

PRELIMINARY NEVADA STREET TRAIL EXTENSION PLAN

CITY OF PLEASANTON, ALAMEDA COUNTY, CALIFORNIA FOR: PUBLIC STORAGE

EXHIBIT F



DATE: APRIL 22, 2019



JOB NO. 171074 SHEET 1 OF 1

Fehr / Peers

MEMORANDUM

Date:May 14, 2019To:Public Storage, c/o Patrick Costanzo, Jr.From:Kathrin Tellez and Ashlee Takushi, Fehr & PeersSubject:Pleasanton Public Storage Trip Generation Assessment

WC19-3598

This technical memorandum presents the results of a trip generation analysis for the proposed redevelopment of a Public Storage site, located at 3716 Stanley Boulevard in Pleasanton, California (**Figure 1**). The purpose of this memorandum is to determine the expected level of peak hour trip generation from the proposed project to determine if additional analysis is required. If a proposed project is expected to generate more than 100 peak hour trips, additional analysis could be required to meet the requirements of the Alameda County Transportation Commission (Alameda CTC). For projects that generated less than 100 peak hour trips, additional analysis may be required to meet City of Pleasanton requirements.

The following provides a detailed description of the proposed project, presents the trip generation analysis, followed by conclusions.

PROJECT DESCRIPTION

The project site is occupied by 14 self-storage buildings, seven of which would be removed as part of the project and replaced by one single-story building and one three story building. The existing buildings total 82,655 square feet, with 41,055 square-feet being removed as part of the project. The new buildings to be constructed total 205,027 square-feet, resulting in a net increase of 163,972 square-feet of building area. An outdoor storage area that is used for recreation vehicle, boat, and other vehicle storage would also be removed.

Access to the site is currently provided from a full-access driveway from Stanley Boulevard. As part of the project, a new connection to the Nevada Street extension would be provided, as shown on **Figure 2**.

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ANALYSIS

Trip generation refers to the process of estimating the vehicular traffic a project would add to the surrounding roadway system. Project trip generation estimates for the one-hour peak period during the weekday morning and evening commute when traffic volumes on the adjacent streets are typically the highest.

The Institute of Transportation Engineers (ITE) has published trip generation rates in their *Trip Generation Manual* (10th Edition). This land use falls under Land Use Code 151, Mini-Warehouse, which is characterized as providing individual units or vaults that are rented for the storage of goods. The vehicle trip generation was estimated for the existing site uses, as well as the proposed project, as detailed in **Table 1** for the daily, morning, and evening peak hour condition.

			AM Peak Hour			PM Peak Hour		
Scenario	Quantity	Dally	In	Out	Total	In	Out	Total
Existing	82,655 square feet	120	6	3	9	8	7	15
Proposed Project	246,627 square feet	370	15	10	25	20	22	42
Net-Change	163,972 square feet	250	9	7	16	12	15	27

TABLE 1 TRIP GENERATION SUMMARY

Notes:

1. ITE land use category 151 - Mini-Warehouse (Adj Streets, 7-9A, 4-6P):

Daily: (T) = 1.51 (X)

AM Peak Hour: T = 0.10 (X); Enter = 60%; Exit = 40%

PM Peak Hour: T = 0.17 (X); Enter = 47%; Exit = 53%

Source: Trip Generation Manual (10th Edition), Web Version 2.3.1, ITE, 2019; Fehr & Peers, May 2019.

The existing site uses generate approximately 120 daily trips, including 9 morning and 15 evening peak hour trips. The proposed project could generate up to 370 daily trips, including 25 morning and 42 evening peak hour trips, for a net increase of 250 daily trips, 16 morning and 27 evening peak hour trips. With the planned construction of the Nevada Street extension, and the proposed

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project connection, trips under the proposed project condition would be more dispersed to the roadway system as compared to the existing site uses.

CONCLUSION

The trip generation data shows that the proposed project would generate less than 50 net-new vehicle trips in either peak hour, which is less than the 100 peak hour trips that would require the preparation of a transportation impact assessment based on the Alameda CTC Congestion Management Program (CMP).

The City of Pleasanton has the discretion to require the preparation of a transportation impact assessment for land use developments. However, based on the expected net-new project trip generation, and project access locations, the project is not expected to increase vehicle traffic through any intersections projected to operate at level of service E or F by more than 10-vehicles, which could constitute a significant impact. Therefore, it is unlikely that additional analysis would identify significant impacts to the transportation system.

This concludes our project trip analysis for the proposed redevelopment of the Pleasanton Public Storage facility. Please contact Kathrin or Ashlee at (925) 930-7100 if you have questions.

Attachments:

Figure 1Project Site VicinityFigure 2Project Site Plan



Project Site Vicinity



Source: WARE MALCOMB

Figure 2 Project Site Plan

NEpwc03.fpainc bealtwe-data/PROJECTS1_WC194WC19-3598.00_Pleasanton_Public_StoragetGraphics/Figures/WC19_3598_Fig02_Project_Site_Plan a



P19-0128,0129, 3716 STANLEY BLVD, PUBLIC STORAGE

Planning Division July 30, 2020



Megan Campbell

Subject: P19-0128 and P19-0129 Public Storage, 3716 Stanley Boulevard

From: Laleh Brown Sent: Tuesday, October 20, 2020 11:06 AM To: Megan Campbell Subject: Fwd: P19-0128 and P19-0129 Public Storage, 3716 Stanley Boulevard

Hello Ms. Campbell,

My name is Laleh Brown and I live in the California Reflections Development, adjacent to the current storage unit.

I am concerned about raising the buildings to three stories in an already unsightly area. The storage unit is unattractive as it is and to raise it even further would be an eyesore to say the least. This is not an improvement but a degradation of the area. Do these people even have enough business as it is to justify this increase?

Thanks for taking into account my concerns.

Sincerely,

Laleh Brown

Click here to report this email as spam.

EXHIBIT J



3716 Stanley Boulevard Public Storage Project

Community Plan Consistency Checklist Pursuant to CEQA Guidelines Section 15183

prepared by

City of Pleasanton

Community Development Department 200 Old Bernal Avenue Pleasanton, California 94566 Contact: Megan Campbell, Associate Planner

prepared with the assistance of

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

May 2020



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May 2020



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Acronyms and Abbreviations

AB	Assembly Bill
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMP	best management practices
Btu	British thermal units
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
САР	Climate Action Plan
CBC	California Building Code
СС	Community Commercial
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
CO ₂ e	carbon dioxide equivalent
dBA	A-weighted sound pressure level
DOC	California Department of Conservation
du	dwelling unit
EIR	Environmental Impact Report
EO	Executive Order
FTA	Federal Transit Administration
GHG	greenhouse gas
IPaC	Information for Planning and Consultation
Leq	single steady A-weighted (noise) level
MT	metric tons
NASP	North Area Specific Plan
NPDES	National Pollutant Discharge Elimination System
PM _{2.5}	particulate matter up to 2.5 microns in size
PM ₁₀	particulate matter up to 10 microns in size
РМС	City of Pleasanton Municipal Code
PRC	Public Resources Code
RWQCB	Regional Water Quality Control Board
SB	Senate Bill

City of Pleasanton 3716 Stanley Boulevard Public Storage Project

SWPPPStormwater Pollution Prevention PlanU.S.United StatesUSFWSUnited States Fish and Wildlife ServiceVdBvibration decibels

Community Plan Consistency Checklist

1. Project Title

3716 Stanley Boulevard Public Storage Project

2. Lead Agency Name and Address

City of Pleasanton 200 Old Bernal Avenue Pleasanton, California 94566

3. Contact Person and Phone Number

Megan Campbell, Associate Planner City of Pleasanton, Community Development Department mcampbell@cityofpleasanton.gov 925 931 5610

4. Project Location

The project site is located off Stanley Boulevard southwest of the Stanley Boulevard / California Avenue intersection in Pleasanton. The site is approximately 6.6 acres and is bounded by Stanley Boulevard to the north, Nevada Street and the Arroyo del Valle riparian corridor to the south, commercial development to the east, and residential development to the west. The site is in an industrial area of Pleasanton, approximately 0.8 miles northeast of downtown. The project site is less than 500 feet south of Southern Pacific Railroad, and approximately 2.2 miles east of Interstate 680 (I-680) and 2.3 miles south of Interstate 580 (I-580). Figure 1 shows the site's location in the region and Figure 2 depicts the project site in its neighborhood context.

5. Project Sponsor's Name and Address

Public Storage Bryan Miranda, Public Storage Owner 701 Western Avenue Glendale, California 91201

6. General Plan Designation

The City of Pleasanton (City) 2002-2025 General Plan indicates the project site has a land use designation of "Retail, Highway, and Service Commercial; Business and Professional Offices." The broad commercial designation allows an average floor area ratio (FAR) of 0.35, but projects may be allowed up to 0.6 FAR provided enough amenities and mitigation are incorporated to justify the increased density. Additionally, the land use element allows a FAR beyond 0.6 (and up to that



Figure 1 Regional Location

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Figure 2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2020.

allowed by the subject zoning district) for projects where employee density and traffic are minimal, provided the project meets the requirements of the Zoning Ordinance and all other City requirements (City of Pleasanton 2009).

7. Zoning

The project site is zoned as Commercial Service District (C-S), a designation that seeks to provide appropriately located areas for commercial uses having features incompatible with the purposes of the other commercial districts and to provide sites for businesses not typically found in shopping centers, that require relatively large sites providing off-street parking, and that attract little or no pedestrian traffic (City of Pleasanton 2004). The C-S zone allows a FAR up to 1.0.

8. Project Description

The project would redevelop a portion of an existing self-storage facility with a new self-storage facility. The existing site contains 14 single-story, storage buildings, an attached office, and a parking storage lot, which can be seen in Figure 2. The project would remove seven of the eastern storage buildings (39,774 square feet), the existing 1,281-square foot office building, and the storage parking lot. These would be replaced with one single-story storage building, one three-story storage building, and a new office building, shown in the site plan in Figure 3. The new one-story building would be 9,750 square feet and would be accessed from a common lobby. The proposed three-story building would be 194,377 square feet, with a 66,974-square foot footprint; it would be climate controlled and accessed from the inside of the building through two lobbies. The proposed office would be 900 square feet and located closer to Stanley Boulevard than the existing office for increase of 163,972 square feet of public storage facilities. Up to three employees are expected to staff the proposed public storage facility per shift, which would be a similar number of employees as the existing public storage facility.

The surfaces of the proposed buildings would incorporate a stucco finish with cobblestone and color-band accents. Tower elements have been added to give the proposed commercial structures and portions of the south and east elevations on the three-story building alternate upper-story setbacks up to 10 feet, to improve articulation and reduce the sense of scale and massing. Figure 4 shows two renderings of the proposed project from Nevada Street.

Site Access, Circulation, and Parking

The project site would be accessed through two gated entrances, one at Stanley Boulevard near the proposed office and one along Nevada Street. An existing center drive-aisle will continue to provide the main circulation through the project site, and would connect the Stanley Boulevard and Nevada Street entrances. A third entrance from Nevada Street would be located at the southeast corner of the project site, and would provide emergency fire access on the eastern side of the proposed three-story storage building. The project would include 14 designated parking spaces, three of which would be to the south behind the new office building. Three of the designated spaces would be Americans with Disabilities Act-accessible. Designated loading zones would be provided along the western frontage of the proposed three-story building for customer loading and unloading activities.





Figure 4 Project Rendering from the Southeast Entrance Looking Northwest and from Nevada Street Facing Northeast



SOUTH ELEVATION 3-STORY STORAGE / COLOR RENDERING



NEVADA STREET NORTHWEST VIEW / COLOR RENDERING

Site Preparation, Grading and Drainage

The project area has been graded previously and would be further modified by grading. Site work and grading would result approximately 3,900 cubic yard (CY) of cut material and require 600 CY of fill, resulting in 3,300 CY of material exported off site. The maximum excavation depth during construction would be 4 feet due to the level nature of the site. The project would increase on-site pervious surfaces over existing conditions, which currently include an approximately 1,000-square foot landscaped area along Stanley Boulevard. Under the proposed project, landscaping and bioretention areas would total approximately 35,362 square feet, or 12 percent of the lot area. Bioretention areas would be located near each of the new buildings, which would provide approximately 4,866 square feet of stormwater drainage and treatment. Stormwater drainage will be directed to one of the three stormwater treatment basins, sized in accordance with the Alameda County Clean Water Project C.3 Stormwater Technical Guidance.

Landscaping and Trees

The project would implement landscaping and trees along the eastern and southern frontages, around the propose office, and along the building perimeters. The landscaping palate would be consistent with the surrounding residential development and would consist of vegetation that requires low-water, consistent with the City's Water Efficient Landscape Ordinance in Chapter 17.14 of the Pleasanton Municipal Code (PMC). Trees and plants would be planted along the southern frontage to buffer the appearance of structures for off-site viewers. No trees would be removed as a result of project implementation.

The project would have a 6-foot high decorative metal fence along the Nevada Street frontage, which would continue 40 feet along the western boundary to connect with a wood fence from the adjacent residential development. The project entrances would have electronic gates consistent with the design of the metal fencing.

Off-site Improvements

The project includes sidewalk and pavement improvements along roadways that border the project site. The Nevada Street extension along the project's southern frontage is being constructed and installed by the adjacent residential developments. The project applicant is proposing to contribute funding to construct a portion of a trail on the south side of Nevada Street, adjacent to the Arroyo del Valle riparian corridor. The trail and necessary improvements would be implemented as a separate independent project as the proposed project would only provide partial funding for the trail and would not construct it.

9. Surrounding Land Uses and Setting

The project site is in an urbanized area and is generally flat and developed with an existing selfstorage facility, as seen in Figure 2. The site is currently entirely paved and contains 14 single-story, storage structures and a storage parking area where various types of vehicles are kept. Table 1 details the surrounding development and land use designations. Buildings on other sites in the area range in height from one to three stories.

