

CITY OF RICHMOND, CALIFORNIA

Bay Area Rescue Mission Bridge of Hope Project

INITIAL STUDY &
MITIGATED NEGATIVE DECLARATION

JUNE 2019



Bay Area Rescue Mission Bridge of Hope Project

Initial Study/Mitigated Negative Declaration

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California Environmental Quality Act (CEQA) Environmental Checklist Form

1. Project Title: Bay Area Rescue Mission Bridge of Hope Project

2. Lead Agency Name and Address:

City of Richmond
Planning and Building Services Department
450 Civic Center Plaza, Second Floor
Richmond, CA 94804-1630

3. Contact Person and Phone Number:

Roberta Felciano, Planner II
(510) 620-6662
RobertaFelciano@ci.richmond.ca.us

4. Project Location:

257 3rd Street
City of Richmond, Contra Costa County, California

Assessor's Parcel Numbers: 538-190-007 and 538-190-006

The project site is located on the west side of 3rd Street, approximately 125 feet south of Macdonald Avenue, in the City of Richmond. The site is located about 1,800 feet east of the Richmond Parkway, one-half mile north of Interstate 580, and 2.2 miles west of Interstate 80.

5. Project Sponsor's Name and Address:

Bay Area Rescue Mission (BARM)
2114 Macdonald Avenue
Richmond, CA 94801

Contact: Sherwin Harris
(510) 215-4884
sherwinh@bayarearescue.org

6. General Plan Designation:

Low Density Residential

7. Zoning:

RL2, Single Family Low Density Residential; and
T4N Transect Zone (IS1 Form Based Code)

8. Description of Project:

Bay Area Rescue Mission (BARM), the project applicant, is proposing to develop a two-story, 9,553-square-foot residential building that would serve as a rescue shelter to house homeless single women with their children. The project would be developed on an approximately 9,000-square-foot rectangular-shaped site encompassing two parcels located in the City of Richmond. The southern portion of the site is currently occupied by a single-family residence that would be demolished as part of the proposed project. The location of the project site is shown on Figure 1 and an aerial view of the site and the surrounding neighborhood is shown on Figure 2.

The proposed homeless shelter would be added to BARM's existing campus of seven other buildings on Macdonald Avenue that provide shelter, meals, and a variety of educational and support services to homeless and impoverished men, women, and children. The new building would be located at 257 3rd Street, currently occupied by the existing one-story residence, and the adjoining lot to the north of 257 3rd Street. Figure 3 shows the proposed Bridge of Hope project in relation to the adjacent existing BARM facilities on the same block.

The proposed new building would provide 26 bedrooms with a total of 114 beds for women and children. The project would provide three bedroom types: a four-bed family bedroom for a mother and her children, an eight-bed bedroom for single women, and a handicap-accessible bedroom with two standard beds and a fully-accessible bathroom reserved for women with disabilities. The four- and eight-bed apartments would be furnished with bunk beds. Each larger apartment would have its own bathroom, while each pair of four-bed apartments would share a bathroom located between them. A landscaped outdoor courtyard would provide a play area with a cushioned surface for toddlers and young children, as well as outdoor tables and seating for adults.

This proposed facility would include other amenities including a lounge providing common community space, laundromat, reception area, management office, and outdoor seating areas, all located on the ground floor. Although the proposed shelter is mainly intended for sleeping, the residents would have full access to BARM's other facilities within the existing adjacent campus located in the one-hundred and two-hundred blocks of Macdonald Avenue as well as to additional BARM facilities located at 2112 and 2114 Macdonald Avenue. These facilities include classrooms, a computer lab, counseling center, chapel, kitchen and dining center, multi-purpose rooms, and more.

It is anticipated that the facilities would have an average occupancy rate of 85 percent because the four-bed family apartments are reserved for women with children, such that a mother with one child would only utilize two of the four beds in these apartments. However, for purposes of evaluating potential environmental impacts of the project, 100-percent occupancy has been assumed.

There would be a total of three eight-bed apartments for single women, 22 four-bed family apartments, and one two-bed handicap-accessible bedroom and bathroom. The first floor of the

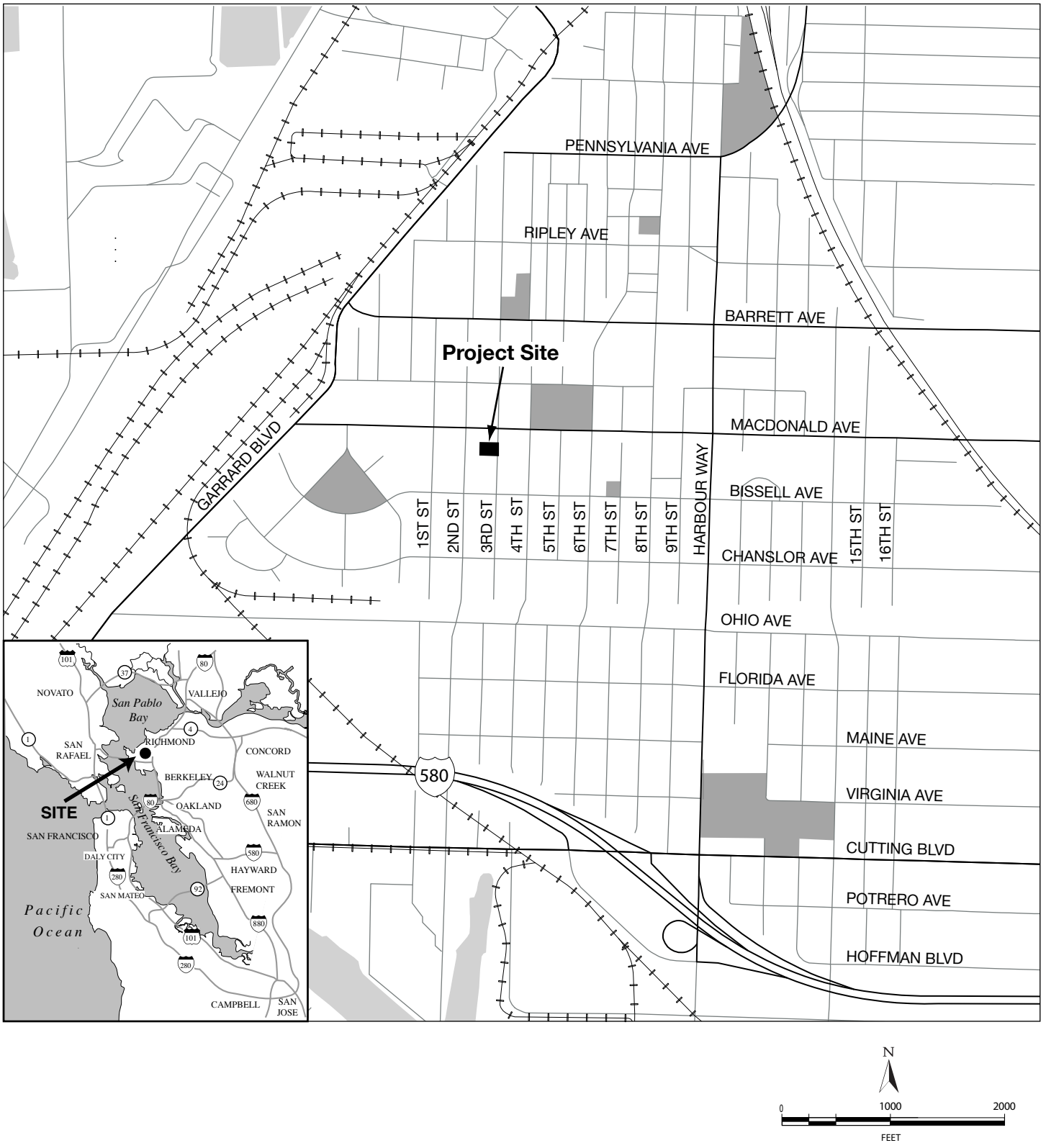


Figure 1

Project Site Location

Source: Douglas Herring & Associates



Figure 2

Aerial Overview of Site and Surroundings

Source: Google Maps; Douglas Herring & Associates

building would have eight family apartments, one eight-bed single apartment, and the handicap-accessible bedroom/bathroom. A bathroom would be shared between each pair of family apartments and the eight-bed dormitory room would have a single bathroom, for a total of five resident bathrooms, in addition to the handicap-accessible bedroom/bathroom. A staff bathroom would also be located adjacent to the reception lobby. The second floor would provide the other 14 four-bed family apartments and two eight-bed dormitories for single women. The floor plans are shown on Figure 4.

The proposed building would have a height of 22 feet 4-³/₄ inches to the eaves, and a height of 31 feet 1-³/₄ inches to the top of the chimneys. The building would have a total floor area of 9,553 square feet. There would be a front setback of 10 feet, side setbacks of 5 to 6 feet, and a rear setback varying from 17 feet 3 inches to 21 feet 4 inches. There would be no off-street parking on the project site.

