

Pleasant Hill 2040 General Plan

Final Environmental Impact Report State Clearinghouse #2022070095

prepared for

City of Pleasant Hill
Planning Division
100 Gregory Lane
Pleasant Hill, California 94523
Contact: Troy Fujimoto, City Planner

prepared by

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

April 24, 2023



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Table of Contents

1	Introduction	1-1
1.1	Environmental Review Process	1-1
2	Responses to Comments	2-1
3	Errata	3-1
3.1	Changes in Response to Specific Comments	3-1
3.2	Staff-initiated Changes.....	3-8

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1 Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Pleasant Hill has evaluated the comments received on the Pleasant Hill General Plan Update Draft Environmental Impact Report (EIR). The responses to the comments and errata, which are included in this document – together with the Draft EIR, the Draft EIR appendices, and the Mitigation Monitoring and Reporting Program – form the Final EIR for use by the City of Pleasant Hill in its review.

This document is organized into three chapters:

- **Chapter 1 – Introduction.**
- **Chapter 2 – Responses to Comments.** Provides a list of the agencies, organizations, and individuals who provided written comments on the Draft EIR. Copies of all of the letters received regarding the Draft EIR and responses thereto are included in this section.
- **Chapter 3 – Errata.** Lists refinements to and clarifications on the Draft EIR.

The Final EIR includes the following contents:

- Draft EIR (provided under separate cover)
- Draft EIR appendices (provided under separate cover)
- Responses to Comments on the Draft EIR and Errata (Chapters 2 and 3 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

1.1 Environmental Review Process

Pursuant to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The City of Pleasant Hill distributed a Notice of Preparation (NOP) of the Program EIR for a 31-day agency and public review period commencing July 7, 2022 and public comment closed on August 8, 2022. In addition, the City held a virtual Scoping Meeting on July 26, 2022. The meeting was aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members, and at receiving comments on the scope and content of the EIR. Due to the COVID-19 pandemic, the meeting was held virtually, through an online meeting platform and a call-in number.

The Draft EIR was made available for public review for a 45-day comment period that began on January 30, 2023, and ended on March 15, 2023. The Notice of Availability of a Draft EIR was posted with the County Clerk, sent to the State Clearinghouse, and posted on the City's website.

The City received written comment letters on the Draft EIR from four agencies, one organization, and five individual commenters. Copies of written comments are included in Chapter 2 of this document.

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2 Responses to Comments

Environmental Impact Report (EIR) prepared for the City of Pleasant Hill 2040 General Plan as well as responses to such comments.

The Draft EIR was circulated for a 45-day public review period that began on January 30, 2023, and ended on March 15, 2023. The City of Pleasant Hill received 10 comment letters on the Draft EIR. Agency letters that were received are labeled with an “A” and numbered in the order they were received. Comment letters received from organizations are labeled with an “O” and numbered in the order they were received. Comment letters received from individual persons are labeled with an “I” and numbered in the order they were received. The comment identification label, as well as commentators’ names/associations and the dates comment letters were received, are listed below.

Letter ID and Commentator Name/Association		Date Received
Agency Letters		
A1	Contra Costa County Flood Control & Water Conservation District	02/10/23
A2	East Bay Municipal Utility District	03/01/23
A3	California Geological Survey	02/22/23
A4	California Department of Transportation	03/15/23
Organization Letters		
O1	Friends of Pleasant Hill Creeks	03/15/23
Individual Person Letters		
I1	Bruce Irion	02/25/23
I2	Celia Chiang	03/12/23
I3	Wendy Gollop and Alan Bade	03/15/23
I4	Wendy Gollop and Alan Bade	03/15/23
I5	Wendy Gollop and Alan Bade	03/15/23

The comment letters and responses follow. The comment letters have been numbered sequentially, and each separate issue raised by the commentator has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response A1-1, for example, indicates that the response is for the first issue raised in comment Letter A1).

In some cases, specific changes to the text of the Draft EIR have been made in response to comments received. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft EIR. Where revisions to the Draft EIR text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

Letter A1

From: Michael Burger <Michael.Burger@pw.cccounty.us>
Sent: Friday, February 10, 2023 3:11 PM
To: Troy Fujimoto <Tfujimoto@pleasanthillca.org>
Cc: Michelle Cordis <michelle.cordis@pw.cccounty.us>
Subject: EXTERNAL: Notice of Availability of the Draft EIR for the Pleasant Hill 2040 General Plan - Request for Comments

Hello Mr. Fujimoto,

The Contra Costa County Flood Control and Water Conservation District (FC District) has reviewed the Draft Environmental Impact Report (DEIR) for the Pleasant Hill 2040 General Plan Update (GPU) prepared by Rincon Consultants, Inc. and dated January 30, 2023.

Previously, the FC District provided comments on the Notice of Preparation of the Environmental Impact Report (NOP) on August 8, 2022. These comments are attached for reference. We appreciate the efforts of the City of Pleasant Hill (City) to address our concerns.

We submit and reiterate the following comments on areas that remain of concern to the FC District:

- | | |
|------|--|
| A1-1 | <p>1. We request that the EIR provide a map of the watersheds within the GPU, especially where the land use designation changes will be located. An overlay of the features (watersheds, creeks, and tributaries) from Figure 3.8-1 on a map of areas where land use designation will change would be sufficient.</p> |
| A1-2 | <p>2. The EIR should discuss the payment of drainage area fees for development within formed drainage areas as a mitigation measure. The FC District charges drainage area fees for any new impervious surfaces created within Drainage Area 16, 44B, 46, 47, 62, 72, 78, and 89. By Ordinance, all building permits or subdivision maps filed in this area are subject to the provisions of the drainage fee ordinance. Effective January 1, 2023, the current fees in these drainage areas are listed in the attached Drainage Fee Schedule per square foot of newly created impervious surface.</p> <p>Please note that the FC District is not the approving local agency for projects within the City's jurisdiction as defined by the Subdivision Map Act. As a special district, the FC District has an independent authority to collect drainage fees that is not restricted by the Subdivision Map Act. The FC District reviews the drainage fee rate every year that the ordinance is in effect and adjusts the rate annually on January 1 to account for inflation. The drainage fee rate does not vest at the time of tentative map approval. The Drainage fees due and payable will be based on the fee in effect at the time of fee collection.</p> |
| A1-3 | <p>3. The FC District should be included in the review of all drainage facilities that have a region-wide benefit, that impact region-wide facilities, or that impact FC District-owned facilities. The FC District is available to provide technical assistance to the City in their update efforts under our Fee-for-Service program.</p> |

We appreciate the opportunity to comment on the DEIR for the Pleasant Hill 2040 GPU and welcome continued coordination with the City. If you have any questions, please contact us at your earliest convenience.

Regards,



Michael Burger | Engineering Technician

Contra Costa County Flood Control & Water Conservation District

255 Glacier Drive, Martinez, CA 94553

Phone: 925.313.2308 | Fax: 925.313.2333

michael.burger@pw.cccounty.us | cccpublicworks.org

Letter A1

COMMENTATOR: Michael Burger, Engineering Technician, Contra Costa County Flood Control & Water Conservation District

DATE: February 10, 2023

Response A1-1

The commentator requests that a map of the watersheds within the General Plan Update area be created.

This comment is acknowledged. In response to this comment, the following revision has been made to Section 3.8, *Hydrology and Water Quality*, Sub-Section 3.8.2, *Environmental Setting*, Page 3.8-2 of the Draft EIR:

The major waterways in Pleasant Hill are Grayson Creek and Contra Costa Canal. Both waterways are largely paved and channelized, but still provide some habitat in the channel bottoms (see Section 3.3, *Biological, Agriculture, and Forestry Resources*, for discussion of habitat and vegetation). Existing development throughout the General Plan area is characterized by extensive impervious surfaces such as concrete, asphalt, and structures, as well as the drainage control features implemented to accommodate existing development. An extensive stormwater drainage system is maintained throughout the General Plan area, rerouting surface waters that once meandered across the valley.¹ Waterways within Pleasant Hill city limits are shown in Figure 3.8-2.

The following figure was also added to Section 3.8, *Hydrology and Water Quality*, Sub-Section 3.8.2, *Environmental Setting*, Page 3.8-4 of the Draft EIR:

Figure 3.8-2 Surface Water in Pleasant Hill

All subsequent figures in Section 3.8, *Hydrology and Water Quality*, have been renumbered sequentially (e.g. Figure 3.8-3 is now numbered Figure 3.8-4). See Section 3 for a full list of errata. This addition of a figure and revisions to the numbering of the figures does not change the analysis within the Draft EIR and does not warrant recirculation of the Draft EIR.

Response A1-2

The commentator requests that the EIR discuss payment of drainage area fees for development within formed drainage areas as a mitigation measure.

This comment is acknowledged. Payment of drainage area fees are standard Conditions of Approval and operating procedures in the City of Pleasant Hill, as shown below. Impacts related to drainage under Impact HYD-3 would remain less than significant.

“The Developer shall pay the Drainage Area fee established by the Contra Costa County Flood Control and Water Conservation District in accordance with regulations establishing the Drainage Area prior to issuance of a building permit. (Reso 53-97 & Reso 124-00)”

¹ Contra Costa County Community Development Department and Public Works Department. 2003. Contra Costa County Watershed Atlas.

Response A1-3

The commentator requests that they be included in the review of all drainage facilities that have a region-wide benefit, that impact region-wide facilities, or that impact FC District-owned facilities.

For projects where the City of Pleasant Hill is the CEQA lead agency, the City of Pleasant Hill will include the FC District in the review of all drainage facilities that have a region-wide benefit, that impact region-wide facilities, or that impact FC District-owned facilities prior to final action on planning entitlement applications.



Letter A2

March 1, 2023

Troy Fujimoto, City Planner
Pleasant Hill Planning Division
100 Gregory Lane
Pleasant Hill, CA 94523

Re: Draft Environmental Impact Report for the Pleasant Hill 2040 General Plan, Pleasant Hill

Dear Mr. Fujimoto:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Pleasant Hill 2040 General Plan located in the City of Pleasant Hill (City). EBMUD commented on the Draft Housing Element Update on December 1, 2022, which included EBMUD's July 13, 2022 comments on the Notice of Preparation (NOP) of a Draft EIR for the Pleasant Hill 2040 General Plan. EBMUD's original comments for the Draft Housing Element Update and the NOP (see enclosure) still apply to the Pleasant Hill 2040 General Plan Draft EIR.

If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Sincerely,

A handwritten signature in blue ink that reads 'David J. Rehnstrom'.

David J. Rehnstrom
Manager of Water Distribution Planning

Enclosure

DJR:EZ:kvv
wdpd23_067 Pleasant Hill 2040 General Plan NOA Response

December 1, 2022

Troy Fujimoto, City Planner
City of Pleasant Hill, Planning Division
100 Gregory Lane
Pleasant Hill, CA 94523

Re: City of Pleasant Hill Housing Element Public Review Draft

Dear Mr. Fujimoto:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Housing Element Update for the Pleasant Hill 2040 General Plan. EBMUD commented on the Notice of Preparation of an Environmental Impact Report (EIR) for the project on July 13, 2022. EBMUD's original comments (see Attachment A) still apply regarding water service and water conservation. EBMUD has the following additional comments.

WATER SERVICE

EBMUD's Mokelumne Aqueducts (Aqueduct) right-of-way (owned in fee) is located through portions of the City of Pleasant Hill (see Attachment B - Map of EBMUD Aqueducts in Pleasant Hill). Any projects being planned within or immediately adjacent to EBMUD property will need to follow EBMUD's Procedure 718 – Raw Water Aqueduct Right-of-Way Non-Aqueduct Uses (see Attachment C for a copy of the procedure).

A2-1

Design drawings for any project encroachment (roadway, utility, facility, etc.) or restoration projects crossing or within the Aqueduct right-of-way will need to be submitted to EBMUD for review of possible drainage, site grading, fencing, construction access, and other conditions that may impact EBMUD property. EBMUD requires a full set of drawings to be submitted electronically in PDF format. All submittals shall be sent to the attention of Vincent H. Pon, P.E., Superintendent of Aqueduct Section, (vincent.pon@ebmud.com). Additional information and an encroachment package are included in EBMUD's Procedure 718. Applications for non-EBMUD uses will not be processed unless accompanied by the appropriate application fees outlined in the current applicable Water and Wastewater System Schedule of Rates and Charges and Fees. Contractors must secure an encroachment permit from EBMUD Aqueduct Section prior to mobilizing and starting construction work. A pre-construction meeting with EBMUD is mandatory.

When a project involves the construction of a retaining wall and fence along the property line; these must be constructed completely outside of EBMUD property, including all footings. The project sponsor shall contact EBMUD's Survey Section to coordinate identifying, locating and marking correct property lines.



July 13, 2022

Troy Fujimoto, City Planner
Pleasant Hill Planning Division
100 Gregory Lane
Pleasant Hill, CA 94523

Re: Notice of Preparation of an Environmental Impact Report for the Pleasant Hill
2040 General Plan, Pleasant Hill

Dear Mr. Fujimoto:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Pleasant Hill 2040 General Plan, which encompasses the entire City of Pleasant Hill (City). EBMUD has the following comments.

WATER SERVICE

Effective January 1, 2018, water service for new multi-unit structures shall be individually metered or sub-metered in compliance with California State Senate Bill 7 (SB-7). SB-7 encourages conservation of water in multi-family residential, mixed-use multi-family and commercial buildings through metering infrastructure for each dwelling unit, including appropriate water billing safeguards for both tenants and landlords. EBMUD water services shall be conditioned for all development projects within the General Plan that are subject to SB-7 requirements and will be released only after the project sponsor has satisfied all requirements and provided evidence of conformance with SB-7.

Main extensions that may be required to serve any specific developments within the General Plan to provide adequate domestic water supply, fire flows, and system redundancy will be at the project sponsor's expense. Pipeline and fire hydrant relocations and replacements due to modifications of existing streets, and off-site pipeline improvements, also at the project sponsor's expense, may be required depending on EBMUD metering requirements and fire flow requirements set by the local fire department. When the development plans are finalized for individual projects within the General Plan, project sponsors for individual projects should contact EBMUD's New Business Office and request a water service estimate to determine costs and conditions of providing water service to the development. Engineering and installation of new and relocated pipelines and services require substantial lead time, which should be provided for in the project sponsor's development schedule.