	Existing Land Use	General Plan Designation	Zoning Designation
North	Residential, Union Pacific Railroad	Medium Density Residential	PUD/MDR – Planned Unit Development Medium Density Residential
West	Residential	Retail/Highway/Service Commercial Business and Professional Offices	PUD/HDR – Planned Unit Development High Density Residential
South	Proposed roadway and Arroyo Del Valle	Open Space (Public Health and Safety) with a Wildland Overlay	n/a
East	Professional Business and Office developments	Retail/Highway/Service Commercial Business and Professional Offices	PUD/C – Planned Unit Development Commercial

Table 1 Surrounding Setting and Land Use Designations

10. Other Public Agencies Whose Approval is Required

The City is the lead agency with responsibility for approving the project. Approval from other public agencies is not required. The project would require the following discretionary approvals from the City:

- Design Review Permit
- Conditional Use Permit

Other permitting agencies and required permits are as follows:

 San Francisco Bay Regional Water Quality Control Board (RWQBC): National Pollutant Discharge Elimination System Construction General Permit and Municipal Regional Stormwater Permit

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, as indicated by the checklist on the following pages.

•	Aesthetics		Agriculture and Forestry Resources	•	Air Quality
	Biological Resources		Cultural Resources		Energy
•	Geology/Soils	•	Greenhouse Gas Emissions	•	Hazards & Hazardous Materials
	Hydrology/Water Quality		Land Use/Planning		Mineral Resources
•	Noise		Population/Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
•	Utilities/Service Systems	•	Wildfire		Mandatory Findings of Significance

Determination

On the basis of this initial evaluation:

- I find that the Proposed Project qualifies as a Residential Project pursuant to a Specific Plan I find that the Proposed Project qualifies as a Residential Project pursuant to a Specific Plan and is EXEMPT from CEQA in accordance with CEQA Guidelines Section 15182.
- I find that pursuant with CEQA Guidelines Section 15183, the Proposed Project is a Project consistent with a Community Plan or Zoning, that there are no project-specific significant effects which are peculiar to the project or its site, and NO ADDITIONAL ENVIRONMENTAL REVIEW IS REQUIRED.
- □ I find that the Proposed Project qualifies as an Infill Project that would result in new specific effects. However these effects would be substantially mitigated under uniformly applicable development policies. NO FURTHER REVIEW required.
- I find that the Proposed Project qualifies as an Infill Project but would result in new specific effects that would not be substantially mitigated under uniformly applicable development policies. A STREAMLINED MITIGATED NEGATIVE DECLARATION is recommended.

City of Pleasanton 3716 Stanley Boulevard Public Storage Project

□ I find that the Proposed Project qualifies as an Infill Project but would result in new specific effects that would not be substantially mitigated under uniformly applicable development policies, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

May 5, 2020 Date Director of Community Development

Ellen Clark

Printed Name

Title

This report follows a checklist format that outlines performance standards for projects eligible for streamlined review under the California Environmental Quality Act (CEQA). A consistency checklist is prepared by a lead agency to streamline the environmental review process for eligible projects by limiting the topics subject to review at the project level where the effects of development have been addressed in a previous community plan. In accordance with CEQA Guidelines Section 15183, if the project would result in new specific effects or more significant effects, and uniformly applicable development policies or standards would not substantially mitigate such effects, those effects are subject to CEQA. With respect to the effects that are subject to CEQA, the lead agency is to prepare an Environmental Impact Report (EIR) if the written checklist shows that the effects of the project would be potentially significant.

The checklist concludes that the project would not have significant effects on the environment that either have not already been analyzed in a prior EIR or are more significant than previously analyzed, or that uniformly applicable development policies would not substantially mitigate. Pursuant to Public Resources Code (PRC) Section 21094.5, such effects are exempt from further CEQA review.

California PRC Section 21083.3 also limits the application of CEQA to effects on the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the General Plan EIR, or which substantial new information shows will be more significant than described in the General Plan EIR when projects are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified (CEQA Guidelines, Section 15183[a], also PRC, Section 21083.3[b]: Exemption applies to "a development project [that] is consistent with the general plan of a local agency [if] an environmental impact report was certified with respect to that general plan).

This CEQA Guidelines Section 15183 Consistency Checklist has been prepared in accordance with PRC Section 21000 et seq. and the CEQA Guidelines, California Code of Regulations Section 15000 et seq.

Environmental Checklist

Pursuant to CEQA Guidelines Section 15183, CEQA mandates that projects consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified may not require additional review unless there may be project-specific effects particular to the project or site that were not adequately addressed in the EIR for the 2005-2025 General Plan. In approving a project meeting the requirements of CEQA Guidelines Section 15183, a public agency must limit its examination of environmental effects to those the agency determines in an Initial Study or other analysis:

- 1. Are peculiar to the project or the parcel on which the project would be located
- 2. Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent
- 3. Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action
- 4. Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR

The purpose of this checklist is to assess whether the project is generally consistent with the development density established by the 2005-2025 General Plan, and whether it would result in project-specific effects, particular to the project or site that were not adequately addressed in the EIR for the 2005-2025 General Plan. This will help to determine if additional environmental review is required under CEQA in accordance with CEQA Guidelines Section 15183.

Relationship of the Proposed Project to Previous EIR Analysis

The City adopted its current General Plan on July 21, 2009. It includes policies and programs that convey the City's long-term vision and guide local decision-making to reach that vision. The General Plan EIR was certified in 2008 and assessed impacts from the implementation of the 2005-2025 General Plan.

Project Consistency with Adopted City Plans and Ordinances

City of Pleasanton 2005-2025 General Plan

The 2005-2025 General Plan is the fundamental document governing land use development and includes policies and programs relating to land use, transportation, air quality, economy, conservation and open space, water, energy, public facilities, community design, and noise. The project would be required to abide by all applicable goals and policies in the adopted General Plan. The General Plan land use designations for the project site is Retail, Highway, and Service Commercial; Business and Professional Offices. This designation is intended for business and offices not typically found in commercial retail centers.

The project would exceed the maximum FAR of 0.6 under its Commercial designation. However, the land use element also allows a FAR beyond 0.6 for projects that provide sufficient amenities and

mitigation and where employee density and traffic are minimal. The project would only require three on-site employees per shift and would not significantly increase traffic, as discussed in Section 17, *Transportation*. The project applicant would contribute funds toward construction of a trail along Arroyo Del Valle south of Nevada Road, including trail maintenance, and the project would include public seating along the Nevada Street right-of-way and the installation of solar panels or LEED certification beyond City code. The project is therefore generally consistent with the development density established by the 2005-2025 General Plan.

Consistent with General Plan Land Use Programs 2.1, 2.2, 15.4, the project would provide commercial and employment uses near residential areas to reduce the need for vehicles, reuse an underutilized parcel through infill development, and would provide a landscape and fencing buffer between adjacent residential development.

City of Pleasanton Zoning Code

The project would comply with provisions of the City's Zoning Code and would be subject to the approval of applicable permits, as described under Project Approvals. The Commercial Service (C-S) District allows for areas for commercial uses having features that are incompatible with the purposes of the other commercial districts and to provide sites for businesses that typically are not found in shopping centers, that usually have relatively large sites providing off-street parking, and that attract little or no pedestrian traffic. Public storage is an allowed use in the C-S zone.

The project would meet standards for setbacks building height, and parking consistent with the C-S District; satisfies applicable site and landscaping requirements under the PMC Chapter 18.84; and complies with other applicable sections of the PMC. Table 2 shows the project's consistency with C-S development standards. As shown in Table 2, the project's FAR would not exceed the maximum allowed in the C-S District (1.0).

Standards	Allowed/Required (C-S Zone)	Proposed
Minimum Lot Size	10,000 square feet	287,000 square feet
Front and Rear Setback	10 feet	82 feet and 22.5 feet
Floor Area Ratio maximum	1.0	0.98
Building Height (ft) maximum	40 feet	36.5 feet
Parking	3 spaces	14 spaces

Table 2 Consistency with Development Standards

Aesthetics

in
EIR
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Except as provided in PRC Section 21099, would the project:

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced a from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Analysis in the General Plan EIR

Impacts to aesthetics were analyzed in Section 3.11 of the General Plan EIR. The EIR concluded that impacts would be less than significant with no mitigation measures required (City of Pleasanton 2008).

The following section describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

The General Plan EIR concluded that impacts to scenic vistas from development under the General Plan would be less than significant because development would be located in areas already impacted by development and due to compliance with General Plan goals and policies such as requiring planned unit developments on undeveloped hillsides.

The General Plan and General Plan EIR define the undeveloped hillside and ridgeline areas and riparian corridors in Pleasanton as scenic resources. The project site is located over four miles from the surrounding hillsides in an urbanized, light industrial/commercial area of Pleasanton. Views through the site from Stanley Boulevard and California Avenue are blocked by the existing buildings on the site. Therefore, the project would not block or intrude into views of the surrounding hillsides in the area beyond existing conditions. The project site is located adjacent to the Arroyo del Valle riparian corridor, which is identified as a scenic resource. The project site is developed currently with a public storage facility, and redevelopment of the site would not create additional impacts to views of the riparian area. Therefore, impacts of the project on scenic vistas would be less than significant and consistent with the findings of the 2005-2025 General Plan.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

I-680 travels north-south through Pleasanton and is a designated state scenic highway; I-580 travels east-west along the northern city limits, and is eligible for state scenic highway designation (City of Pleasanton 2008). The General Plan EIR found less than significant impacts along the I-580 and I-680 corridors because the proposed land use in the General Plan would not intensify development in the area over that already allowed.

As discussed in the Project Description, the project site is 2.2 miles east of I-680 and 2.3 miles south of I-580 and is not visible from either highway. No trees would be removed as part of the project, there are no rock outcroppings or historic buildings on the site, and the project site is not visible from either of these highways. Therefore, similar to the conclusion in the General Plan EIR, there would be no impact to scenic resources within a state scenic highway.

NO IMPACT

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

The project site is in an urbanized area, and the 2005-2025 General Plan contains regulations governing scenic quality and scenic resources. The project would be consistent with applicable zoning and land use regulations that relate to the visual character of the area, such as setbacks, height, and development density, as discussed above under *Project Consistency with Adopted City Plans and Ordinances*, Table 2, as well as in Section 11, *Land Use and Planning*. It would also be subject to City design review, a process through which conformance to aesthetic guidelines and criteria to ensure visual compatibility with surrounding development would be required.

Accordingly, the project would not substantially degrade the existing visual character or quality of the site and its surroundings beyond what was identified in the 2005-2025 General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR states that impacts from individual development under the General Plan will be reviewed by Planning Commission and City Council with respect to building materials and glare. Projects would be required to comply with the California Building Code (CBC) Title 24 Nightime Sky-Outdoor Lighting Standards, and Sections 18.48.100, 18.88.040, and 18.96.020 of the PMC, both of which would prevent light spillover. The General Plan EIR determined that compliance with these regulations would reduce impacts to less than significant levels.

The exterior materials of the proposed structures would be painted light gray to dark gray stucco and concrete blocks, none of which would cause significant glare. The project would be subject to the City's Design Review permit process and be reviewed for consistency with lighting standards in the PMC. The project would be consistent with the CBC and subject to the California Green Building Standards Code (CALGreen), which include limitations on light fixtures (refer to CALGreen Section 5.106.8 regarding light pollution reduction and Table 5.106.8 regarding the maximum allowable backlight) (State of California 2019). Compliance with regulations and review by the City would reduce project impacts from lighting to less than significant, consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

The project would be consistent with the General Plan EIR. Review of the project plans would occur as part of the City's Design Review process and would ensure the project would result in less than significant aesthetic impacts. The project would have no new or substantially more severe impacts to aesthetics and visual resources, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

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2 Agriculture and Forestry Resources

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
Wo	ould the project:				
a.	Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b.	Conflict with existing zoning for agricultural use or a Williamson Act contract?			•	•
C.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)); timberland (as defined by PRC Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?			-	
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest				

Analysis in the General Plan EIR

use?

Impacts to agricultural resources were analyzed in Section 3.1 of the General Plan EIR. The EIR concluded that the General Plan may result in land use conflicts between existing agricultural uses and proposed non-agricultural uses, but existing regulations such as PMC setback requirements and Right to Farm Ordinance in Pleasanton and Alameda County would reduce impacts to less than significant levels. The EIR also concluded that impacts to Williamson Act contracts and prime farmland would be less than significant without mitigation. Impacts to forestry resources were not analyzed in the General Plan EIR, because there were no identified forestry resources or land uses in Pleasanton.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

- a. Would the project convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?
- c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)); timberland (as defined by PRC Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?
- e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

The project site is currently developed with an existing self-storage facility and is in a developed area of Pleasanton. The project site is not on prime farmland, land under Williamson Act contract, land zoned for agriculture, or forest land. There is no land dedicated for timber production in Pleasanton, nor land used for agricultural near the project site; the nearest land designated for agricultural use is approximately 1.5 miles east, along Vineyard Avenue. Redevelopment of the project site with a larger public storage facility would not result in the conversion of farmland or forest land to non-agricultural use. Therefore, the proposed project would have no impacts on agricultural resources or forest land and would result in no new or more severe impacts beyond those identified in the General Plan EIR.

NO IMPACT

Conclusion

The project would have no new or substantially more severe impacts to agriculture or forestry resources, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

3 Air Quality

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
Wo	ould the project:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?		•		•
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?				•
c.	Expose sensitive receptors to substantial pollutant concentrations?				-
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				

Analysis in the General Plan EIR

The Section 3.10 of the General Plan EIR discusses air quality impacts and finds that the 2005-2025 General Plan would result in less than significant impacts with no mitigation required related to cumulatively considerable net increases in criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations, and creation of objectionable odors. The EIR concluded that the 2005-2025 General Plan would conflict with the applicable air quality management plan, and impacts would be significant and unavoidable with no feasible mitigation.

The following sections describes the analysis included in the General Plan EIR and provide a streamlined review to determine whether there would be project-specific impacts that are 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

Thresholds

The Bay Area Air Quality Management District's (BAAQMD) significance thresholds in the updated May 2017 *CEQA Air Quality Guidelines* for project operations are the most appropriate thresholds for use in determining air quality impacts of the proposed project. The BAAQMD has developed

City of Pleasanton 3716 Stanley Boulevard Public Storage Project

screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant air quality impacts. Because public storage facilities are not one of the land uses for which screening criteria are provided, the BAAQMD significance thresholds for criteria air pollutants, shown in Table 3, were used to evaluate the project's potential construction-related air quality impacts. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would potentially result in a cumulatively considerable net increase in criteria air pollutants for which the San Francisco Bay Area Air Basin (the Basin) is in non-attainment under applicable federal or state ambient air quality standards.

