximately ~~52~~ 62-percent buffer above the 6<sup>th</sup> Cycle RHNA.

The Project would include rezoning of ~~169~~ 166 of the sites to allow residential development or more intense residential development, and comparable General Plan and Specific Plan amendments would be required to make the land use designations of the sites consistent with the zoning. The physical environmental effects of these rezonings and the greater density of development that could result are addressed in other topical sections of this EIR, including those addressing air quality, biological resources, greenhouse gases, transportation, and utilities. The Project would accommodate residential growth and associated population growth in accordance with the City's policies for location, type, and intensity of residential development, as set forth in the Housing Element, Land Use Element, and applicable Specific Plans.

It's unrealistic to assume that all housing site parcels identified in the Housing Element would be developed and that they would all be developed at the maximum allowable density, so the actual number of housing units that will be developed as a result of the Project is undoubtedly below ~~4,575~~ 4,881 units. While the Housing Element encourages the development of new housing, the actual construction of new units will be driven by market forces, the motivation of property owners, subsidies for affordable housing, and other factors outside the control of the City. Nonetheless, this theoretically possible number of ~~4,575~~ 4,881 new housing units is used as a basis for estimating the effect this could have on Antioch's population.

Based on the DOF data, Antioch has an average household size of 3.22 persons.<sup>29</sup> Applying this average, development of ~~4,575~~ 4,881 new housing units would increase the population in Antioch by approximately ~~14,732~~ 15,717 people. ...

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<sup>29</sup> California Department of Finance (DOF), 2021. E-5 City/County Population and Housing Estimates, April 1.

*To reflect revisions to the Project's Housing Sites Inventory, Population and Housing, page IV.M-16, first full paragraph, of the Draft EIR is revised as follows:*

With respect to household size, the growth forecasts presented in Plan Bay Area 2050 were developed using the Bay Area UrbanSim 2 Land Use Model. The model, which synthesizes U.S. Census data, developed a region-wide average household size of 2.7 persons per household. Applying this average, development of ~~4,575~~ 4,881 new housing units would increase the population in Antioch by approximately ~~12,352~~ 13,179 people.

The proposed Housing Element is intended to accommodate anticipated growth and facilitate the development of new housing to meet the City's RHNA obligation share determined by ABAG for the 2023-2031 planning period. As such, the population growth engendered by the creation of up to ~~4,575~~ 4,881 new housing units would not be unplanned; to the contrary, it is specifically being planned for, with suitable sites for development identified and evaluated. The Project would be consistent with the General Plan, including the Housing Element, and applicable specific plans, as amended by the Project. The population growth would also be consistent with Plan Bay Area 2050, a regional plan intended to guide the regional population growth anticipated by 2050. Consequently, the Project would not induce substantial unplanned population growth. This would be a less-than-significant impact.

*To reflect revisions to the Project's Housing Sites Inventory, Population and Housing, page IV.M-16, first paragraph under heading (2), of the Draft EIR is revised as follows:*

A substantial number—125 parcels—of the ~~182~~ 184 Sites Inventory identified in the proposed Housing Element are currently nonvacant and support some degree of existing land use, which in most cases is a single-family home. All of the nonvacant parcels are considered underutilized and good candidates for redevelopment.

## I. REVISIONS TO PUBLIC SERVICES

*To reflect revisions to the Project's Housing Sites Inventory, Public Services, page IV.N-17, first paragraph under heading (1), of the Draft EIR is revised as follows:*

The increase in development intensity and overall density in the city would result in an increase in demand for fire protection and emergency services. The Project would provide for the development of up ~~4,575~~ 4,881 new residential units, resulting in an estimated increase of ~~14,732~~ 15,717 new residents in the city of Antioch (see *Section IV.M, Population and Housing*, for more detail). With buildout of potential residential units, the population of the city would grow by about ~~12.7~~ 13.6 percent, from 115,327 residents in 2020 to ~~130,059~~ 131,044 residents at full buildout.

*To reflect revisions to the Project's Housing Sites Inventory, Public Services, page IV.N-18, first paragraph of the Draft EIR is revised as follows:*

Assuming the max capacity of units the Project is planning for at ~~4,575 units~~ 4,881, According to APD, they would require 15 new officers, 1 new dispatcher, and 1 community service officer in order to maintain appropriate response times. Additional facilities would be required to accommodate the growth in APD's services.

*To reflect revisions to the Project's Housing Sites Inventory, Public Services, page IV.N-19, first paragraph of the Draft EIR is revised as follows:*

As stated previously, implementation of the Housing Element Update could result in an additional ~~4,575~~ 4,881 housing units in the city. This increase of new housing units would result in a potential population increase in the city of up to ~~14,732~~ 15,717 persons when compared to 2020 population estimates. With the anticipated development under the Project, there would be an increase in the number of school-aged children that would reside in the city, potentially triggering the need for additional public school facilities. Based on the existing student generation factors, the Housing Element Update could result in an additional ~~2,007~~ 2,141 students to be enrolled in Antioch Unified School District schools.

## J. REVISIONS TO UTILITIES

*To reflect revisions to the Project's Housing Sites Inventory, Utilities, page IV.O-15, first paragraph under heading (4), of the Draft EIR is revised as follows:*

The Project would provide for the development of up ~~4,575~~ 4,881 new residential units, resulting in an estimated increase of ~~14,732~~ 15,717 new residents in the city. Using the 2020 solid waste disposal rate of .77 tons per resident per year (equivalent to 4.2 pounds per day), implementation of the Project would generate approximately ~~11,343~~ 12,102 tons of waste per year (equivalent to ~~61,872~~ 66,011 pounds per day). This increase would occur gradually over eight years and be on par with the population growth Antioch. ....

## K. REVISIONS TO WILDFIRE

*To reflect revisions to the Project's Housing Sites Inventory, Wildfire, page IV.P-2, Figure IV.P-1, of the Draft EIR is revised as follows:*