Project sponsors for individual projects within the General Plan should be aware that EBMUD will not install piping or services in contaminated soil or groundwater (if

375 ELEVENTH STREET • OAKLAND • CA 94607-4240 • TOLL FREE 1-866-40-EBMUD

A2-2

Troy Fujimoto, City Planner
July 13, 2022
Page 2

A2-2, cont.

groundwater is present at any time during the year at the depth piping is to be installed) that must be handled as a hazardous waste or that may be hazardous to the health and safety of construction and maintenance personnel wearing Level D personal protective equipment. Nor will EBMUD install piping or services in areas where groundwater contaminant concentrations exceed specified limits for discharge to the sanitary sewer system and sewage treatment plants. The project sponsor must submit copies to EBMUD of all known information regarding soil and groundwater quality within or adjacent to the project boundary and a legally sufficient, complete, and specific written remediation plan establishing the methodology, planning and design of all necessary systems for the removal, treatment, and disposal of contaminated soil and groundwater.

EBMUD will not design piping or services until soil and groundwater quality data and remediation plans have been received and reviewed and will not start underground work until remediation has been carried out and documentation of the effectiveness of the remediation has been received and reviewed. If no soil or groundwater quality data exists, or the information supplied by the project sponsor is insufficient, EBMUD may require the project sponsor to perform sampling and analysis to characterize the soil and groundwater that may be encountered during excavation, or EBMUD may perform such sampling and analysis at the project sponsor's expense. If evidence of contamination is discovered during EBMUD work on the project site, work may be suspended until such contamination is adequately characterized and remediated to EBMUD standards.

WATER CONSERVATION

A2-3

Individual projects within the General Plan presents an opportunity to incorporate water conservation measures. EBMUD requests that the City include in its conditions of approval a requirement that the project sponsor comply with Assembly Bill 325, "Model Water Efficient Landscape Ordinance," (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495). The project sponsors should be aware that Section 31 of EBMUD's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense.

If you have any questions concerning this response, please contact Timothy R. McGowan, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-1981.

Sincerely,



David J. Rehnstrom
Manager of Water Distribution Planning

DJR:KTL:grd
sb22_156 Pleasant Hill 2040 General Plan NOP Response

Letter A2

COMMENTATOR: David J. Rehnstrom, Manager of Water Distribution Planning, East Bay Municipal Utility District

DATE: March 1, 2023

Response A2-1

The commentator requests that all projects being planned within or immediately adjacent to EBMUD property would need to follow EBMUD's Procedure 718 – Raw Water Aqueduct Right-Of-Way Non-Aqueduct Uses.

This comment is acknowledged. Projects planned within or immediately adjacent to EBMUD property would follow EBMUD Procedure 718.

Response A2-2

The commentator states that water service for new multi-unit structures shall be individually metered or sub-metered in compliance with California State Senate Bill 7. The commentator further states that main extensions that may be required to serve specific developments within the General Plan area to provide adequate domestic water supply, fire flows, and system redundancy will be at the project sponsor's expense.

This comment is acknowledged and will be passed on to decision-makers for their consideration. The City would require implementation of California Senate Bill 7, as applicable, given it is State law.

Response A2-3

The commentator requests that the City include in its conditions of approval a requirement that the project sponsor comply with Assembly Bill 325, Model Water Efficient Landscape Ordinance.

This comment is acknowledged. At the time an individual project is proposed within the Pleasant Hill General Plan area, the City would require implementation of Assembly Bill 325, as applicable, given it is a State law. This comment will be passed on to decision-makers for their consideration.

From: Zachariasen, Judith@DOC <Judith.Zachariasen@conservation.ca.gov>
Sent: Wednesday, February 22, 2023 1:58:44 PM
To: tfujimoto@pleasanthillca.org <tfujimoto@pleasanthillca.org>
Cc: OLRA@DOC <OLRA@conservation.ca.gov>; OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Subject: EXTERNAL: CGS Comments on Draft Environmental Impact Report for the Pleasant Hill 2040 General Plan - SCN 2022070095

Letter A3

Hello, Mr. Fujimoto,

Thank you for providing the Draft Environmental Impact Report for the Pleasant Hill 2040 General Plan for review. This email conveys the following recommendations from the California Geological Survey (CGS) concerning geologic issues in Pleasant Hill:

Liquefaction and Landslide Hazards

A3-1

The CGS has not yet produced a Seismic Hazard Zone Map for liquefaction and seismically induced landslide hazards in the vicinity of the City. The City provides a general description of these hazards, which may exist in the planning area. With respect to liquefaction hazard, the City provides a map of liquefaction hazard, but the source does not appear to be referenced correctly (USGS, 2022, appears to be a USGS landslide inventory), and it is unclear where the map came from. CGS suggests the City provide the correct reference for the map.

1

A3-2

With respect to landslide hazards (seismically induced or otherwise), the City has provided a map titled "Landslide Potential within the General Plan Area," but the map is actually a landslide inventory depicting landslides that have already occurred, not the landslide potential. The City may, therefore, wish to refer to CGS Map Sheet 58, which analyzes landslide susceptibility throughout the state. The full map publication is available here:

https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.conservation.ca.gov%2Fcgis%2FDocuments%2FPublications%2FMap-Sheets%2FMS_058.pdf&data=05%7C01%7Cltrejo%40rinconconsultants.com%7C87fc8de190724bc2dc1908db15d69287%7C0601450f05594ee5b99257193f29a7f8%7C0%7C638127784005283479%7CUnknown%7CTWFpbGZsb3d8eyJWljoImCM4wLjAwMDAilCJQJoiV2luMzliLCJBTiI6IjEhaWwlcXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=k9IdyBwFo%2F%2F%2FwWAdV4se4njr1pQhaUsfeqxbeqlfA%3D&reserved=0

The GIS data for Map Sheet 58 is available at the link below. Please let me know if you have

any questions regarding the use of these data.

<https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgis.conservation.ca.gov%2Fportal%2Fhome%2Fitem.html&data=05%7C01%7Cltrejo%40rinconconsultants.com%7C87fc8de190724bc2dc1908db15d69287%7C0601450f05594ee5b99257193f29a7f8%7C0%7C638127784005283479%7CUnknown%7CTWFpbGZsb3d8eyJWljoImCM4wLjAwMDAilCJQJoiV2luMzliLCJBTiI6IjEhaWwlcXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Dy%2F103Qg7z7sOjXPaxJayDt66UDVakAw0HEVg2kTX4M%3D&reserved=0>

[id=87289025c11d4ba7ae65f0f472bf7c2d](https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgis.conservation.ca.gov%2Fportal%2Fhome%2Fitem.html&data=05%7C01%7Cltrejo%40rinconconsultants.com%7C87fc8de190724bc2dc1908db15d69287%7C0601450f05594ee5b99257193f29a7f8%7C0%7C638127784005283479%7CUnknown%7CTWFpbGZsb3d8eyJWljoImCM4wLjAwMDAilCJQJoiV2luMzliLCJBTiI6IjEhaWwlcXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Dy%2F103Qg7z7sOjXPaxJayDt66UDVakAw0HEVg2kTX4M%3D&reserved=0)

Thank you again for providing this draft DEIR for review. If you have any additional comments or questions, feel free to call or email.

Judy Zachariasen

[E-Sig-DOC-
Logo]<<https://nam10.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.conservation.ca.gov%2F&data=05%7C01%7Cltrejo%40rinconconsultants.com%7C87fc8de190724bc2dc1908db15d69287%7C0601450f05594ee5b99257193f29a7f8%7C0%7C638127784005283479%7CUnknown%7CTWFpbGZsb3d8eyJWljoImCM4wLjAwMDAilCJQJoiV2luMzliLCJBTiI6IjEhaWwlcXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Dy%2F103Qg7z7sOjXPaxJayDt66UDVakAw0HEVg2kTX4M%3D&reserved=0>>

2

Letter A3

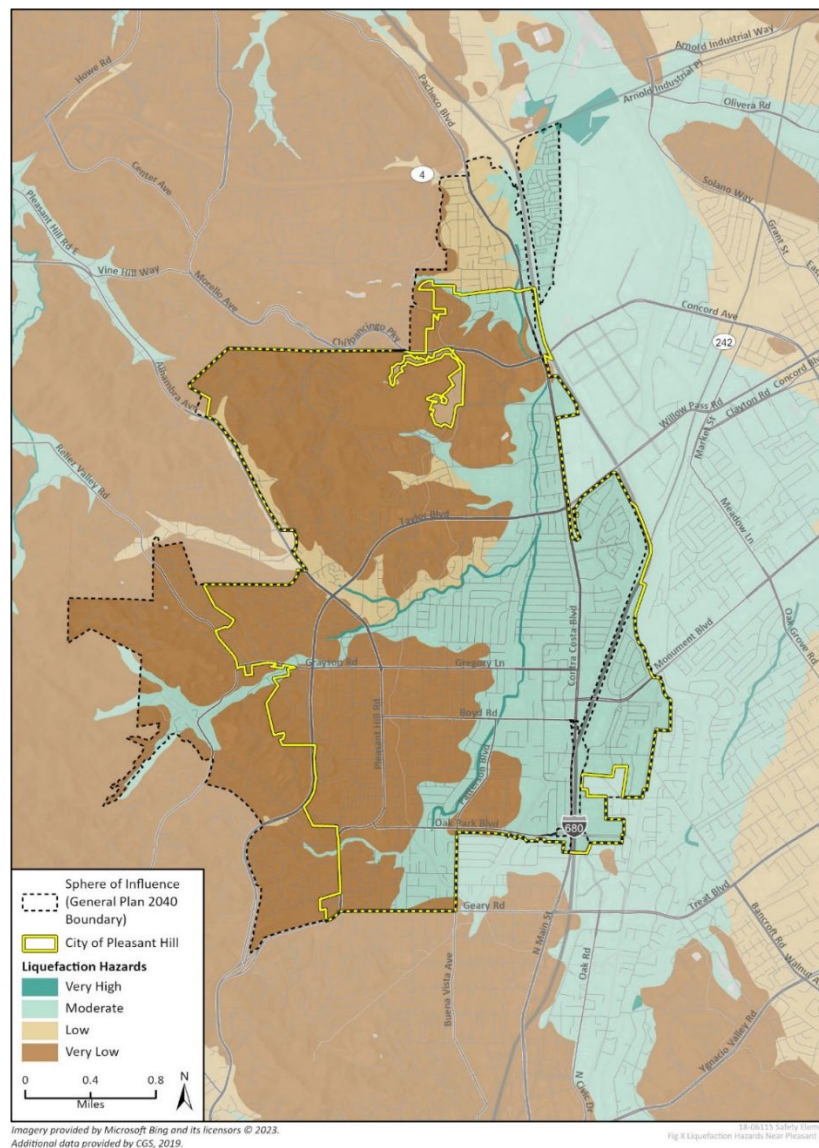
COMMENTATOR: Judith Zachariasen PhD, PG,CEG, Senior Engineering Geologist, California Geological Survey

DATE: February 22, 2023

Response A3-1

The commentator requests that the reference on the liquefaction map provided in the Draft EIR be corrected.

In response to this comment, the following citation revision has been made to Draft EIR Section 3.5, *Geology, Soils, and Mineral Resources*, Sub-Section 3.5.2, *Environmental Setting*, Figure 3.5-4, page 3.5-9:

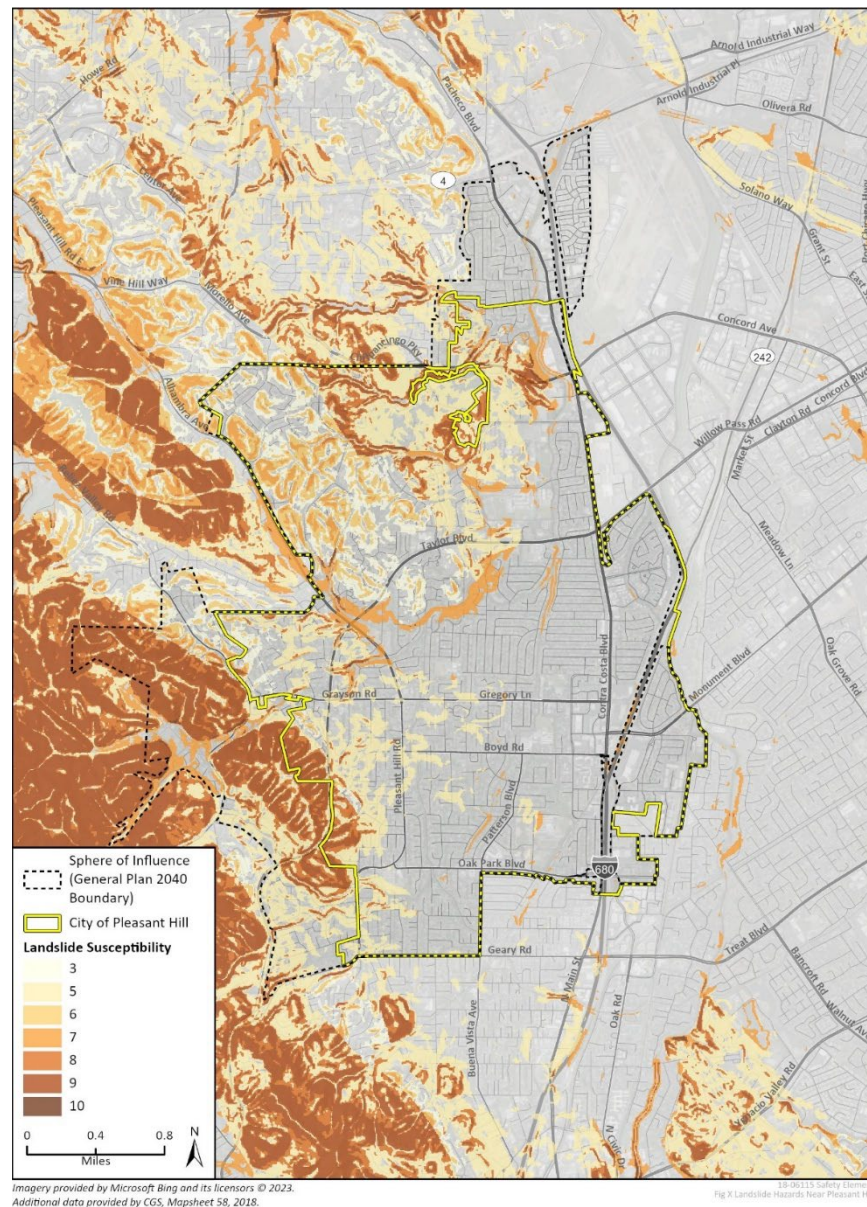


The citation revision to the figure does not change the analysis within the Draft EIR and does not warrant recirculation of the Draft EIR.