	Construction Thresholds	Operational Thresholds		
Pollutant	Average Daily Emissions (lbs/day)	Average Daily Emissions (Ibs/day)	Maximum Annual Emissions (tpy)	
ROG	54	54	10	
NO _X	54	54	10	
PM ₁₀	82 (exhaust)	82	15	
PM _{2.5}	54 (exhaust)	54	10	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Appli	cable	

Table 3 Air Quality Thresholds of Significance

Notes: lbs/day = pounds per day; tpy = tons per year; ROG = reactive organic gases; $NO_x = oxides of nitrogen$; $PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; <math>PM_{2.5} =$ fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less

Source: BAAQMD 2017a

Methodology

The project's construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. CalEEMod uses project-specific information, including the project's land use, square footage, and location, to estimate a project's construction and operational emissions. Complete CalEEMod results and assumptions are provided in Appendix A.

Construction emissions modeled include the demolition of seven existing storage structures (approximately 39,774 square feet) and the construction of new structures. Construction emissions include emissions generated by construction equipment used on site and emissions generated by vehicle trips associated with construction, such as worker, vendor, and haul trips. The construction schedule and list of construction equipment used in CalEEMod were primarily based on CalEEMod defaults. However, the default architectural coating phase was extended to better reflect actual construction practices. Construction equipment numbers were reduced to accurately reflect the feasible numbers of construction vehicles that would operate on the project site during each construction phase given the size of the project site and the nature of the proposed project. It was assumed that project construction would comply with all applicable regulatory standards, including BAAQMD Regulation 8, Rule 3 (Architectural Coatings), which restricts the volatile organic compound (VOC) content of flat coatings to 100 grams per liter and non-flat coatings to 150 grams per liter.

Operational emissions modeled include mobile source emissions (i.e., vehicle emissions), energy emissions, and area source emissions. Mobile source emissions consist of emissions generated by

customer and worker trips to and from the project site. Trip generation rates were provided by Fehr & Peers (Appendix D). Because the project would demolish existing storage facilities, only the net increase in square footage of storage facilities (approximately 163,970 square feet) was included in the modeling of operational emissions. Because the project would demolish the existing office building and replace it with an office of smaller size, operational emissions generated by the proposed office were not modeled because they would be less than those generated by the existing office due to its smaller size.

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

As addressed in the General Plan EIR, the projected population associated with the buildout of the 2005-2025 General Plan was determined to be less than that projected by the Association of Bay Area Governments (ABAG). However, the EIR determined that vehicle miles travelled (VMT) associated with the General Plan would significantly conflict with the 2005 Ozone Strategy, and impacts would be significant and unavoidable.

The most recent air quality plan for the Basin is the 2017 Clean Air Plan, which provides a strategy to control ozone, particulate matter (PM), toxic air contaminants (TACs) and greenhouse gas (GHG) emissions (BAAQMD 2017b). The 2017 Plan updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan, pursuant to air quality planning requirements defined in the California Health & Safety Code. To fulfill State ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors ROG and NO_x and reduce transport of ozone and its precursors to neighboring air basins. The 2017 Clean Air Plan builds upon and enhances the air district's efforts to reduce emissions of fine particulate matter and toxic air contaminants. The 2017 Clean Air Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes measures related to stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants.

The 2017 Clean Air Plan focuses on two paramount goals:

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from toxic air contaminants
- Protect the climate by reducing Bay Area GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050

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

- Supports the primary goals of the 2017 Clean Air Plan
- Includes applicable control measures from the 2017 Clean Air Plan
- Would not disrupt or hinder implementation of any control measures in the 2017 Clean Air Plan

A project that would not support the 2017 Clean Air Plan's goals would not be considered consistent with the 2017 Clean Air Plan. On an individual project basis, consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the 2017 Clean Air Plan's goals. As shown in the response to Impacts b and c below, the project would not result in exceedances of BAAQMD thresholds for criteria air pollutants and thus would not conflict with the 2017 Clean Air Plan's goal to attain air quality standards. Therefore, the proposed project would not conflict with or obstruct
the implementation of an applicable air quality plan. Impacts would not be more significant than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR assessed air quality impacts on a programmatic level and determined construction emissions would be less than significant due to General Plan programs that would require application of construction-related conditions to each project. The General Plan EIR also concluded the 2005-2025 General Plan would not result in a cumulatively considerable increase in criteria pollutants for which the region was in non-attainment during operations due to stronger vehicle emission regulations.

Construction Emissions

Criteria Pollutants

Project construction would result in temporary construction emissions and long-term operational emissions. Construction activities such as the operation of construction vehicles and equipment over unpaved areas, grading, trenching, and disturbance of stockpiled soils have the potential to generate fugitive dust (PM₁₀) through the exposure of soil to wind erosion and dust entrainment. Exhaust emissions associated with heavy-duty construction equipment would potentially degrade regional air quality. Daily construction emissions are shown in Table 4.

Pollutant	Maximum Daily Emissions (lbs/day)	Significance Threshold (lbs/day)	Significant Impact?
ROG	47.8	54	No
NO _x	39.4	54	No
со	19.3	N/A	N/A
PM ₁₀ (exhaust)	1.6	82	No
PM _{2.5} (exhaust)	1.4	54	No

Table 4 Estimated Construction Emissions

Notes: lbs/day = pounds per day; ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; PM₁₀ = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM_{2.5} = fine particulate matter with an aerodynamic resistance diameter or less

All emissions modeling was completed using CalEEMod in accordance with applicant-provided information and data. Some numbers may not add up due to rounding. Emissions presented are the highest of the winter and summer modeled emissions.

Source: CalEEMod Output Files, Appendix A

As shown in Table 4, emissions generated by project construction would not exceed BAAQMD thresholds. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts from emissions of criteria pollutants during

project construction would therefore be less than significant and consistent with the General Plan EIR.

Fugitive Dust

Site preparation and grading may cause wind-blown dust that could contribute particulate matter into the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMP) for fugitive dust control during construction would have a less than significant impact related to fugitive dust emissions. The City requires the preparation of a dust control plan as a standard condition of project approval and would include BMPs designed to reduce construction-generated dust. Therefore, impacts from emissions of fugitive dust during project construction would be less than significant and consistent with the General Plan EIR.

Operational Emissions

Operational emissions, as shown in Table 5 and Table 6, would include emissions from vehicle trips from employees and customers (mobile sources), natural gas use (energy sources), and landscape maintenance equipment, consumer products, and architectural coating associated with on site development (area sources). As shown in Table 5 and Table 6, operational emissions would not exceed BAAQMD daily or annual thresholds for any criteria pollutant. Consequently, project operation would not result in a cumulatively considerable net increase of ROG, NO_x, PM₁₀, or PM_{2.5}, and impacts would be less than significant and consistent with the General Plan EIR.

Average Daily Emissions (lbs/d				'day)		
Sources	ROG	NOx	СО	PM ₁₀	PM _{2.5}	SO ₂
Area	4.0	<0.1	<0.1	<0.1	<0.1	0
Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile	0.4	3.1	5.5	1.7	0.5	<0.1
Total Project Emissions	4.4	3.3	5.6	1.7	0.5	<0.1
BAAQMD Thresholds	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

Table 5 Estimated Daily Operational Emissions

Notes: lbs/day = pounds per day; ROG = reactive organic gases; $NO_X = oxides of nitrogen$; CO = carbon monoxide; $PM_{10} = respirable$ particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; $PM_{2.5} =$ fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; $SO_2 =$ sulfur dioxide; N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO or SO_2 .

All emissions modeling was completed made using the CalEEMod in accordance with applicant-provided information and data. Some numbers may not add up due to rounding. Emissions presented are the highest of the winter and summer modeled emissions Source: CalEEMod Output Files, Appendix A

		Ma	kimum Annual	Emissions (tons,	/year)	
Sources	ROG	NO _x	СО	PM ₁₀	PM _{2.5}	SO2
Area	0.7	<0.1	<0.1	<0.1	<0.1	0
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile	0.1	0.5	0.9	0.3	0.1	<0.1
Total Project Emissions	0.8	0.5	0.9	0.3	0.1	<0.1
BAAQMD Thresholds	10	10	N/A	15	10	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

Table 6 Estimated Annual Operational Emissions

Notes: lbs/day = pounds per day; ROG = reactive organic gases; NOx = oxides of nitrogen; CO = carbon monoxide; PM₁₀ = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM_{2.5} = fine particulate matter with an aerodynamic resistance diameter or less; SO₂ = sulfur dioxide; N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO or SO₂.

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

Source: CalEEMod Output Files, Appendix A

As shown in Table 4, Table 5, and Table 6, the project would not exceed BAAQMD thresholds for criteria pollutants. Therefore, the proposed project would not result in a cumulatively considerable increase in criteria pollutants, and impacts would be less than significant and consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR concluded the 2005-2025 General Plan would not expose sensitive receptors to toxic air contaminants (TAC) due to policies and programs in the General Plan which separate sensitive land uses from sources of TACs.

A TAC is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. In the Bay Area, there are several urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. However, the project site is not located in an impacted community (BAAQMD 2018). With respect to TACs, a project would result in a less than significant impact if the project would not result in one of more of the following:

- Non-compliance with a qualified risk reduction plan
- An excess cancer risk level of more than 10 in one million, or a non-cancer (i.e., chronic or acute) hazard index greater than 1.0
- An incremental increase of greater than 0.3 micrograms per cubic meter (μg/m³) annual average PM_{2.5}

Common sources of TACs include, but are not limited to, land uses such as freeways and highvolume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. The proposed project would not involve any uses which are considered a common source of TACs. According to traffic counts conducted by the City in 2018, Stanley Boulevard currently has 19,600 average daily trips (City of Pleasanton 2018b). Therefore, Stanley Boulevard is considered a major roadway (more than 10,000 average annual daily vehicle trips) that has potential to result in TAC impacts to sensitive receptors, which are located as close as 40 feet from Stanley Boulevard. As estimated using the BAAQMD Roadway Screening Analysis Tool, daily traffic volumes under existing conditions would expose receptors to a cancer risk of approximately 9.84 in one million, which would not exceed the BAAQMD screening threshold of 10 in one million for excess cancer risk. Under existing plus project conditions, daily traffic volumes would expose receptors to cancer risk of approximately 9.96 in one million, which would not exceed the BAAQMD screening threshold (Appendix A). Therefore, impacts would be less than significant, consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR concluded implementation of the 2005-2025 General Plan would not create objectionable odors because the General Plan does not include development of new sources of odors in Pleasanton. According to the BAAQMD, odor-generating projects include wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants, none of which are proposed (BAAQMD 2017b). The proposed project is a public storage facility and therefore would not emit odors that would impact surrounding land uses. Impacts would be less than significant and consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

Based on the air quality analysis provided in the General Plan EIR and consideration of the project relative to the BAAQMD thresholds described above, no specific impacts or peculiar circumstances associated with the project would occur that would require additional review. The project would comply with all applicable City and BAAQMD requirements. The project would not have a substantially more severe impact to air quality, nor would there be any potentially significant offsite impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR. The proposed project would not have a more severe impact than that previously identified, significant impacts discussed in the General Plan EIR.

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4 Biological Resources

	Less than Significant or Less than Significant		
Significant	with Mitigation		Analyzed in the Prior
Impact	Incorporated	No Impact	EIR

Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?



Analysis in the General Plan EIR

Impacts to biological resources were analyzed in Section 3.8 of the General Plan EIR. The EIR concluded that impacts to biological resources in Pleasanton, and cumulative impacts would be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

As discussed in the General Plan EIR, future development would occur primarily in infill areas where special status species are not expected to occur. However, the EIR concluded there is the potential for future development associated with General Plan implementation to occur in areas with sensitive species and associated habitat. Impacts were determined to be less than significant with compliance with federal and State regulations and adopted General Plan Conservation and Open Space Element Policy 1, Program 1.1, 1.3, and 1.6.

According to the General Plan Figure 7-1, the project site is designated as urban/developed (City of Pleasanton 2009). The project site is currently developed with structures, parking areas, and paved driveways, with no native or non-native vegetation except for landscape shrubs and street trees along Stanley Boulevard. Therefore, redevelopment of the site would not impact special status species or habitat. Due to the location of the project site near the Arroyo del Valley riparian corridor and adjacent street trees and vegetation along Stanley Boulevard, there is the potential for construction activities to impact nesting birds if activities occur during nesting season. Consistent with the General Plan EIR, the project would be required to comply with the Migratory Bird Treaty Act. The City would require a condition of approval that a qualified biologist conduct a nesting bird survey and implement avoidance measures as necessary if construction activities occur during nesting season. Therefore, similar to the conclusions of the General Plan EIR, compliance with applicable and adopted regulations would reduce potential impacts to sensitive species to less than significant levels. Impacts would not be greater than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The General Plan EIR determined impacts to riparian corridors and wetlands would be less than significant with adherence to requirements in the Clean Water Act and policies and programs in the General Plan Conservation and Open Space Element. The project site does not contain riparian habitat, as shown in the General Plan Figure 7-1, nor does it contain sensitive natural communities or state or federally protected wetlands. The project site is located approximately 110 feet northeast of the Arroyo del Valley, which is a major riparian corridor in Pleasanton. As discussed under Section 10, *Hydrology and Water Quality*, the project would not result in impacts to water quality or increases in flow during project construction or operation at the nearby riparian corridor. No riparian habitat or vegetation would be disturbed during project construction or operation. Therefore, impacts would be less than significant and would not be greater than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Development under the 2005-2025 General Plan was determined to have a less than significant impact in the General Plan EIR with compliance with General Plan policies and programs that preserve corridors and establish mitigation requirements. The project site is located near the Arroyo del Valle riparian corridor, which has a Wildlands Overlay and is an important wildlife movement area in Pleasanton. The proposed project would not impact the Arroyo del Valle riparian corridor. The adjacent residential development is currently constructing the new Nevada Street right-of-way as well as a new trail between the project site and the riparian corridor. The project would not encroach into the riparian corridor or impact the movement of wildlife within. Therefore, impacts would be less than significant and would not be greater than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

As discussed in the General Plan EIR, the PMC includes a tree preservation ordinance under Chapter 17.16, which establishes regulations for the removal of significant trees in Pleasanton. No trees would be removed during project implementation. Therefore, the project would not conflict with any local policies or ordinances and impacts would not be greater than those identified in the General Plan EIR.