The outdoor ground-floor courtyard would provide approximately 812 square feet of private open space for project residents, with drought-tolerant landscaping lining the sides. As shown in the proposed site plan on Figure 5, additional outdoor spaces would be provided at the east and west ends of the building. Raised garden planter beds would be located at the west end, along with benches for seating and trees and other landscaping. A private entry courtyard with wall seating would be located at the east end of the building, providing access to the primary entrance. Landscaped areas would extend north and south of the entry courtyard to the corners of the building. A solid wood privacy fence with lattice top would enclose the north, west, and south sides of the building.

The proposed building has been designed with a Spanish Mission architectural style, which is illustrated on Figure 6. This architecture is characterized by plain, smooth stucco walls, a terracotta tile roof with shallow pitch, and an arched second-story window grouping above the main entrance. The interior courtyard is also consistent with the Spanish Mission style, which is reinforced by a tile inset surrounding the main entrance, a low wooden gate with reverse-arched top leading to the entry courtyard, and accent tiles on the front façade between the first and second stories, flanking the main entrance. Other distinguishing characteristics that contribute to the Spanish Mission style include some recessed windows in the front façade, plain horizontal windowsills and lintels, two tower-like faux chimneys with tapered tops, wrought-iron wall-mounted lamp fixtures, and decorative wooden gable windows on the east and west elevations. The proposed elevations are shown on Figures 7 and 8.

The proposed Bridge of Hope Project would be a hotel-like facility used for long-term shelter housing. Women and children who reside there would be enrolled in a structured, full-time program of education, counseling, job and life-skills training, and more all taking place at the Bay Area Rescue Mission's other facilities within the campus. They would obtain meals at BARM's dining hall located around the corner at 200 Macdonald Avenue. For educational programs, they would be transported to the Alma Calton Educational Center at 2114 Macdonald Avenue, located about 1 mile east of the project site. A drop-off area in front of the shelter, on 3rd Street, would

accommodate transportation and shuttling of women and children to the Alma Calton Educational Center and other outside appointments. The newly renovated Alma Calton Education Center provides women and children access to a computer lab, a series of classrooms, a comprehensive library and resource center, and child care while mothers are in class. BARM collaborates closely with the West Contra Costa County Unified School District to ensure that school-aged children are rapidly integrated into the public school system.

Although detailed civil engineering plans had not been completed at the time of this environmental review, it was estimated by the project design team that 400 cubic yards or less of excess soil excavated from the site would need to be exported for offsite disposal. This would result in between 31 and 33 truck trips, assuming a per-truck capacity of 15 to 20 cubic yards. Details about project construction were also unavailable, so for purposes of this environmental review, it is assumed that project construction would commence in the Fall of 2019 and last for approximately 16 months. It is assumed that about 5 to 20 construction workers would be on site during most construction days, varying by construction phase, with the larger number present during construction of the building, and fewer present during site grading and foundation construction.

Planning Approvals

Parcel Map: The project would require approval of a Parcel Map to merge the two separate parcels comprising the project site to a single parcel, pursuant to Article 1.5, Section 66451.10 *et. seq.* of the Subdivision Map Act and Chapter 15.04, Article 15.04.703 *et. seq.* of the Richmond Municipal Code.

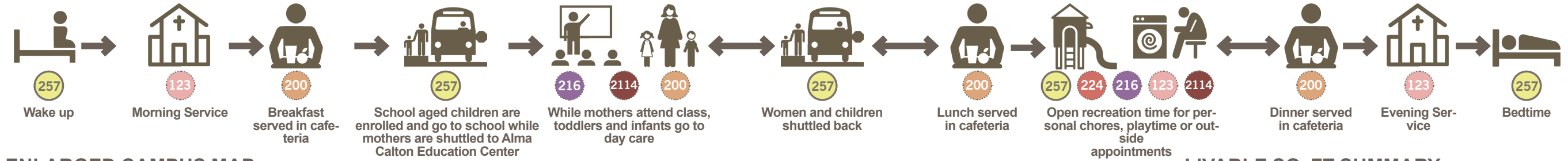
Conditional Use Permit: The project would require approval of a Conditional Use Permit (CUP) pursuant to Chapter 15.04, Article 15.04.806 of the Richmond Municipal Code, as required by Section 15.05.120.080.H of the Richmond Form-Based Code.

Design Review Permit: The project would require Design Review approval by the Design Review Board pursuant to Article 15.04.805 of the Richmond Municipal Code. In order to obtain this approval, the project will need to demonstrate consistency with the General Plan, applicable design guidelines, and the design review criteria set forth in Section 15.04.805.040 of the Municipal Code.

Other Approvals

State Water Resources Control Board (SWRCB): The project will require filing of a Notice of Intent (NOI) with the SWRCB for coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) administered by the SWRCB. This requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that addresses control of stormwater pollution during and after construction through implementation of Best Management Practices (BMPs). See Section IX, Hydrology and Water Quality, for additional information.

San Francisco Bay Regional Water Quality Control Board (RWQCB): The project will also require filing of an NOI with the SWRCB for coverage under the NPDES Municipal Regional Stormwater Permit (IGP) administered by the RWQCB. This also requires preparation and implementation of



ENLARGED CAMPUS MAP



LIVABLE SQ. FT SUMMARY

| Livable Square foot and parking | | | | |
|--|-----------|--------------|-------------|---|
| Facility | Parking | Livable Sf | Guest Count | Livable SF per person (Livable SF/Guests) |
| 123 Macdonald Ave | 10 | 9000 | 210 | 43 |
| 200 Macdonald Ave | 2 | 8000 | 210 | 38 |
| 216 Macdonald Ave | - | 3750 | 210 | 18 |
| 224 Macdonald Ave | - | 7500 | 210 | 36 |
| 257 Third Street (Bridge Of Hope) | - | 9,553 | 114 | 84 |
| 257 Third Street Outdoor play/lounge area) | - | 941 | 114 | 8 |
| 2114 Macdonald Ave | 26 | 8000 | 210 | 38 |
| Totals | 38 | 46744 | 265 | |

Note:
 114 refers to the total # guests for the Bridge of Hope Project
 210 refers to the total # of guests occupying Bay Area Rescue Mission's existing women and children's shelter and BOH (114+96=210)

This campus map and livable sf table demonstrates that with the combined usable square footage of all the BARM facilities, at maximum capacity of 114 beds by the Proposed Bridge of Hope project and 96 beds for the existing women's shelter, there will be 265 SF of livable space by each person. Please note that the proposed Bridge of Hope project or existing 96 bed womens shelter will rarely have max capacity. Based on Bay Area Rescue Mission's past data and operation, the typical occupancy rate will be about 85% due to reserving 4 bed rooms for families. Please refer to the enlarged bedroom plans for more information and A1.1 for full list of amenities per BARM facility.

***Homeless women and children typically do not have a vehicle so, there is a shuttle service that pick up guests on Third street and delivers them to BARM facilities or outside appointments. The 10 BOH staff will have 38 parking spaces throughout the campus as well as ample street parking on Third St. and Macdonald Ave.

Figure 3

Project Site in Relation to Existing BARM Campus

CODE ANALYSIS

| Occupancy Classification | |
|--|---|
| Occupancy Group | Description |
| R2 | "Residential Occupancies containing sleeping units or more than two dwelling units where occupants are primarily permanent in nature" |
| Congregate Residence (non transient with more than 16 occupants) | "Any building or portion thereof that contains facilities for living, sleeping, and sanitation, as required by this code, and may include facilities for eating and cooking, for occupancy by other than a family. A congregate residence may be a shelter , convent, monastery, dormitory , fraternity or sorority house, but does not include jails, hospitals, nursing homes, hotels or lodging houses." |

| MULTI USE OCCUPANCY SEPARATION AND FIRE RATINGS (Revised: 5/9/18) | | |
|---|--|-----------------------|
| Occupancy | Hour/Rating type | Code Sections |
| R-2 / R-2 | 1-HR Fire Partition | 420.2 & 708 |
| R-2 / R-2 | 1-HR horizontal assembly | 420.3 & 711 |
| R-2 / S-2 | 1-Hr separation & Fire Barrier | 508.4 & 707 |
| R-2 / B | 1-HR separation & Fire Barrier | 508.4 & 707 |
| Corridor walls | 1-HR Fire Resistance Rating & Fire barrier | 707.3.4 & 708 & 1020. |
| Stairs (Exit access stairway) | 1-HR Fire Resistance Rating & Fire barrier | 713.4 & 707.3.3 |

| ADDITIONAL FIRE PROTECTION SYSTEMS | | |
|--|-------------------------------|---------------|
| System | Description | Code Sections |
| Fire Sprinkler System | | 903.2.8 |
| Automatic Smoke detection System | | 907.28.2 |
| Smoke Alarms | Located in all sleeping areas | 907.2.11.1 |
| Carbon Monoxide Detection | | CBC 915 |
| Security Gate on Property with Fire dept. access | | |