Response A3-2

The commentator requests that the landslide figure depict landslide susceptibility within the city and reference CGS Map Sheet 58.

In response to this comment the following map revision has been made to Draft EIR Section 3.5, *Geology, Soils, and Mineral Resources*, Sub-Section 3.5.2, *Environmental Setting*, Figure 3.5-5, page 3.5-11. The base map has been changed from historic landslides in the Pleasant Hill area to landslide susceptibility in the area. This revision to the figure does not change the analysis within the Draft EIR and does not warrant recirculation of the Draft EIR.



Letter A4

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, 115-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



March 15, 2023

SCH #: 2022070095
GTS #: 04-SCL-2022-00685
GTS ID: 26972
Co/Rt/Pm: CC/VAR

Troy Fujimoto, City Planner
City of Pleasant Hill
100 Gregory Lane
Pleasant Hill, CA 94523

Re: Pleasant Hill General Plan Update Draft Environmental Impact Report (DEIR)

Dear Troy Fujimoto:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Pleasant Hill General Plan Update Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the January 2023 DEIR.

Project Understanding

The Pleasant Hill 2040 General Plan would serve as a long-term framework for future growth, reflect issues identified from community input and changes in State law, and update all elements of the General Plan. The City of Pleasant Hill sits on the west side of I-680 in Contra Costa County and is located south of SR-4.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory and current guidance from the Contra Costa Transportation Authority (CCTA). Per the DEIR, this project is found to have *Significant and Unavoidable VMT impact*. Caltrans

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A4-1

Troy Fujimoto, City Planner
March 15, 2023
Page 2

- A4-1, cont. | supports the mitigation strategies proposed in TRA-1, which include TDM measures proven to support multi-modal transportation use and the VMT Mitigation Banking/Exchange program under development by CCTA.
- A4-2 | **Complete Streets**
Section 3.12.3 of the Draft EIR references Caltrans Deputy Directive 64-R1 on Complete Streets. This reference should be updated to reflect Caltrans Director's Policy 37 (DP-37), which supersedes Deputy Directive 64-R1, and further builds upon its goals. More information on DP-37 can be found here: <https://dot.ca.gov/-/media/dot-media/programs/sustainability/documents/dp-37-complete-streets-a11y.pdf>
- A4-3 | **Bicycle and Pedestrian Regulatory Framework and Needs**
Section 3.12.3 of the Draft EIR should include review of the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018). The Pedestrian Plan studied existing conditions for walking along and across the STN in the nine-county Bay Area and developed a list of location-based and prioritized needs. Pedestrian improvements identified on or near I-680 in Pleasant Hill include improved pedestrian features at Oak Park Blvd, improved pedestrian access between W Hookston Rd. and Buskirk Ave. over I-680, a pedestrian overcrossing over I-680 near the 242/680 split, improved pedestrian features at Sunvalley Blvd, improved pedestrian access over I-680 near the Sunvalley Shopping Center, and improved pedestrian features at Chilpancingo Pkwy junction.

As well, the Bike Plan identified the need for bicycle improvements such as a Class II bicycle facility and associated elements at the I-680/Monument Blvd interchange. Improvements needs such as buffered Class II facilities at the I-680/Willow Pass Rd interchange and I-680/Concord Ave interchange, which fall beyond Pleasant Hill City limits but within the sphere of influence. Caltrans suggests these needs, both pedestrian and bicycle, be noted as sites for potential Fair Share Mitigation. For more info on these plans, please refer to:

<https://dot.ca.gov/caltrans-near-me/district-4/d4-news/07-07-21-caltrans-releases-bay-area-pedestrian-plan>

<https://dot.ca.gov/caltrans-near-me/district-4/d4-popular-links/d4-bike-plan>

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Troy Fujimoto, City Planner
March 15, 2023
Page 3

Lead Agency

A4-4

As the Lead Agency, the City of Pleasant Hill is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

A4-5

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right of Way (ROW) requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

Please note that Caltrans is in the process of implementing an online, automated, and milestone-based Caltrans Encroachment Permit System (CEPS) to replace the current permit application submittal process with a fully electronic system, including online payments. The new system is expected to be available during 2023. To obtain information about the most current encroachment permit process and to download the permit application, please visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Troy Fujimoto, City Planner
March 15, 2023
Page 4

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is fluid and cursive, with the first letters of "Mark" and "Leong" being capitalized and prominent.

MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse

Letter A4

COMMENTATOR: Mark Leong, District Branch Chief, California Department of Transportation

DATE: March 15, 2023

Response A4-1

The commentator acknowledges that the proposed plans vehicle miles traveled analysis is consistent with the Office of Planning and Research's Technical Advisory.

The transportation analysis of the proposed plan focuses on vehicle-miles of travel, consistent with the Caltrans Transportation Impact Study Guide. Even with implementation of Mitigation Measure TRA-1, the proposed plan would result in a significant and unavoidable impact as stated under Impact TRA-2. No revisions to the EIR would be required in response to this comment.

Response A4-2

The commentator requests that Section 3.12.3 of the Draft EIR be updated to reference Caltrans Director's Policy 37 (DP-37).

In response to this comment, the following revisions have been made to the Draft EIR Section 3.12, *Transportation*, Sub-Section 3.12.3, *Regulatory Framework*, Page 3.12-12. The revision would not alter the impact analysis or findings of Section 3.12 and, as such, would not warrant recirculation of the Draft EIR.

CALTRANS DEPUTY DIRECTIVE 64-R1: COMPLETE STREETS – INTEGRATING THE TRANSPORTATION SYSTEM

~~In 2001, Caltrans adopted Deputy Directive 64; a policy directive related to non-motorized travel throughout the State. In October 2008, Deputy Directive 64 was strengthened to reflect changing priorities and challenges. Deputy Directive 64 R1 states:~~

~~The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Providing safe mobility for all users, including motorists, bicyclists, pedestrians and transit riders, contributes to the Department's mission/vision: "Improving Mobility across California."~~

~~Successful long-term implementation of this directive is intended to result in more options for people to go from one place to another, less traffic congestion and greenhouse gas emissions, more walkable communities (with healthier, more active people), and fewer barriers for older adults, children, and people with disabilities.~~

CALTRANS DIRECTIVE POLICY 37: COMPLETE STREETS

In 2021, Caltrans adopted Director's Policy 37, a policy directive related to non-motorized travel throughout the State. Director's Policy 37 states:

The California Department of Transportation (Caltrans) recognizes that walking, biking, transit, and passenger rail are integral to our vision of delivering a brighter future for all through a world-class transportation network. Additionally, Caltrans recognizes that streets are not only used for transportation but are also valuable community spaces. Accordingly, in locations with current and/or future pedestrian, bicycle, or transit needs, all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved. When decisions are made not to include complete streets elements in capital and maintenance projects, the justification will be documented with final approval by the responsible District Director. Opportunities for complete streets exist in all phases of project development from planning and design to construction, operations, and maintenance. Complete streets projects should prioritize underserved communities that have been historically harmed and segmented by the transportation network and should serve people of all ages and abilities. Furthermore, Caltrans commits to removing unnecessary policy and procedural barriers and partnering with communities and agencies to ensure projects on local and state transportation systems improve the connectivity to existing and planned pedestrian, bicycle, and transit facilities, and accessibility to existing and planned destinations, where possible.

Response A4-3

The commentator requests that Section 3.12.3 of the Draft EIR include review of the Caltrans District 4 Pedestrian Plan and the Caltrans District 4 Bike Plan.

The City of Pleasant Hill will review the Caltrans District 4 Pedestrian Plan and the Caltrans District 4 Bike Plan for their feasibility and implementation as part of the upcoming City of Pleasant Hill Bike and Pedestrian Master Plan. This comment is acknowledged and will be passed on to decision-makers for their consideration.

Response A4-4

The commentator states that if Caltrans facilities are impacted by the proposed plans, those facilities must meet Americans Disabilities Act Standards.

Transportation facilities that are constructed in support of the proposed plan would conform to all requirements for ADA standards and maintain bicycle and pedestrian access during related future projects construction. No revisions to the EIR are required in response to this comment.

Response A4-5

The commentator states that if permanent work or temporary traffic control encroaches onto Caltrans' Right of Way, it would require a Caltrans-issued encroachment permit.

Projects that would result in encroachment onto Caltrans' right of way would seek Caltrans-issued encroachment permits prior to the beginning of work. No revisions to the EIR are required in response to this comment.

Pleasant Hill Community
GREEN AWARD WINNER



Letter O1

Friends of Pleasant Hill Creeks

March 15, 2023

[Via Email: tfujimoto@pleasanthillca.org](mailto:tfujimoto@pleasanthillca.org)

Troy Fujimoto, City Planner
100 Gregory Lane, Pleasant Hill, CA 94523

RE: Pleasant Hill 2040 General Plan Draft Environmental Impact Report (DEIR)
State Clearinghouse #: 2022070095

Dear Mr. Fujimoto:

Friends of Pleasant Hill Creeks (FPHC) is a nonprofit community organization of Pleasant Hill residents who care about our creeks. Since 2017, FPHC volunteers have participated in creek cleanups, water quality monitoring, environmental education, wildlife surveys, native plantings, and other activities to help protect and restore our creeks. We respectfully submit the following comments on the above-referenced DEIR.

O1-1

A. Significance of Creeks and Riparian Corridors: We appreciate that the DEIR recognizes the significance of Pleasant Hill's creeks and riparian corridors to our community's environment and to California's native wildlife. We also appreciate that the proposed 2040 General Plan includes multiple new goals, policies, and programs to support protection and restoration of our creeks and riparian corridors and to help ensure that anticipated new development does not negatively impact these resources.

O1-2

B. Specific Comments: We respectfully request that the DEIR be revised to address the following issues.

1. The DEIR currently does not adequately describe the level of biodiversity, particularly avian diversity, that is present in and supported by Pleasant Hill's creek system. FPHC and other local organizations have documented the presence of a significant number of California native species (including special status species) in Pleasant Hill's riparian corridors. The DEIR should incorporate the following wildlife data, all of which was recorded in the General Plan area.

- **Native and Migratory Birds:** The DEIR should note that *more than 100 species of native and migratory birds, including ten species of raptors*, have been recorded in the Grayson Creek riparian corridor by a community science survey conducted by FPHC and Mt. Diablo Audubon Society (MDAS).¹ Further, the DEIR should note that raptors have been documented nesting in trees adjacent to Grayson Creek and foraging in the creek.² MM BIO-1 should recommend that biologists conducting surveys in or near a riparian zone review the most current avian data available, including detections recorded in the FPHC-MDAS survey and e-Bird. DEIR 3.3.3 should note that raptors, particularly nesting raptors, have specific legal protections³ in addition to the protections afforded to all migratory birds under federal and state law.
- **Salmonids:** The DEIR should note that, historically, Grayson Creek has provided habitat for Salmonids⁴ and that *multiple adult Chinook salmon were observed and recorded in Grayson Creek in October 2021*.⁵ Chinook salmon appear on the *Special Animals List* published by the California Department of Fish and Wildlife (CDFW)⁶ and should be added to DEIR Appendix B (Special Status Species Tables).

¹ FPHC and MDAS, *Grayson Creek Bird Survey Species List* (2017–2022). Attachment 1.

² Attachment 2.

³ CDFW, *Raptors of California*, <https://wildlife.ca.gov/Conservation/Birds/Raptors>.

⁴ See, e.g., Hanson, Charles H. 2014. *Fish Passage Assessment – Lower Walnut Creek and Lower Grayson Creek, Contra Costa County* (Walnut Creek: Hanson Environmental, Inc.).

⁵ Attachment 3.

⁶ CDFW, *Special Animals List* (January 2023), <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline>.

- 01-2, cont.
- **Western Pond Turtle:** The DEIR should note that western pond turtles, a special-status species, have been observed and recorded in Grayson Creek.⁷ (FPHC volunteers have observed western pond turtles multiple times.) The DEIR should include a specific mitigation measure to address protection of this species, including pre-construction surveys for nesting sites.⁸
 - **Beaver:** The DEIR should note that beavers have recently been observed and recorded in several sections of Grayson Creek within the General Plan area, and they may be expanding their range.⁹ Beavers are a keystone species according to CDFW.¹⁰
 - **River Otters:** The DEIR should note that there have been multiple recent observations of river otters, including pups, in Grayson Creek.¹¹ While river otters are not currently a special-status species, their presence indicates that the creek system is sufficiently healthy, in terms of water quality and food web, to support a breeding river otter population. Their presence also confirms that Pleasant Hill's creeks are functioning as wildlife movement corridors.
 - **Newts:** Based on detections in creeks in nearby areas (e.g., Briones Regional Park), we believe that the riparian corridors in the General Plan area may also provide suitable habitat for newts.
- 01-3
2. The DEIR states: "The major waterways in Pleasant Hill are Grayson Creek and Contra Costa Canal. Both waterways are largely paved and channelized... but still provide some habitat in the channel bottoms..." (3.8-2) This statement is not accurate. *Unlike the Contra Costa Canal (a man-made structure), Grayson Creek and its tributaries are natural creeks, most of which are in a natural state or flowing through earthen channels that support riparian plant communities and wildlife.*
 - The *Contra Costa County Watershed Atlas* shows that a relatively small portion of Pleasant Hill's creek system is in concrete channels or underground.¹² Therefore, it is not accurate to characterize Grayson Creek and its tributaries as "largely paved." Rather, the DEIR should describe the creek system in the General Plan area as largely natural or flowing through earthen channels.
 - There is a significant difference between earthen channels and concrete channels, and the DEIR should clarify that most of the channelized sections are earthen.¹³
 - The habitat value of the creeks is not limited to the channel bottom. Most of the creeks in the General Plan area have natural or earthen channel banks that sustain native plant communities, including native oaks, that provide important habitat for wildlife. Further, the creeks and their adjacent riparian zones provide wildlife movement corridors, as noted in DEIR 3.3-12 ff. Therefore, the above statement in DEIR 3.8-2 as to habitat value should be clarified.
- 01-4
3. The DEIR states: "The General Plan area is primarily developed and does not offer suitable habitat for special-status species or other special-status biological resources." (3.3-1) This statement is not accurate because, as described elsewhere in the DEIR, the General Plan area includes park and open space areas and riparian corridors that do provide suitable habitat for a significant number of (more than 100) special-status species. (DEIR 3.3-11 ff.) Therefore, the DEIR should be revised to state: "While the General Plan area is primarily developed, it includes open space, parkland, and riparian corridors that provide suitable habitat for special-status species or other special-status biological resources."
- 01-5
4. Figure 3.3-1 is incorrect because it classifies most of Pleasant Hill's creek system as "urban." Instead, this Figure should show Pleasant Hill's creeks and riparian corridors, most of which are in a natural

⁷ Attachment 4.