NO IMPACT

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

The project site is not located within an adopted Habitat Conservation Plan or Natural Community Conservation Plan. However, Pleasanton is in Conservation Zone 2 in the East Alameda County Conservation Strategy. Priorities in Conservation Zone 2 include protection of willow riparian scrub habitat along the Arroyo del Valle. The project would not impact the nearby Arroyo del Valle riparian corridor and, therefore, would not conflict with the provisions of the East Alameda County Conservation Strategy. Therefore, there would be no impacts, similar to the General Plan EIR.

NO IMPACT

Conclusion

The project would comply with applicable 2005-2025 General Plan, PMC, and Zoning Code regulations, and would have no new or substantially more severe impacts to biological resources, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

5 Cultural Resources

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
W	ould the project:				
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		•		•
C.	Disturb any human remains, including those interred outside of formal cemeteries?		•		•

Analysis in the General Plan EIR

The General Plan EIR analyzes cultural resources in Section 3.12 and finds that impacts to cultural resources would be less than significant with no mitigation required.

Rincon Consultants, Inc. prepared a Cultural Resources Study for the project to evaluate project impacts to historical and archaeological resources. The Cultural Resources Study includes a cultural resources records search at the North West Information Center (NWIC), a Sacred Lands File (SLF) search with the Native American Heritage Commission (NAHC), and informal Native American consultation. The following analysis is based on the Cultural Resources Study, which is provided in full as Appendix B.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

The results of the cultural resources records search identified no previously recorded historic-period built-environment resources within the project site. Three historic structures, two historic buildings, and one historic district exist within a half-mile radius of the project site. As construction will be

maintained within the project site and plans are to keep the same type of building, a self-storage facility, these historic resources will not be impacted by this project.

NO IMPACT

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

The General Plan EIR determined that impacts to historical and archaeological resources in the planning area would be less than significant with compliance to required laws and policies as well as individual project review under CEQA.

The results of the cultural resources records search identified no previously recorded archaeological resources within the project site. One prehistoric archaeological site is located within a half-mile radius of the project site, located north of Stanley Blvd and the adjacent railroad tracks. Ground disturbing activities related to the construction of new storage facilities will not affect this site (Appendix B).

Rincon requested a records search of the SLF from the NAHC to identify the potential for cultural resources within the project site and to obtain contact information for Native Americans groups or individuals who may have knowledge of resources within the project site. The SLF search was returned with negative results, which means that the NAHC did not identify any known or potentially sensitive tribal cultural resources within the project area. The NAHC provided Rincon with a list of Native American Contacts that may have additional information about archaeological resources in the area. Rincon prepared and mailed letters to seven NAHC-listed Native American contacts to request information on potential cultural resources in the project vicinity that may be impacted by project development (Appendix B). Rincon did not receive any comments from Native American contacts regarding the project. Due to the nature of the project site and proposed project (e.g. previously disturbed sediments from prior site development and the maximum depth of excavation during construction of four feet), impacts to archaeological resources would be unlikely. Consistent with General Plan Program 5.3, the City applies a standard condition of approval to projects requiring Planning Department approval, which would require all construction to stop if cultural resources were uncovered during excavation. Compliance with 2005-2025 General Plan Program 5.3 would ensure historic and archaeological resources are protected in the event an unanticipated discovery during project construction, consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The project site is not known to contain human remains, but the discovery of human remains is always a possibility during ground-disturbing activities. As stated in the General Plan EIR, compliance with existing federal, state, and local laws would reduce potential impacts to less than significant levels. Consistent with California Health and Safety Code Section 7050.5, if human remains are found, no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner is required to notify the Native American Heritage Commission, a representative of which would determine and notify a most likely descendant. The most likely descendant must complete the inspection of the site within 48 hours of notification and

may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Compliance with existing regulations would reduce potential impacts to human remains to less than significant, consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

No cultural resources (archaeological resources and historical resources) are located on the project site. Compliance with laws and regulations and with standard City conditions ensures impacts to archaeological resources and human remains would be less than significant. Accordingly, the project would have no new or substantially more severe impacts to cultural resources, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

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6 Energy

Less than Significant or Less than Significant or Less than Significant with Significant Mitigation Analyzed in Impact Mitigation No Impact the Prior EIR Would the project: a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? Impact						
Would the project: a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
 a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? 	Wo	ould the project:				
	a.	Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?		_		-

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Analysis in the General Plan EIR

Impacts to energy were analyzed in Section 3.5, *Utilities and Service Systems*, on pages 3.5-21 through 3.5-27 of the General Plan EIR. Impacts were determined to be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

Electricity

Pacific Gas and Electric (PG&E) provides electric utilities for Pleasanton and project site's. PG&E's 2018 energy sources were from the following: 39 percent renewable resources, 34 percent nuclear energy, 13 percent hydroelectric, and 15 percent natural gas and other fuels (PG&E 2018). According to the California Energy Commission (CEC), Alameda County consumed approximately 10,417 giga-watt hours (GWh) of electricity in 2018 (CEC 2019a). Table 7 illustrates the County's 2018 electricity consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its electricity demand. With a current population of 1,666,753, Alameda County's 2018 per capita electricity consumption was approximately 8,713 kWh, or 29.7 million British thermal units (Btu) (U.S. Census Bureau 2020).

Energy Type	Alameda County (GWh)	California (GWh)	Proportion of Statewide Consumption	County per Capita Consumption (kWh)	County per Capita Consumption (MMBtu)
Electricity (MWh)	10,417	281,120.2	3.7%	6,249.9	21.3
Source: CEC 2	2019a				

Table 7 2018 Annual Electricity Consumption

Natural Gas

Pleasanton also falls within PG&E's natural gas service area, which spans central and northern California (CEC 2018). In 2018, PG&E customers consumed a total of 4.8 billion therms of natural gas. Residential users accounted for approximately 40 percent of PG&E's natural gas consumption. Industrial and commercial users accounted for another 36 and 20 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts (CEC 2019b).

According to the CEC, Alameda County consumed approximately 377 million therms of natural gas in 2018 (CEC 2019c). In 2018, Alameda County users accounted for approximately 7.9 percent of PG&E's total natural gas consumption across the entire service area. Table 8 illustrates the County's 2018 natural gas consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its natural gas demand. With a population of 1,666,753, Alameda County's 2018 per capita natural gas consumption was approximately 226 therms, or approximately 21 million Btu.

Table 8	2018 Annual Natural Gas Consumption

Energy Type	Alameda County (U.S. therms)	California (U.S. therms)	Proportion of Statewide Consumption	County per Capita Consumption (U.S. therms)	County per Capita Consumption (MMBtu)
Natural Gas	377,001,740	12,666,398,560	3.0%	226.1	21.0

Source: CEC 2019c

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

Construction

Project construction would result in short-term consumption of energy from the use of construction equipment and processes. Energy use during construction would be primarily from fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Table 9 summarizes the anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the project site.

	Fuel Consum	ption (Gallons)
Source	Gasoline	Diesel
Construction Equipment & Vendor/Hauling Trips	_	33,675.4
Construction Worker Vehicle Trips	9,542.3	_
Source: Appendix A		

Table 9 Proposed Project Construction Energy Usage

As shown in Table 9, project demolition and construction would require approximately 9,542 gallons of gasoline and 33,675 gallons of diesel fuel. This energy use would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Project construction contractors would demonstrate compliance with applicable California Air Resource Board regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction contractors would be required to comply with the provisions of 13 CCR Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes, thereby minimizing unnecessary fuel consumption. Furthermore, the project would comply with the 2019 CALGreen requirements to divert a minimum of 65 percent of construction and demolition debris. These practices would result in efficient use of energy necessary to construct the project. In the interest of cost efficiency, construction contractors would not be anticipated to use fuel in a wasteful or unnecessary manner. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the project's construction energy consumption would not be greater than those identified in the General Plan EIR.

Operation

Energy demand from the project's operation would include fuel consumed by passenger vehicles; natural gas consumed for heating the buildings; and electricity consumed by the proposed structures, including lighting, water conveyance, and air conditioning. Table 10 shows the project's estimated total annual gasoline and diesel fuel consumption, as well as electricity and natural gas use.

	······································	
Source	Ene	ergy Consumption
Vehicle Trips		
Gasoline	24,607.5 gallons	2,649.5 MMBtu ¹
Diesel	10,109.6 gallons	1,263.7 MMBtu ¹
Built Environment		
Electricity	0.6 GWh	1,921.2 MMBtu
Natural Gas Usage	4,320.8 U.S. therms	401.7 MMBtu
¹ CaRFG fuel specification of 109 classes specified above (Californ	9,786 Btu/gallon used to identify conversion rate fonia Air Resources Board 2015).	or fuel energy consumption for vehicle

Table 10 Proposed Project Operational Energy Usage

Source: Appendix A

City of Pleasanton 3716 Stanley Boulevard Public Storage Project

Project operation would require approximately 24,608 gallons of gasoline and 10,110 gallons of diesel fuel annually, and approximately 0.6 giga-hours per year of electricity and 4,321 therms of natural gas per year. Project energy and fuel consumed would represent an insignificant increase in the County's existing electricity and natural gas use shown in Table 7 and Table 8. The project would comply with standards set in CBC Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. CALGreen Title 24, Part 11 requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance. According to the CEC, nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades (CEC 2018b). Furthermore, the project would provide rooftop solar panels to offset electricity use, and the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by PCE continues to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

In summary, project construction would be temporary and typical of similar projects; it would not result in wasteful use energy. Project operation would increase energy use on the site compared to existing conditions. However, the energy use would be in conformance with the latest version of CALGreen and the Building Energy Efficiency Standards. Additionally, the electricity and natural gas use would not result in a significant increased demand for PG&E. Along with compliance with 2005-2025 General Plan policies regarding energy use, potential impacts would be less than significant. No impacts beyond those analyzed in the General Plan EIR would occur because of the project.

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

As detailed in Table 15 in Section 8, *Greenhouse Gas Emissions*, the project would not conflict with any applicable measures in the City's Climate Action Plan which relate to energy resources and conservation. Table 11 summarizes the project's consistency with the programs of the 2005-2025 General Plan related to energy consumption. As discussed therein, the project would be consistent with the applicable goals and policies related to renewable energy and energy efficiency and would not conflict with or obstruct state or local plans for renewable energy and energy efficiency. Therefore, impacts would be less than significant and would not be greater than those identified in the General Plan EIR.

Table 11 Consistency with Pleasanton General Plan Energy-Related Goals c	and Policies
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Pleasanton General Plan Goal/Policy	Discussion
Energy Element	
Program 7.5: For new construction, require roofs that are strong enough and have roof truss spacing to hold photovoltaic panels, where feasible and cost effective	Consistent. The project would include wiring future solar systems pursuant to CalGreen standards. In addition, the project would provide rooftop solar panels.
Program 7.6: Require solar water heating and/or photovoltaic-ready roofs in new construction, i.e., roofs with wiring installed for a roof-mounted photovoltaic system, where feasible	Consistent. The project would comply with CalGreen standards and include wiring for solar voltaic systems and would provide rooftop solar panels.
Program 10.3: Require the installation of energy efficient lighting	Consistent. The project would comply with CalGreen standards and include the installation of energy efficient lighting.
Source: City of Pleasanton 2009	

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Conclusion

The project would be consistent with the General Plan EIR for the project site. Compliance with applicable 2005-2025 General Plan policies and CalGreen would ensure the project would result in less than significant energy impacts. The project would have no new or substantially more severe impacts from energy use, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

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7 Geology and Soils

	Less than Significant or Less than		
	Significant with		
Significant Impact	Mitigation Incorporated	No Impact	Analyzed in the Prior EIR

Would the project:

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
 - 2. Strong seismic ground shaking?
 - 3. Seismic-related ground failure, including liquefaction?
 - 4. Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?
- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?
- Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		•		

Analysis in the General Plan EIR

The General Plan EIR discusses geology and soils impacts in Section 3.7 and on pages 3.12-8 and 3.12-9 for paleontological resources and found impacts to be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

- a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
- a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?
- a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?
- a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The General Plan EIR determined that impacts involving the risk of loss, injury, or death from the rupture of a known fault, seismic ground shaking, seismic-related ground failure, and landslides would be less than significant with compliance with General Plan Safety Element Programs, such as not allowing development of structures within an active fault zone and compliance with the CBC and the City's Building Code.

The project site is relatively flat and not adjacent to the hillsides in areas of Pleasanton, west of I-680 that would cause potential effects from landslides, as shown in Figure 5-1 of the General Plan (City of Pleasanton 2009). Figure 5-4 in the General Plan shows the project site in an area with liquefaction potential, and the Geotechnical Report prepared for the project by Giles Engineering Associates (Appendix C to this document) states that the project site is in an area requiring investigation for liquefaction potential. However, Giles Engineering Associates conducted a sitespecific liquefaction analysis and concluded that soils under the project site are not susceptible to liquefaction and have low potential for liquefaction-induced lateral spreading and surface manifestation. The report includes site development and building foundation recommendations based on conditions of on-site soils and potential for spreading.

According to the General Plan EIR and California Geologic Survey, there are two fault zones in Pleasanton: The Calaveras Fault Zone and the Verona Fault Zone. Mt. Diablo Fault Zone is also located just north of the city limits (City of Pleasanton 2008, California Geologic Survey 2019). However, the project site is not located within the boundaries of these earthquake fault zones as defined by the Alquist-Priolo Earthquake Fault Zoning Act (Appendix C). As discussed in the General Plan EIR, most of Pleasanton is expected to experience strong ground shaking during earthquakes of significant magnitude. Project implementation would potentially expose people to hazards involving seismic ground shaking. Compliance with CBC and the City's Building Code protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements, which would reduce impacts from seismic ground shaking. General Plan Programs 2.1 and 2.2 require recommendations in the site-specific geotechnical analysis to be included as project development conditions. With adherence to applicable CBC and recommendations in the Geotechnical Report required by General Plan Safety Element Programs 2.1 and 2.2, impacts related to these geologic hazards would be less than significant and would not be greater than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR determined less than significant impacts from soil erosion or loss of topsoil would occur through compliance with regulatory requirements, including the National Pollutant Discharge Elimination System (NPDES) permit process.