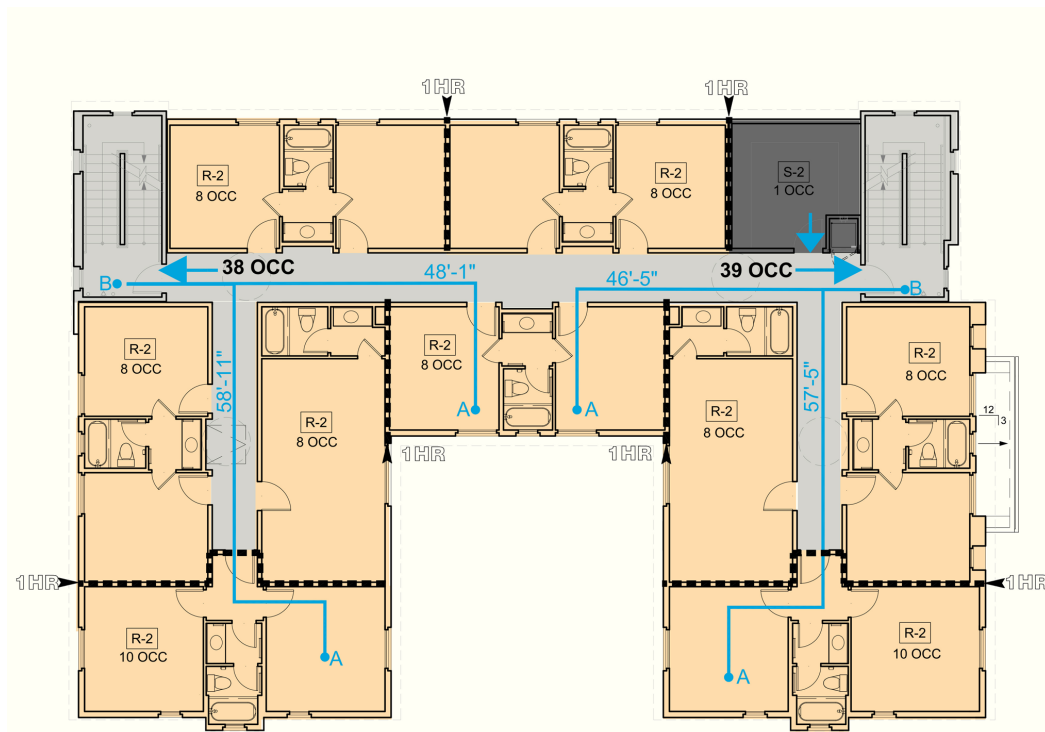
OCCUPANCY ANALYSIS

| Occupancy Loads (per table 1004.1.2) | | | | |
|---|----------------|------------|-----------------------|---------------|
| Description | Occupancy Type | Gross Sq F | Occupancy Load Factor | Occupant Load |
| 1st Floor | | | | |
| ADMINISTRATION AND OFFICES | | | | |
| Reception/Lobby + ADA RESTROOM | | 307 | 100 | 3 |
| Office 1 | B | 123 | 100 | 1 |
| Common Area | | 568 | 15 | 38 |
| (Less than 50 occ. Classified as B occ. per Sec 303.12) | B | | | |
| Laundry (4 wash, 4 dry) + trash Room | B | 302 | 15 | 20 |
| APARTMENTS | | | | |
| "Dorms" (Sleeping Area) | R-2 | 2345 | 50 | 47 |
| STORAGE ROOMS | | | | |
| Electrical / Cable/ Fire Rooms | S-2 | 73 | 300 | 0 |
| Mechanical Room | S-2 | 159 | 300 | 1 |
| Water heater Room | S-2 | 10 | 300 | 0 |
| Storage 1 | S-2 | 90 | 300 | 1 |
| Janitor | S-2 | 12 | 300 | 0 |
| Dumb Waiter | S-2 | 13 | 300 | 0 |

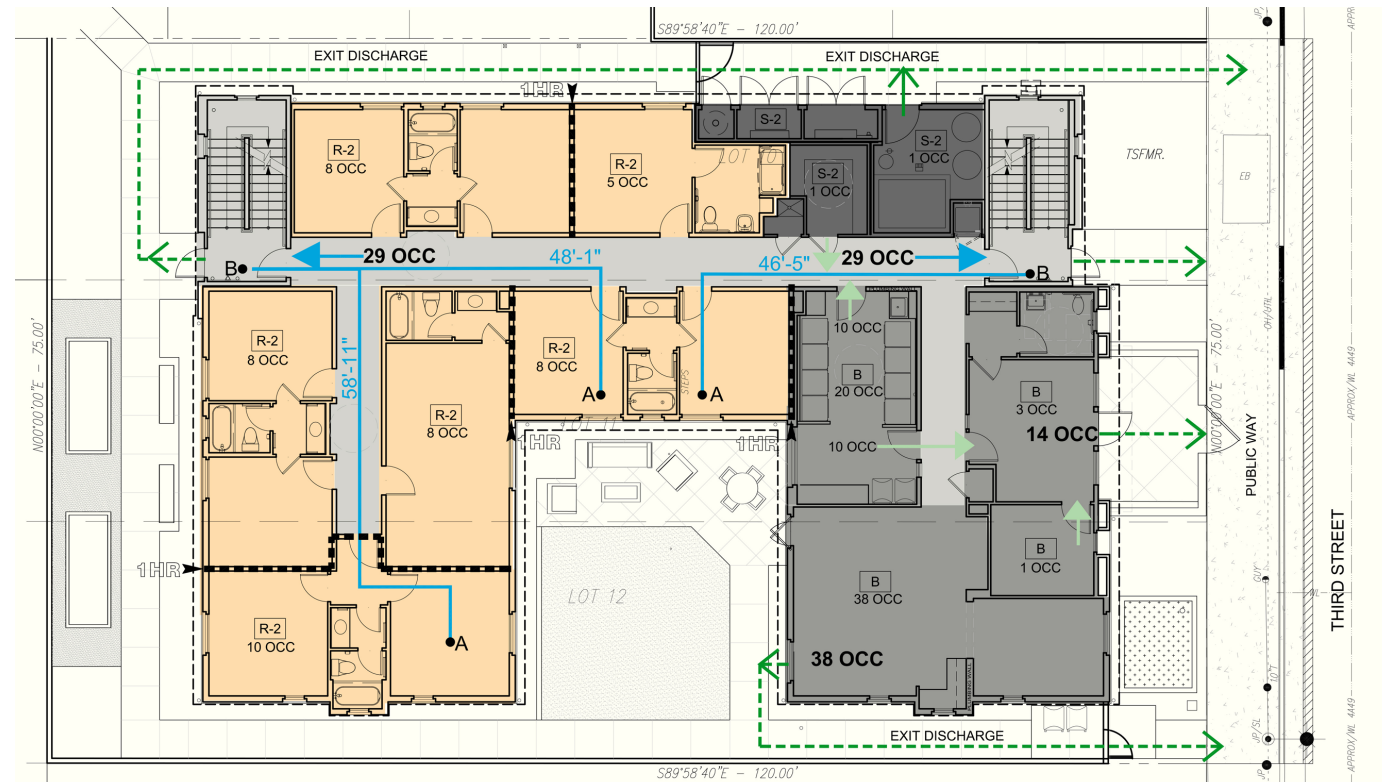
| Description | Occupancy Type | Gross Sq F | Occupancy Load Factor | Occupant Load |
|-------------------------|----------------|------------|-----------------------|---------------|
| 2nd Floor | | | | |
| APARTMENTS | | | | |
| "Dorms" (Sleeping Area) | R-2 | 3,775 | 50 | 76 |
| STORAGE ROOMS | | | | |
| Storage 2 | S-2 | 169 | 300 | 1 |
| Dumb Waiter | S-2 | 16 | 300 | 0 |

KEY LEGEND

- EXIT STAIR/CORRIDOR 1 HR RATED
- R-2 OCCUPANCY
- B OCCUPANCY
- S-2 OCCUPANCY
- X OCCUPANCY TYPE
- # OCC NUMBER OF OCCUPANT LOAD
- EXIT & EXIT DIRECTION
- EXIT ACCESS
- TO EXIT DISCHARGE & PUBLIC WAY
- A ● B EXIT ACCESS TRAVEL DISTANCE
- 1 HR