⁸ The following resources include suggested best management practices: [WPT RCC Strategy 2020.pdf](https://www.dnr.ca.gov/publications/2020/01/pond-turtles-bmp) (fws.gov) here: <https://www.dnr.ca.gov/publications/2020/01/pond-turtles-bmp>

⁹ Worth a Dam, Video: *Beaver in Pleasant Hill* (2022), YouTube: <https://www.youtube.com/watch?v=elQW85u8KR0>, and article "Beavers in Pleasant Hill," November 15, 2022, <https://martinezbeavers.org/?i=pleasant-hill>.

¹⁰ CDFW, *Beaver*, <https://wildlife.ca.gov/Conservation/Mammals/Beaver>.

¹¹ Attachment 5.

¹² Attachment 6.

¹³ See note 12.

- O1-5, cont. state or flowing through earthen channels, as supporting riparian plant and animal communities. These natural and earthen riparian corridors should also be included in the percentage classified as “Valley Foothill Riparian” because they support riparian plant and animal communities. We note that Figure 3.3-2 accurately shows the creek system as “Riverine.”
5. The DEIR states: “Because the development facilitated by the 2040 General Plan would occur as development and infill within existing developed areas, existing roads, water, and sewer are already in place and would minimize the need for construction of new utilities and infrastructure.” (3.3-23) This statement is not accurate because there are at least two multi-acre *undeveloped* areas that are currently designated for development in the General Plan area. These undeveloped areas are the Mangini-Delu site and the Beatrice site. Both of these sites are intersected by Grayson Creek.
- O1-8 The DEIR’s analysis should therefore take into account the current undeveloped nature of each of these sites and the following information.
- **Grayson Creek / Mangini-Delu Site:** This site, which is intersected by Grayson Creek, is one of the last significant undeveloped privately owned sites in the General Plan area. This site is currently open space but is expected to be developed. FPHC supports the concept of a Master Plan that addresses multiple priorities, including protection and restoration of the creek corridor. In FPHC’s view, the Creek Protection Zone established for this site should extend significantly more than 25 feet from each bank to protect and restore the creek corridor. In alignment with the General Plan, we support consultations with the community, the Contra Costa County Flood Control and Water Conservation District, the property owner(s), and restoration experts to analyze potential multi-benefit restoration opportunities for this site and to determine the appropriate size of the Creek Protection Zone.
 - **Grayson Creek / Beatrice Site:** This site, which is intersected by Grayson Creek, is one of the last significant undeveloped publicly owned sites in the General Plan area. It is currently open space but is designated for high- and medium-density multi-family housing. (General Plan Figure LU-1, 3-12). FPHC does not believe that development of this site will be feasible because of frequent and severe *flooding*.¹⁴ As open space, the site offers substantial habitat value as a *riparian zone and seasonal wetlands*. It is also an excellent candidate for creek restoration as multiple species of birds (including raptors) and other riverine wildlife (e.g., turtles and river otters) have been observed at this site. However, if there is going to be future development, a Creek Protection Zone with a setback of at least 100 feet from each creek bank should be established to protect the riparian corridor, to provide for flood water management, and to preserve as much as possible of the seasonal wetlands and wildlife movement corridor. We note that most of this site is owned by the county, and a minimum 100-foot setback would be consistent with the county’s current draft General Plan provision on wetlands.¹⁵
- O1-7 6. The DEIR notes that the General Plan increases the allowable density that could be constructed on some infill and development sites within the General Plan area, which could negatively impact adjacent or intersecting creeks. Section 3.3 should analyze the potential environmental impact of increased lighting on nocturnal and migrating wildlife and on dark skies, which are increasingly recognized as an important resource.¹⁶ The DEIR should include a mitigation measure to address this issue.

¹⁴ Attachment 7.

¹⁵ “Require new buildings and structures on private property be set back at least 100 feet from the edge of any wetland area, unless a site-specific evaluation indicates that a different setback is appropriate to protect the wetland and adjacent upland areas.” COS-P5.3 Contra Costa County General Plan 2040 – Conservation, Open Space, and Working Lands Element – DRAFT Goals, Policies, and Actions (May 2022).

¹⁶ International Dark-Sky Association, “Light Pollution Effects on Wildlife and Ecosystems,” <https://www.darksky.org/light-pollution/wildlife/>.

All attachments submitted and information provided or cited in footnotes to this letter are incorporated herein by reference.

We request that this comment letter and all the attachments be included as part of the DEIR.

Thank you for your consideration of our comments.

Sincerely,



Heather Rosmarin
Co-Founder
Friends of Pleasant Hill Creeks
A Project of Social and Environmental Entrepreneurs (SEE), a non-profit 501(c)(3) public charity
25A Crescent Drive #245
Pleasant Hill, CA 94523
pleasanthillcreeks@gmail.com

cc: City Council of Pleasant Hill
Contra Costa County Flood Control and Water Conservation District
San Francisco Regional Water Quality Control Board
California Department of Fish and Wildlife
Walnut Creek Watershed Council

Letter O1

COMMENTATOR: Heather Rosmarin, Co-Founder, Friends of Pleasant Hill Creeks

DATE: March 15, 2023

Response O1-1

The commentator states appreciation for the Draft EIR's recognition of the creeks and riparian corridors in Pleasant Hill and their importance to the local environment. The commentator also states appreciation for the 2040 General Plan goals, policies, and programs aimed at supporting protection and restoration of these features.

This comment is informational and is not related to the adequacy or conclusions of the EIR. No revisions to the EIR are required in response to this comment.

Response O1-2

The commentator opines that the Draft EIR does not adequately describe the level of biodiversity present in Pleasant Hill's creek system. The commentator requests that the Draft EIR be revised to include further information describing the diversity of native and migratory birds, salmonid species, western pond turtle, beaver, river otters, and newts present in Grayson Creek and other creek systems.

Common species (i.e., species with no protected status) are not required to be addressed as part of CEQA assessment. The environmental setting of EIR Section 3.3, *Biological Resources*, does describe the General Plan area in its larger context as generally representing an ecologically diverse area supporting many plants and animal species, including special-status species. While only some special-status species are named in the section, Table B-2 in EIR Appendix B includes listed salmonids and species of special concern, such as the western pond turtle. Grayson Creek and the other creek systems within the General Plan area are noted as providing wildlife movement corridors and riparian habitat for fish and other aquatic and terrestrial species. No revisions to the EIR are required in response to this comment.

Response O1-3

The commentator opines that the statement in the Draft EIR regarding Grayson Creek being largely paved and channelized is inaccurate. The commentator opines that Grayson Creek, and its tributaries are natural creeks that are mostly in a natural state. The commentator recommends that the Draft EIR be revised to state that Grayson Creek is largely natural or flowing through earthen channels rather than "largely paved". The commentator also notes that the habitat value of a creek is not limited to the channel bottom and that many creeks in the area provide important wildlife habitat. The commentator recommends that the statement in the Draft EIR on page 3.8-2 be revised to clarify the habitat value.

Drainage areas are described in general in the Riverine section of the Setting section as consisting of rock, cobble, gravel, or sand, consistent with what the commentator has stated. Additionally, the Draft EIR identifies the streams as habitat under special-status species and movement corridors. No revisions to the EIR are required in response to this comment.

Response O1-4

The commentator requests a revision to the Draft EIR on page 3.3-1 to clarify that the although the General Plan area is primarily developed, it includes open space, parkland, and riparian corridors that provide suitable habitat for special-status species and other special-status biological resources.

In response to this comment, the following revisions have been made to the Draft EIR Section 3.3, *Biological Resources*, Sub-Section 3.3.2, *Environmental Setting*, Page 3.3-1 to clarify the character of the General Plan Area:

The General Plan area is primarily developed and does not offer suitable habitat for special-status species or other special-status biological resources. However, riparian stream corridors and open space and parks within the General Plan area, though intersected by streets, still offer habitat and corridors for movement for a variety of plant and wildlife species, including some special-status species. Additionally, Pleasant Hill is located south of Suisun Bay and east of San Francisco Bay and generally representing an ecologically diverse area supporting many plants and animal species, ~~including special-status species.~~

This revision to the Draft EIR text would not change the impact analysis or the findings of the Draft EIR and would not warrant recirculation of the Draft EIR.

Response O1-5

The commentator states that Figure 3.3-1 is incorrect because it classifies most of Pleasant Hill's creek system as "urban" and requests that the streams and corridors be re-classified and included in the percentage classified as "Valley Foothill Riparian". Additionally, the commentator notes that Figure 3.3-2 accurately shows the creek system as "Riverine".

Figure 3.3-1 is a map of vegetation communities and land cover types depicting a small-scale (large area, limited detail) open-source data set from CalFire, while Figure 3.3-2 is a map of wetlands and aquatic resources depicting the open-source National Wetlands Inventory data set. While Figure 3.3-2 shows some area of Freshwater Forested/Shrub Wetland along Walnut Creek, it does not depict the associated upland riparian corridors for any of the streams. Therefore, combining the NWI data with the CalFire data does not address the issue. These are standard datasets used for large geographic areas, and mapping at the level of detail to depict and calculate acreage of riparian corridor within the urban land cover type is neither feasible nor practicable. Furthermore, the acreages are provided simply for reference and do not affect the analysis. No revisions to the EIR are required in response to this comment.

Response O1-6

The commentator claims that a statement that the development facilitated by the 2040 General Plan would occur as development and infill within existing developed areas where infrastructure is already in place and would minimize the need for construction of new utilities and infrastructure is not accurate because there are two multi-acre undeveloped areas that are currently designated for development, the Mangini-Delu and Beatrice sites. They request that additional information be provided for these two future development areas because they are the last significantly undeveloped privately and publicly owned sites, respectively, in the General Plan Area, and they are both intersected by Grayson Creek.

The commentator specifically recommends for the privately-owned Mangini-Delu site that the Creek Protection Zone be extended beyond the current ordinance requirement of 25 feet from top of bank and that the creek corridor be restored. For the County-owned Beatrice site, they state they do not believe that development of this site is feasible because of frequent and severe flooding. They believe that the site offers substantial habitat value as open space containing sensitive riparian and wetland habitat, and that it is an excellent candidate for restoration that would benefit multiple species. They recommend that if the site is to be developed, the Creek Protection Zone should reflect the 100-foot setback from top of bank, consistent with the County's current draft General Plan provisions. They believe this larger setback would serve to protect the riparian corridor, provide for flood water management, and preserve the sensitive habitats.

The statement about development facilitated by the 2040 General Plan is a general statement and not inaccurate. Even though the two sites identified by the commentator are partially developed, they are surrounded by developed areas, which still minimizes the need for construction of new utilities and infrastructure. The General Plan provides policies specific to the Mangini-Delu site that promote a comprehensive planning process that includes preservation of natural habitat, creation of open space and walking trails, and creek preservation and incorporation (Policies LU-6.7, LU-6.10, LU-6.12, and LU-6.13). Also, the General Plan identifies Program I, which would provide for creation of a Mangini-Delu Master Plan that incorporates those policies.

For future development at either site further discretionary approvals would be needed. For sites that may have effects that were not examined in this program EIR, further environmental review would be required such as a site-specific biological resources assessment, and/or a site-specific initial study, supplemental or subsequent EIR. Issues such as the habitat value of these specific sites, which may differ from each other and from other identified future development sites with or without adjacency to a stream, would be further analyzed at that time. However, the minimum size of Creek Protection Zones is dictated by policies and ordinance. While larger setbacks may be desirable, the size of setbacks only become a CEQA issue when the project-specific proposed setbacks would conflict with local policies or ordinances. It should also be noted, General Plan 2040 Policy ENV-2.6 promotes setbacks that exceed the minimum regulatory setback guidelines. No revisions to the EIR are required in response to this comment.

Response O1-7

The commentator notes that allowable increases in density may negatively impact adjacent or intersecting creeks and that Section 3.3 should analyze the potential environmental impact of increased lighting on nocturnal and migrating wildlife and on dark skies and include a mitigation measure to address the issue.

Light and glare impacts from the proposed plan are analyzed in Draft EIR Section 3.1, Aesthetics, beginning on Page 3.1-22. The impact from lighting due to allowable density increases on adjacent or intersecting creeks cannot be reasonably known at this time. However, City Wide Design Guidelines 2017 require that lighting levels are minimized to preserve the night (dark) sky, light sources are shielded to prevent glare or direct illumination on adjacent properties, and that wall pack light glare is shielded and minimized. No revisions to the EIR are required in response to this comment.