Project construction, including site clearing, grading, and excavation would have the potential to loosen soil on site and result in soil erosion and loss of topsoil. The project would be required to comply with NPDES General Construction Permit and prepare a Stormwater Pollution Prevention Plan (SWPPP), which would include BMPs to control sedimentation and erosion. As discussed in the General Plan EIR, the SWPPP includes an Erosion and Sediment Control Plan be prepared prior to grading activities. Compliance with existing State and City regulations would reduce impacts to less than significant and impacts would not be greater than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

The General Plan EIR found less than significant impacts from unstable soils or geologic units and expansive soils, as development standards and compliance with the CBC would ensure structures are constructed to accommodate unstable or expansive soil units. The General Plan EIR said site-specific geotechnical review and recommendations would be required in individual project design.

The Geotechnical Report concluded the project site has low potential for lateral spreading, liquefaction, and expansion (see Appendix C). The report also concluded that on-site soils are susceptible to a moderate degree of consolidation under the weight of new structures but stated that the project site is suitable for the proposed development. As discussed in the General Plan EIR, the project would be required to comply with measures in the CBC, which regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to reduce impacts from unstable or expansive soils. Building foundation recommendations in the Geotechnical Report would be implemented per General Plan Safety Element Programs 2.1 and 2.2, which state that recommendations in the site-specific geotechnical analysis to be included as project development conditions. Therefore, no impacts beyond those previously identified in the General Plan EIR would occur.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The General Plan EIR found less than significant impacts from soils incapable of supporting the use of septic tanks because most of the city would be serviced by the City's wastewater collection and the Dublin-San Ramon Service District wastewater treatment plant. Municipal wastewater systems would also serve the proposed project, and no septic tanks or alternative wastewater disposal systems would be installed. Therefore, the project would have no impacts beyond those identified in the General Plan EIR.

NO IMPACT

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

The General Plan EIR determined that impacts to paleontological resources in the planning area would be less than significant with compliance with existing laws and policies as well as individual project review under CEQA.

The paleontological sensitivity of the geologic units underlying the project site was evaluated based on a desktop review of existing data, and a paleontological sensitivity classification was assigned to the geologic units within the project site. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. The Society of Vertebrate Paleontology (SVP) has developed a system for assessing paleontological sensitivity and describes sedimentary rock units as having high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources (SVP 2010). This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present.

The project site is situated within the Amador Valley in the Coast Ranges geomorphic province (California Geological Survey 2002). Surface geology at the project site is mapped as younger Quaternary (middle to late Holocene) alluvial deposits (Qa) (Dibblee and Minch 2006), derived from the surrounding hillsides. Existing site-specific geotechnical data documents that these deposits consist of unconsolidated, moderately sorted sand and silty clay, and fluvial sediments deposited from the nearby Arroyo del Valle (Giles Engineering Associates 2018). Middle to late Holocene deposits are typically too young (i.e., less than 5,000 years old) to preserve paleontological

resources and are determined to have a low paleontological resource potential according to SVP standards (SVP 2010). However, middle to late Holocene deposits may grade down into older deposits with the potential to preserve paleontological resources at shallow or unknown depths.

At an indeterminate depth within the project site, middle to late Holocene deposits may transition to sediments of older Quaternary (Pleistocene to early Holocene) alluvium, which is mapped at the surface approximately 0.25 miles south of the project area and described as moderately consolidated, gravel to medium-grained sand and silt by Dibblee and Minch (2006). The results of the geotechnical analysis by Giles Engineering Associates (2018) indicate a change in lithology at approximately 35 feet below ground surface from unconsolidated sand and silty clay to moderately consolidated, medium stiff to hard sandy gravel. Although sediments above and below this transition are not assigned to mapped geologic units or ages within the geotechnical report (Appendix C), the change in lithology at 35 feet below ground surface may correspond to the contact between middle to late Holocene deposits and older sediments, suggesting that older deposits are at depths of at least 35 feet below ground surface.

The project site contains previously disturbed sediments from prior site development and the maximum depth of excavation during construction would be four feet. Given that older deposits with the potential to yield paleontological resources would likely occur at depths greater than the anticipated project ground disturbance, impacts to paleontological would be unlikely as a result of the project. Consistent with General Plan Program 5.3, the City requires a standard condition of approval for projects requiring Planning Department approval, which would require that construction stop in the event that paleontological resources are uncovered during excavation. Compliance with 2005-2025 General Plan Program 5.3 would ensure that paleontological resources are protected in the event of an unanticipated discovery during project construction, consistent with the findings in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

As discussed in the General Plan EIR, required regulations and implementation of 2005-2025 General Plan programs would reduce potential impacts to less than significant levels. The project would have no new or substantially more severe impacts to geology and soil resources, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR. This page left blank intentionally.

8 Greenhouse Gas Emissions

Significant Impact	Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
			•
	_	_	_
	Significant Impact	Significant with Significant Mitigation Impact Incorporated	Significant with Significant Mitigation Impact Incorporated No Impact

Analysis in the General Plan EIR

Impacts related to greenhouse gas (GHG) emissions were analyzed in Section 3.10 of the General Plan EIR. Development under the General Plan was determined to not have a cumulatively considerable contribution to climate change, and impacts were determined to be less than significant with no mitigation measures required.

The following sections describe the analysis included in the General Plan EIR and provide a streamlined review to determine whether there would be project-specific impacts that are 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

Threshold

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

In the 2017 BAAQMD CEQA Air Quality Guidelines, the BAAQMD outlines an approach to determine the significance of project-related GHG emissions. The BAAQMD recommends that lead agencies determine appropriate thresholds of significance for GHG emissions based on substantial evidence in the record. The BAAQMD's significance thresholds in the updated May 2017 CEQA Air Quality Guidelines for project operations in the Basin are the most appropriate thresholds for use in determining GHG emission impacts of the proposed project. The BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant GHG emission impacts. If all screening criteria are met by a project, then the lead agency or applicant would not need to perform a detailed assessment of their project's GHG emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (BAAQMD 2017b).

As discussed under Section 3, *Air Quality*, public storage facilities are not one of the land uses for which screening criteria are provided. Therefore, the project's GHG emissions are compared in this Consistency Checklist to the BAAQMD's significance thresholds shown in Table 12.

GHG Emission Source Category	Operational Emissions
Non-stationary Sources	1,100 MT of CO ₂ e/year
	or
	4.6 MT of CO ₂ e/SP/year (residents + employees)
Stationary Sources	10,000 MT/year
Plans	6.6 MT of CO ₂ e/SP/year (residents + employees)

Table 12 GHG Emissions Thresholds of Significance

MT = metric tons; CO_2e = carbon dioxide equivalents; SP = service population;

Notes: Project emissions can be expressed on a per-capita basis as MT of CO_2e /service population/year, which represents the project's total estimated annual GHG emissions divided by the estimated total number of new residents and/or employees that would be accommodated by a project.

BAAQMD's thresholds were established based on achieving the 2020 GHG emission reduction targets set forth in the AB 32 Scoping Plan. Therefore, because the project would have a post-2020 buildout year, the threshold of significance (1,100 metric tons (MT) of carbon dioxide equivalents (CO₂e) per year) was adjusted based on the SB 32 target of a 40 percent reduction in GHG emissions below 1990 levels (Association of Environmental Professionals 2016). Since the 2020 GHG emissions targets set forth in the AB 32 Scoping Plan are designed to reduce GHG emissions to 1990 levels, it follows that the BAAQMD threshold of 1,100 MT of CO₂e per year must decrease by 40 percent by 2030 to meet the statewide 2030 GHG emission reduction targets. Therefore, for the purposes of this analysis, the project's year 2030 GHG emissions would be significant if they would exceed 660 MT of CO₂e per year.

Methodology

GHG emissions for project construction and operation were calculated using CalEEMod, version 2016.3.2 (Appendix A). The model calculates emissions of CO₂, N₂O, and CH₄, reported as CO₂e, for most emissions sources except for mobile sources for which only CO₂ and CH₄ emissions are calculated. The construction schedule and list of construction equipment used in CalEEMod were primarily based on CalEEMod defaults. However, the default architectural coating phase was extended to better reflect actual construction practices. Construction equipment numbers were

reduced to accurately reflect the feasible numbers of construction vehicles that would operate on the project site during each construction phase given the size of the project site and the nature of the proposed project. For modeling operational emissions, only the net increase in square footage of storage facilities (approximately 163,970 square feet) was included because the project would demolish existing storage facilities. Because the project would demolish the existing office building and replace it with an office of smaller size, operational emissions generated by the proposed office were not modeled because they would be less than those generated by the existing office due to its smaller size.

Because CalEEMod does not calculate N₂O emissions from mobile sources, N₂O emissions were quantified using guidance from California Air Resources Board and the Emission Factors (EMFAC) 2017 Emissions Inventory for the Alameda County region for the year 2030 using the EMFAC2011 categories. Trip generation rates used in the model were based on the project's Trip Generation Memorandum (Appendix D).

Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt hour (CAPCOA 2017). The project would be served by PG&E. Therefore, PG&E's specific energy intensity factors (i.e., the amount of CO₂, CH4, and N2O per kilowatt-hour) are used in the calculations of GHG emissions. Per SB 100, the statewide Renewable Portfolio Standard (RPS) Program requires electricity providers to increase procurement from eligible renewable energy sources to 60 percent by 2030. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by PG&E, as shown in Table 13.

	2009 (lbs/MWh) ¹	2030 (lbs/MWh) ²
Percent procurement	14.1%	60%
Carbon dioxide (CO ₂)	641.35	417.62
Methane (CH ₄)	0.029	0.019
Nitrous oxide (N ₂ O)	0.006	0.004
¹ Source: California Rublic Utilities	Commission 2011	

Table 13 PG&E Energy Intensity Factors

ilities Commission 2011:

² RPS goal established by SB 100

Energy usage from non-residential energy usage was reduced by 30 percent to account for the requirements of 2019 Title 24 standards (CEC 2019d). CalEEMod does not incorporate water use reductions achieved by 2016 CALGreen, which requires a 20 percent increase in indoor water use efficiency. Thus, to account for compliance with CalGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations for new development.

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

Project construction would generate temporary, short-term GHG emissions from the operation of heavy construction equipment such as graders, backhoes, and generators and travel to and from the worksite by material delivery trucks, haul trucks, and construction worker vehicle trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Construction activity would generate approximately 499 MT of

 CO_2e . As there is no applicable construction GHG threshold, this calculation is included for informational purposes. Nonetheless, the project applicant would be required to comply with all BAAQMD rules and regulations regarding emission control measures. Therefore, impacts related to GHG emissions generated during construction would be less than significant and consistent with the General Plan EIR.

Table 14 summarizes the project's estimated operational GHG emissions, which would be approximately 557 MT of CO₂e per year with the primary sources of emissions being mobile sources and energy use (Appendix A). This level of emissions would be below the significance threshold of 660 MT CO₂e per year. Therefore, impacts related to GHG emissions and climate change would be less than significant and consistent with those identified in the General Plan EIR.

Emission Source	Annual Emissions (MT of CO ₂ e)	
Operational		
Area	<0.1	
Energy	128.7	
Solid Waste	77.5	
Water	72.5	
Mobile		
CO_2 and CH_4	275.0	
N ₂ O	3.7	
Total	557.4	
Threshold	660	
Exceeds Threshold?	No	
MT of CO ₂ e = metric tons of carbon of	lioxide equivalent	

Table 14 Combined Annual Emissions of Greenhouse Gases

Source: CalEEMod Output Files, Appendix A

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

Plan Bay Area 2040

SB 375, signed in August 2008, requires the inclusion of Sustainable Communities' Strategies (SCS) in Regional Transportation Plans (RTP) to reduce GHG emissions. ABAG adopted the Plan Bay Area 2040, which is a state-mandated, integrated long-range transportation, land-use, and housing plan that supports a growing economy, provides more housing and transportation choices, and reduces transportation-related pollution in the nine-county San Francisco Bay Area (ABAG 2017). The goals of Plan Bay Area 2040 related to GHG emissions include (ABAG 2017):

- 1. Climate Protection. Reduce per capita CO₂ emissions
- 2. Healthy and Safe Communities. Reduce adverse health impacts
- Open Space and Agricultural Preservation. Direct development within urban footprint
- 4. Transportation. Increase non-auto mode share

The proposed project is an infill development and is adjacent to Tri-Valley Wheels (Livermore Amador Valley Transit Authority) Route 10R, which connects to the East Dublin/Pleasanton Bay Area Rapid Transit (BART) station approximately three miles to the northwest of the project site. However, public storage projects would typically attract automobile use to transport personal belongings to and from the project site. An expanded public storage facility would provide a service for Pleasanton residents and would potentially reduce the need to travel further outside the City for storage needs. The project is consistent with its land use designation and would not conflict with the Plan Bay Area 2040.

Pleasanton Climate Action Plan

Applicable local plans include the Pleasanton Climate Action Plan (CAP) and the City's 2005-2025 General Plan. The City adopted the CAP in 2012 to reduce GHG emissions in Pleasanton in compliance with the AB 32 to 15 percent below baseline levels. Because the CAP was prepared to reach a 2020 GHG reduction goal and the proposed project would be operational after 2020, a quantitative evaluation is not appropriate. Table 15 includes a consistency evaluation with the proposed project and GHG reduction measures in the City's CAP and the 2005-2025 General Plan. As shown in Table 15, the project would be consistent with all applicable measures and programs in the City's CAP and 2005-2025 General Plan. Therefore, the project would have a less than significant impact. No impacts beyond those analyzed in the previous environmental documents would occur.

Table 15	Consistency with	Applicable	2005-2025	General I	Plan and	CAP	GHG E	mission
Reductio	n Strategies							

Measures/Programs	Project Consistency
City of Pleasanton Climate Action Plan	
LU 1: Support infill and high-density development	Consistent. The project is infill development.
LU 2: Support Mixed-use Infill and New Development near Local-serving Commercial Areas	Consistent. The project is a commercial development located adjacent to existing and new residential uses.
LU 3: Improve Transportation Efficiency through Design Improvements	Consistent. The project allows for the extension of Nevada Street and includes payment of fees toward construction of a trail.
NM 1: Enhance and Maintain a Safe, Convenient, and Effective System for Pedestrians and Bicyclists	Consistent. The project would not adversely affect the bike lane or sidewalks on Stanley Boulevard and the sidewalk improvements of the Nevada Street extension. The project applicant would contribute fees to construct a pedestrian trail along the Arroyo del Valle.
VE 1: Develop a Supportive Community Infrastructure for More Fuel-Efficient and Alternative Fuel Vehicles	Consistent. The project would provide EV charging spaces consistent with CALGreen standards.
SW 2: Increase Recycling, Organics Diversion, and Waste Reduction Associated with the Entire Community	Consistent. The project would be required to include a construction waste management plan to comply with CALGreen and City green building requirements.
WA 1: Conserve Community Water through Building and Landscape Design and Improvements	Consistent. The project would replace outdated structures with ones that have low water use fixtures and include low water use landscaping, in accordance with CALGreen.