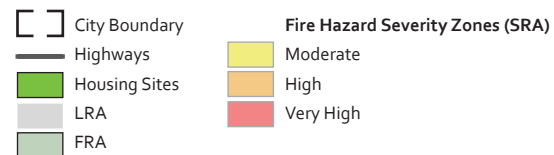
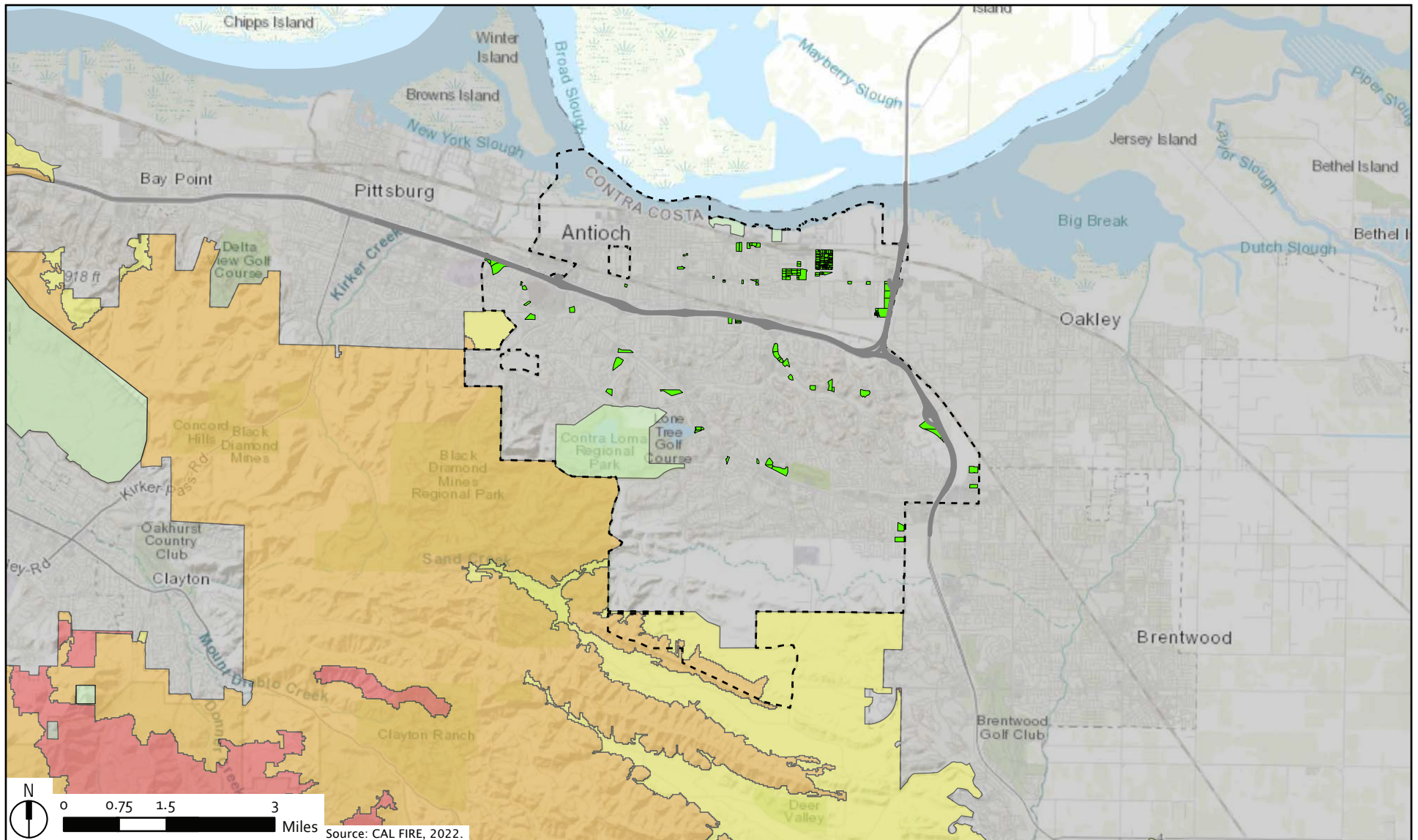


Figure IV.P-1  
Fire Hazard Severity Zones

*To reflect revisions to the Project's Housing Sites Inventory, Wildfire, page IV.P-11, last paragraph, of the Draft EIR is revised as follows:*

Based on discussions with CCCFPD as part of this EIR, CCCFPD indicated that it is likely that build-out of the ~~4,575~~ 4,881 residential units identified by the Project would likely necessitate the need for additional fire protection facilities and infrastructure. ....

## L. REVISIONS TO AGRICULTURE AND FORESTRY RESOURCES

*To reflect revisions to the Project's Housing Sites Inventory, Agriculture and Forestry Resources, page IV.Q-10, third paragraph under heading (1), of the Draft EIR is revised as follows:*

The City's Roddy Ranch, Sand Creek, Ginocchio, and East Lone Tree focus areas are predominantly designated as Farmland of Local Importance by the DOC, with portions of the first three designated as Grazing Land. Land to the north and northwest of the Sand Creek Focus Area also carries these farmland designations. Housing Site 183, located within the East Lone Tree focus area is presently designated Farmland of Local Importance. Although the Farmland of Local Importance category supports livestock grazing and limited dryland farming, it lacks the characteristics for high-quality agricultural production that is inherent in the Important Farmland categories. Conversion of these lands to non-agricultural uses would not be considered a significant impact pursuant to CEQA.

*To reflect revisions and clarifications to the Project's Housing Sites Inventory, Agriculture and Forestry Resources, page IV.Q-10, fourth paragraph under heading (1), of the Draft EIR is revised as follows:*

~~Six~~Four Housing Sites are assigned to the East Lone Tree Focus Area: sites 113, 114, 115, ~~and 162, 183, and 184.~~ As shown on Figure III-9 in *Chapter III, Project Description*, the first three of these sites are clustered together, just to the west of the State Route (SR-) 4/Laurel Road interchange southbound on-ramp. Together, these sites have a total area of ~~8.404~~29.85 acres and development potential for ~~286~~430 dwelling units, including ~~18~~ low-income units. These ~~three~~six sites represent approximately ~~1.2~~4.1 percent of the 720 acres in the East Lone Tree Focus Area.

*To reflect revisions to the Project's Housing Sites Inventory, Agriculture and Forestry Resources, page IV.Q-11, first full paragraph, of the Draft EIR is revised as follows:*

All told, the Project could lead to housing development on ~~11.704~~24.95 acres in the East Lone Tree Focus Area that are designated as Farmland of Local Importance by the DOC. Pursuant to the Project, less than 2 percent of the focus area would be developed with new housing. The General Plan already envisions development of the area west of SR-4 with commercial and residential development. To the east of SR-4, Site 162 is surrounded by commercial development and has limited viability as an agricultural production site, and it is also in an area planned for commercial development. The amount of land removed from agricultural production would represent about 0.012 percent of the 97,073 acres of Important Farmland (including Farmland of Local Importance) inventoried by the DOC in Contra Costa County in 2018. This would have a negligible effect on agricultural production in the County. Furthermore, Farmland of Local Importance is not treated as Important Farmland for purposes of CEQA, as reflected in the



criterion of significance established in the CEQA Guidelines. Therefore, the Project's impact on Important Farmland would be less than significant.

## M. REVISIONS TO HYDROLOGY

*To reflect a response to comment contained within Comment Letter A2, Hydrology, page IV.K-29 to IV.K-30 of the DEIR will be revised to include a discussion of the general permits that could be applicable to the construction dewatering as follows:*

The Construction General Permit allows the discharge of non-contaminated dewatering effluent if the water is properly filtered or treated, using appropriate technology. These technologies include, but are not limited to, retention in settling ponds (where sediments settle out prior to discharge of water) and filtration using gravel and sand filters (to mechanically remove the sediment). Small temporary construction dewatering projects that would discharge groundwater to land from excavation activities or dewatering of underground utility vaults may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Dischargers seeking coverage under the Low Threat General Order or Low Threat Waiver must file a Notice of Intent with the CVRWQCB prior to beginning the discharge.

If the dewatering activity is deemed by the Regional Water Board not to be covered by the Construction General Permit, Low Threat General Order, or Low Threat Waiver, then the discharger could potentially prepare a Report of Waste Discharge, and if approved by the Regional Water Board, be issued site-specific WDRs under the NPDES regulations. Site-specific WDRs contain rigorous monitoring requirements and performance standards that, when implemented, ensure that receiving water quality is not substantially degraded.

If the water is not suitable for discharge to the storm drain (receiving water), as discussed above, dewatering effluent may be discharged to the sanitary sewer system if Delta Diablo's special discharge criteria are met. These include, but are not limited to, application of pretreatment technologies which would result in achieving compliance with the wastewater discharge limits. Discharges to Delta Diablo's facilities must occur under a Special Discharge Permit. Delta Diablo manages the water it accepts into its facilities so that it can ensure proper treatment of wastewater at the treatment facility prior to discharge.

If it is infeasible to meet the requirements of the Construction General Permit, Low Threat General Order, Low Threat Waiver, acquire site-specific WDRs, or meet the Delta Diablo Special Discharge Permit requirements, the construction contractor would be required to transport the dewatering effluent off-site for treatment.

*To reflect a response to comment contained within Comment Letter A2, the conclusion statement of Hydrology, Section IV.K.3.c.1, Construction, on pages IV.K-29 to IV.K-30 of the Draft EIR is revised as follows:*

Compliance with State, regional, and local regulations and implementation of General Plan policies listed above regarding ~~stormwater and dewatering~~ water quality during construction would protect groundwater and receiving water quality. Therefore, impacts related to water quality during construction associated with development under the Project would be less than significant.