SECOND FLOOR PLAN



FIRST FLOOR PLAN

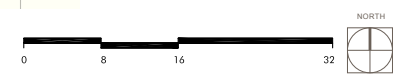


Figure 4

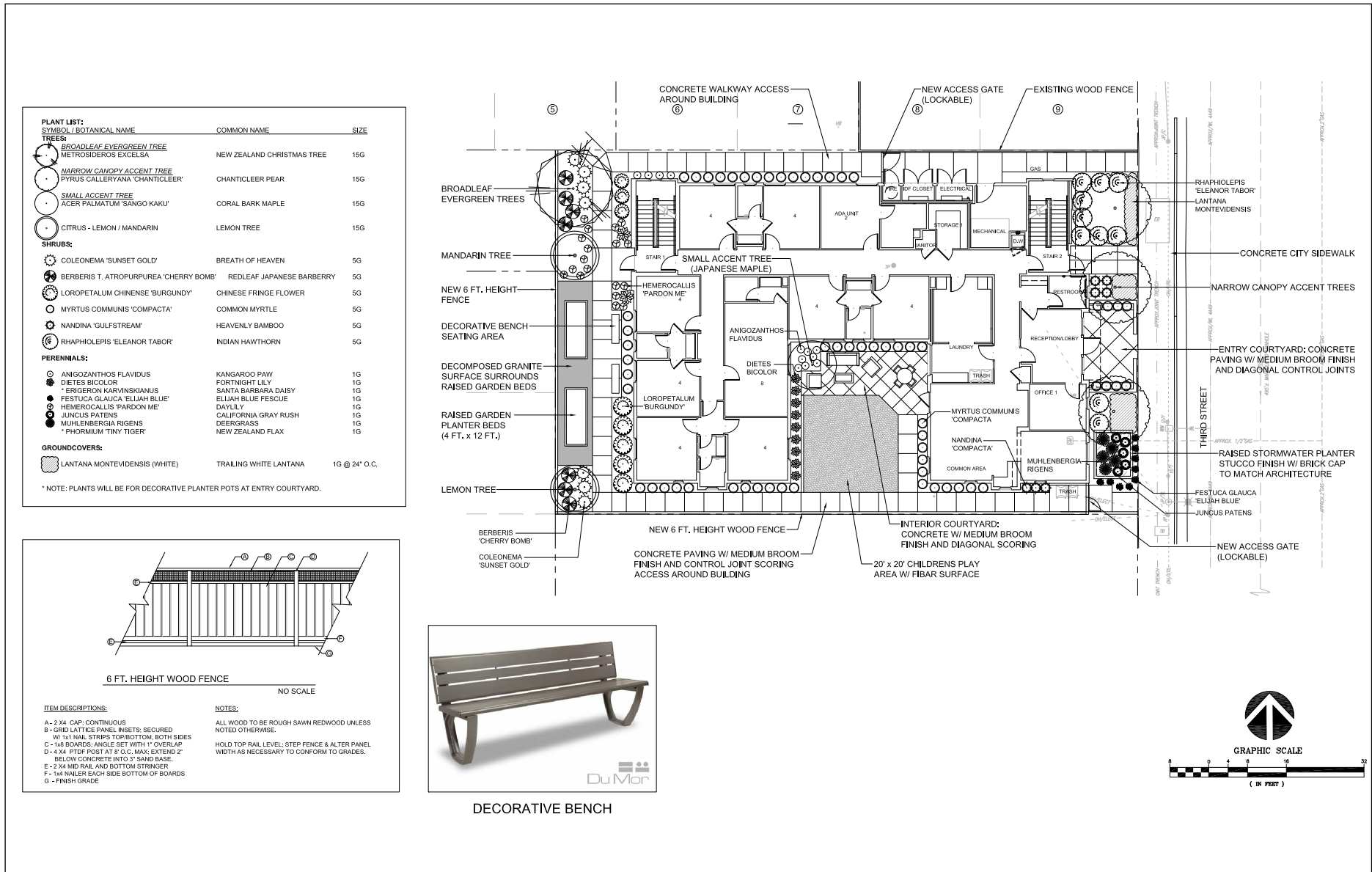


Figure 5

Proposed Site Plan and Landscaping

Source: Dahlin



Figure 6

Architectural Rendering of Project

Source: Dahlin



2. NORTH ELEVATION (SIDE)



1. EAST ELEVATION (FRONT ENTRANCE AT THIRD STREET)

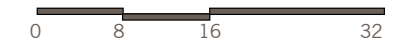
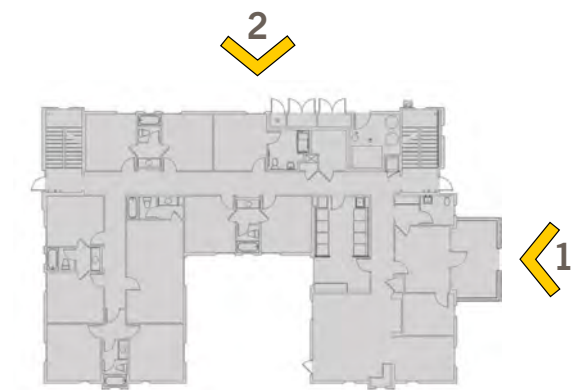


Figure 7

North and East Building Elevations



2. SOUTH ELEVATION (COURTYARD)



1. WEST ELEVATION (REAR)

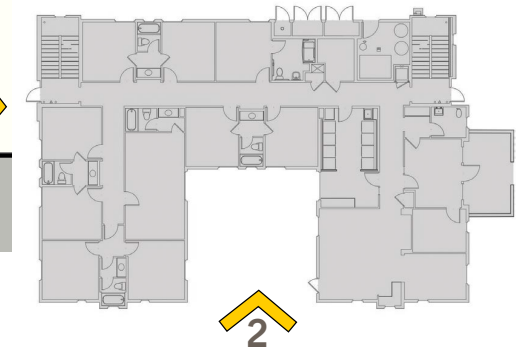


Figure 8

South and West Building Elevations

a SWPPP that addresses control of stormwater pollution through implementation of BMPs. See Section IX, Hydrology and Water Quality, for additional information.

9. Site Description and Surrounding Land Uses:

The project site consists of two adjacent rectangular parcels that would be merged with four other contiguous parcels that comprise the existing BARM campus. The two parcels comprising the project site are located on a fully developed urban block occupied by commercial and institutional uses on the northern end, with the remainder of the block occupied by single-family residential homes. The southern parcel, at 257 3rd Street, is currently occupied by a single-story residence constructed in 1905 that would be demolished to accommodate the proposed project. (As discussed in more detail in Section V, Cultural Resources, this structure was evaluated by architectural historians in June 2018 and was determined to not be eligible for listing as an historic resource.) A solid wood fence encloses this residential property, which is shown on Figure 9A.

The adjacent project parcel to the north is vacant, with a turf lawn and a short paved walkway, shown on Figure 9B. Also surrounded by a solid wood fence, this lot appears to currently be used as an outdoor play and gathering area by BARM clients.

Immediately north of the project site and east of the existing BARM buildings on Macdonald Avenue is a single-story cement block and plaster building housing a plumbing contractor. To the west of this building are three two-story buildings comprising part of the BARM campus, shown on Figure 10A. Immediately to the west of the project site is a private fenced garden. South of the project site, the rest of the block is developed with single-family homes that are predominantly single-story structures. This is true of the blocks immediately to the east and west of the project block, except for the parcels lining Macdonald Avenue, which is a commercial thoroughfare.

Macdonald Avenue in the vicinity of the project is lined with a mix of commercial, residential, and institutional uses, as well as a number of vacant lots. The north side of the street, opposite the project site, is occupied by two small churches (Iglesia de Dios de las Profeta and Guiding Light Church of God in Christ) and a vacant former bar, as shown on Figure 10B. The corner lot at the northwest corner of Macdonald and 3rd Street is a vacant, fenced field. In the block to the east, another church (Iglesia Pentecostes, housed in a former two-story residential structure) occupies the west end of the block, and a two-story building housing the 4th Street Market and Bellvue Hotel occupies the east end of the block. A fenced vacant lot separates these two properties. Immediately to the east of the market is Nevin Park, which occupies most of two consolidated blocks that are bounded by 4th Street on the west, 6th Street on the east, Macdonald Avenue on the south, and Nevin Avenue on the north. The only other uses on this consolidated block are the Richmond Museum, located on the northwest corner of the block, and the Nevin Community Center on the northeast corner of the block.



a) Existing residence at 257 3rd Street



b) Existing project parcel immediately north of 257 3rd Street

Figure 9

Existing Site Conditions

Source: Douglas Herring & Associates



a) Existing nearby BARM facilities at 200, 216, and 224 Macdonald Avenue



b) Churches and vacant former bar opposite the existing BARM facilities shown above

Figure 10

Neighboring Land Uses

Source: Douglas Herring & Associates

The south side of Macdonald Avenue in the block just to the east of the project site is developed with the Faith Temple Church, in a one-story stucco building at the corner of Macdonald Avenue and 3rd Street, and a three-story stucco building covering the rest of the block that houses the Trinity Plaza Senior Apartments, which are shown on Figure 11A. These apartments continue in the next block to the east, with another three-story building located on the southeast corner of Macdonald and 4th Street that takes up about half of the block. The east half of the block is occupied by a one-story unidentified building that appears to be a church and by a vacant lot on the eastern corner.

Immediately to the west of the project site on the south side of Macdonald Avenue is a three-story stucco and wood building housing the Lillie Mae Jones Plaza apartments, an affordable housing project, shown on Figure 11B. A fenced vacant lot is located on the west end of this block. The north side of Macdonald Avenue between 1st and 2nd Streets is occupied by another BARM facility, the Church of Deliverance, and a small fenced vacant lot strewn with trash between the two uses.