Letter I1

From: Bruce Irion <bpjeas6@comcast.net>
Date: February 25, 2023 at 10:14:07 AM PST
To: Troy Fujimoto <Tfujimoto@pleasanthillca.org>
Cc: City Council <citycouncil@pleasanthillca.org>
Subject: EXTERNAL: Comment on PH General Plan Draft EIR

I am writing to provide two comments on Pleasant Hill's General Plan draft EIR. While neither rises to the level of a legal deficiency of the review, I provide both for the consideration of the City Council who has both chartered and will approve the EIR.

I1-1

Over the course of the General Plan development, many residents have spoken up on behalf of nature and wildlife preservation. Pleasant Hill benefits from many forms of wildlife – deer, owls, opossums, and many others. Wildlife navigate and make their homes along the creeks and open spaces throughout the city. The draft EIR assessed the adequacy of the General Plan from the perspective of endangered species preservation which as the City Planner said at a recent Planning Commission meeting “gets a disproportionate share of attention in environmental law”. I am glad to see a tone in Pleasant Hill's General Plan that respects resident's broader view of respect for all species and the open space they need. Given the unprecedented growth in the 2040 General Plan, I would like to see not just a tone, but a more specific commitment by the city to broad protection of wildlife and open space including but not limited to periodic surveys of wildlife and fauna. I am sure there are many nature groups that would be happy to volunteer to participate.

I1-2

Second, in assessing alternatives, Pleasant Hill's General Plan EIR, like the Plan Bay Area 2050 EIR that preceded it, did not cannot consider any alternative that did not comply with the state's housing target. In approving the General Plan, the public interest in increasing housing must outweigh any adverse impact to the public. The draft EIR concluded the 2040 General Plan has or risks “significant and unavoidable” impact to traffic; noise; green-house-gases; water, waste-water, & stormwater; schools; loss, injury, or death from wildfires; and potential impact to significant historical resource (HAZ-4, TRA-3, NOI-1, GHG-1, UTL-1, PS-3, HAZ-5, & CR-1). Further, the draft EIR could not identify any alternative complying with the state housing mandate that did not also share these same “significant and unavoidable” impacts. One has to wonder whether it is truly in the public interest for all residents to suffer more traffic, noise, green-house-gases, water and other resource shortages, greater impact from wildfires, and impacts to schools and items of historical significance so that the state can continue to accommodate unlimited growth?

Bruce Irion
Resident, Pleasant Hill

Letter I1

COMMENTATOR: Bruce Irion

DATE: February 25, 2023

Response I1-1

The commentator expresses a desire for the General Plan to have broad protections of wildlife and open space.

This comment is acknowledged and will be passed on to decision-makers for their consideration.

Response I1-2

The commentator requests that an alternative that did not comply with the state's housing target. The commentator questions why all the alternatives had the same significant and unavoidable impacts.

As discussed in EIR Section 5.8, *Alternatives Considered but Rejected*, an alternative considered was a reduced residential alternative that would not meet the Regional Housing Needs Allocation requirements. However, this alternative was rejected, because it would not meet the overall project objectives and also not account for the natural increase of population and result in increased housing need, which in turn would result in a significant and unavoidable impact related to land use planning, population, and housing.

Each of the EIR Alternatives may have the similarly formatted conclusionary statement, but as shown in Table 5-2 in EIR Section 5.9.1 of Chapter 5, *Alternatives*, each of the alternatives' environmental impacts were analyzed, as well as compared for whether the impacts were greater than, lesser than, or similar to that of the proposed plan for each of the topic areas that were analyzed. No revisions to the EIR are necessary in response to this comment.

From: Celia Chiang <chchiang26@gmail.com>
Sent: Sunday, March 12, 2023 7:08 PM
To: Troy Fujimoto <Tfujimoto@pleasanthillca.org>
Subject: EXTERNAL: Comments to Draft EIR - 2040 General Plan Update

Troy,

As I may not complete my review of the entire DEIR before 3/15, please see comments as follows

- 12-1 Many of my comments are around Pleasant Hill's Environment and Sustainability Goals (ESG) which may be in process of refinement.
If the General Plan is Pleasant Hill's aspirational policy document, to encourage low-rise multi-family and mixed use development, it would help to define guidelines and incentives to ensure the diverse housing options that meet the city's ESG strategy.
- 12-2 - Please confirm if current City Lighting Standards are aligned with latest CalGreen requirements and voluntary Dark Sky ordinances
- 12-3 - Although avian risk mitigation is voluntary, is it possible to consider adding bird-friendly standards to city design guidelines?
- 12-4 - Some analysis sections refer to 2019 version of CCR T24, whereas others refer to the currently adopted 2022 version. References should be consistent. The later version has further residential and non-residential measures for EV charging to take into account
- 12-5 - Please confirm current count of publicly accessible EV charging stations in Pleasant Hill. It would also be helpful to know projected count by 2040.
- 12-6 Please include link to Pleasant Hill Climate Action Plan
If the city is working on this, is the Action Plan the vehicle to incorporate Reach Codes on Zero Net Energy, Building Electrification, increased EV charging capacity especially around the type of low-rise multi-family development we are encouraging?
We briefly touched upon Reach Codes in our last discussion about the General Plan and possibly tying these to incentives.
What does that process look like to identify incentives that are acceptable to Pleasant Hill?
- 12-7 It would be helpful if Engineering could provide specific water management strategies than beyond what is listed in the DEIR for consideration in providing guidance for single family home permit applicants. There may be technologies available that are not known to lay people not in the design and construction industry.
- 12-8 Separate from ESG is the topic of cultural resources, which are stated as based on buildings 45+ years. My concern is to what the 45 year benchmark is related, since 43% of the single family housing stock was built between 1970-90, would that mean most single family homes in Pleasant Hill could be contested on historic grounds from redevelopment?
- 12-9 Regarding the EIR alternatives, please clarify how the Planning Commission and City Council are to consider Alternate 2 as part of the evaluation of the DEIR as it has been identified as the environmentally superior alternative?
What are the next steps towards finalizing the EIR?

If the consultants will clarify these comments in their presentation, no need to respond by email.
I have about 100 pages to go thru the last 3 sections, so I will likely reserve my comments for that April/May meeting.

Thanks, Celia

Letter I2

COMMENTATOR: Celia Chiang

DATE: March 12, 2023

Response I2-1

The commentator expresses a desire to define guidelines and incentives to ensure the diverse housing options would meet the City's Environment and Sustainability Goals.

The City of Pleasant Hill has already adopted Objective Residential Design and Development Standards that are intended to increase by-right residential project approvals and make the residential development requirements more clear and predictable for developers. As part of General Plan implementation, the City intends to update the Zoning Code to, among other things, make housing development more flexible and provide updated development standards for a diverse range of multi-family development product types in Pleasant Hill.

Response I2-2

The commentator requests confirmation that the current City lighting standards are aligned with the latest CalGreen requirements and voluntary Dark Sky ordinances.

The City of Pleasant Hill implements Title 24, which includes CalGreen provisions. In addition, the City has a parking lot lighting provision that preserves the dark sky by having foot candle provisions and full cutoff fixtures that minimize lighting impacts above the light source.

Response I2-3

The commentator requests consideration of adding bird-friendly standards to city design guidelines.

While not a CEQA comment, this comment is acknowledged and will be passed on to decision-makers for their consideration.

Response I2-4

The commentator states that some Draft EIR sections refer to the 2019 version of CCR Title 24, whereas others refer to the currently adopted version and requests that they be made consistent.

In response to this comment, all references to the 2019 version of CCR Title 24 have been corrected to the currently adopted 2022 version of CCR Title 24. Please refer to Chapter 3, *Errata*, of this Final EIR for a full list of corrected references. This revision to the Draft EIR text would not change the impact analysis or the findings of the Draft EIR and would not warrant recirculation of the Draft EIR.

Response I2-5

The commentator requests the current count of publicly accessible EV charging stations in Pleasant Hill and the projected count in 2040.

The City of Pleasant Hill does not track publicly accessible EV Charging Stations. However, it is current practice to include EV Charging Stations as part of major site redevelopments pursuant to current building code.

Response I2-6

The commentator requests the link to the Pleasant Hill Climate Action Plan. The commentator further requests information on reach codes on zero net energy building electrification and increased EV charging capacity.

While not a CEQA comment, this comment is acknowledged and will be passed on to decision-makers for their consideration. For informational purposes, the City does not currently have a Climate Action Plan (CAP); therefore, Mitigation Measure GHG-2 in Section 3.6, *Greenhouse Gas Emissions & Energy*, of the Draft EIR would require preparation of a CAP by Summer 2025.

Response I2-7

The commentator requests the City's Engineering Department provide specific water management strategies beyond what is listed in the Draft EIR for consideration in providing guidance for single-family home permit applicants.

The City of Pleasant Hill is constantly exploring options for water management strategies beyond what is required for stormwater runoff provisions. The City relies on the multiple water providers that serves the City for water management strategies. No revisions to the EIR are necessary in response to this comment.

Response I2-8

The commentator expresses concern that single family homes in Pleasant Hill would be contested on historic grounds from redevelopment due to their age and the benchmark of 45 years.

In response to this comment, the following revision has been made to Section 3.4, *Cultural and Tribal Cultural Resources*, Sub-Section 3.4.4, *Impacts and Mitigation Measures*, Page 3.4-21:

MITIGATION MEASURE CR-1: REVISE GENERAL PLAN IMPLEMENTATION PROGRAM M TO INCLUDE PREPARATION OF HISTORICAL RESOURCES EVALUATION PRIOR TO APPROVAL FOR PROJECTS INVOLVING BUILDINGS 45 YEARS OR OLDER AND IMPLEMENTATION OF MITIGATION PRIOR TO AND DURING CONSTRUCTION

The City shall revise 2040 General Plan Environment Element Program M to include that, in addition to updating the existing historical and cultural resources survey, a historical resources evaluation shall be prepared prior to approval of a project carried out under the 2040 General Plan involving the demolition or substantial alteration of a building, structure, object, or other built environment feature that is 45 years of age or older and as deemed necessary by the Community Development Director.

The City shall add further details to 2040 General Plan Program M that state the following:

- The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards in architectural history or history (as defined in Code of Federal Regulations, Title 36, Part 61). The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to

identify potential historical resources within the proposed development site. All properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. If the property is already listed in the NRHP or CRHR, the historical resources evaluation described above shall not be required.

- If historical resources are identified within the site of a proposed development, efforts shall be made to the extent feasible to ensure that impacts are mitigated. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the Professional Qualification Standards, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with a development application that may affect the historical resource, the historical resources evaluation report shall also identify and specify the treatment of character-defining features and construction activities.
- Efforts shall be made to the greatest extent feasible to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the Professional Qualification Standards. In conjunction with a development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City for review and concurrence. As applicable, the report shall demonstrate how a project complies with the Standards and be submitted to the City for review and approval prior to the issuance of permits.
- If significant historical resources are identified on a development site and compliance with the Standards and or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS) report, or equivalent. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Professional Qualification Standards and submitted to the City prior to issuance of any permits for demolition or alteration of the historical resource.

In addition, while future redevelopment of buildings 45 years or more in age may result in a significant and unavoidable impact, the City is still able to make a Statement of Overriding Consideration when deemed necessary if all feasible mitigation would not reduce impacts to Less than Significant. This revision to the

Draft EIR text would not change the impact analysis or the findings of the Draft EIR and would not warrant recirculation of the Draft EIR.

Response I2-9

The commentator requests clarification on how the Planning Commission and the City Council are to consider Alternative 2 as part of the evaluation of the Draft EIR, as it has been identified as the environmentally superior alternative. The commentator also requests clarification on what the next steps are toward finalizing the EIR.

If, as here, a project will result in significant environmental impacts that will not be avoided or substantially lessened by mitigation measures, the City body which approves the project must consider the environmentally superior alternative identified in the EIR and must find that it is "infeasible" before approving the project. (Public Resources Code §21081(a)(3); CEQA Guidelines §15091(a)(3).) The City of Pleasant Hill's finding that an alternative is infeasible must describe the specific reasons for rejecting the alternatives described in the EIR. (CEQA Guidelines §15091(a).) The finding must also be supported by substantial evidence in the record. (Public Resource Code §21081.5.) "Feasible" is defined as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. (Public Resources Code §21061.1; CEQA Guidelines §15364.) The statute also provides that "other considerations" may provide the basis for an infeasibility finding. (Public Resources Code §21081(a)(3); CEQA Guidelines §15091(a)(3). For instance, in *California Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1002 the Court found that when making infeasibility findings an agency determines how competing interests should be resolved, and in *No Slo Transit, Inc. v. City of Long Beach* (1987) 197 Cal.App.3d 241, 257 the Court found that consideration of feasibility may be based on various factors, including practicality. A conflict between proposed alternatives and agency planning goals may support a finding of infeasibility. In *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, San Diego rejected alternatives to a proposed general plan amendment as infeasible because they would conflict with the City's growth management program. Noting that a determination of infeasibility involves balancing economic, environmental, social, and technological factors, the court concluded that accommodating these factors with a staged growth management program was appropriate. 133 CA3d at 417. An agency may also find alternatives infeasible because they do not adequately accommodate its policies. In *California Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001, the city found the alternatives to the proposed project infeasible because they would not accomplish its policy goals of promoting transportation alternatives and access for persons with disabilities. The court upheld the city's findings, concluding the statutory language providing that an agency may consider social and other considerations allows the agency to find an alternative infeasible because it is impractical or undesirable as a matter of policy.

Next steps for the certification of the EIR would be recommendation by the Planning Commission to the City Council followed by City Council certification of the EIR.

From: Wendy Gollop <golwern@gmail.com>
Sent: Wednesday, March 15, 2023 11:21 AM
To:
Subject: EXTERNAL: Pleasant Hill Draft EIR on noise in Residential areas.

Dear Troy Fujimoto
Please add these comments to the Pleasant Hill General Plan DEIR

The draft EIR discusses noise in residential areas.

(pg 459-460) "HS-7 Ensure the community is protected from noise that interferes with human activity or causes health problems."