*To reflect a response to comments contained within Comment Letter A2, the conclusion statement of Hydrology, Section IV.K.3.c.1, Operation, on page IV.K-31 of the DEIR will be revised as follows:*

Compliance with State, regional, and local regulations and implementation of General Plan policies listed above regarding ~~stormwater~~ water quality during operation of developments under the Project would protect groundwater and receiving water quality. Therefore, impacts related to water quality during operation of developments under the Project would be less than significant.

## N. REVISIONS TO HAZARDS AND HAZARDOUS MATERIALS

*To reflect a response to comment contained within Comment Letter A1, Accidental Release of Hazardous Materials (Criterion 2), shall be revised on pages IV.J-35 to IV.J-36 of the DEIR as follows:*

The updated Environmental Hazards Element includes the following new ~~policies~~ policy related to hazardous materials contamination.

### *Policy 11.7.2: Hazardous Materials Policies*

#### *Hazardous Materials Contamination*

- u. The following requirements... shall be implemented.
- v. If any projects initiated under the proposed project would require the importation of soil to backfill any excavated areas, proper sampling of the soil shall be conducted to ensure that the imported soil is free of contamination according to DTSC's 2001 *Information Advisory Clean Imported Fill Material*, or more current guidance from DTSC.

Compliance with ~~this~~ these updated General Plan ~~policy~~ policies would ensure that the risk of hazardous materials being released into the environment under the Project due to soil or groundwater contamination would be less than significant.

## O. REVISIONS TO ALTERNATIVES

*At the time that the Draft EIR was prepared, the Project's alternatives were developed around several assumptions related to the Project, including: number of housing units, below-market rate housing unit distribution, number and location of housing sites, RHNA estimates, and other similar factors. With the updates to the Project as described in Chapter I, Introduction, of this Final EIR, many of these core assumptions that were relied upon have since changed. As such, many of the estimates and figures (both in terms of the description of each alternative, as well as the relative figures used to compare the Project against each alternative) provided in Chapter VI, Alternatives, are no longer accurate. Rather than provide a significant number of in-text edits, tables (some of which were included in Chapter VI, Alternatives, in the Draft EIR) have been provided or updated to highlight the changes to each alternative and how they compare against the Project. The Reduced VMT Alternative has also been updated to account for the 2 new housing sites located in TAZs with a home-based VMT per resident that is above the significance threshold.*

*Despite changes to the Project and alternatives, none of the impact conclusions or findings provided in Chapter VI, Alternatives, would change. The Reduced RHNA Buffer Alternative would still be considered the environmentally superior alternative in that environmental impacts associated with its implementation would be the least of all the alternatives examined (including the Project). The Reduced RHNA Buffer Alternative would not have greater impacts to any environmental resources than the Project and would have somewhat reduced potential for impacts across most resource categories. The alternative would have similar impacts to the Project on land use, aesthetics, geology/soils, hazardous materials, noise, and population/housing. The Reduced RHNA Buffer Alternative would continue to meet the primary Project objectives but would provide a smaller margin for error in the potential for the city to fully meet its 6th-cycle RHNA obligations.*

### SUMMARY OF ALTERNATIVES TO THE PROJECT

Housing Units by Income Category	2015-2023 Housing Element (Existing Baseline)	2023-2031 Housing Element (Project)	No Project Alternative	Reduced VMT Alternative	Reduced RHNA Buffer Alternative
Very Low Income (0-50% AMI)	349	<del>967</del> <u>882</u>	349	<del>967</del> <u>896</u>	990
Low Income (51-80% AMI)	205	<del>548</del> <u>760</u>	205	<del>548</del> <u>505</u>	570
Moderate Income (81-120% AMI)	214	<del>947</del> <u>845</u>	214	<del>771</del> <u>724</u>	616
Above Moderate Income (>120% AMI)	680	<del>2,113</del> <u>2,394</u>	680	<del>1,821</del> <u>2,046</u>	1,594
<b>Total Allocation</b>	<b>1,448</b>	<del>4,575</del> <u>4,881</u>	<b>1,448</b>	<del>4,107</del> <u>4,171</u>	<b>3,770</b>

Source: Urban Planning Partners, 2022.

**SUMMARY OF ALTERNATIVES TO THE PROJECT**

Housing Units by Income Category	2023-2031 Housing Element (Project)	No Project Alternative	Reduced VMT Alternative	Reduced RHNA Buffer Alternative
Housing Unit Reduction Compared to Project	n/a	<del>1,448</del> <u>-3,433</u>	<del>-468</del> <u>-710</u>	<del>805</del> <u>-1,111</u>
RHNA Buffer	<del>51.7%</del> <u>61.8%</u>	52%	<del>36.2%</del> <u>38.3%</u>	25.0%
Units Above RHNA Allocation	<del>1,559</del> <u>1,865</u>	-1,568	<del>1,091</del> <u>1,155</u>	754
Population Generated	<del>14,732</del> <u>15,717</u>	11,054	<del>13,225</del> <u>13,431</u>	12,139

Source: Urban Planning Partners, 2022.

**TABLE VI-5 2020 HOME-BASED VMT SUMMARY: PROJECT VS. REDUCED VMT ALTERNATIVE**

	2020 Baseline	Project		Reduced VMT Alternative	
		Project	2020 + Project	Alternative	2020 + Alternative
Citywide Average	2,435,265	365,627	2,800,892	<del>328,225</del> <u>312,442</u>	<del>2,763,490</del> <u>2,747,707</u>
Home-Based VMT/Resident	21.5	--	21.9	--	<del>21.5</del> <u>21.3</u>
Significant (>18.3)?			Yes		Yes

Source: Fehr &amp; Peers, 2022; Urban Planning Partners, 2022.

**TABLE VI-6 2040 HOME-BASED VMT SUMMARY: PROJECT VS. REDUCED VMT ALTERNATIVE**

	2040 Baseline	Project		Reduced VMT Alternative	
		Project	2040 + Project	Alternative	2040 + Alternative
Citywide Average	2,310,190	336,721	2,646,911	<del>302,276</del> <u>287,741</u>	<del>2,612,466</del> <u>2,597,931</u>
Home-Based VMT/Resident	20.4	--	20.7	--	<del>18.1</del> <u>18.0</u>
Significant (>17.4)?			Yes		Yes

Source: Fehr &amp; Peers, 2022; Urban Planning Partners, 2022.

**TABLE VI-7 2020 HOME-BASED VMT SUMMARY: PROJECT VS. REDUCED RHNA BUFFER ALTERNATIVE**

	2020 Baseline	Project		Reduced RHNA Buffer Alternative 3	
		Project	2020 + Project	Alternative 3	2020 + Alternative 3
Citywide Average	2,435,265	365,627	2,800,892	<del>301,293</del> <u>282,404</u>	<del>2,736,558</del> <u>2,717,669</u>

<b>Home-Based VMT/Resident</b>	21.5	--	21.9	--	<del>21.5</del> <u>21.3</u>
<b>Significant (&gt;18.3)?</b>			Yes		Yes

Source: Fehr & Peers, 2022; Urban Planning Partners, 2022.

**TABLE VI-8 2040 HOME-BASED VMT SUMMARY: PROJECT VS. REDUCED RHNA BUFFER ALTERNATIVE**

	2040 Baseline	Project		Reduced RHNA Buffer Alternative 3	
		Project	2040 + Project	Alternative 3	2040 + Alternative 3
<b>Citywide Average</b>	2,310,190	336,721	2,646,911	<del>277,473</del> <u>260,077</u>	<del>2,587,663</del> <u>2,570,267</u>
<b>Home-Based VMT/Resident</b>	20.4	--	20.7	--	<del>18.1</del> <u>18.0</u>
<b>Significant (&gt;17.4)?</b>			Yes		Yes

Source: Fehr & Peers, 2022; Urban Planning Partners, 2022.