Joe's Market is located on the northwest corner of the intersection of Macdonald and 1st Street. The southwest corner of this intersection is developed with a laundromat and another unidentified commercial use. A private parking lot with a security gate is located immediately to the west of these buildings. The area to the west of this is occupied by Atchison Woods, a large area developed with single-story residential duplexes. Atchison Village Park is located in the center of this development, about 1,000 feet southwest of the project site. The north side of Macdonald Avenue, west of Joe's Market, is developed with a large complex of two-story apartment buildings.

Aside from the variety of land uses along Macdonald Avenue described above, a large residential area comprised primarily of single-family homes extends for numerous blocks to the south. The area to the north is also predominantly residential, but is intermixed with commercial and warehouse uses. Stewart Playground is located on the north side of Barrett Avenue between 3rd and 4th Streets, approximately 1,000 feet north of the project site.



a) Senior apartments in the 300 block of Macdonald Avenue, one block east of the project site



b) Lillie Mae Jones Plaza affordable apartments in the 100 block of Macdonald Avenue, one block west of the project site

Figure 11

Neighboring Land Uses

Source: Douglas Herring & Associates

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Haz. Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION:

On the basis of the initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed name

For

EVALUATION OF ENVIRONMENTAL IMPACTS:

I. AESTHETICS — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| a) <i>Have a substantial adverse effect on a scenic vista?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site is situated in an area fully built out with urban development, with predominantly commercial and institutional development lining nearby Macdonald Avenue and predominantly residential uses extending north and south of Macdonald Avenue. There are no scenic vistas in or visible from the project area. All view corridors in the area are defined by buildings lining roadways.

From the public vantage point adjacent to the project site (i.e., the sidewalk), the view to the north along 3rd Street consists of a two-lane roadway lined by low-rise commercial buildings. Toward the south, the view shows the roadway lined by one-story single-family homes and intermittent street trees. Views to the east and west from this vantage point consist of buildings in the near and middle distance. Directly to the east of the project site, there is a vacant lot, enclosed by an opaque fence, over which a more distant apartment building is visible.

None of these views are remarkable, and they would not represent a scenic vista by any reasonable measure. Therefore, implementation of the proposed project would have ***no impact*** on a scenic vista.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| b) <i>Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There are no State-designated scenic highways in the vicinity of the project site.¹ Furthermore, there are no scenic resources on the project site, which consists two adjacent flat parcels, one covered with grass and pavements and the other developed with a single-family home and a turf lawn, as shown on Figure 9. Therefore, the project would have ***no adverse impact*** on scenic resources.

¹ California Department of Transportation, Officially Designated State Scenic Highways, accessed December 18, 2018 at: <http://www.dot.ca.gov/hq/LandArch/16livability/scenichighways/schwy.htm>.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| c) <i>Substantially degrade the existing visual character or quality of the site and its surroundings?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: While aesthetics are subjective and aesthetic preferences can vary widely among different individuals, for purposes of CEQA, natural environments are typically considered to have a higher degree of aesthetic appeal to the average person than a built environment. Dramatic natural features tend to elicit greater aesthetic response than featureless landscapes. For example, the average viewer will rate a view of a lake surrounded by trees and dramatic mountains more aesthetically appealing than a flat vacant field vegetated with native grasses.

Within an urban environment, a variety of parameters affect how highly a site and its surroundings may be rated in terms of aesthetic appeal. For example, building massing, scale, design, articulation, materials, color, texture, architectural cohesiveness, and landscaping all heavily influence the perceived aesthetics of urban development.

The evaluation of a visual impact is also affected by the social relationship of the impact. For example, a visual change to the environment may be considered significant when viewed from a public gathering place, such as a public park or beach. That same visual change could be considered less than significant when viewed from a longer distance by motorists on a highway. It is therefore necessary to consider the context in which the change in the visual environment would be viewed, including the length of time of exposure.

The context in which a visual change occurs is also an important consideration in the evaluation of visual impacts. For example, constructing a high-rise office building in the heart of an urban downtown containing other similar structures creates a very different visual effect than if the same building were constructed in the middle of a meadow; the context is a primary determinant of its visual compatibility. Similarly, construction of a residential development in a context of similar surrounding development cannot be seen to create the same kind of visual incompatibility that would occur if the development were placed in the context of a natural and undeveloped environment.

It is clear from the above discussion that the many elements of visual quality are subjective in nature. It is therefore difficult, if not impossible, to perform an objective analysis of visual impacts. An attempt has been made to utilize some of the concepts discussed above as a rational basis for the conclusions reached in this discussion. The analysis also attempts to take a middle-of-the-road position that represents the visual sensibilities of the average person, recognizing the difficulty of this, and that there would inevitably be persons who disagree with the conclusions.

Disregarding the solid wood fence that largely obscures a public view of the project site and substantially detracts from the site's aesthetics, the existing visual quality of the project site is generally moderate to low. The southern portion of the site is occupied and dominated by a modest single-story single-family residence constructed in 1905 in a transitional Queen Anne style characterized by a gable and hip roof covered with asphalt shingles, a covered porch with a hip

roof supported on tapered square posts, and limited fenestration, with all windows covered with metal security bars, as shown on Figure 9-a. The house siding consists of vertical groove plywood painted an off-white color. No landscaping embellishes the site, and the turf lawn is sparse, with large patches of bare dirt. In comparison with many of the other residential properties on the same block, this parcel has less aesthetic appeal.

The northern parcel consists of a vacant lot covered with bare dirt and a limited amount of sparse grass. An outdoor metal table, chairs, and benches are arranged around the perimeter of the lot, which is enclosed by a solid wood fence (see Figure 9-b).

Implementation of the proposed project would transform the visual appearance of the site, constructing a two-story stucco building with a Spanish Mission architectural style. While the building would have greater height and much greater massing than the residential homes to the south, it would be consistent with other nearby development lining Macdonald Avenue, including the two- and three-story buildings nearby on the rest of the BARM campus, a large three-story apartment building about 100 feet to the east, and a large three-story apartment building about 170 feet to the west.

Trees would be planted all along the southern edge of the site, which would serve to partially obscure the building as viewed from the residential neighborhood to the south and also introduce a welcome natural element to the area, which is fairly devoid of such amenities. The building is attractively designed and features embellishments consistent with the Mission style, such as an arched and recessed window grouping on the second floor of the front façade, a terra cotta tile roof, tower-like faux chimneys with tapered tops, simple heavy wood windowsills and lintels, wrought-iron wall-mounted lamp fixtures, decorative wooden gable windows on the east and west elevations, and more (see Figure 6). The front façade would be distinguished by an entry courtyard with a low wooden gate with reverse-arched top and three grouped entrance doors surrounded by inset tiles.

While the proposed project would substantially increase the scale of built structures on the site, it would also result in what most viewers would consider an overall improved visual appearance of the site. Furthermore, as noted above, the increased massing is in keeping with larger buildings located within a 200-foot radius of the site. Although some viewers may take exception to this analysis, the preceding discussion clearly demonstrates that the proposed improvements would not constitute a substantial adverse change in the visual character of the site, which is the applicable threshold of significance. Therefore, the project would have a *less-than-significant impact* on the visual character of the site.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| d) <i>Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The proposed project would not result in the introduction of a substantial source of new glare to the site. The building façades would not include reflective materials other than the

glass windows. The amount of fenestration proposed is quite modest, and some of the windows would be recessed, further reducing the potential for sunlight glare.

New nighttime lighting would be added that would be less than is typically employed on multi-family housing developments. A single wall-mounted light luminaire would be placed over the rear entry door on the west side of the building. No outdoor lighting would be placed on the northern façade or on the southern façade that faces the adjoining residential neighborhood. On the 3rd Street façade, two wrought iron lamps with frosted glass would flank the main entrance and another lamp would be mounted above a secondary entrance to the north of the main entrance. A pole-mounted LED light fixture would be located at the northeast and southeast corners of the site that would provide pedestrian lighting along the sidewalk. The few lights would not produce offsite glare or a substantial amount of new light in the project vicinity.

The total light output from the site would be subject to the limits established for Lighting Zone LZ2, set forth in Section 15.04.604.050 of the Richmond Municipal Code. Lighting Zone LZ2 is assigned to areas of medium ambient lighting levels. The regulations require Class 2 lighting with initial output of 2,000 lumens or more to employ fully shielded fixtures. Class 2 lighting is general outdoor illumination used for safety and security as the primary concern. For residential uses in Lighting Zone LZ2, there is a maximum allowable total light output of 10,000 lumens for shielded and unshielded lighting, with a limit of 5,000 lumens for unshielded only lighting. The proposed project would be required to comply with these lighting regulations, which would ensure that the project would not generate substantial nighttime glare. Based on all of the foregoing considerations, the project's light and glare impacts would therefore be *less than significant*.