Source: City of Pleasanton 2009; 2012

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Conclusion

Based on the analysis of GHG emissions provided in the General Plan EIR and consideration of the project relative to the GHG emissions thresholds and CAP policies, no specific impacts or peculiar circumstances associated with the project would occur that would require additional review. The project would have no new or substantially more severe impacts to GHGs, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

9 Hazards and Hazardous Materials

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
Wo	ould the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		-		
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		-		
C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?			-	
d.	Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		-		-

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?			•	•

Analysis in the General Plan EIR

The General Plan EIR discusses hazardous materials impacts in Section 3.13 and finds that impacts would be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

The General Plan EIR found this impact to be less than significant because new development in Pleasanton would be regulated by federal, state, and local hazardous waste transport laws and regulations.

During construction, it is anticipated that limited quantities of miscellaneous hazardous substances, such as gasoline, diesel fuel, hydraulic fluid, solvents, oils, paints, would be brought onto the site. However, the project would be required to comply with all applicable 2005-2025 General Plan programs and federal, state, and local regulations to eliminate potential significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction contractors would be required to comply with applicable federal and state environmental and workplace safety laws. Additionally, the construction SWPPP would include BMPs to control accidental spills of equipment fluids and measures for cleanup. Public storage structures do not typically use or store large quantities of hazardous materials during operation. Adherence to these regulatory requirements would ensure that this impact would be less than significant, consistent with the General Plan EIR.

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b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The General Plan EIR concluded that compliance with applicable federal, state, and local laws and regulations regarding handling of hazardous materials, and compliance with the SWPPP and required BMPs, would ensure future development under the proposed General Plan would be less than significant.

Project construction would involve the temporary use and transport of hazardous materials used in the operation of required construction equipment. These materials include diesel fuel, lubricants, gasoline, adhesives, cleaning solutions, and chemical toilets. The materials would be transported to and within the project site for regular construction activities. The project, however, would comply with all pertinent federal, state, and City regulations, which regulate the control of these materials on site and the disposal of them off site. Compliance with applicable regulations would reduce potential impact to a less than significant level.

Project construction would also involve the demolition of seven storage structures constructed between 1979 and 1982 and that could have asbestos-containing materials. Demolition of these structures could expose and/or release these contaminants, which could result in health hazard impacts to workers if not remediated prior to construction activities. However, prior to demolition, an asbestos-containing building material survey would be conducted per regulations as set forth by the Asbestos National Emission Standards for Hazardous Air Pollutants Section 61.145 and the Toxic Substances Control Act Compliance Monitoring Program (United States Environmental Protection Agency 2019). Existing regulatory requirements would ensure that if such materials are disturbed during demolition, they would be handled and disposed in a manner that protects public and environmental health and safety. The project implementation would be required to adhere to BAAQMD Regulation 11, Rule 2, which governs the proper handling and disposal of asbestos-containing materials for demolition, renovation, and manufacturing activities in the Bay Area, and California Occupational Safety and Health Administration regulations regarding asbestos-containing materials to less than significant levels.

Typically, self-storage uses do not involve the use or storage large quantities of hazardous materials. The project would not involve the use, storage, transportation, or disposal of hazardous materials other than those used for cleaning, maintenance, and landscaping. Customers would be required to sign a lease agreement committing to a policy that prohibits storage of hazardous materials on site. Therefore, impacts would be less than significant and not more severe than those identified in the General Plan EIR.

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

The General Plan EIR found less than significant impacts to hazardous emissions near schools, as compliance with laws and regulations and project-level environmental review would ensure future developments do not emit hazardous emissions within 0.25 mile of school sites. The nearest school to the project site is Valley View Elementary School, located approximately 0.4 mile south. Therefore, the project would not emit hazardous emissions to handle hazardous materials within

0.25 mile of a school and there would be no new or substantially more severe impacts than identified in the General Plan EIR.

NO IMPACT

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

The General Plan EIR found this impact to be less than significant, as new development would be regulated by federal, state, and local hazardous materials laws, including 2005-2025 General Plan policies which would require cleanup and reuse of listed hazardous materials sites.

A search of the State Department of Toxic Substances EnviroStor database and the State Water Board GeoTracker database concluded that the project site is not located on a known hazardous materials site (Department of Toxic Substances Control 2020; State Water Resources Control Board 2020). Therefore, there would be no impacts and there would be no new or substantially more severe impacts than identified in the General Plan EIR.

NO IMPACT

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

The General Plan EIR determined that a portion of the General Plan area is within the Livermore Airport Land Use Compatibility Plan's Airport Protection Area. The EIR concluded impacts would be less than significant with review of development projects by the Airport Land Use Commission. The project site is located approximately 2.5 miles southwest of the Livermore Municipal Airport. The project site is not located in the Livermore Airport Land Use Compatibility Plan's Airport Protection Area Airport Protection Area and is located outside the Noise Compatibility Zones (Alameda County 2012). Therefore, there would be no impact and there would be no new or substantially more severe impacts than identified in the General Plan EIR.

NO IMPACT

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

The General Plan EIR identified less than significant impacts regarding interference with the adopted Pleasanton Comprehensive Emergency Management Plan and Alameda County Disaster Plan. The City Fire Department reviews individual development proposals to ensure emergency access needs are met, consistent with CBC and fire code. The project would not block or reconfigure existing roadways or prevent implementation of the Pleasanton Comprehensive Emergency Management Plan, which sets standards for warning, communication, hazardous material containment, and other emergency planning matters. Therefore, impacts would be less than significant and there would be no new or substantially more severe impacts than identified in the General Plan EIR.

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

The General Plan EIR concluded that over 6,000 acres in Pleasanton are within designated wildlandurban interface areas. The General Plan EIR concluded impacts would be less than significant with compliance to CBC, review by the City Fire Department, and because sensitive uses are not proposed in areas with high fire risk. The project site is in an urban area of the city and not in a fire protection area, as shown in Figure 5-6 of the General Plan Safety Element (City of Pleasanton 2009). Therefore, there would be no impact and there would be no new or substantially more severe impacts than identified in the General Plan EIR.

NO IMPACT

Conclusion

The project would not generate or expose sensitive receptors to hazards and hazardous materials. The project would have no new or substantially more severe impacts regarding hazards and hazardous materials, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.
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10 Hydrology and Water Quality

			Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
Wo	ould the project:					
a.	Violate any water que waste discharge req otherwise substantion or ground water que	uality standards or uirements or ally degrade surface ality?				
b.	Substantially decrea supplies or interfere groundwater rechar project may impede groundwater manag	se groundwater substantially with ge such that the sustainable gement of the basin?		-		
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
	(i) Result in subst siltation on- or	antial erosion or off-site;				-
	 (ii) Substantially ir amount of surf manner which flooding on- or 	ncrease the rate or face runoff in a would result in off-site;				
	 (iii) Create or contr which would e existing or plar drainage syster substantial add polluted runof 	ribute runoff water xceed the capacity of nned stormwater ms or provide ditional sources of f; or		-		•
	(iv) Impede or redi	rect flood flows?				
d.	In flood hazard, tsur risk release of pollut inundation?	nami, or seiche zones, cants due to project			-	

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				

Analysis in the General Plan EIR

Impacts to hydrology and water quality were analyzed in Section 3.6 of the General Plan EIR. Impacts were determined to be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The General Plan EIR found this impact to be less than significant with compliance with the San Francisco Bay RWQCB's Construction General Permit requirements and compliance with the NPDES municipal permit with BMPs, stormwater treatment flow rate and volume design requirements, and peak runoff discharge requirements.

Construction of the proposed project would have the potential to impact water quality through increasing debris in stormwater runoff as well as the use of construction materials such as fuels, solvents, and paints. However, the project would be required to comply with the San Francisco Bay RWQCB's Construction General Permit and prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Implementation of an Erosion and Sediment Control Plan as a part of the SWPPP would reduce sedimentation caused by construction activities.

Project operation could also impact water quality from typical oil, grease, fuel, pesticides in landscaping, and other pollutants that runoff into stormwater. However, the project would be required to comply with NPDES municipal permit requirements, as adopted in PMC Chapter 9.14, which would require the project treat pollutants in stormwater using low impact development measures and must control post-project peak flows. The project would provide three bioretention areas, which would provide approximately 4,866 square feet of stormwater treatment area. Stormwater drainage would be directed to one of the three stormwater treatment basins which would be sized in accordance with the Alameda County Clean Water Project, C.3 Stormwater Technical Guidance.

The City must receive a Stormwater Management Plan that describes how runoff and associated water quality impacts from the project would be controlled by the project's postconstruction requirements. As the project would be required to comply with regulations under the NPDES permit, RWQCB, and adopted City regulations, impacts would be less than significant, consistent with the General Plan EIR.

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

The General Plan EIR concluded that implementation of 2005-2025 General Plan would not significantly decrease groundwater supplies or interfere with recharge through compliance with proposed General Plan programs and due to existing groundwater management. The project would reduce the amount of impervious surfaces by providing 35,362 square-feet of on-site landscaping and bioretention areas that would allow for groundwater recharge. The project would involve development consistent with that allowed in the 2005-2025 General Plan and would not use water or prevent recharge at a rate beyond that anticipated in the General Plan EIR. Therefore, the project would have no impacts beyond those previously identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR determined these impacts to be less than significant, as individual projects would be subject to regulatory requirements that would reduce impacts. As shown in Figure 5-7 in the General Plan Safety Element, the project site is near a 100-year flood zone due to its proximity to the Arroyo del Valle riparian corridor. However, according to the Federal Emergency Management Agency flood map number 06001C0336G, the project site is outside of any flood zones (Federal Emergency Management Agency 2009).

City of Pleasanton 3716 Stanley Boulevard Public Storage Project

There is no on-site stream or river that would be altered directly by development of the proposed project. However, the project site is located near the Arroyo del Valle riparian corridor. As discussed under above, the project would be required to implement a SWPPP that would incorporate BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. As discussed under Impact b above, the project would not increase impervious surfaces on site. The project would create three bioretention areas, which would provide approximately 4,866 square feet of stormwater treatment area. The bioretention basins would be sized in accordance with the Alameda County Clean Water Project, C.3 Stormwater Technical Guidance and control post-project peak flows. Therefore, there would be no net increase in runoff from the site that would impact the City's stormwater drainage system or adjacent Arroyo del Valle, and no on-site or off-site flooding would occur. The project would be required to prepare a Stormwater Management Plan that describes how runoff and associated water quality impacts from the operation of the project will be controlled. Compliance with existing regulations would ensure that impacts would be less than significant, consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Pleasanton is not located near the Pacific Ocean or any large body of water and, therefore, there would be no impacts from a tsunami or seiche. As shown in Figure 5-8 of the General Plan Safety Element, the project site and most of Pleasanton are within the Del Valle Dam inundation area. According to the General Plan EIR, the probability of dam failure is extremely low. The EIR concluded impacts would be less than significant with the existing regulatory mechanisms that require inspection, maintenance, and review of the dam through the California Department of Water Resources. The City adopted an Emergency Operations Plan that also provides emergency response actions (City of Pleasanton 2018a). The proposed project would involve development of the site with additional public storage facilities. The project would not place new sensitive uses such as residences, schools, or senior housing in the dam inundation area; it would also be subject to the same emergency plan as the rest of the city. Impacts would be less than significant, consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed under Impact a, the project would be required to implement construction and postconstruction measures to reduce impacts to water quality, consistent with the San Francisco Bay RWQCB. Therefore, the project would not conflict with or obstruct implementation of the Water Quality Control Plan.

The project site is in the Livermore Valley Groundwater Basin, which is not designated as a high priority basin under the Sustainable Groundwater Management Act (SGMA) (DWR 2019). The project would be consistent with the land use in the 2005-2025 General Plan, for which the General Plan EIR concluded there is enough groundwater supply to support development under the Plan. The proposed project would not significantly increase water demand, as discussed in Section 19, *Utilities and Services Systems*. The project would include bioretention basins that would contribute

to groundwater recharge. Therefore, the project would not conflict with or obstruct the Alternative Groundwater Sustainability Plan and impacts would be less than significant.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

The project would not lead to flooding, increased runoff, or the significant degradation of water quality. The project would have no new or substantially more severe impacts to hydrology and water quality, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

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11 Land Use and Planning

	Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
d the project:				
nysically divide an established ommunity?			-	•
ause a significant environmental impact ue to a conflict with any land use plan, plicy, or regulation adopted for the urpose of avoiding or mitigating an nvironmental effect?				
	I the project: aysically divide an established mmunity? use a significant environmental impact e to a conflict with any land use plan, licy, or regulation adopted for the irpose of avoiding or mitigating an vironmental effect?	Significant Impact I the project: A significant environmental impact I use a significant environmental impact I the to a conflict with any land use plan, blicy, or regulation adopted for the Impose of avoiding or mitigating an Vironmental effect?	Less than Significant or Less than Significant or Less than Significant with Mitigation Incorporated I the project: sysically divide an established mmunity? use a significant environmental impact te to a conflict with any land use plan, licy, or regulation adopted for the strong or mitigating an vironmental effect? Less than Significant or Less than Significant or Less than Significant or Less than Significant or Less than Significant or Less than Significant or Less than Significant mitigating an vironmental effect?	Less than Significant or Less than Significant with Mitigation Incorporated No Impact I the project: sysically divide an established mmunity? use a significant environmental impact te to a conflict with any land use plan, licy, or regulation adopted for the rrpose of avoiding or mitigating an vironmental effect? Less than Significant or Less than Significant or Less than Significant or Less than Significant or Less than Significant Mitigation Incorporated No Impact I the project: I the proje

Analysis in the General Plan EIR

Land Use was analyzed in Section 3.1 of the General Plan EIR, and impacts were determined to be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

a. Would the project physically divide an established community?