## P. REVISIONS TO CEQA REQUIRED ASSESSMENT CONCLUSIONS

*To reflect revisions to the Project's Housing Sites Inventory, CEQA Required Assessment Conclusions, page VII-1-2, last paragraph, of the Draft EIR is revised as follows:*

As described within *Chapter III, Project Description*, to accommodate the existing and projected housing needs of the City of Antioch, the Housing Element of the City is being updated as part of the Project to compile a Housing Sites Inventory (Sites Inventory) to identify 182 housing sites (Hosing Sites) intended to accommodate the potential for ~~4,575-4,881~~ new residential units located throughout the city. In conjunction with identification of these ~~182-184~~ Housing Sites, the City will rezone ~~169-166~~ of these sites to allow for residential development or more intense residential development than presently permitted, along with comparable General Plan and Specific Plan amendments which will be required to make the land use designations of the sites consistent with the zoning.

*To reflect revisions to the Project's Housing Sites Inventory, CEQA Required Assessment Conclusions, page VII-2, first full paragraph, of the Draft EIR is revised as follows:*

While the Project anticipates accommodation of up to ~~4,881-591~~ units, it's unrealistic to assume that all housing site parcels identified in the Housing Element would be developed and that they would all be developed at the maximum allowable density. While the Housing Element encourages the development of new housing, the actual construction of new units will be driven by market forces, the motivation of property owners, subsidies for affordable housing, and other factors outside the control of the City. Nonetheless, this theoretically possible number of ~~4,575~~ 4,881 new housing units is used as a basis for estimating the effect this could have on Antioch's population. Using 2020 California Department of Finance (DOF) data, such as the average household size of a household in Antioch, population projections can be estimated to evaluate the potential for induced growth as part of the Project. According to such data, the average household's size in the city of Antioch is 3.22 persons.<sup>1</sup> Applying this average, development of ~~4,575~~ 4,881 new housing units would increase the population in Antioch by approximately ~~14,732~~ 15,717 people. Applying DOF data for the county-wide average household size of 2.82 persons per household, development of ~~4,575~~ 4,881 new housing units would increase the population in Antioch by approximately ~~12,901~~ 13,764 people.

<sup>1</sup> California Department of Finance (DOF), 2020. E-5 City/County Population and Housing Estimates, April 1.

<sup>2</sup> California Department of Finance (DOF), 2020. E-5 City/County Population and Housing Estimates, April 1.

*To reflect revisions to the Project's Housing Sites Inventory, CEQA Required Assessment Conclusions, page VII-3, first paragraph, of the Draft EIR is revised as follows:*

.... As such, the population growth anticipated by the Project's potential development of the 184 Housing Sites, totaling a maximum of ~~4,575~~ 4,881 residential units, is considered planned, not unplanned growth that is consistent with the City's General Plan. Accordingly, impacts to unplanned population growth are determined to be less than significant as demonstrated in Section IV.M, Population and Housing.

*To reflect revisions to the Project's Housing Sites Inventory, CEQA Required Assessment Conclusions, page VII-3, last paragraph, of the Draft EIR is revised as follows:*

.... As part of these updates the city is planning for the potential accommodation of up to ~~4,575~~ 4,881 residential units between the years 2023-2031 on a total of ~~182~~ 184 Housing Sites as described within Chapter III, Project Description. ....

*To reflect revisions to the Project's Housing Sites Inventory, CEQA Required Assessment Conclusions, page VII-4, last paragraph, of the Draft EIR is revised as follows:*

.... As part of these updates the city is planning for the accommodation of up to ~~4,881~~ 4,881 residential units between the years 2023-2031 on a total of ~~182~~ 184 Housing Sites as described within Chapter III, Project Description. Housing Sites are anticipated to be developed over the course of the 8year planning period. ....



## **IV. MITIGATION MONITORING AND REPORTING PROGRAM**

This Mitigation Monitoring and Reporting Program (MMRP) (see Table IV-1 below) has been prepared to comply with the requirements of State law (Public Resources Code Section 21081.6). State law requires the adoption of a mitigation monitoring program when mitigation measures are required to avoid significant impacts. The monitoring program is intended to ensure compliance during implementation of the project.

This MMRP has been formulated based upon the findings of the Project's Draft Environmental Impact Report (EIR) and the comments received on this document and addressed herein. This MMRP identifies mitigation measures recommended in the Project's Draft EIR to avoid or reduce identified impacts and specifies the agencies/parties responsible for implementation and monitoring of the measure.

The first column identifies the mitigation measure. The second column, entitled "Party Responsible for Ensuring Implementation," refers to the person(s) who will undertake the mitigation measures. The third column, entitled "Party Responsible for Monitoring," refers to the person/agency responsible for ensuring that the mitigation measure has been implemented and recorded. The fourth column, entitled "Monitoring Timing," identifies when and/or for how long the monitoring shall occur.

**TABLE IV-1 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
B. Transportation						
<b>TRANS-1: Implement VMT Reduction Measures.</b> Individual housing project development proposals that do not screen out from VMT impact analysis shall provide a quantitative VMT analysis using the methods applied in this EIR, with modifications if appropriate based on future changes to City of Antioch practices and CCTA VMT analysis methodology guidelines. Projects which result in a significant impact shall include travel demand management measures and physical measures to reduce VMT to a less-than-significant level. Measures may include, but are not limited to, those described below, which have been identified as potentially VMT reducing in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. Potential VMT reduction estimates are included below, but detailed requirements, calculation steps, and limitations are described in the CAPCOA Handbook. In addition, application of one or more measures is generally expected to result in a net VMT reduction of 10 percent or less for development projects in suburban settings such as Antioch. <ul style="list-style-type: none"><li>▪ Unbundle parking costs (i.e., sell or lease parking separately from the housing unit). Effectiveness: up to 15.7 percent reduction in GHG from VMT per the CAPCOA Handbook.</li><li>▪ Provide car-sharing, bike sharing, or scooter sharing programs. Effectiveness: 0.15 to 0.18 percent reduction in GHG from VMT for car share, 0.02 to 0.06 percent for bike share, and 0.07 percent for scooter share, per the CAPCOA Handbook. The higher car share and bike share values are for electric car and bike share programs.</li><li>▪ Subsidize transit passes for residents of affordable housing. Effectiveness: up to 5.5 percent reduction in GHG from VMT per the CAPCOA Handbook.</li></ul>	Project Applicant: <ul style="list-style-type: none"><li>▪ Select a qualified transportation consultant to prepare and provide a VMT analysis per guidelines.</li><li>▪ If necessary, based on the VMT assessment, prepare, and provide a Transportation Demand Management (TDM) Plan for the project which demonstrates a VMT reduction in accordance with requirements and threshold.</li><li>▪ Conduct on-going monitoring of development VMT in accordance with TDM plan requirements to verify trip reduction goals are achieved.</li></ul>	City of Antioch Community and Development Department, Planning Division: <ul style="list-style-type: none"><li>▪ Review and approve VMT analysis.</li><li>▪ Review and approve TDM plan.</li><li>▪ Review and approve TDM plan monitoring and achievement of trip reduction goals.</li></ul>	Prior to Construction			
C. Air Quality						
<b>AIR-1: Residential Construction Controls for Criteria Air Pollutants.</b> For construction of residential projects with more than 114 single-	Project Applicant:	City of Antioch Community and	Prior to issuance of building permit			