II. AGRICULTURAL RESOURCES — *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State’s inventory of forest land, including the Forest and Range Assessment project and the Forestry Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a) <i>Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site and all of the surrounding area are designated “Urban and Built-Up Land” on the map of important farmland in Contra Costa County prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) by the Department of Conservation (DOC), a department of the California Resources Agency.² The DOC updates the maps every two years; the most recent map was prepared in 2016 and published in 2018.

Since the project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, there is no potential for conversion of these types of farmlands. The project would have ***no impact*** on valuable farmland.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| b) <i>Conflict with existing zoning for agricultural use, or a Williamson Act contract?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project property is not zoned for agricultural use or under a Williamson Act contract.

² California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, “Contra Costa County Important Farmland 2016” (map), August 2018.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site is not zoned as forest land and there is no forest land on the site. The proposed project would therefore have no impact on forest or timber land.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>d) Result in the loss of forest land or conversion of forest land to a non-forest use?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: Public Resources Code Section 12220(g) defines forest land as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. There is no forest land on the project site as defined in Public Resources Code Section 12220(g).

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>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 use?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site does not contain farmland or forest land, and implementation of the proposed project would therefore have no potential to convert such lands to other uses.

III. AIR QUALITY — *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) <i>Conflict with or obstruct implementation of the applicable air quality plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The Bay Area Air Quality Management District (BAAQMD) adopted the current Bay Area Clean Air Plan (CAP) on April 19, 2017 in accordance with the requirements of the California Clean Air Act (CCAA) to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gas (GHG) emissions in a single, integrated plan; and establish emission control measures to be adopted or implemented over the next three to five years.³ The two closely-related primary goals of the 2017 Bay Area CAP are to protect public health and protect the climate. The plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The 2017 Clean Air Plan/Regional Climate Protection Strategy (CAP/RCPS) provides a roadmap for BAAQMD’s efforts over the next few years to reduce air pollution and protect public health and the global climate. The CAP/RCPS includes the Bay Area’s first-ever comprehensive RCPS, which identifies potential rules, control measures, and strategies that the BAAQMD can pursue to reduce GHG in the Bay Area. Measures of the 2017 CAP addressing the transportation sector are in direct support of Plan Bay Area, which was prepared by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) and includes the region’s Sustainable Communities Strategy and the 2040 Regional Transportation Plan. The 2017 Clean Air Plan control strategy is based on four key priorities:

- Reduce emissions of criteria air pollutants and toxic air contaminants from all key sources.
- Reduce emissions of “super-GHGs” such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels (gasoline, diesel, and natural gas).
 - Increase efficiency of our industrial processes, energy, and transportation systems.
 - Reduce demand for vehicle travel, and high-carbon goods and services.
- Decarbonize our energy system.
 - Make the electricity supply carbon-free.
 - Electrify the transportation and building sectors.

³ Bay Area Air Quality Management District, *Final 2017 Clean Air Plan*, adopted April 19, 2017.

Targeting three major sectors, the control strategy includes the following key elements:

Stationary Sources:

- Decrease emissions of GHGs and criteria air pollutants through a region-wide strategy to reduce combustion and improve combustion efficiency at industrial facilities, beginning with the three largest sources of emissions: oil refineries, power plants, and cements plants.
- Reduce methane emissions from landfills, and from oil and natural gas production and distribution.
- Reduce emissions of toxic air contaminants by adopting more stringent thresholds and methods for evaluating toxic risks at existing and new facilities.

Transportation:

- Reduce motor vehicle travel by promoting transit, bicycling, walking, and ridesharing.
- Implement pricing measures to reduce travel demand.
- Direct new development to areas that are well served by transit, and conducive to bicycling and walking.
- Accelerate the widespread adoption of electric vehicles.
- Promote the use of clean fuels and low- or zero-carbon technologies in trucks and heavy-duty equipment.

Buildings and Energy:

- Expand the production of low-carbon, renewable energy by promoting on-site technologies such as rooftop solar, wind, and ground-source heat pumps.
- Support the expansion of community choice energy programs throughout the Bay Area.
- Promote energy and water efficiency in both new and existing buildings.
- Promote the switch from natural gas to electricity for space and water heating in Bay Area buildings.

The 2010 Clean Air Plan identified 18 Stationary Source Measures (SSMs), 10 Mobile Source Measures (MSMs), 17 Transportation Control Measures (TCMs), six Land Use and Local Impact Measures (LUMs), and four Energy and Climate Measures (ECMs). The Air District and its partner agencies have taken action to implement the control measures in the 2010 Clean Air Plan, with the result that eight of the 18 SSMs have been adopted in regulations or rules, and the remaining ten SSMs have been carried forward as part of the 2017 control strategy. Eight of the MSMs and all of the TCMs, LUMs, and ECMs have been carried forward in the current CAP. The 2017 CAP also adopts 30 new SSMs in addition to the eight carried over from the previous CAP. Additionally, BAAQMD identified a number of potential measures that appear to have merit but need further evaluation before they can be included as formal control measures. These measures have been included as further study measures (FSMs). The CAP identifies 11 FSMs, nine of them pertaining to stationary sources, along with one for buildings and one for agriculture. None of the CAP control measures are directly applicable to the project.

When a public agency contemplates approving a project where an air quality plan consistency determination is required, BAAQMD recommends that the agency analyze the project with respect to the three questions listed below. If the first two questions are concluded in the affirmative and the third question concluded in the negative, the BAAQMD considers the project consistent with air quality plans prepared for the Bay Area.

1) Does the project support the primary goals of the air quality plan?

Any project that would not support the 2017 CAP goals would not be considered consistent with the 2017 CAP. The recommended measure for determining project support of these goals is consistency with BAAQMD CEQA thresholds of significance. As discussed further in the subsequent sections, the proposed project would not exceed the BAAQMD significance thresholds; therefore, the proposed project would support the primary goals of the 2017 CAP.

2) Does the project include applicable control measures from the air quality plan?

As noted above, none of the CAP control measures are directly applicable to the project.

3) Does the project disrupt or hinder implementation of any 2017 CAP control measures?

The project would not disrupt or hinder implementation of any 2017 CAP control measures.

Based on these answers, the proposed project would be consistent with the 2017 CAP. Therefore, the project would not conflict with or obstructing implementation of the applicable air quality plan.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|--------------------------|
| <i>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: Air quality standards for the San Francisco Bay Area are set by the Bay Area Air Quality Management District (BAAQMD). They are based on the National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency (USEPA) pursuant to the federal Clean Air Act (CAA), as well as the more stringent California Ambient Air Quality Standards (CAAQS) set by the California Air Resources Board (CARB).

BAAQMD's *CEQA Air Quality Guidelines* establish thresholds of significance for construction emissions of 54 pounds per day (lb./day) for reactive organic gases (ROG), fine particulate matter equal to or less than 2.5 microns (PM_{2.5}), and nitrogen oxides (NO_x), and 82 lb./day for respirable particulate matter equal to or less than 10 microns (PM₁₀). The same thresholds apply to operational emissions. The construction particulate matter (PM) thresholds apply to exhaust emissions only, not ground disturbance; emissions from grading and other site disturbance, for which there is no adopted threshold of significance, are addressed through best management practices.

BAAQMD has developed both construction-related and operational screening criteria that provide lead agencies a conservative indication of whether a proposed project could potentially result in an exceedance of any of the thresholds of significance listed above. Because they were developed with very conservative assumptions, a project that falls below the screening criteria can be assumed to have no potential to exceed the adopted air quality thresholds of significance. For such projects, BAAQMD has determined that a quantified analysis of the project's potential emissions of criteria air pollutants and precursors is not necessary. The construction and operational screening criteria are discussed separately below.

Construction Impacts

Construction operations for any sizeable project have the potential to result in short-term but significant adverse air quality impacts. Although the proposed project is quite small, the BAAQMD recommends implementation of its Basic Construction Mitigation Measures by all projects subject to environmental review under CEQA.

The BAAQMD *CEQA Air Quality Guidelines* contain screening criteria for construction of a variety of land use development projects. Projects that fall below these thresholds are considered by BAAQMD to have less-than-significant construction-phase air pollutant emissions, provided the following additional conditions are met:

- All Basic Construction Mitigation Measures would be included in the project design and implemented during construction; and
- Construction-related activities would not include any of the following:
 - a. Demolition activities inconsistent with District Regulation 11, Rule 2: Asbestos Demolition, Renovation and Manufacturing;
 - b. Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously);
 - c. Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development);
 - d. Extensive site preparation (i.e., greater than default assumptions used by the Urban Land Use Emissions Model [URBEMIS] for grading, cut/fill, or earth movement);
or
 - e. Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity.

Project construction would not include any of these exclusionary activities. Although there is no screening criteria land use category directly applicable to the proposed homeless shelter, there are related categories that provide a reasonable basis for comparison. For a Low-Rise Apartment project, the screening size for construction emissions is 240 dwelling units. For a Retirement Community, the threshold is 114 dwelling units, and for a Congregate Care Facility, the threshold is 240 dwelling units. All of these categories provide residential housing for groups, consolidated in large buildings, similar to the proposed project.