The General Plan EIR determined this impact to be less than significant, as the land use plan would not disrupt the physical arrangement of existing land uses in Pleasanton. The project would involve development of additional public storage facilities on a site with existing storage facilities. The project would not result in new obstructions or divisions between established communities as it would be limited to the project site, and no linear or other features that could impede access between or within neighborhoods are proposed. Project implementation would have no impact, and there would be no impact beyond that identified in the General Plan EIR.

NO IMPACT

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

The General Plan EIR determined this impact to be less than significant as policies included in the 2005-2025 General Plan were designed to comply with existing land use plans, policies, and regulations. Please refer to the *Project Consistency with Adopted City Plans and Ordinances* discussion in the introductory sections to this document. As stated therein and shown in Table 2, the project would be generally consistent with the City's General Plan and the PMC. There would be no impact beyond that identified in the General Plan EIR.

NO IMPACT

Conclusion

The project would be consistent with the land use policies of the 2005-2025 General Plan and would comply with the PMC. The project would have no new or substantially more severe impacts to land use and planning, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

12 Mineral Resources

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
W	ould the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land				
	use plan?				-

Analysis in the General Plan EIR

Impacts to mineral resources are discussed in Section 3.7 in the General Plan EIR, which states no impacts to these resources would occur. The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

- a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The General Plan concluded that impacts would be less than significant because development would be primarily infill and areas currently used for sand and gravel harvesting would continue to be designated for that use under the General Plan. The project site is not zoned or designated for mining uses and no active mining operations are on the project site or in its vicinity. The project would not result in the loss of available, known mineral resources that would be of value to the residents of the state and the region, nor would it result in loss of a locally important mineral resource recovery site. Because the project site is currently developed, project implementation would not alter undeveloped land containing valuable mineral resources. There would be no impact.

NO IMPACT

Conclusion

The project would not involve construction or physical changes to existing mineral resource extraction facilities, nor does it propose to have peculiar or substantial impacts not covered in the General Plan EIR. Project implementation would have no new or substantially more severe impacts to mineral resources, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

13 Noise

Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
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Would the project result in:

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b. Generation of excessive groundborne vibration or groundborne noise levels?
- c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?



Analysis in the General Plan EIR

The General Plan EIR analyzed noise in Section 3.09 and determined impacts to be less than significant with no mitigation measures required.

The following sections describe the analysis included in the General Plan EIR and provide a streamlined review to determine whether there would be project-specific impacts that are 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

Construction Noise

The General Plan EIR concluded that temporary increases in noise from construction activities would be less than significant due to compliance with the PMC, which would reduce the severity of construction noise. Pursuant to PMC Section 9.04.100, construction activities are allowed between 8:00 a.m. and 8:00 p.m. Monday through Saturday and 10:00 a.m. and 6:00 p.m. on Sundays and holidays. PMC Section 9.04.100 also states that noise levels at any point outside of the property shall not exceed 86 dBA.

Construction of the proposed project would include demolition, site preparation, grading, building construction, architectural coating, and paving of the project site. In typical construction projects, grading activities generate the highest noise levels because grading involves the largest equipment and covers the greatest area. While the project site is adjacent to existing residential properties to the west, construction equipment would move throughout the site, coming near and then moving further away from individual receivers. Due to the dynamic nature of construction, noise levels are analyzed from the center of the site; therefore, construction noise levels at the residential receivers west of the project site were evaluated at 200 feet from the center of the project site.

Construction of the proposed project would be typical of construction projects throughout the City and would not require the use of high noise generating equipment such as rock crushers or pile drivers. The Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual provides typical noise levels from various types of construction equipment. Table 16 below includes the noise levels of typical construction equipment that would be used by the proposed project.

Construction Equipment	Typical Noise Level (dBA) at 50 feet from Source	
Air Compressor	80	
Backhoe	80	
Compactor	82	
Concrete Mixer	85	
Dozer	85	
Generator	82	
Grader	85	
Loader	80	
Paver	85	
Roller	85	
Saw	76	
Scraper	85	
Truck	84	
Source: FTA 2018		

Table 16 Construction Equipment Noise Levels

As shown in Table 16, none of the common equipment would exceed 86 dBA at 50 feet. Therefore, construction noise impacts would not exceed PMC requirements at the adjacent residential sensitive receivers 200 feet from the construction area. Project implementation would comply with construction hours indicated in the PMC, and construction noise would not occur during nighttime sleep hours and disturb the noise-sensitive residential receptors.

Therefore, construction noise impacts would be less than significant, consistent with the General Plan EIR.

Operational Noise

The General Plan EIR concluded that noise impacts associated with traffic from buildout under the 2005-2025 General Plan would be reduced to less than significant levels with the implementation of policies and programs in the General Plan and noise limits in the PMC for various uses. Additionally, the General Plan EIR concluded that the 2005-2025 General Plan would not significantly increase interior noise levels at sensitive receivers.

The proposed project would involve redevelopment of a public storage facility with new storage and office structures. On-site noise generated by most operational activities (e..g, vehicle circulation, parking activities, and conversations with customers) would be similar to existing noise sources on site. However, the new storage structures would include rooftop HVAC units for the climatecontrolled storage facilities. According to the project plans, the project would include nine rooftop HVAC units, six of which would be on the three-story structure and three on the single-story structure. Equipment specifications for the future HVAC systems are not available at this stage of project design; however, specifications for typical commercial condensers provides a reasonable basis for analysis. Modeling assumed the use of Carrier 16-ton packaged HVAC units (50PG03-16) with a manufacturer's Sound Power Rating of 84.0 dBA SWL. A Carrier 50PG03-16 split system with a sound power level of 84.0 dBA would generate a noise level of 69 dBA at a distance of seven feet (Appendix E). Table 17 summarizes the noise levels of the nine proposed HVAC units at their respective distances from residences to the west. As shown therein, the combined noise from all HVAC units would be approximately 56 dBA at the nearest residence, which would not exceed the maximum noise level of 60 dBA from commercial uses at adjacent residential uses, per PMC 9.04.043. Therefore, operational noise impacts would be less than significant.

HVAC Unit	Distance from Western Residences (feet)	Noise Level (dBA)		
1	40	54		
2	80	48		
3	120	44		
4	280	37		
5	280	37		
6	330	36		
7	340	35		
8	340	35		
9	420	33		
Total Combined Noise Level		56		
See Appendix E for summed noise calculations.				

Table 17 HVAC Noise Levels at Residences

Additional off-site traffic generated by the increase in available storage area on-site would increase noise levels on local roadways. According to the 2005-2025 General Plan and General Plan EIR, a noise increase on local roadways greater than 4 dBA would be considered significant. The City 2018 traffic counts reflect approximately 19,600 daily vehicle trips along Stanley Boulevard adjacent to the project site and 18,200 daily vehicle trips along Bernal Avenue to the east of the project site (City of Pleasanton 2018b). The project's Trip Generation Memorandum determined that the project would generate an additional 250 daily trips (see Appendix D). To provide a conservative estimate of impacts, this analysis assumed all 250 daily trips would occur on both Stanley Boulevard and Bernal Avenue. These additional trips would result in an approximately 1.3 percent increase in daily trips along Stanley Boulevard and an approximately 1.4 percent increase along Bernal Avenue, which would result in less than a 0.1-decibel increase along either roadway (see Appendix D). Therefore, noise from additional traffic created by project implementation would not exceed the 4-dBA threshold, and off-site roadway impacts would be less than significant and consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Project operation would not include any substantial vibration sources (e.g., heavy manufacturing processes, pile driving, or blasting). Thus, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers, especially during grading and excavation of the project site. The equipment utilized during project construction that would generate the highest levels of vibration would include rollers, loaded trucks, and bulldozers. According to the Federal Transit Administration's (FTA), Transit Noise and Vibration Impact Assessment Manual, a vibration threshold of 80 VdB is appropriate to evaluate infrequent events, such as construction activity, at residential land uses during daytime hours. A vibration thresholds of 72 VdB is used to evaluate impacts at residential uses during nighttime hours (10:00 p.m. to 7:00 a.m.) (FTA 2018). This analysis assumes that construction equipment would operate up to 115 feet from the nearest residential structures to the west. Table 18 shows the estimated vibration levels of construction equipment at adjacent residential structures using the FTA's Transit Noise and Vibration Impact Assessment Manual.

Equipment	Approximate Velocity level at 115 feet (VdB)	
Vibratory Roller	79	
Bulldozer	72	
Loaded Trucks	68	
PPV = peak particle velocity		

Table 1	8	Groundborne	Vibration	Levels for	Construction	Equipment
I UDIC I	0	Giounabonne	VIDIGIOI	Levels IOI	CONSILOCITON	Lyophien

See Appendix E for vibration calculations.

As shown in Table 18, vibration levels would not exceed the threshold of 80 VdB at the adjacent residential structures. Moreover, per PMC Section 9.04.100, construction would only be allowed between 8:00 a.m. and 8:00 p.m., Monday through Saturday, and 10:00 a.m. and 6:00 p.m. on Sundays and holidays. Therefore, construction activities would not exceed the threshold of 72 VdB for residential uses during nighttime hours (10:00 p.m. to 7:00 a.m.) because construction activities would not occur during these hours. Therefore, vibration impacts during construction would be less than significant, consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

There are no private airstrips near the project site. The project site is located approximately 2.5 miles southwest of the Livermore Municipal Airport. The project site is not located in the Livermore Airport Land Use Compatibility Plan's Noise Compatibility Zones (Alameda County 2012). The impact would be less than significant and consistent with the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

Project implementation would not generate a substantial temporary or permanent increase in ambient noise or vibration levels in the project vicinity above existing conditions. Project implementation would have no new or substantially more severe impacts to noise, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

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14 Population and Housing

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
W	ould the project:				
a.	Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?		-		
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			-	

Analysis in the General Plan EIR

The General Plan EIR discusses population and housing in Section 3.3 and determined that impacts to be less than significant with no mitigation measures required. The General Plan EIR accounts for a net increase of 9,400 residents at full buildout of the 2005-2025 General Plan.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

The General Plan EIR determined that the projected level of growth under the 2005-2025 General Plan would be limited by the existing housing cap and policies from the proposed General Plan would provide a planning framework for this growth. The proposed project would involve redevelopment of a portion of a public storage facility with new one-story and three-story storage buildings and a new office; it does not include residential units so would not directly induce population growth. The project is expected to require up to three on-site employees, which would not increase the existing number of on-site employees. Project implementation would be consistent with the City's land use designation in the 2005-2025 and, therefore, was included in the growth

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projections. Therefore, project implementation would not induce substantial population growth directly or indirectly and would be consistent with the land use and growth projections in the 2005-2025 General Plan. The project's resultant population growth would not be more than identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

There are currently no residences on the project site. Therefore, project implementation would not displace people or residences. Project implementation would have no impact related to displacement of housing or people.

NO IMPACT

Conclusion

Project implementation would not induce population growth or result in impacts to population and housing not analyzed in the General Plan EIR. Project implementation would have no new or substantially more severe impacts concerning population and housing, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

15 Public Services

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

Analysis in the General Plan EIR

The General Plan EIR analyzes public services in Section 3.4 and concludes that impacts to public services would be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

- a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?
- a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The General Plan EIR found less than significant impacts related to Pleasanton Fire Department (PFD) (now Livermore Pleasanton Fire District (LPFD)) and Pleasanton Police Department (PPD) facilities through compliance with programs in the 2005-2025 General Plan and individual project review under CEQA. The project is located approximately 0.3 mile west of the nearest LPFD Fire Station and 1.1 miles northeast of the PPD and is in an urbanized area already served by the LPFD and PPD. Project implementation would not include residences and would have access gates to only allow access to public storage customers. The project site is already served by the LPFD and the proposed project is not expected to generate a substantial increase in service needs. The project would be reviewed by the LPFD and for compliance with safety regulations and would be subject to applicable Capital Facility Fees to offset potential increases in demand. Therefore, project implementation would not cause a need for new or expanded fire or police facilities. Impacts would be less than significant and would not be greater than identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR determined that buildout under the 2005-2025 General Plan would not have a significant impact on Pleasanton Unified School District because there is available capacity in elementary, middle, and high schools to support the projected growth. As discussed in Section 14, *Population and Housing*, project implementation would not result in an increase in population. Therefore, the project would not result in a direct increase in students. The project proponent would be required to pay any applicable school impact fees to Pleasanton Unified School District. The project would therefore have a less than significant impact that would not be greater than identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

Please refer to Section 16, Recreation.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The proposed project would add storage facilities to an existing public storage facility, which would not result in additional significant demand on public facilities in Pleasanton. The project proponent would be required to pay capital facility fees, which would be used for capital improvements in Pleasanton. Therefore, impacts would be less than significant and would not be greater than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

Project impacts would not require new or altered public service facilities, consistent with the General Plan EIR. Project implementation would have no new or substantially more severe impacts to public services, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

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16 Recreation

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?		_		

Analysis in the General Plan EIR

The General Plan EIR analyzes public services in Section 3.4 and concludes that impacts to recreation would be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The General Plan EIR determined that under buildout of the General Plan the City would have a parkland ratio of 5.8 acres per 1,000 residents, which would exceed the City's standard of five acres per 1,000 residents. the General Plan EIR concluded residents also have access to several large regional parks in the area and impacts would be less than significant. The proposed project would not result in an increase in recreational facility demand or the need to construct or expand existing recreational facilities. The project proponent would be required to pay applicable capital facility fees, which the City could use to expand or develop new recreational amenities in Pleasanton.

Therefore, there would be no impacts to parks and recreational facilities and impacts would not be greater than those identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

Impacts of the project would not require new or altered recreational facilities and would be consistent with the General Plan EIR. Project implementation would have no new or substantially more severe impacts concerning recreational resources, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

17 Transportation

		Significant Impact	Less than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR
Wo	ould the project:				
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		-		
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?		-		
d.	Result in inadequate emergency access?		•		-

Analysis in the General Plan EIR

The General Plan EIR evaluated transportation impacts in Section 3.2, which concluded impacts from hazards due to a design feature, emergency access, conflicts with adopted alternative transportation plans and policies, and traffic on roadway and highway segments would be less than significant. Impacts from increased vehicle traffic on intersections was found to be less than with the implementation of mitigation measures. However, none of the mitigation measures are applicable to the project, as explained in the analysis below.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The General Plan EIR determined that four gateway intersections could operate at an unacceptable level of service (LOS) with the implementation of the 2005-2025 General Plan. The EIR included

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Mitigation Measures TR-1.1 through TR-1.4 which would reduce impacts at these intersections to less than significant levels. The General Plan EIR also concluded that impacts to adopted alternative transportation plans and to bicycle and pedestrian facilities would be less than significant with the goals, policies, and programs in the 2005-2025 General Plan.