I3-1

I greatly applaud this goal. Noise is a significant stressor and quality sleep is an important component of a healthy lifestyle. I would like to suggest that street sweeping be added to the list of noise generating activities that are disturbing at night listed in the goal of HS 7.--7.5 and programs O,P, and R. Currently street sweeping of streets such as Oak Park Blvd is done once weekly at 2:30 am and lasts for sometimes half an hour or more with the street sweeper stopping and starting along the way. This greatly disrupts sleep and could be accomplished either early in the morning or late evening (6-7 am or after 9pm as has been done in the past). Oak Park Blvd is lined with residential houses, both multifamily and single family homes as are other streets on the street sweeping route. This activity is not consistent with the hazard and safety element of the General Plan.

Thank You
Wendy Gollop and Alan Bade
280 Longfellow Dr
Pleasant Hill CA

Letter I3

COMMENTATOR: Wendy Gollop and Alan Bade

DATE: March 15, 2023

Response I3-1

The commentator requests that noise from street sweeping be added to the list of noise generating activities in Goal HS-7 of the General Plan.

In response to this comment, City staff recommend the City Council consider the following revision to 2040 General Plan Health and Safety Element Program R:

Program R Noise in Residential Areas

Amend the City noise ordinance to prohibit during late night and early morning hours excessive noise-generating activities (e.g., garbage and recycling pickup, parking lot vacuuming, etc.), including the use of all landscape equipment on commercial properties located adjacent to existing residential areas.

This proposed revision to the 2040 General Plan text would not change the Draft EIR impact analysis or the findings of the Draft EIR and would not warrant recirculation of the Draft EIR.

From: Wendy Gollop <golwen@gmail.com>
Sent: Wednesday, March 15, 2023 11:27 AM
To: Letter I4
Subject: EXTERNAL: Light pollution and dark skies, DEIR for GP

Dear Troy Fugimoto,

Please submit the following comments to the DEIR

I4-1 The DEIR analyzes the effect of Light and Glare on aesthetics and scenic views, but it should also analyze the effects of Light and Glare on biological resources. It has not addressed the effects of light pollution and artificial light on open space and creeks. Light and Glare will increase during the time frame of the General Plan as a result of increased development.

I4-2 As acknowledged in the DEIR, riparian areas act as wildlife corridors for birds, mammals such as beaver, otters, muskrats, coyotes, and birds and aquatic species. Light pollution has an effect on both plants and animals. Artificial light affects animals and birds in many ways. Bird migration is disrupted by nighttime lights from buildings. Night light disrupts predator prey relationships, particularly night hunting species. Light pollution alters organisms' eyes and their visual perception of prey and objects. Insects are attracted to artificial light and will spend time around light sources as opposed to spending time pollinating plants or other activities necessary for their survival, which affects the food chain. Excessive nighttime light affects circadian rhythm in all species. It is important that artificial light be used in beneficial ways by requiring lighting to be downwardly directed to areas that need lighting for safety and activity related purposes. Light color is also important. Harsh blue light is reported to harm human health and be less welcoming at night. Warmer LED wavelengths produce a more ambient and pleasing glow both in public settings such as outdoor gathering places and are less disruptive to birds, insects and mammals. Please consider policies to address artificial light and light pollution in the General Plan and the DEIR to address these issues.

Thank you.

Wendy Gollop and Alan Bade
Pleasant Hill Resident

References:

1. The ecological impacts of nighttime light pollution: a mechanistic appraisal.
<https://onlinelibrary.wiley.com/doi/10.1111/brv.12036>
2. International Dark Sky Association. <https://www.darksky.org/light-pollution/wildlife/>

Letter I4

COMMENTATOR: Wendy Gollop and Alan Bade

DATE: March 15, 2023

Response I4-1

The commentator requests that the effects of light and glare on biological resources be analyzed as well.

Given that the wildlife in the urban environment of the General Plan area has been exposed to light at night (e.g., light from residences, street lighting, and car lights), the wildlife is habituated to lighting at night. Further, development facilitated by the proposed plan would be required to comply with lighting standards as set forth by the City of Pleasant Hill. Compliance with the City Lighting Standards Study Findings as a result of Mitigation Measure AES-1 would also help to reduce potential impacts related to light and glare. Development facilitated by the proposed plan would also be required to landscape in accordance with City requirements and, coupled with lighting standards, would result in less-than-significant lighting impacts to wildlife.

Response I4-2

The commentator requests that policies be added to the General Plan that address artificial light and light pollution.

In response to this comment, City staff recommend the City Council consider the following new 2040 General Plan policy to address light exposure:

Blue Light Spectrums

Consider installation of new lighting systems, when replacing existing lighting systems, that minimize the negative effects of blue light spectrums on animals and human beings.

This proposed revision to the 2040 General Plan text would not change the Draft EIR impact analysis or the findings of the Draft EIR and would not warrant recirculation of the Draft EIR.

From: Wendy Gollop <golwern@gmail.com> Letter I5
Sent: Wednesday, March 15, 2023 11:50 AM
To: To:
Subject: EXTERNAL: Comments to DEIR General Plan GHG and Noise from idling trucks
Attachments: 20221019_144023 Idling truck.jpg; Idling truck on Longfellow.jpg; Trucks next to Longfellow houses.jpg; truck_idling_fact_sheet.pdf; 20221207_134757_Truck_with_kids.jpg

Dear Troy Fujimoto

Please add these comments to the DEIR

I5-1

The Draft EIR discusses the importance of reducing greenhouse gas emissions in section 3.6 and accompanying pollutants such as diesel particulate matter and polyaromatic hydrocarbons which can cause cancers. TC14.3 in the draft General Plan states "minimize truck impacts on air quality and noise". Yet the DEIR does not discuss the impact of idling trucks in residential neighborhoods and does not put forth a plan to enforce the laws regarding diesel trucks idling in restricted areas. Please consider a goal in the General Plan to address it and a pathway to enforce it.

From the California Air Resources Board:

" California's 5-minute Idling Rules are Enforced:

Know the rules and your options

Trucks can idle for 5 minutes everywhere in California. Any law enforcement department, including air districts and CARB, can fine a 10,000 pound or greater truck owner and driver up to \$1000 per day for illegal idling (13 CCR 2480 & 2485). Where can't trucks idle for more than 5 minutes? Within 100 feet of these restricted areas, Homes, Schools, Hospitals, Senior Care Facilities, Childcare Facilities even with a certified Clean Idle engine/sticker or while queuing: When can trucks idle for more than 5 minutes? With certified Clean Idle engines and while queuing in unrestricted areas In adverse weather conditions Using power take-off devices In traffic During mechanical failure."

I5-2

Also, Section 3.10 in the Draft EIR discusses noise. Table 3.10-5 (pg 454) lists Residential and neighborhood businesses with max noise standards of 50 dB. Trucks produce noise at 84 dB (pg 484) at 50 ft.

We have numerous trucks using Keats Circle and Longfellow to deliver to the Oak Park Shopping Center. Many park on Longfellow next to residential houses or in the adjacent shopping center parking lot and idle their trucks. These trucks are within the 100 ft restricted area of residential houses, kids walking home from school, and a Karate studio. Noise makes it hard to participate in zoom meetings and generally in daily activities around the house. Idling can last for more than an hour at times, multiple times per day and all hours of the night. The Oak Park Shopping Center is zoned NB and is serviced from the rear by neighborhood streets. These conflicts have not been adequately addressed in the Draft EIR. The draft General Plan has rezoned quite a few residential neighborhoods to mixed use which will increase the conflict between commercial use, noise and pollution and existing residential neighborhoods. Please address these issues and adopt policies to mitigate and enforce policies regarding these issues. I have written and spoken about these issues at many meetings but as of yet they have not been addressed.

I5-2,
cont.

Additionally, the new Contra Costa Co general plan has policies to address this very issue. Specifically, HS P1.8 states "Prohibit non-essential idling of diesel engines county wide and prohibit non essential idling of all vehicles within 100 ft of sensitive receptors". HS A1.1 "Adopt an ordinance that matches or is more stringent than the states maximum idling law and coordinates with CARB, BAAQMD and law enforcement to achieve compliance."

I hope that you can see that there is sufficient need to address this issue. Please adopt policies to address and enforce both noise and pollution in residential neighborhoods from idling trucks.

Thank You.

Sincerely
Wendy Gollop and Alan Bade
280 Longfellow Dr
Pleasant Hill, CA

One attachment • Scanned by Gmail

Letter I5

COMMENTATOR: Wendy Gollop and Alan Bade

DATE: March 15, 2023

Response I5-1

The commentator requests that the EIR should discuss the air quality and greenhouse gas impacts of idling trucks in residential neighborhoods.

Potential construction and operational air quality and greenhouse gas emissions impacts from implementation of the proposed plan are discussed in EIR Sections 3.2, *Air Quality*, and 3.6, *Greenhouse Gas Emissions and Energy*, respectively. The potential air quality impacts to sensitive receptors such as residences are discussed in EIR Section 3.2, *Air Quality*, and were found to be less than significant with implementation of Mitigation Measures AQ-3 (implementation of a Construction Health Risk Assessment) and AQ-4 (implementation of a General Plan Policy to reduce operational toxic air contaminants). Therefore, no revisions to the EIR are necessary in response to this comment.

Response I5-1

The commentator requests that the EIR should discuss the noise impacts of idling trucks in residential neighborhoods.

Potential noise impacts resulting from idling trucks would be related primarily to construction noise as discussed in EIR Section 3.10, *Noise*. As discussed therein, implementation of Mitigation Measure NOI-1 (construction noise reduction measures) would help to reduce some construction noise but not all. Construction noise would remain significant and an unavoidable impact as stated under Impact NOI-1. However, idling trucks would not be the greatest contributor to noise. Greatest contributors to noise would be equipment-intensive phases of initial construction (i.e., demolition, site preparation, and grading work), as discussed in the impact analysis discussion.

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3 Errata

The following are revisions to the Draft Environmental Impact Report (EIR) for the Pleasant Hill 2040 General Plan Update. These revisions are minor modifications and clarifications to the document and do not change the significance of the environmental issue conclusions within the Draft EIR. The revisions are listed by the Draft EIR section and page number. All additions to the text are underlined (underlined), and all deletions from the text are stricken (~~stricken~~).

3.1 Changes in Response to Specific Comments

Section 3.3, Biological Resources

Sub-Section 3.3.2, Environmental Setting

Draft EIR Page 3.3-1:

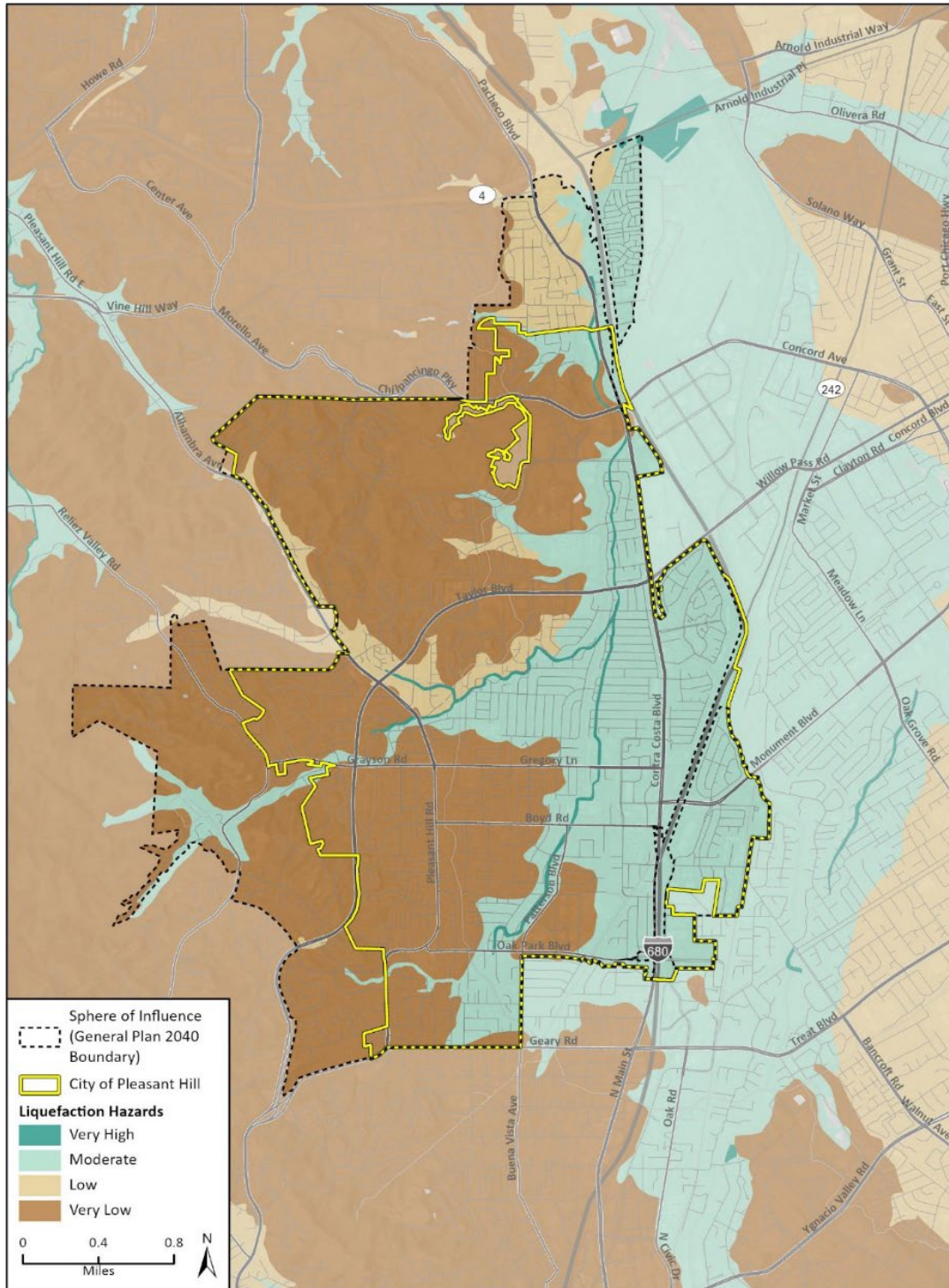
The General Plan area is primarily developed and does not offer suitable habitat for special-status species or other special-status biological resources. However, riparian stream corridors and open space and parks within the General Plan area, though intersected by streets, still offer habitat and corridors for movement for a variety of plant and wildlife species, including some special-status species. Additionally, Pleasant Hill is located south of Suisun Bay and east of San Francisco Bay and generally representing an ecologically diverse area supporting many plants and animal species, ~~including special-status species.~~