The proposed homeless shelter would provide 26 bedrooms with a total of 114 beds for women and children. While the 114 beds would not be comparable to dwelling units in the land use

categories identified above, the 26 bedrooms would also not represent dwelling units since some of the bedrooms would have eight beds. Therefore, for purposes of this discussion, it is conservatively assumed that every two beds would be equivalent to one dwelling unit. Thus, it is assumed that the project would be equivalent to 57 dwelling units. This is a highly conservative assumption, both for construction emissions and for operational emissions. In the case of construction emissions, it is very conservative due to the size of the proposed building, which would provide a total of 9,553 square feet of building area. An apartment building, congregate care facility, or retirement community with 57 dwelling units would be substantially larger than this and would therefore generate substantially greater construction-related emissions of criteria air pollutants. Consequently, with an assumed 57 dwelling units, the project would be well below the screening criteria for comparable land use types, and in accordance with BAAQMD's *CEQA Air Quality Guidelines*, construction of the project would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation, and quantified modeling of the construction emissions is not warranted.

Although the proposed project is not expected to generate substantial construction-phase emissions, absent implementation of the BAAQMD's Basic Construction Mitigation Measures, the project's effects of construction-generated criteria pollutants would be a ***potentially significant impact***, based on the thresholds of significance discussed above. Implementation of the controls listed in Mitigation Measure AQ-1, which incorporates the Basic Construction Mitigation Measures, would reduce the project's construction-related air quality impacts to a less-than-significant level.

Mitigation Measure AQ-1: The property owner/applicant shall require the construction contractor to reduce the severity of project construction period dust and equipment exhaust impacts by complying with the following control measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of

Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Operational Impacts

As noted above, BAAQMD's operational thresholds of significance are the same as the construction thresholds. However, the screening criteria for project operations differ. The operational thresholds are 451 dwelling units for the low-rise apartment category, 487 dwelling units for the retirement community category, and 657 dwelling units for the congregate care category. Again, the rough equivalent of 57 dwelling units proposed by the project would be significantly below BAAQMD's operational screening thresholds for all of the comparable land use categories.

Furthermore, the assumed 57 dwelling units is highly conservative because a significant portion of operational emissions of air pollutants from residential uses is caused by motor vehicle emissions. Due to the nature of the client population to be served by the proposed project, very few if any residents are expected to own private automobiles, and the majority of vehicle trips generated by the project would be from van shuttles ferrying groups of residents to and from the Alma Calton Educational Center at 2114 Macdonald Avenue, which is only about one mile from the project site. Thus, the project would generate far fewer vehicle miles of travel than the typical residential land uses to which the project has been compared in this analysis. Furthermore, dwelling units typically have more than two occupants, so assuming the 114 beds proposed for the homeless shelter would be equivalent to 57 dwelling units exaggerates the potential operational air quality impact.

As previously noted, if a project falls below the applicable operational screening criteria, then BAAQMD has determined that the project would not result in the generation of operations-related criteria air pollutants and/or precursors that exceed the thresholds of significance, and there is no need to perform a detailed air quality assessment of the project's air pollutant emissions. (However, the screening criteria should not be used if a project includes emissions from stationary source engines (e.g., back-up generators) or industrial sources subject to Air District Rules and Regulations. These exceptions are not applicable to the proposed project.) Since the project would fall far below the operational screening thresholds for apartment and other group residential categories, there is no potential for the project to exceed BAAQMD operational thresholds of significance. Therefore, the project would have a ***less-than-significant impact*** on air quality from project operations, and no mitigation is required.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| c) <i>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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: As noted in BAAQMD’s *CEQA Air Quality Guidelines*, air pollution is, by its very nature, largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. According to the Air Quality Guidelines, if a project’s contribution to the cumulative impact is considerable, then the project’s impact on air quality would be considered significant. The Air Quality Guidelines state that a project’s emissions would be cumulatively considerable if they would exceed the significance thresholds identified in Section III-b, above. Conversely, if a project is determined to have less-than-significant project-level emissions, then it would also have a less-than-significant cumulative air quality impact.

As demonstrated in Section III-b, above, project-related operational emissions would be below the BAAQMD significance thresholds, per BAAQMD’s *CEQA Air Quality Guidelines*. The BAAQMD *CEQA Air Quality Guidelines* recommend that cumulative air quality effects from criteria air pollutants be addressed by comparison to the project-level daily and annual emission thresholds. These significance thresholds were developed to identify a cumulatively considerable contribution to a significant regional air quality impact. The proposed project’s operational emissions from the project would be less than significant and, therefore, the project’s emissions would not be cumulatively considerable. Therefore, the project would have a ***less-than-significant cumulative impact*** on air quality.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| d) <i>Expose sensitive receptors to substantial pollutant concentrations?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The BAAQMD *CEQA Air Quality Guidelines* previously discussed include thresholds of significance for exposure of sensitive receptors to substantial pollutant concentrations. These thresholds, originally adopted by the District in June 2010, were previously the subject of litigation brought by the California Building Industry Association (CBIA). Following litigation in the trial court, the court of appeal, and ultimately the California Supreme Court, all of the thresholds were upheld. However, in an opinion issued on December 17, 2015,

the California Supreme Court held that CEQA does not generally require an analysis of the impacts of locating development in areas subject to environmental hazards unless the project would exacerbate existing environmental hazards. (There are certain exceptions that are not applicable to the proposed project.) However, the Supreme Court also held that public agencies remain free to conduct this analysis regardless of whether it is required by CEQA. Furthermore, if a public agency has adopted local policies, ordinances, or regulations pertaining to exposure of sensitive receptors to substantial pollutant concentrations, conflicts with such policies, ordinances, or regulations may represent a significant impact under CEQA.

The review of the City's General Plan policies and zoning regulations discussed in Section X, Land Use and Planning, did not identify any policies regulating exposure to air pollution. Although Action HW9.F in the Community Health and Wellness Element of the General Plan calls for developing and enforcing guidelines for protecting sensitive receptors from impacts caused by stationary and mobile sources of air pollution, the City has not yet adopted such guidelines. Consequently, the discussion presented in this section is provided for informational purposes. (The proposed project would not exacerbate existing environmental hazards, which could represent a significant impact under CEQA.)

Health risk from exposure to air pollutants is evaluated based on the potential for exposure to PM_{2.5} and toxic air contaminants (TACs), the two emission types that pose the most significant threat to human health. According to BAAQMD, more than 80 percent of the inhalation cancer risk from TACs in the Bay Area is from diesel engine emissions.⁴ TACs are a set of airborne pollutants that may pose a present or potential hazard to human health, and are separated into carcinogens and non-carcinogens. State and local regulatory programs are intended to limit exposure to TACs and the associated health risk. Both TACs and PM_{2.5} are emitted by trucks, cars, construction equipment, and other mobile sources. They are also emitted by stationary sources that require permitting by the BAAQMD, which requires source controls.

Project impacts related to increased health risk can occur either by introducing a new sensitive receptor in proximity to an existing source of TACs or by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity. Sensitive receptors are people most susceptible to poor air quality, and include children, the elderly, the infirm, or others with medical conditions susceptible to poor air quality (e.g., asthma, bronchitis, chronic respiratory disease). Land uses that are generally considered to be sensitive receptors include residences of all types, schools and school yards, parks and playgrounds, daycare centers, nursing homes, and medical facilities.

The BAAQMD recommends using a 1,000-foot radius around a project site for purposes of identifying community health risk from siting a new sensitive receptor or a new source of TACs. A lead agency should enlarge the radius if an unusually large source or sources of hazardous emissions that might affect a project lies outside the 1,000-foot radius.

Virtually any land use that attracts and/or generates vehicle trips emits TACs and PM_{2.5}. It is only when substantial quantities of TACs are emitted that cancer or health risk can potentially rise to a level of significance. The BAAQMD considers an excess cancer risk of more than 10 in one

⁴ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, page 5-3, May 2017.

million or a non-cancer (i.e., chronic or acute) health risk greater than a Hazard Index (HI) of 1.0 to be a significant adverse impact.

The proposed project would introduce new sensitive receptors to the project site, and there are also existing sensitive receptors within 1,000 feet of the project, including other residences and two parks: Nevin Park, located about 400 feet northeast of the project site, and Atchison Village Park, located about 950 feet southwest of the project site.

The proposed project would create a new short-term emission source of diesel particulate matter (DPM) due to construction activities.⁵ Studies have demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk. However, construction activities would be short-term in duration and emissions would quickly disperse, and implementation of Mitigation Measure AQ-1 would reduce combustion emissions such that health impacts on existing residents in the vicinity from project construction emissions would be a *less-than-significant impact*.