A Trip Generation Memorandum was prepared for the proposed project (Fehr & Peers, 2019, included in this document as Appendix D). Per the Alameda County Transportation Commission, a traffic analysis is typically required for projects that generate more than 100 peak hour trips. The Trip Generation Memorandum determined project implementation would add 250 daily trips, 16 of which would occur during a.m. peak hour and 27 during p.m. peak hour (Appendix D). Therefore, project implementation would result in less than 100 new peak hour vehicle trips and therefore does not require a traffic impact analysis. The Memorandum concluded that based on the new project trip generation and project access locations, project implementation would not increase vehicle traffic through any intersections projected to operate at level of service E or F by more than 10 vehicles, which could constitute a significant impact. Therefore, the project's transportation impacts would be less than significant and less than those evaluated in the General Plan EIR. Additionally, the project is within the density projections in the General Plan EIR; therefore, project implementation would not result in unanticipated vehicle trips in Pleasanton.

The project also includes contribution of funds to complete a section of public trail south of Nevada Street along the Arroyo del Valle, as well as public seating along the Nevada Street right-of-way. The project would be located on an existing public storage site and would not impact transit, bicycle, or pedestrian infrastructure, such as bike lanes on Stanley Boulevard. Therefore, project implementation would introduce no new or more severe impacts related to conflicts with public transit and active transportation modes or their safety than were identified in the General Plan EIR.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The project site is adjacent to a bus stop on Stanley Boulevard served by Tri-Valley Wheels (Livermore Amador Valley Transit Authority) Route 10R. Per CEQA Guidelines Section 15064.3(b)(1), land use projects located within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Route 10R provides service through Pleasanton and to Livermore and connects to the East Dublin/Pleasanton BART station (Tri-Valley Wheels 2020). Route 10R is one of two routes Tri-Valley Wheels operates to provide rapid service. Bus service along this corridor operates every 15 minutes between 5:00 a.m. and 7:00 p.m. on weekdays, which provides a connection to every BART train during those hours. Therefore, the project site is along a major transit corridor that provides access throughout Pleasanton, to other cities, and to other major transit centers. Project implementation would not conflict with CEQA Guidelines section 15064.3 and impacts would be less than significant.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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

The General Plan EIR concluded that impacts would be less than significant due to compliance with applicable standards and regulations and review by City departments. No new roadways are proposed as a part of the project. Two public driveways would provide access to the project site, one of which is located along Stanley Boulevard and the other along Nevada Street. The City's Engineering Department and Traffic Division would review project plans for driveways and internal circulation to ensure design for safe operation. Project implementation would also provide emergency fire access along the southeast corner of the project site. The City's Fire Department would review project plans for compliance with applicable fire and building codes with respect to emergency access and safety. Therefore, impacts would be less than significant and no impacts beyond those identified in the General Plan EIR would occur.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

Project implementation would not generate a significant number of daily trips that would exceed City standards or impact the transportation system. Project implementation would have no new or substantially more severe impacts concerning transportation and traffic, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR. This page intentionally left blank.

18 Tribal Cultural Resources

	Less than Significant or		
	Less than		
	Significant		
	with		
Significant	Mitigation		Analyzed in
Impact	Incorporated	No Impact	the Prior EIR

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:



Analysis in the General Plan EIR

The General Plan EIR concluded impacts to tribal cultural resources would be less than significant. The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

Assembly Bill (AB) 52 consultation is triggered by publication of a notice, which is not required for this Consistency Analysis. Therefore, AB 52 consultation is not required for this project. Given that the project site contains previously disturbed sediments from prior site development and the maximum depth of excavation during construction would be four feet, impacts to tribal cultural resources would be unlikely as a result of the project. Compliance with 2005-2025 General Plan Program 5.3, which would require that construction stop in the event that tribal cultural resources are uncovered during excavation, would ensure tribal cultural resources are protected in the event an unanticipated discovery during project construction, and impacts would be less than significant.

LESS THAN SIGNIFICANT OR LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Conclusion

Project implementation would not result in a substantial adverse change to any tribal cultural resources. Compliance with 2005-2025 General Plan policies and programs would ensure that if any resources of Native American origin are discovered they would be properly evaluated and protected. Project implementation would not have a significant impact on tribal cultural resources and there would be no significant off-site or cumulative tribal cultural resource impacts.

19 Utilities and Service Systems

	Less than Significant or		
	Less than		
	Significant		
	with		
Significant	Mitigation		Analyzed in
Impact	Incorporated	No Impact	the Prior EIR

Would the project:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?
- Analysis in the General Plan EIR

Impacts to utilities and service systems were analyzed in Section 3.05 of the General Plan EIR, and impacts were determined to be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to

have a more severe impact than discussed in the General Plan EIR due to substantial new information.

Project-Specific Impacts

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

The General Plan EIR concluded that the 2005-2025 General Plan would not require additional expansions of wastewater treatment as there are already planned improvements to the wastewater treatment plant that would accommodate development under the General Plan. The EIR concluded there are sufficient water supplies to serve the City under buildout of the General Plan through 2025.

The project site is served by existing telecommunication, electricity, natural gas, stormwater, wastewater, and water infrastructure. The proposed project would not require the off-site construction or relocation of these utilities. On-site connections to these utilities from the proposed storage structures are included in the project analysis throughout this environmental document. As discussed under Section 10, *Hydrology and Water Quality*, the required BMPs and Stormwater Management Plan would control post-project peak flows of stormwater in three bioretention areas, which would provide approximately 4,866 square feet of stormwater treatment area. Therefore, the project would not require construction or relocation and, therefore, would not require construction of additional utility infrastructure than was analyzed in the General Plan EIR. Therefore, there would be no impacts beyond those analyzed in the General Plan EIR.

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

The General Plan EIR concluded that water demand under buildout of the General Plan would have a less than significant impact on water supplies in Zone 7 of the Alameda County Flood Control and Water Conservation District (Zone 7 Water Agency). During times of increased demand during time a drought could result in temporary water shortages; however, the EIR concluded that conservation measures required under PMC Chapter 9.30 would reduce water demand impacts to less than significant.

Zone 7 Water Agency supplied water to the California Water Service Company- Livermore District, the Dublin San Ramon Services District, Livermore, and Pleasanton; the agency updated its Urban Water Management Plan since the adoption of the General Plan EIR. The 2015 Urban Water Management Plan determined that sufficient water supply exists to meet demand under normal, dry, and multiple dry years through 2035 (Zone 7 Water Agency 2016). The increase in public storage area from the proposed project would not substantially increase demand of potable water in Pleasanton. The public storage use of the site would have substantially less water demand than other uses allowed under the CS zoning designation, which include micro-breweries, automotive repair centers, and manufacturing. The 2015 Urban Water Management Plan projects water demand from land uses in its service area, and because the project is consistent with the General Plan land use and density designations, project implementation would not result in unanticipated or

additional demand on the water supply. Therefore, impacts resulting from increased water demand would be consistent with the conclusions provided in the General Plan EIR. Project implementation would have no impacts beyond those analyzed previously.

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c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The General Plan EIR determined that development under the 2005-2025 General Plan would require new and improved sewer infrastructure. However, the EIR determined impacts would be less than significant because the Wastewater Collection System Master Plan would plan for the need for increased sewage capacity. The General Plan states that future development under the General Plan would not be built prior to installation of adequate infrastructure. The EIR also concluded that there would be adequate capacity at the Dublin-San Ramon Service District wastewater treatment plant, with the planned improvements and expansions, to development under the 2005-2025 General Plan.

The proposed project is consistent with the General Plan land use designations; therefore, project implementation would not result in unanticipated demand on wastewater conveyance and treatment facilities. The public storage use of the site would produce less wastewater than other uses allowed under the CS zoning designation, which include micro-breweries, warehouses, automotive repair centers, and manufacturing. Therefore, impacts resulting from increased wastewater generation on conveyance and treatment facilities would be consistent with the conclusions provided in the General Plan EIR and there would be no impacts beyond those analyzed previously.

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

The General Plan EIR determined that the build out under the 2005-2025 General Plan could result in approximately 44,373 tons per day of solid waste. The EIR concluded this represents less than 0.3 percent of the remaining capacity at the Vasco Road Sanitary Landfill and impacts would be less than significant. The General Plan EIR also concluded that development under the General Plan would comply with new waste diversion requirements for residential projects and policies/programs in the 2005-2025 General Plan.

Construction of the proposed project would be required to comply with CalGreen standards, which mandates the diversion of at least 65 percent of construction waste. the project must submit a Waste Management Plan (WMP) through the City prior to building permit issuance. Because the project is consistent with the General Plan land use and density designations, project implementation would not result in unanticipated increases in solid waste generation under operation of the project. Therefore, impacts resulting from solid waste would be consistent with the conclusions provided in the General Plan EIR.

Solid waste facilities require solid waste facility permits to operate, and the Alameda County Department of Environmental Health issues the facility permits. The Vasco Road Sanitary Landfill currently has active permit 01-AA-0010 and undergoes quarterly inspections. As solid waste from would be disposed at the Vasco Road Sanitary Landfill, the project would comply with existing regulations related to solid waste. The City currently meets its jurisdictional solid waste disposal rates, consistent with AB 939 (CalRecycle 2019). The project would comply with applicable solid waste diversion programs in Pleasanton; therefore, impacts would be less than significant and there would be no impacts beyond those analyzed previously.

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Conclusion

Project implementation would not require new or altered utility facilities, consistent with the General Plan EIR. Project implementation would have no new or substantially more severe impacts, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

20 Wildfire

	Less than		
	Significant or		
	Less than		
	Significant		
	with		
Significant	Mitigation		Analyzed in
Impact	Incorporated	No Impact	the Prior EIR

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				-
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			-	
d.	Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	П	П	_	Π

Analysis in the General Plan EIR

Impacts to wildfires were analyzed on pages 4.7-29 through 4.7-30 of the General Plan EIR. Impacts were determined to be less than significant with no mitigation measures required.

The following describes the analysis included in the General Plan EIR and provides a streamlined review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcel on which the project is located; 2) were not previously analyzed in the General Plan EIR as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the General Plan EIR; or 4) are now determined to have a more severe impact than discussed in the General Plan EIR due to substantial new information.
Project-Specific Impacts

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

The project site is not located in a state responsibility area. According to California Department of Forestry and Fire Protection area fire maps for Pleasanton and surrounding Alameda County, the project site is not in or near a very high fire hazard severity zone. The nearest fire hazard area is located approximately 1.6 miles to the south of the project site (California Department of Forestry and Fire Protection 2007). Therefore, there would be no impacts related to wildfire.

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Conclusion

The project site is not located near a fire hazard area and would not increase the likelihood or severity of wildfire hazards. Project implementation would have no new or substantially more severe impacts to wildfires, nor would there be any potentially significant off-site impacts, cumulative impacts, or previously identified significant effects not discussed in the General Plan EIR.

21 Mandatory Findings of Significance

	Less than		
	Less than		
	Significant		
	with		
Significant	Mitigation		Analyzed in
Impact	Incorporated	No Impact	the Prior EIR

Does the project:

- a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Project-Specific Impacts

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

Consistent with the findings of the General Plan EIR and as discussed in Section 4, *Biological Resources*, project implementation would not substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife species population to drop below self-sustaining levels; threaten to

eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in the General Plan EIR and in Section 5, *Cultural Resources*, and Section 7, *Geology and Soils*, project implementation would not impact or eliminate important examples of the major periods of California history or prehistory, including archaeological or paleontological resources. As such, project implementation would not result in impacts peculiar to the project beyond those identified in the General Plan EIR.

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b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Conformance with 2005-2025 General Plan policies and standard conditions of approval specified within this document would ensure that potential impacts are individually limited and not cumulatively considerable in the context of impacts associated with other pending and planned development projects. The project would be consistent with the General Plan EIR, and other existing and allowable land uses in the project vicinity are not significantly different than what was studied in the cumulative analysis of the General Plan EIR. The 2005-2025 General Plan is a planning document that establishes a land use scenario and goals, policies, and programs for development and growth throughout the city through the year 2025. Thus, the impact analyses in the General Plan EIR effectively constitute cumulative analyses of the approved land uses in the planning boundaries. Project implementation would not result in significant impacts peculiar to the project site, as indicated in Sections 1 through 20 above. Nearby development would be required to be consistent with the local planning documents or mitigation would be required to address the impacts that were not addressed in the General Plan EIR. Therefore, the project's consistency with the 2005-2025 General Plan and subsequent analysis above in Section 1 through 20 indicate that project implementation would not result in significant cumulative impacts that were not addressed in the General Plan EIR.

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, geology and soils, noise, and traffic safety. As detailed in the preceding responses, project implementation would not result, either directly or indirectly, in substantial adverse impacts related to these issue areas. The project's effects on regional air quality, transportation/traffic, and geology and soils would be less than significant, consistent with the General Plan EIR. As discussed in Section 9, *Hazards and Hazardous Materials*, project construction and operations would not expose residents or customers to known hazardous materials. The generation of noise and vibration from construction activity, as discussed in Section 13, *Noise*, would be less than significant by compliance with the PMC. Therefore, project implementation would not have substantial direct or indirect adverse effects on human beings.

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Conclusion

The proposed project would be consistent with the development density established by existing zoning and 2005-2025 General Plan policies for which the previous EIR was certified. Accordingly, based on the assessments presented the environmental checklist, the project does not require additional environmental review as the impacts:

- 1. Are not peculiar to the project or the parcel on which the project would be located
- 2. Were analyzed as significant effects in a prior EIR on the zoning action, general plan, and specific plan, with which the project is consistent where applicable
- 3. Are not potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan and specific plan
- 4. Are not previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR

Furthermore, impacts would be mitigated by the imposition of uniformly applied development policies or standards, including the City's standard conditions of approval and requirements of the PMC and federal and State flaws. Accordingly, project implementation complies with CEQA Guidelines Section 15183, which determines the requirements for when a Supplemental or Subsequent EIR is necessary for projects consistent with a community plan or zoning code, and no further environmental review is required.

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Rincon Consultants, Inc. prepared this consistency analysis under contract to the City of Pleasanton. Persons involved in data gathering analysis, project management, and quality control are listed below.

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