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
<p>family units or 240 multi-family units, the project applicant shall retain a qualified air quality consultant to identify measures to reduce the project's criteria air pollutant and precursor emissions below the Bay Area Air Quality Management District's (BAAQMD's) recommended thresholds of significance. Emission reduction measures may include, but are not limited to, the use of off-road equipment with engines that meet the Environmental Protection Agency's Tier 4 emission standards or engines retrofitted with the most effective Verified Diesel Emissions Control Strategy (VDECS) certified by the California Air Resources Board (CARB). Quantified emissions and identified reduction measures shall be submitted to the City (and the Air District if specifically requested) for review and approval prior to the issuance of building permits and the approved criteria air pollutant reduction measures shall be implemented during construction.</p> <p>In addition, the project applicant shall prepare a Construction Emissions Minimization Plan (Emissions Plan) for all identified criteria air pollutant reduction measures (if any). The Emissions Plan shall be submitted to the City (and BAAQMD if specifically requested) for review and approval prior to the issuance of building permits. The Emissions Plan shall include the following:</p> <ul style="list-style-type: none"> <li>▪ An equipment inventory summarizing the type of off-road equipment required for each phase of construction, including the equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, and engine serial number. For all VDECS, the equipment inventory shall also include the technology type, serial number, make, model, manufacturer, CARB verification number level, and installation date.</li> <li>▪ A Certification Statement that the Contractor agrees to comply fully with the Emissions Plan and acknowledges that a significant violation of the Emissions Plan shall constitute a material breach of contract.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Retain a qualified air quality consultant to identify measures to reduce emissions.</li> <li>▪ Prepare a Construction Emissions Minimization Plan (Emissions Plan).</li> </ul>	<p>Development Department, Planning Division:</p> <ul style="list-style-type: none"> <li>▪ Review and approve air quality analysis and associated reduction measures.</li> <li>▪ Review and approve Emissions Plan.</li> </ul> <p>(if necessary) Bay Area Air Quality Management District (BAAQMD):</p> <ul style="list-style-type: none"> <li>▪ Review and approve air quality analysis and associated reduction measures.</li> <li>▪ Review and approve Emissions Plan.</li> </ul>				
<b>AIR-2: Residential Operation Controls for Criteria Air Pollutants.</b> For operation of residential projects with more than 325 single-family	Project Applicant:	City of Antioch Community and	Prior to issuance of building permit			

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
units or 451 multi-family units, the project applicant shall retain a qualified air quality consultant to identify measures to reduce the project's criteria air pollutant and precursor emissions below the BAAQMD's recommended thresholds of significance. Emission reduction measures may include, but are not limited to, implementation of a transportation design management plan, compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2, or excluding natural gas appliances or natural gas plumbing in the building design. Quantified emissions and identified reduction measures shall be submitted to the City (and BAAQMD if specifically requested) for review and approval prior to the issuance of building permits.	<ul style="list-style-type: none"> <li>Retain a qualified air quality consultant to identify measures to reduce emissions.</li> </ul>	<p>Development Department, Planning Division:</p> <ul style="list-style-type: none"> <li>Review and approve air quality analysis and associated reduction measures.</li> </ul> <p>(if necessary) Bay Area Air Quality Management District (BAAQMD):</p> <ul style="list-style-type: none"> <li>Review and approve air quality analysis and associated reduction measures.</li> </ul>				
<p><b>AIR-3a: Residential Construction Controls for Diesel Particulate Matter.</b> For construction of residential projects with a construction duration greater than 6 months that are located in an area defined as needing "Best Practices" or "Further Study" on the BAAQMD's Planning Healthy Places Map (<a href="https://www.baaqmd.gov/plans-and-climate/planning-healthy-places">https://www.baaqmd.gov/plans-and-climate/planning-healthy-places</a>), the project applicant shall apply <u>one</u> of the following two measures:</p> <p>1. The project applicant shall retain a qualified air quality consultant to prepare a Health Risk Assessment (HRA) in accordance with current guidance from the Office of Environmental Health Hazard Assessment to determine the health risks to sensitive receptors exposed to diesel particulate matter (DPM) from project construction emissions. The HRA shall be submitted to the City (and BAAQMD if specifically requested) for review and approval. If the HRA concludes that the health risks are at or below acceptable levels, then DPM reduction measures are not required. If the HRA concludes that the health risks exceed acceptable levels, DPM reduction measures shall be identified to reduce the health risks to acceptable levels. Identified DPM reduction measures shall be submitted to the City for review and</p>	<p>Project Applicant:</p> <ul style="list-style-type: none"> <li>Retain a qualified air quality consultant to prepare HRA.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>Ensure all construction-related equipment is equipped with the most effective VDECS available as certified by CARB.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>Prepare an Emissions Plan.</li> </ul>	<p>City of Antioch Community and Development Department, Planning Division:</p> <ul style="list-style-type: none"> <li>Review and approve HRA.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>Review and approve construction equipment list for most effective VDECS.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>Review and approve Emissions Plan.</li> </ul> <p>(if necessary) Bay Area Air Quality Management District (BAAQMD):</p>	Prior to issuance of building permit			

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
<p>approval prior to the issuance of building permits and the approved DPM reduction measures shall be implemented during construction.</p> <p>OR</p> <p>2. All off-road diesel equipment shall be equipped with the most effective VDECS available for the engine type (Tier 4 engines automatically meet this requirement) as certified by CARB. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications.</p> <p>In addition, the project applicant shall prepare a Construction Emissions Minimization Plan (Emissions Plan) for all identified DPM reduction measures (if any). The Emissions Plan shall be submitted to the City (and BAAQMD if specifically requested) for review and approval prior to the issuance of building permits. The Emissions Plan shall include the following:</p> <ul style="list-style-type: none"> <li>An equipment inventory summarizing the type of off-road equipment required for each phase of construction, including the equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, and engine serial number. For all VDECS, the equipment inventory shall also include the technology type, serial number, make, model, manufacturer, CARB verification number level, and installation date.</li> <li>A Certification Statement that the Contractor agrees to comply fully with the Emissions Plan and acknowledges that a significant violation of the Emissions Plan shall constitute a material breach of contract.</li> </ul>		<ul style="list-style-type: none"> <li>Review and approve HRA.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>Review and approve construction equipment list for most effective VDECS.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>Review and approve Emissions Plan.</li> </ul>				
<p><b>AIR-3b: Residential Emergency Generators.</b> Require all emergency generators for new residential development projects (if required) to use best available control technology for air pollutant emissions, such as using engines that meet the Environmental Protection Agency's Tier 4 Final emission standards or are battery powered.</p>	<p>Project Applicant:</p> <ul style="list-style-type: none"> <li>Provide list of emergency generators planned for usage.</li> </ul>	<p>City of Antioch Community and Development Department, Planning Division:</p> <ul style="list-style-type: none"> <li>Review and approve list of emergency</li> </ul>	<p>Prior to issuance of building permit</p>			

Mitigation Measure	Party Responsible for Ensuring Implementation	Party Responsible for Monitoring	Monitoring Timing	Compliance Verification		
				Initial	Date	Project/ Comments
		generators to ensure that engines meet EPA Tier 4 Final emissions standards or are battery powered.				