Section 3.5, Geology, Soils, and Mineral Resources

Sub-Section 3.5.2, Environmental Setting

Draft EIR Page 3.5-9:

Figure 3.5-4 Liquefaction Potential within the General Plan Area

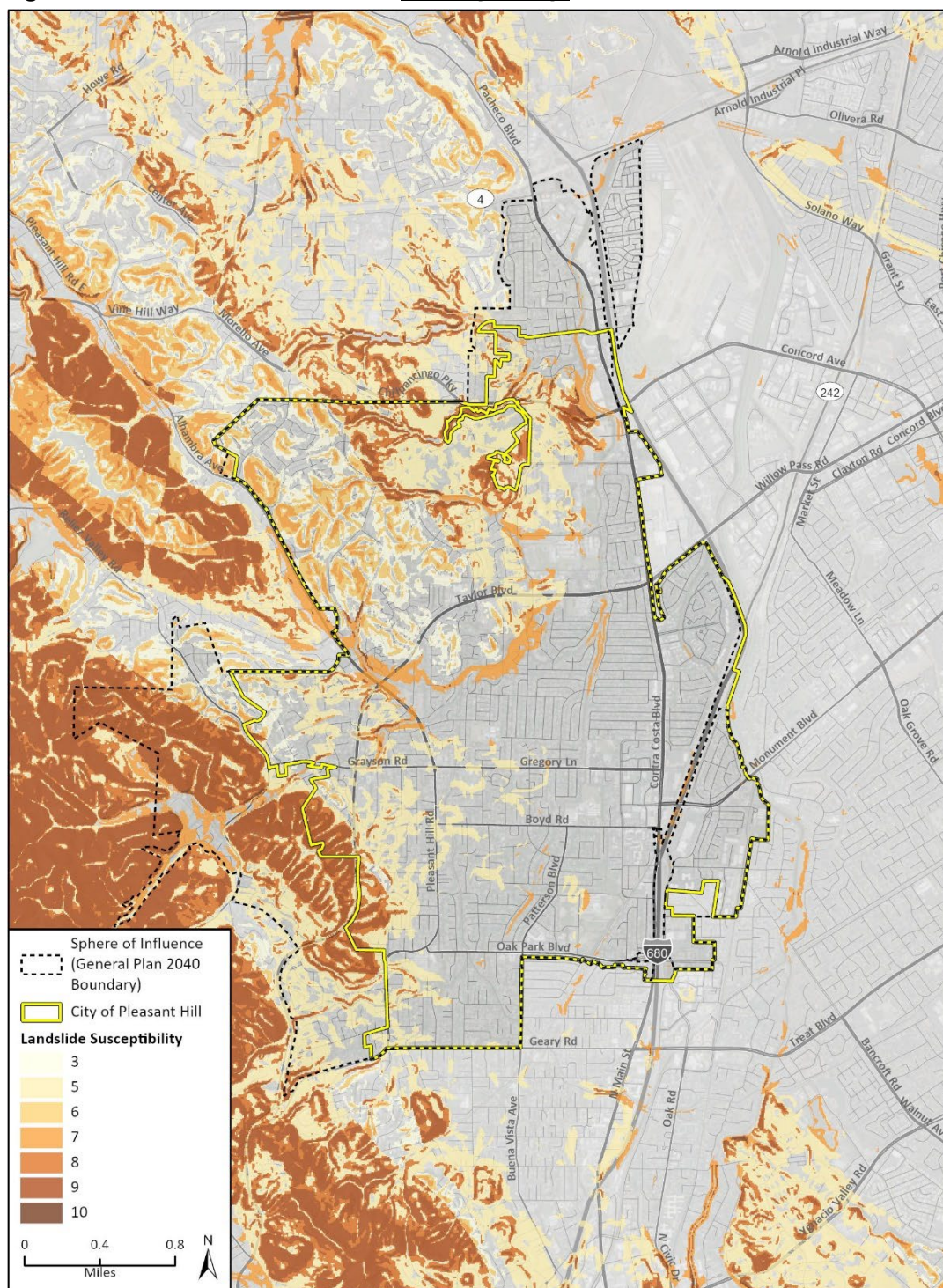


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Additional data provided by CGS, 2019.

18-06115 Safety Element
Fig X Liquefaction Hazards Near Pleasant Hill

Draft EIR Page 3.5-11:

Figure 3.5-5 ~~Landslide Potential~~ Susceptibility within the General Plan Area



Imagery provided by Microsoft Bing and its licensors © 2023.
Additional data provided by CGS, Mapsheet 58, 2018.

18-06115 Safety Element
Fig X Landslide Hazards Near Pleasant Hill

Section 3.6, Greenhouse Gas Emissions and Energy

Sub-Section 3.6.3, Regulatory Framework

Draft EIR Page 3.6-20:

PART 6 – BUILDING ENERGY EFFICIENCY STANDARDS

CCR Title 24 Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California’s energy demand. The Building Energy Efficiency Standards is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. Under the 2019 standards, nonresidential buildings will be 30 percent more energy efficient compared to the 2016 standards, and residential buildings will be seven percent more energy efficient. When accounting for the electricity generated by the solar photovoltaic system, residential buildings would use 53 percent less energy compared to buildings built to the 2016 standards.

The 2019 Building Energy Efficiency Standards, adopted on May 9, 2018, became effective on January 1, 2020. The 2019 Standards move toward cutting energy use in new residential units by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less. The 2019 Standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements. Under the 2019 Standards, non-residential buildings will be 30 percent more energy-efficient compared to the 2016 Standards, and single-family homes will be seven percent more energy efficient. The 2022 Standards have been adopted and will come into effect January 1, 2023. Development facilitated by the 2040 General Plan would be subject to the ~~2022~~ latest Standards.

Sub-Section 3.6.4, Impacts and Mitigation Measures

Draft EIR Page 3.6-43:

Operation

Relevant plans and policies that aim to increase energy efficiency and the production of renewable energy include SB 100, the ~~2022~~ current California Green Building Standards Code (CALGreen or Title 24 Part 11), and the ~~2022~~ current California Building Energy Efficiency Standards (Title 24 Part 6). SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State’s Renewables Portfolio Standard Program and requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Section 3.8, Hydrology and Water Quality

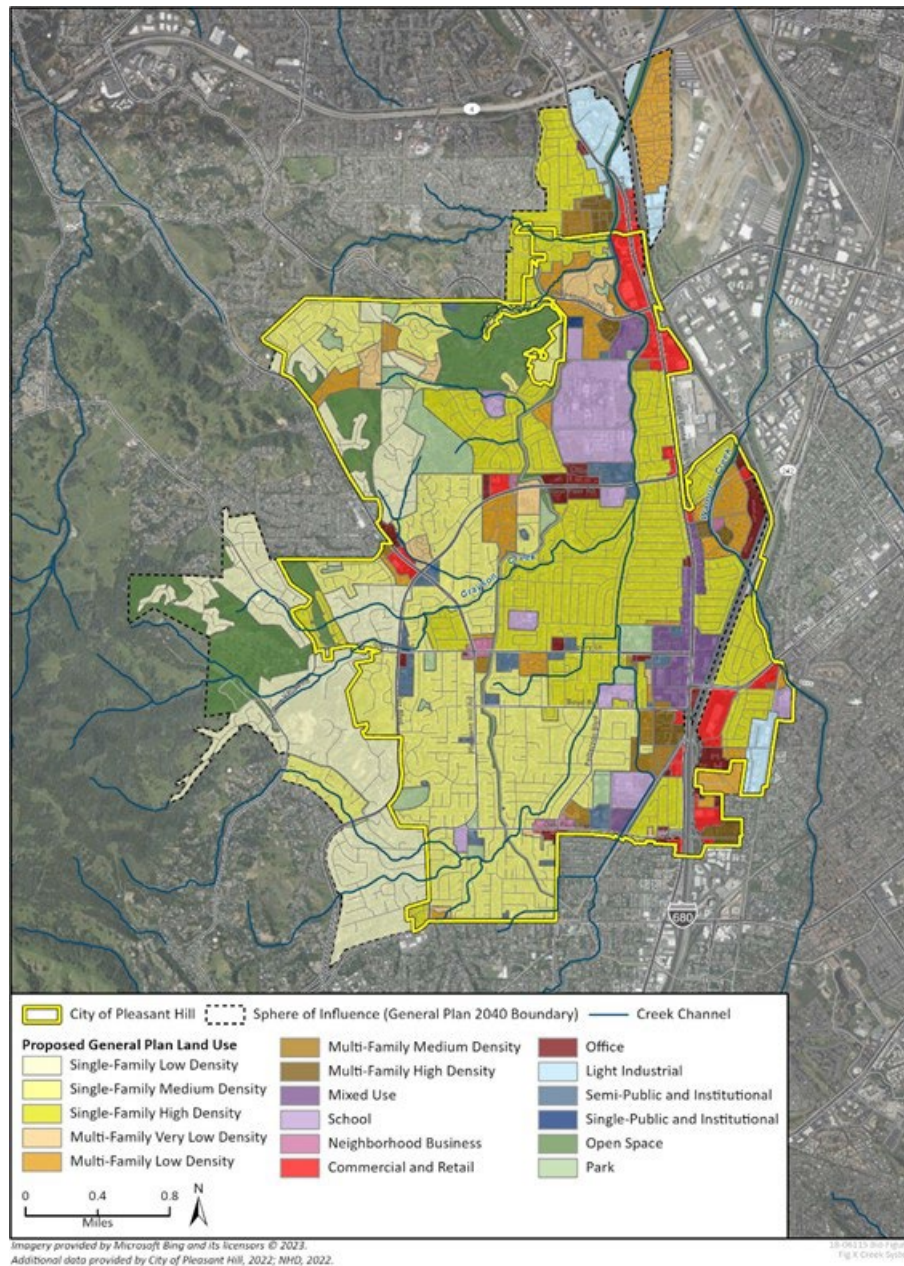
Sub-Section 3.8.2, Environmental Setting

Draft EIR Page 3.8-2:

The major waterways in Pleasant Hill are Grayson Creek and Contra Costa Canal. Both waterways are largely paved and channelized, but still provide some habitat in the channel bottoms (see Section 3.3, *Biological, Agriculture, and Forestry Resources*, for discussion of habitat and vegetation). Existing development throughout the General Plan area is characterized by extensive impervious surfaces such as concrete, asphalt, and structures, as well as the drainage control features implemented to accommodate existing development. An extensive stormwater drainage system is maintained throughout the General Plan area, rerouting surface waters that once meandered across the valley.¹ Waterways within Pleasant Hill city limits are shown in Figure 3.8-2.

¹ Contra Costa County Community Development Department and Public Works Department. 2003. Contra Costa County Watershed Atlas.

Figure 3.8-2 Surface Water in Pleasant Hill



Draft EIR Page 3.8-7:

Figure 3.8-32 Groundwater in and Adjacent to General Plan Area

Draft EIR Page 3.8-9:

Figure 3.8-43 Flood Hazard Areas in and Adjacent to General Plan Area

Section 3.12, Transportation

Sub-Section 3.12.3, Regulatory Framework

Draft EIR Page 3.12-12:

CALTRANS DEPUTY DIRECTIVE 64-R1: COMPLETE STREETS – INTEGRATING THE TRANSPORTATION SYSTEM

~~In 2001, Caltrans adopted Deputy Directive 64; a policy directive related to non-motorized travel throughout the State. In October 2008, Deputy Directive 64 was strengthened to reflect changing priorities and challenges. Deputy Directive 64 R1 states:~~

~~The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Providing safe mobility for all users, including motorists, bicyclists, pedestrians and transit riders, contributes to the Department's mission/vision: "Improving Mobility across California."~~

~~Successful long-term implementation of this directive is intended to result in more options for people to go from one place to another, less traffic congestion and greenhouse gas emissions, more walkable communities (with healthier, more active people), and fewer barriers for older adults, children, and people with disabilities.~~

CALTRANS DIRECTIVE POLICY 37: COMPLETE STREETS

In 2021, Caltrans adopted Director's Policy 37, a policy directive related to non-motorized travel throughout the State. Director's Policy 37 states:

The California Department of Transportation (Caltrans) recognizes that walking, biking, transit, and passenger rail are integral to our vision of delivering a brighter future for all through a world-class transportation network. Additionally, Caltrans recognizes that streets are not only used for transportation but are also valuable community spaces. Accordingly, in locations with current and/or future pedestrian, bicycle, or transit needs, all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved. When decisions are made not to include complete streets elements in capital and maintenance projects, the justification will be documented with final approval by the responsible District Director. Opportunities for complete streets exist in all phases of project development from planning and design to construction, operations, and maintenance. Complete streets projects should prioritize underserved communities that have been historically harmed and segmented by the transportation network and should serve people of all ages and abilities. Furthermore, Caltrans commits to removing unnecessary policy and procedural barriers and partnering with communities and agencies to ensure projects on local and state transportation systems improve the connectivity to existing and planned pedestrian, bicycle, and transit facilities, and accessibility to existing and planned destinations, where possible.

3.2 Staff-initiated Changes

Executive Summary

Page ES-9 through ES-12:

Cultural and Tribal Cultural Resources

Impact CR-1. The 2040 General Plan has the potential to result in significant impacts if development carried out under the plan would cause a substantial adverse change in the significance of a historical resource. this impact would be significant and unavoidable even with mitigation.

CR-1 Revise General Plan Implementation Program M to Include Preparation of Historical Resources Evaluation prior to Approval for Projects Involving Buildings 45 years or Older and Implementation of Mitigation Prior to and During Construction. The City shall revise 2040 General Plan Environment Element Program M to include that, in addition to updating the existing historical and cultural resources survey, a historical resources evaluation shall be prepared prior to approval of a project carried out under the 2040 General Plan involving the demolition or substantial alteration of a building, structure, object, or other built environment feature that is 45 years of age or older and as deemed necessary by the Community Development Director.