## **V. PREPARERS**

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John Gust, Principal Investigator II/Project Manager II



CITY OF ANTIOCH HOUSING SITE INVENTORY

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
1	051-061-001	1650 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.42	Nonvacant	0	0	1	1	2
2	051-061-002	1700 VIERA AVE Antioch CA	94509	Medium Density Residential	Amend to HDR	S	R-20	0	20	0.92	Nonvacant	0	0	2	2	4
3	051-061-003	1730 VIERA AVE Antioch CA	94509	Medium Density Residential	Amend to HDR	S	R-20	0	20	0.92	Nonvacant	0	0	2	2	4
4	051-062-004	1839 STEWART LN	94509	Medium Density Residential	Amend to HDR	S	R-20	0	20	0.26	Nonvacant	0	0	0	0	0
5	051-062-005	1829 STEWART LN Antioch CA	94509	Medium Density Residential	Amend to HDR	S	R-20	0	20	0.29	Nonvacant	0	0	0	0	0
6	051-062-006	1705 VIERA AVE Antioch CA	94509	Medium Density Residential	Amend to HDR	S	R-20	0	20	0.42	Nonvacant	0	0	1	1	2
7	051-062-010	1853 STEWART LN Antioch CA	94509	Medium Density Residential	Amend to HDR	S	R-20	0	20	1.65	Nonvacant	0	0	4	4	8
8	051-071-001	1524 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.93	Nonvacant	0	0	2	2	4
9	051-071-002	1550 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.51	Nonvacant	0	0	1	1	2
10	051-071-003	1560 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.41	Nonvacant	0	0	1	1	2
11	051-071-004	1574 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.47	Nonvacant	0	0	1	1	2
12	051-071-005	1600 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.12	Nonvacant	0	0	0	0	0
13	051-071-006	1606 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.82	Nonvacant	0	0	2	2	4
14	051-071-008	1588 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.46	Nonvacant	0	0	1	1	2
15	051-071-011	1636 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.46	Nonvacant	0	0	1	1	2

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
16	051-071-012	1628 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.44	Nonvacant	0	0	1	1	2
17	051-072-005	1537 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.46	Nonvacant	0	0	1	1	2
18	051-072-006	1540 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.4	Nonvacant	0	0	1	1	2
19	051-072-007	1554 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.51	Nonvacant	0	0	1	1	2
20	051-072-013	1549 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.49	Nonvacant	0	0	1	1	2
21	051-072-014	1565 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.87	Nonvacant	0	0	2	2	4
22	051-072-015	1863 BOWN LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.23	Nonvacant	0	0	0	0	0
23	051-072-016	1877 BOWN LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.23	Nonvacant	0	0	0	0	0
24	051-072-017	1568 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.23	Nonvacant	0	0	0	0	0
25	051-072-018	1580 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0
26	051-073-001	1605 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.3	Nonvacant	0	0	0	0	0
27	051-073-002	1601 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0
28	051-073-003	1837 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.205	Nonvacant	0	0	0	0	0
29	051-073-004	1845 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.205	Nonvacant	0	0	0	0	0
30	051-073-005	1859 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.21	Nonvacant	0	0	0	0	0
31	051-073-006	1867 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.21	Nonvacant	0	0	0	0	0

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
32	051-073-007	1881 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.21	Nonvacant	0	0	0	0	0
33	051-073-008	1897 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.85	Nonvacant	0	0	0	0	0
34	051-073-009	1905 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.3	Nonvacant	0	0	0	0	0
35	051-073-011	1965 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.46	Nonvacant	0	0	0	0	0
36	051-073-012	1585 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.86	Nonvacant	0	0	2	2	4
37	051-073-014	1537 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.51	Nonvacant	0	0	1	1	2
38	051-073-015	1523 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.34	Nonvacant	0	0	1	1	2
39	051-073-016	1551 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.39	Nonvacant	0	0	1	1	2
40	051-073-017	1927 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.24	Nonvacant	0	0	0	0	0
41	051-073-018	1945 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.26	Nonvacant	0	0	0	0	0
42	051-073-019	1567 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.23	Nonvacant	0	0	0	0	0
43	051-073-020	1559 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.23	Nonvacant	0	0	0	0	0
44	051-074-001	1966 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.2	Nonvacant	0	0	0	0	0
45	051-074-002	1954 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.23	Nonvacant	0	0	0	0	0
46	051-074-003	1936 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0
47	051-074-005	1898 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
48	051-074-006	VINE LN & VIERA AVE, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0
49	051-074-007	1870 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0
50	051-074-008	1854 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.36	Nonvacant	0	0	0	0	0
51	051-074-009	1836 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.29	Nonvacant	0	0	0	0	0
52	051-074-010	1633 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.528	Nonvacant	0	0	0	0	0
53	051-074-011	1908 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0
54	051-074-012	1920 VINE LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.22	Nonvacant	0	0	0	0	0
55	051-081-001	1400 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.17	Nonvacant	0	0	0	0	0
56	051-081-002	1410 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.78	Nonvacant	0	0	2	2	4
57	051-081-003	1428 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.9	Nonvacant	0	0	2	2	4
58	051-081-004	1452 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.45	Nonvacant	0	0	1	1	2
59	051-081-006	1470 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.95	Nonvacant	0	0	2	2	4
60	051-081-007	1490 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.46	Nonvacant	0	0	1	1	2
61	051-081-008	1500 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.91	Nonvacant	0	0	2	2	4
62	051-082-002	1497 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.85	Nonvacant	0	0	2	2	4
63	051-082-003	1473 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.43	Nonvacant	0	0	1	1	2

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
64	051-082-004	1957 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.64	Nonvacant	0	0	1	1	2
65	051-082-005	1915 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.75	Nonvacant	0	0	2	2	4
66	051-082-006	1887 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.81	Nonvacant	0	0	2	2	4
67	051-082-007	1859 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.45	Nonvacant	0	0	1	1	2
68	051-082-008	1831 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.74	Nonvacant	0	0	2	2	4
69	051-082-009	1429 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.77	Nonvacant	0	0	2	2	4
70	051-082-010	WALNUT AV & SANTA FE AV, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.43	Vacant	0	0	1	1	2
71	051-082-011	1939 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.39	Nonvacant	0	0	1	1	2
72	051-082-012	SANTA FE AV & VIERA AVE, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.38	Nonvacant	0	0	1	1	2
73	051-082-013	1503 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.42	Nonvacant	0	0	1	1	2
74	051-082-014	1515 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.43	Nonvacant	0	0	1	1	2
75	051-083-001	1528 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.91	Nonvacant	0	0	2	2	4
76	051-083-002	1506 WALNUT AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.45	Nonvacant	0	0	1	1	2
77	051-083-004	1866 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.38	Nonvacant	0	0	4	4	8
78	051-083-005	1834 SANTA FE AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.46	Nonvacant	0	0	1	1	2
79	051-083-006	1471 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.46	Nonvacant	0	0	1	1	2

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
80	051-083-009	1509 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.91	Nonvacant	0	0	2	2	4
81	051-083-010	1487 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.16	Nonvacant	0	0	0	0	0
82	051-083-012	1495 VIERA AVE Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.75	Nonvacant	0	0	2	2	4
83	051-100-022	2101 E 18TH ST Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	8	Nonvacant	0	0	24	24	48
84	051-120-020	1650 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.48	Nonvacant	0	0	0	8	8
85	051-120-021	1710 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.25	Nonvacant	0	0	0	7	7
86	051-120-024	1450 TREMBATH LN Antioch, CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.01	Nonvacant	0	0	0	6	6
87	051-120-025	1550 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.02	Nonvacant	0	0	0	6	6
88	051-130-001	1305 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.01	Nonvacant	0	0	0	6	6
89	051-130-002	1277 SAINT CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.01	Nonvacant	0	0	0	6	6
90	051-140-001	1705 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.69	Nonvacant	0	0	0	10	10
91	051-140-003	1625 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.23	Nonvacant	0	0	0	7	7
92	051-140-006	1501 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.98	Nonvacant	0	0	0	5	5
93	051-140-007	1425 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.98	Nonvacant	0	0	0	5	5
94	051-140-012	1613 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1	Nonvacant	0	0	0	6	6
95	051-140-013	1525 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1	Nonvacant	0	0	0	6	6

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
96	051-140-014	1423 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.65	Nonvacant	0	0	0	3	3
97	051-140-015	1420 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.98	Nonvacant	0	0	0	5	5
98	051-140-019	88 MIKE YORBA WAY Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.36	Nonvacant	0	0	0	2	2
99	051-140-020	1675 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.39	Nonvacant	0	0	0	2	2
100	051-140-025	1620 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.11	Nonvacant	0	0	0	6	6
101	051-140-026	1520 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	1.87	Nonvacant	0	0	0	11	11
102	051-140-027	1651 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.48	Nonvacant	0	0	0	2	2
103	051-140-028	1715 ST CLAIRE DR Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.49	Nonvacant	0	0	0	2	2
104	051-140-035	1575 TREMBATH LN Antioch CA	94509	Medium Low Density Residential	Amend to HDR	S	R-20	0	20	0.98	Nonvacant	0	0	0	5	5
105	051-200-076	HOLUB LN & E 18TH ST, Antioch CA	94509	Convenience Commercial	Amend to HDR	P-D	R-35	25	35	1.08	Vacant	7	4	4	11	26
106	051-200-037	1841 HOLUB LN, Antioch CA	94509	Convenience Commercial	Amend to HDR	R-35	--	25	35	4.4	Nonvacant	28	16	17	46	107
107	051-200-038	HOLUB LN, Antioch CA	94509	High Density Residential	None	R-35	--	25	35	4.99	Vacant	32	18	20	52	122
108	051-200-039	HOLUB LN, Antioch CA	94509	High Density Residential	None	R-35	--	25	35	5.71	Vacant	37	21	23	60	141
109	051-230-028	3200 E 18TH ST, Antioch CA	94509	Eastern Waterfront Employment Focus Area - Business Park	General Plan Text Amendment	P-D	R-35	25	35	1.286	Vacant	8	4	5	13	30

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110	051-400-027	WILSON ST AND E 18TH ST	94509	Eastern Waterfront Employment Focus Area - Business Park	General Plan Text Amendment	P-D	R-20	0	20	1.204	Vacant	0	0	9	9	18
111	052-042-044	3901 HILLCREST AVE Antioch CA	94509	Open Space	Amend to HDR	P-D	R-35	25	35	1.62	Nonvacant	10	6	6	17	39
112	052-342-010	WILDFLOWER DR & HILLCREST AV, Antioch CA	94531	Low Density Residential	Amend to HDR	R-6	R-35	25	35	3.77	Vacant	24	14	15	39	92
113	053-060-055	NEROLY RD & COUNTRY HILLS DR, Antioch CA	94509	East Lone Tree Specific Plan Focus Area - Res. Open Space	None	S-P	-	0	20	0.525	Vacant					0
114	053-060-056	NEROLY RD & COUNTRY HILLS DR, Antioch CA	94509	East Lone Tree Specific Plan Focus Area - Res. Open Space	None	S-P	-	0	20	0.606	Vacant					0
115	053-060-057	NEROLY RD & COUNTRY HILLS DR, Antioch CA	94509	East Lone Tree Specific Plan Focus Area - Res. Open Space	None	S-P	-	0	20	7.219	Vacant					0
116	055-071-106	LONE TREE WAY & COUNTRY HILLS DR, Antioch CA	94509	Business Park	Amend to HDR	P-D	R-35	25	35	3.628	Vacant	23	13	14	38	88
117	055-071-107	LONE TREE WAY & COUNTRY HILLS DR, Antioch CA	94509	Business Park	Amend to HDR	P-D	R-35	25	35	2.322	Vacant	15	8	9	24	56
118	055-071-108	LONE TREE WAY & DEER VALLEY RD, Antioch CA	94509	Business Park	Amend to HDR	P-D	R-35	25	35	9.54	Vacant	62	36	38	100	236
119	055-071-113	LONE TREE WAY & COUNTRY HILLS DR, Antioch CA	94509	Business Park	Amend to HDR	P-D	R-20	12	20	0.96	Vacant	0	0	5	5	10
120	056-130-014	5200 HEIDORN RANCH RD Antioch CA	94509	Medium Low Density Residential	Amend to HDR	P-D	R-35	25	35	1.95	Nonvacant	12	7	7	20	46
121	056-130-011	5320 HEIDORN RANCH RD Antioch CA	94509	Medium Low Density Residential	Amend to HDR	P-D	R-35	25	35	5.04	Nonvacant	33	19	20	53	125
122	065-071-020	1205 A St Antioch CA	94509	A Street Interchange Focus Area - Residential	General Plan Text Amendment	C-O	R-20	12	20	0.31	Nonvacant	0	0	1	1	2



Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
123	065-110-006	810 WILBUR AVE, Antioch CA	94509	High Density Residential	None	R-25	-	20	25	2.86	Vacant	4	0	0	70	74
124	065-110-007	701 WILBUR AVE, Antioch CA	94509	High Density Residential	None	R-25	R-35	25	35	2.5	Nonvacant	16	9	10	26	61
125	065-161-025	301 E 18TH ST Antioch CA	94509	Medium Low Density Residential	Amend to HDR	C-2	R-20	12	20	0.31	Nonvacant	0	0	1	1	2
126	065-262-026	E 18TH ST & BLOSSOM DR, Antioch, CA	94509	Neighborhood Community Commercial	Amend to HDR	R-20	--	0	20	1.3	Vacant	0	0	10	10	20
127	065-262-035	1015 E 18TH ST Antioch CA	94509	Medium Low Density Residential	Amend to HDR	R-20	--	0	20	0.675	Vacant	0	0	5	5	10
128	067-093-022	A ST & PARK LN, Antioch CA	94509	A Street Interchange Focus Area - Commercial	General Plan Text Amendment	C-O	R-20	0	20	0.32	Vacant	0	0	2	2	4
129	067-103-017	A ST Antioch CA	94509	A Street Interchange Focus Area - Commercial	General Plan Text Amendment	C-O	R-20	12	20	1.774	Vacant	0	0	10	10	20
130	068-051-015	1805 CAVALLO RD, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	R-20	--	0	20	0.47	Vacant	0	0	3	3	6
131	068-051-049	1801 CAVALLO RD Antioch CA	94509	Neighborhood Community Commercial	Amend to HDR	R-20	--	0	20	0.47	Vacant	0	0	3	3	6
132	068-051-050	504 E 18TH ST, Antioch CA	94509	Neighborhood Community Commercial	Amend to HDR	R-20	--	0	20	0.087827	Vacant	0	0	0	0	0
133	068-082-057	TERRACE DR & E 18TH ST, Antioch CA	94509	Neighborhood Community Commercial	Amend to HDR	C-2	R-20	12	20	0.659	Vacant	0	0	3	3	6
134	068-252-041	2721 WINDSOR DR, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	R-6	R-35	25	35	1.57	Vacant	10	5	6	16	37
135	068-252-042	WINDSOR DR & IGLESIA CT, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	R-6	R-35	25	35	0	Vacant	0	0	0	0	0
136	068-252-043	WINDSOR DR & IGLESIA CT, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	R-6	R-35	25	35	0	Vacant	0	0	0	0	0