The City shall add further details to 2040 General Plan Program M that state the following:

- The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards in architectural history or history (as defined in Code of Federal Regulations, Title 36, Part 61). The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed development site. All properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. If the property is already listed in the NRHP or CRHR, the historical resources evaluation described above shall not be required.
- If historical resources are identified within the site of a proposed development, efforts shall be made to the extent feasible to ensure that impacts are mitigated. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the Professional Qualification Standards, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with a development application that may affect the historical resource, the historical resources evaluation report shall also identify and specify the treatment of character-defining features and construction activities.
- Efforts shall be made to the greatest extent feasible to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the Professional Qualification Standards. In conjunction with a development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City for

review and concurrence. As applicable, the report shall demonstrate how a project complies with the Standards and be submitted to the City for review and approval prior to the issuance of permits.

- If significant historical resources are identified on a development site and compliance with the Standards and or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS) report, or equivalent. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Professional Qualification Standards and submitted to the City prior to issuance of any permits for demolition or alteration of the historical resource.

Impact CR-2. The 2040 general Plan has the potential to result in significant impacts if development carried out under the plan would cause a substantial adverse change in the significance of an archaeological resource, including those that qualify as historical resources. This impact would be less than significant with mitigation.

CR-2 Revise General Plan Implementation Program M to Include Preparation of Archaeological Resources Assessment Prior to Project Approval and Implementation of Mitigation Prior To and During Construction.

The City shall revise 2040 General Plan Environment Element Program M to include that, in addition to updating the existing historical and cultural resources survey, prior to approval of a project that involves ground disturbance activities in native or previously undisturbed soils that may include, but are not limited to, pavement removal, potholing, grubbing, tree removal, excavation or grading, an archaeological resources assessment shall be prepared under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualification Standards in either prehistoric or historic archaeology.

The City shall add further details to 2040 General Plan Program M that state the following:

- Assessments shall include a California Historical Resources Information System records search at the Northwest Information Center (NAHC) and a Sacred Lands File search maintained by the Native American Heritage Commission. The records searches will characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around a project site. A Phase I pedestrian survey shall be undertaken at a project site that is on previously undeveloped land in order to locate any surface cultural materials. By performing a records search, consultation with the NAHC, and a Phase I survey, a qualified archaeologist shall be able to classify a project site as having high, medium, or low sensitivity for archaeological resources.
- If the Phase I archaeological survey identifies resources that may be affected by a project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. These measures shall include, but would not be limited to, a Phase III data recovery program, avoidance, or other appropriate actions to be determined by a qualified archaeologist in consultation with the City and any interested Tribes, as stated in the 2040 General Plan Tribal Consultation Implementation Program outlined by Goal ENV-5. If significant archaeological resources cannot be avoided, impacts may be reduced to less-than-significant levels by filling on top of the sites rather than cutting into a cultural deposits. Alternatively, and/or in addition, a data collection program may be warranted, including mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples shall occur as specified by the archaeologist in consultation with the City and any interested Tribes. As stated in the 2040 General Plan Tribal Consultation Implementation Program outlined by Goal ENV-5, the final disposition of artifacts not directly associated with Native American graves shall be negotiated during consultation with interested tribes. If Native American tribes do not accept the artifact, it shall be offered to an institution staffed by qualified

professionals, as determined by the City Planner. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring.

CR-3 Revise General Plan Goal ENV-5 to Include a Policy to Stop Work in the Event of Unanticipated Cultural Resources Discoveries During Construction. The City shall revise the 2040 General Plan Environment Element Goal ENV-5 to include a policy that, if cultural resources are encountered during ground-disturbing activities for a project, work in the immediate area shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology in either prehistoric or historic archaeology shall be contacted immediately to evaluate the find.

If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by a project, additional work such as excavating the cultural deposit to fully characterize its extent, and collecting and curating artifacts may be warranted to mitigate any significant impacts to cultural resources. In the event that archaeological resources of Native American origin are identified during project construction, a qualified archaeologist will consult with the City to begin Native American consultation procedures.

Page ES-14 through ES-15:

Greenhouse Gas Emissions and Energy

Impact GHG-1. Pleasant Hill does not have a Climate Action Plan. Therefore, implementation of the 2040 General Plan would not meet State 2030 and 2045 goals. Mitigation Measures GHG-1 and GHG-2 would result in adoption of CEQA GHG thresholds and a Climate Action Plan; however, development facilitated by the 2040 General Plan would not meet the 2030 and 2045 goals until the CAP is adopted. this impact would be significant and unavoidable.

GHG-1 Revise General Plan Policy ENV 8.1 to Reflect Latest State and BAAQMD GHG Emissions Targets. The City shall revise 2040 General Plan Environment Element Policy ENV 8.1 (Meet State Emission Reduction Targets) to reflect the latest State and BAAQMD GHG emissions targets of 40 percent below 1990 levels by 2030 (pursuant to SB 32) and carbon neutrality by 2045 (pursuant to AB 1279).

GHG-2 Revise General Plan Program O to Include Details Related to Adoption and Implementation of a Climate Action Plan and CEQA GHG Emissions Thresholds. The City shall add further details to 2040 General Plan Environment Element Program O (Climate Action) that state the following:

The City shall adopt the Pleasant Hill Climate Action Plan by Summer ~~2024~~2025 and include targets that reflect those set by SB 32 to reduce GHG emissions by 40 percent below the 1990 levels by 2030 and AB 1279 to achieve carbon neutrality by 2045. Implementation measures in the CAP to achieve the 2030 and 2045 targets shall include, but are not limited to, the following:

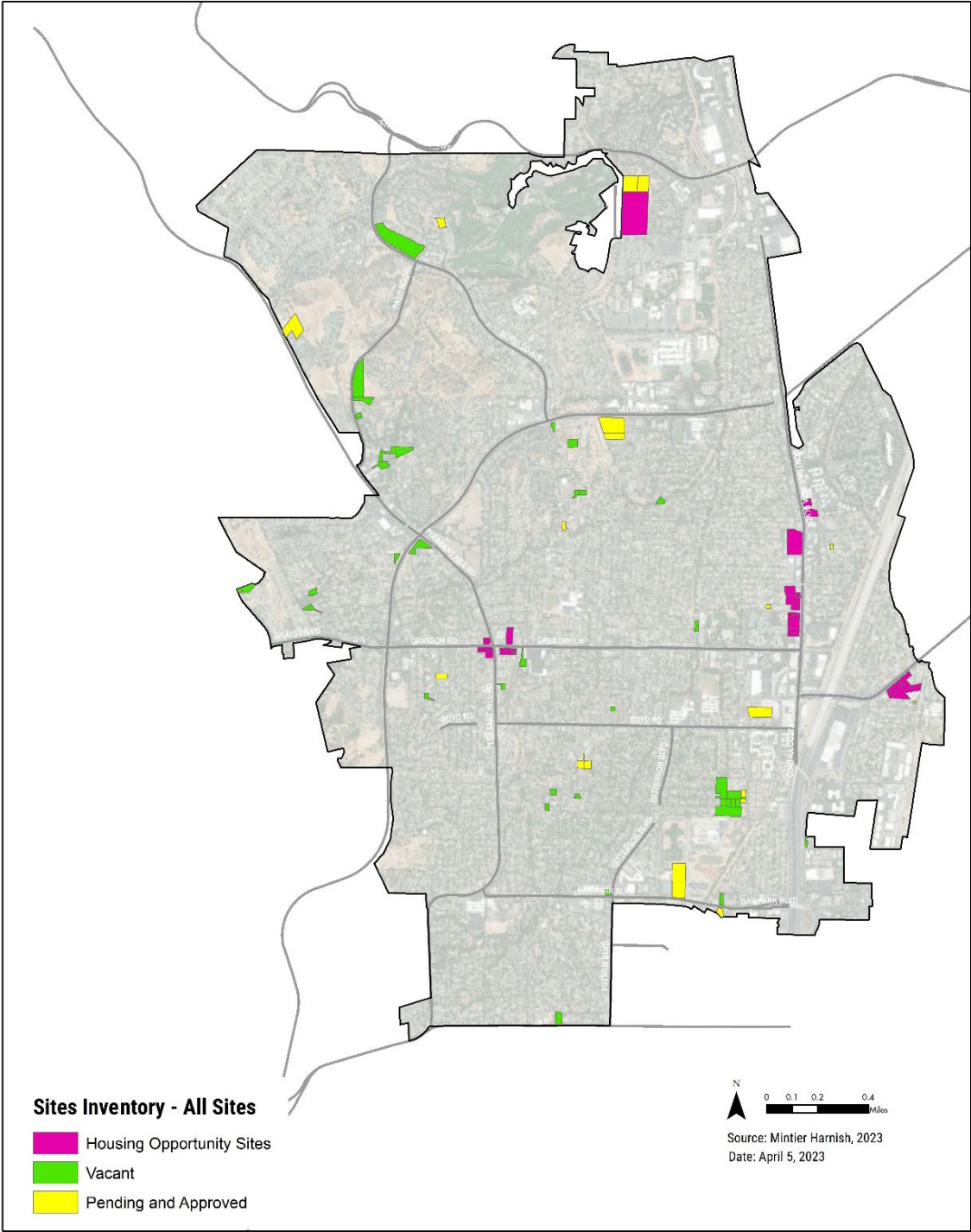
- Develop and adopt Zero Net Energy requirements for new and remodeled residential and non-residential development;
- Develop and adopt a building electrification ordinance for existing and proposed structures;
- Expand charging infrastructure and parking for electric vehicles;
- Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens; and
- Implement policies and measures included in the 2017 and 2022 California Climate Change Scoping Plans, such as mobile source strategies for increasing clean transit options and zero emissions vehicles by providing electric vehicle charging stations.

The City shall also adopt Pleasant Hill CEQA GHG Emissions Thresholds of Significance that are consistent with the Pleasant Hill Climate Action Plan by Summer ~~2024~~2025 for use in future CEQA GHG emissions analyses through 2030 and consistent with SB 32. In addition, upon completion of future Climate Action Plan updates and as necessary, the City shall update the CEQA GHG emissions threshold of significance to be consistent with each climate action plan update.

Chapter 2, Project Description

Sub-Section 2.5, Proposed Plan Components

Figure 2-6 Pleasant Hill Housing Opportunity Sites Locations



Section 3.4, Cultural and Tribal Cultural Resources

Sub-Section 3.4.4, Impacts and Mitigation Measures

Page 3.4-21:

MITIGATION MEASURE CR-1: REVISE GENERAL PLAN IMPLEMENTATION PROGRAM M TO INCLUDE PREPARATION OF HISTORICAL RESOURCES EVALUATION PRIOR TO APPROVAL FOR PROJECTS INVOLVING BUILDINGS 45 YEARS OR OLDER AND IMPLEMENTATION OF MITIGATION PRIOR TO AND DURING CONSTRUCTION

The City shall revise 2040 General Plan Environment Element Program M to include that, in addition to updating the existing historical and cultural resources survey, a historical resources evaluation shall be prepared prior to approval of a project carried out under the 2040 General Plan involving the demolition or substantial alteration of a building, structure, object, or other built environment feature that is 45 years of age or older and as deemed necessary by the Community Development Director.

The City shall add further details to 2040 General Plan Program M that state the following:

- The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards in architectural history or history (as defined in Code of Federal Regulations, Title 36, Part 61). The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed development site. All properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the City for review and concurrence. If the property is already listed in the NRHP or CRHR, the historical resources evaluation described above shall not be required.
- If historical resources are identified within the site of a proposed development, efforts shall be made to the extent feasible to ensure that impacts are mitigated. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the Professional Qualification Standards, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with a development application that may affect the historical resource, the historical resources evaluation report shall also identify and specify the treatment of character-defining features and construction activities.
- Efforts shall be made to the greatest extent feasible to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the Professional Qualification Standards. In conjunction with a development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City for review and concurrence. As applicable, the report shall demonstrate how a project complies

with the Standards and be submitted to the City for review and approval prior to the issuance of permits.

- If significant historical resources are identified on a development site and compliance with the Standards and or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS) report, or equivalent. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Professional Qualification Standards and submitted to the City prior to issuance of any permits for demolition or alteration of the historical resource.

Level of Significance

Significant and unavoidable with mitigation.

Section 3.6, Greenhouse Gas Emissions and Energy

Sub-Section 3.6.4, Impacts and Mitigation Measures

Page 3.6-38:

MITIGATION MEASURE GHG-2: REVISE GENERAL PLAN PROGRAM O TO INCLUDE DETAILS RELATED TO ADOPTION AND IMPLEMENTATION OF A CLIMATE ACTION PLAN AND CEQA GHG EMISSIONS THRESHOLDS

The City shall add further details to 2040 General Plan Environment Element Program O (Climate Action) that state the following:

The City shall adopt the Pleasant Hill Climate Action Plan by Summer ~~2024~~2025 and include targets that reflect those set by SB 32 to reduce GHG emissions by 40 percent below the 1990 levels by 2030 and AB 1279 to achieve carbon neutrality by 2045. Implementation measures in the CAP to achieve the 2030 and 2045 targets shall include, but are not limited to, the following:

- Develop and adopt Zero Net Energy requirements for new and remodeled residential and non-residential development;
- Develop and adopt a building electrification ordinance for existing and proposed structures;
- Expand charging infrastructure and parking for electric vehicles;
- Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens; and
- Implement policies and measures included in the 2017 and 2022 California Climate Change Scoping Plans, such as mobile source strategies for increasing clean transit options and zero emissions vehicles by providing electric vehicle charging stations.

The City shall also adopt Pleasant Hill CEQA GHG Emissions Thresholds of Significance that are consistent with the Pleasant Hill Climate Action Plan by Summer ~~2024~~2025 for use in future

CEQA GHG emissions analyses through 2030 and consistent with SB 32. In addition, upon completion of future Climate Action Plan updates and as necessary, the City shall update the CEQA GHG emissions threshold of significance to be consistent with each climate action plan update.

Level of Significance

Significant and unavoidable

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