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137	068-252-045	2709 WINDSOR DR, Antioch CA	94509	Medium Low Density Residential	Amend to HDR	R-6	R-35	25	35	0	Vacant	0	0	0	0	0
138	071-370-026	3351 CONTRA LOMA BLVD, Antioch CA	94509	Public/Institutional	Amend to HDR	R-6	R-20	0	20	1	Nonvacant	0	0	8	8	16
139	072-400-036	CACHE PEAK DR & GOLF COURSE RD, Antioch CA	94531	Convenience Commercial	Amend to HDR	P-D	R-35	25	35	2.01	Vacant	13	7	8	21	49
140	072-400-039	4655 GOLF COURSE RD, Antioch CA	94531	Convenience Commercial	Amend to HDR	P-D	R-35	25	35	2	Nonvacant	13	7	8	21	49
141	072-400-040	CACHE PEAK DR & GOLF COURSE RD, Antioch CA	94531	Convenience Commercial	Amend to HDR	P-D	R-35	25	35	0.212	Vacant	0	0	2	2	4
142	072-450-013	DALLAS RANCH RD, Antioch CA	94509	Office	Amend to HDR	P-D	R-35	25	35	1.5	Vacant	9	5	6	15	35
143	074-080-026	DELTA FAIR BLVD & BELLE DR, Antioch CA	94509	High Density Residential	None	R-35	--	25	35	12.262	Nonvacant	80	46	50	129	305
144	074-080-028	DELTA FAIR BLVD & E LELAND RD, Antioch CA	94565	High Density Residential	None	R-35	--	25	35	0.494	Vacant	0	0	6	6	12
145	074-080-029	DELTA FAIR BLVD, Antioch CA	94509	High Density Residential	None	R-35	--	25	35	1.117	Nonvacant	7	4	4	11	26
146	074-080-030	DELTA FAIR BLVD, Antioch CA	94565	High Density Residential	None	R-35	--	25	35	5.5	Vacant	36	20	22	58	136
147	074-122-016	DELTA FAIR BLVD, Antioch CA	94509	Western Antioch Commerical Focus Area - Regional Commercial	General Plan Text Amendment	C-3	R-20	0	20	0.6	Vacant	0	0	4	4	8
148	074-123-004	DELTA FAIR BLVD & FAIRVIEW DR, Antioch CA	94509	Western Antioch Commerical Focus Area - Regional Commercial	General Plan Text Amendment	C-3	R-35	25	35	1.75	Vacant	11	6	7	18	42
149	074-123-005	FAIRVIEW DR, Antioch CA	94509	Western Antioch Commerical Focus Area - Regional Commercial	General Plan Text Amendment	C-3	R-35	25	35	1.45	Vacant	9	5	5	15	34
150	074-343-034	2100 L ST, Antioch CA	94509	Convenience Commercial	Amend to HDR	C-1	R-20	12	20	1.5	Vacant	0	0	9	9	18
151	075-460-001	JAMES DONLON BLVD & CONTRA LOMA BLVD, Antioch CA	94509	Office	Amend to HDR	C-1	R-25	20	25	3.13	Vacant	0	0	31	31	62

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
152	076-010-039	SOMERSVILLE RD & BUCHANAN RD, Antioch CA	94509	Western Antioch Commerical Focus Area - Regional Commercial	General Plan Text Amendment	R-20	--	0	20	4.77	Vacant	0	0	38	38	76
153	052-061-053	4325 BERRYESSA CT Antioch CA	94509	Low Density Residential	Amend to HDR	P-D	R-35	25	35	5	Nonvacant	32	18	20	52	122
154	071-130-026	3195 CONTRA LOMA BLVD Antioch CA	94509	High Density Residential	None	R-20	R-35	25	35	2.9	Nonvacant	19	10	11	30	70
155	068-251-012	620 E TREGALLAS RD Antioch, CA	94509	High Density Residential	None	R-25	R-35	25	35	0.86	Nonvacant	5	3	3	9	20
156	052-061-014	4215 HILLCREST AVE Antioch CA	94509	Open Space	Amend to HDR	S	R-35	25	35	0.998	Nonvacant	6	3	4	10	23
157	052-042-037	4201 HILLCREST AVE Antioch CA	94509	Open Space	Amend to HDR	R-6	R-35	25	35	4.39	Nonvacant	28	16	17	46	107
158	052-140-013	WILDFLOWER DRIVE	94531	Mixed Use	Amend to HDR	P-D	R-25	20	25	4.18	Vacant	0	0	41	41	82
159	052-140-014	WILDFLOWER DRIVE	94531	Mixed Use	Amend to HDR	P-D	R-25	20	25	3.95	Vacant	0	0	39	39	78
160	052-140-015	WILDFLOWER DRIVE	94531	Mixed Use	Amend to HDR	P-D	R-25	20	25	0.91	Vacant	0	0	9	9	18
161	052-140-016	WILDFLOWER DRIVE	94531	Mixed Use	Amend to HDR	P-D	R-25	20	25	1.31	Vacant	0	0	13	13	26
162	056-120-096	2721 EMPIRE AVE	94513	East Lone Tree Focus Area - Regional Retail	General Plan Text Amendment	P-D	R-35	25	35	3.3	Nonvacant	21.00	12.00	13.00	34.00	80
163	072-011-052	3950 LONE TREE WAY	94509	Medium Density Residential	Amend to HDR	P-D/S-H	R-35	25	35	4.2	Nonvacant	27.00	15.00	17.00	44.00	103
164	051-200-065	3415 OAKLEY RD	94509	Public/Institutional	Amend to HDR	P-D	R-35	25	35	4	Nonvacant	26.00	15.00	16.00	42.00	99
165	068-091-043	1018 E 18TH ST	94509	Neighborhood Community Commercial	Amend to HDR	R-6	R-35	25	35	0.84	Nonvacant	5.00	3.00	3.00	8.00	19
166	076-231-007	1919 BUCHANAN RD	94509	Public/Institutional	Amend to HDR	P-D	R-35	25	35	1.5	Nonvacant	9.00	5.00	6.00	15.00	35

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
167	065-122-023	APOLLO CT	94509	East Lone Tree Focus Area - Regional Retail / Employment Gen. Uses	General Plan Text Amendment	PBC/Cannabis Overlay	R-35	25	35	1.6	Vacant	10	6	6	16	38
168	061-122-029	APOLLO CT	94509	Eastern Waterfront Employment Focus Area - Business Park	General Plan Text Amendment	PBC/Cannabis Overlay	R-35	25	35	1.7	Vacant	11	6	6	17	40
169	061-122-030	APOLLO CT	94509	Eastern Waterfront Employment Focus Area - Business Park	General Plan Text Amendment	PBC/Cannabis Overlay	R-35	25	35	2.1	Vacant	13	7	8	22	50
170	061-122-028	APOLLO CT	94509	Eastern Waterfront Employment Focus Area - Business Park	General Plan Text Amendment	PBC/Cannabis Overlay	R-35	25	35	0.6	Vacant	3	2	2	6	13
171	052-370-009	HILLCREST AVE	94531	Office	Amend to HDR	P-D	R-35	25	35	2.13	Vacant	13	8	8	22	51
172	051-390-006	3301 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	2.98	Vacant	19	11	12	31	73
173	051-390-005	3305 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.2	Vacant	0.00	0.00	0.00	0.00	0
174	051-390-004	3309 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.22	Vacant	0.00	0.00	0.00	0.00	0
175	051-390-003	3313 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.13	Vacant	0.00	0.00	0.00	0.00	0
176	051-390-002	3317 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.14	Vacant	0.00	0.00	0.00	0.00	0
177	051-390-001	3321 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.76	Nonvacant	0.00	0.00	0.00	0.00	0
178	051-390-016	3325 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.17	Vacant	0.00	0.00	0.00	0.00	0
179	051-390-011	3329 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.17	Vacant	0.00	0.00	0.00	0.00	0
180	051-390-010	3333 JESSICA CT	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.16	Vacant	0.00	0.00	0.00	0.00	0
181	051-390-009	3345 OAKLEY RD	94509	Medium Density Residential	Amend to HDR	P-D	R-35	25	35	0.2	Vacant	0.00	0.00	0.00	0.00	0
182	--	Jessica Court Roundabout	94509	--	None	P-D	R-35	25	35	0.63	Vacant	0.00	0.00	0.00	0.00	0

Site Number	Assessor Parcel Number	Site Address/Intersection	5 Digit ZIP Code	General Plan Designation	Accompanying General Plan Amendment	Existing Zoning Designation	Proposed Rezoning	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Gross Acres)	Vacancy	Rounded VLI	Rounded LI	Rounded Mod	Rounded Above Mod	Rounded Total
183	056-120-098	Empire Ave	94509	East Lone Tree Focus Area - Regional Retail	General Plan Text Amendment	P-D	R-25	20	25	6.4	Vacant	0.00	0.00	0.00	134.00	134
184	053-060-063	LAUREL RD	94509	East Lone Tree Specific Plan Focus Area - Res. Open Space	None	S-P	None	0	20	10.2	Vacant	0.00	0	0	216	216
Total										246		746	420	804	2,091	4,061