Impacts to Future Project Residents

Although the proposed project would not site a new operational source of substantial TAC and PM_{2.5} emissions, it would introduce new sensitive receptors to the project site. The BAAQMD initiated the Community Air Risk Evaluation (CARE) program in 2004 to identify communities where significant sources of TACs were located in proximity to sensitive populations. The BAAQMD strongly recommends that impacted communities develop, adopt, and implement Community Risk Reduction Plans. Nearly all of the City of Richmond, including the project site, is identified by BAAQMD as an identified Impacted Community.⁶ The health impacts in the Bay Area, as determined both by pollution levels and by existing health vulnerabilities in a community, are a cancer risk of approximately 160 cancers per million persons. In Richmond in the 94801 zip code in which the project would be located, the existing health impact is a cancer risk of approximately 230 cancers per million persons.⁷

The BAAQMD provides screening tools and recommended procedures for evaluating the potential health risk associated with proposed land use development.⁸ For new receptor projects, such as the proposed homeless shelter, lead agencies should review the risks from nearby roadways, freeways, and stationary sources. The BAAQMD's *CEQA Air Quality Guidelines* include standards and

⁵ In August 1998, CARB identified particulate emissions from diesel-fueled engines as a toxic air contaminant. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. The document represents a proposal to reduce diesel particulate emissions, with the goal to reduce emissions and the associated health risk by 75 percent in 2010 and by 85 percent in 2020. The program aims to require the use of state-of-the-art catalyzed diesel particulate filters and ultra-low sulfur diesel fuel on diesel-fueled engines.

Diesel particulate matter (DPM) is the most complex of diesel emissions. Diesel particulates, as defined by most emission standards, are sampled from diluted and cooled exhaust gases. This definition includes both solid and liquid material that condenses during the dilution process. The basic fractions of DPM are elemental carbon; heavy hydrocarbons derived from the fuel and lubricating oil and hydrated sulfuric acid derived from the fuel sulfur. DPM contains a large portion of the polycyclic aromatic hydrocarbons found in diesel exhaust. Diesel particulates include small nuclei particles of diameters below 0.04 micrometers (µm) and their agglomerates of diameters up to 1 µm.

⁶ Bay Area Air Quality Management District (BAAQMD), Community Air Risk Evaluation Program: Impacted Areas, accessed December 28, 2018 at: <http://www.baaqmd.gov/plans-and-climate/community-air-risk-evaluation-care-program>.

⁷ BAAQMD, Identifying Areas with Cumulative Impacts from Air Pollution in the San Francisco Bay Area, Version 2, Impacted Areas by Zip Code [table], March 2014.

⁸ Bay Area Air Quality Management District (BAAQMD), *Recommended Methods for Screening and Modeling Local Risks and Hazards*, Version 3.0, May 2012.

methods for determining the significance of cumulative health risk impacts. The method for determining cumulative health risk requires the tallying of health risk from permitted stationary sources, rail activities, and roadways in the vicinity of a proposed project (i.e., within a 1,000-foot radius), then adding the proposed project impacts due to construction and operations to determine whether the cumulative health risk thresholds are exceeded. These evaluations are described below.

Stationary Sources of TACs

BAAQMD has developed a geo-referenced database of permitted emissions sources throughout the San Francisco Bay Area, and has developed the *Stationary Source Risk & Hazard Analysis Tool* for estimating cumulative health risks from permitted sources.⁹ The BAAQMD database provides the estimated cancer risk and non-cancer (i.e., chronic or acute) health risk at these sources. Permitted sources of TACs include facilities such as oil refineries, gas stations, dry cleaners, crematories, landfills, wastewater treatment plants, hospitals, and coffee roasters, among many others. Only one permitted stationary source is located within 1,000 feet of the project site:

5665: Electro Forming Company, 130 Nevin Avenue. This company is located less than 50 feet to the southwest of the project site. It has a cancer risk of 8.25 cancers per million, a health hazard risk index of 0.000165, and a PM_{2.5} concentration of 0.00.

The hazard index (HI) is defined as the ratio of the predicted incremental exposure concentration from the project to a published reference exposure level (REL) that could cause adverse health effects, as established by the California Office of Environmental Health Hazard Assessment (OEHHA). It should be noted that the cancer and health risks as reported by BAAQMD are based on a very conservative set of assumptions.¹⁰ Furthermore, as noted in BAAQMD guidance, the cancer and health risk numbers provided in the database of stationary sources do not represent actual impacts. Rather, they are upper-limit health risk screening values used to determine whether a refined modeling analysis of health impacts is required.

Because there is just a single source located within the search radius, there is no need to aggregate the cancer and non-cancer health risk from multiple facilities. For new TAC and PM_{2.5} emissions that would be generated by a proposed project, the BAAQMD considers an excess cancer risk of more than 10 in one million persons or a non-cancer (i.e., chronic or acute) health risk greater than a Hazard Index (HI) of 1.0 to be a significant adverse impact. For PM_{2.5} the threshold is an incremental increase of greater than 0.3 micrograms per cubic meter (µg/m³). When siting new receptors that would be exposed to existing cumulative TAC emissions from multiple sources within a 1,000-foot radius, a cumulative significance threshold applies. The cumulative thresholds are an excess cancer risk of more than 100 in one million persons, a non-cancer health risk HI greater than 10.0, or an annual average PM_{2.5} concentration greater than 0.8 µg/m³. These cumulative thresholds apply to the potential exposure of future project residents to health risks from existing sources of TAC and PM_{2.5} emissions in the project vicinity.

As demonstrated in the health risks cited above for the Electro Forming Company, project residents would be exposed to increased cancer and health risks below both the individual and cumulative impact thresholds. Although the increased cancer and health risks to project residents do not

⁹ Bay Area Air Quality Management District (BAAQMD), *Stationary Source Screening Analysis Tool*, updated May 30, 2012.

¹⁰ Bay Area Air Quality Management District (BAAQMD), *Recommended Methods for Screening and Modeling Local Risks and Hazards*, Version 3.0, May 2012.

constitute impacts under CEQA, the effects would nevertheless be a *less-than-significant impact*. While the vehicles driven by project employees would also be emitters of TACs and PM_{2.5}, these emissions would be *de minimus* and would not have the potential to expose on-site or off-site sensitive receptors to substantial pollutant concentrations.

Freeway, Roadway, and Railway Sources of TACs

BAAQMD has also developed a geo-referenced database of highways throughout the San Francisco Bay Area and has developed the Highway Screening Analysis Tool and Rail Screening Analysis Tool for estimating cumulative health risks from highways and rail activities. Due to cost constraints, the Traffic Volume Linkage Tool created by the California Environmental Health Tracking Program (CEHTP), which BAAQMD recommends for use in conjunction with its Highway Screening Analysis Tool, was recently retired by CEHTP. The Environmental Impact Report (EIR) for the Richmond General Plan was used as an alternative source of traffic volume data.

Major roadways are only considered to have a potential cancer risk or chronic health hazard risk if they have a traffic volume of at least 10,000 average annual daily traffic (AADT). The high-volume roadways meeting this threshold in the project vicinity include Richmond Parkway from Barrett Avenue to Macdonald Avenue (14,300 AADT in 2007), Richmond Parkway from Macdonald Avenue to Cutting Boulevard (14,800 AADT in 2007), and I-580 from Harbour Way/Cutting Boulevard to Canal Boulevard (68,000 AADT in 2007). However, none of these roadways are within or near the 1,000-foot screening radius recommended by BAAQMD, and therefore they do not pose a potential cancer or health risk to future project residents.¹¹ Similarly, there are no railroad lines within 1,000 feet of the project site, and there is therefore no health risk to project residents from railroad activity in the area.

Based on all of the foregoing considerations, there is no evidence that occupants of the proposed project would be exposed to a significant source of TACs or PM_{2.5} or otherwise expose sensitive receptors to substantial pollutant concentrations. This would be a *less-than-significant impact*.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Though offensive odors from stationary and mobile sources rarely cause any physical harm, they still remain unpleasant and can lead to public distress, generating citizen complaints to local governments. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors. Generally, odor emissions are highly dispersive, especially in areas with higher average wind speeds. However, odors disperse less quickly during inversions or during calm conditions, which hamper vertical mixing and dispersion.

¹¹ Allison Kirk, Senior Planner, Air Quality Planning Section, Bay Area Air Quality Management District, personal communication, October 19, 2016.

The BAAQMD’s significance criteria for odors are subjective and are based on the number of odor complaints generated by a project. Generally, the BAAQMD considers any project with the potential to frequently expose members of the public to objectionable odors to cause a significant impact. With respect to the proposed project, during the short-term construction of the project, diesel-fueled equipment exhaust would generate some odors. However, these emissions typically dissipate quickly and would be unlikely to affect a substantial number of people.

Although found objectionable by many people, odors generated by construction equipment are intermittent and short-term sources of odors that are highly subject to the atmospheric dispersion and dissipation described above. The BAAQMD CEQA guidelines state that projects falling below the screening criteria discussed in Section III-b, above, are considered to have less-than-significant odor impacts during construction. Because the proposed project is well under the screening criteria, odor impacts from project construction would be *less than significant*. Following completion of project construction, there would be no objectionable odors generated during project operations.

Odor impacts can also occur from siting a new receptor (particularly a residential receptor) in proximity to an existing odor source, such as a sanitary landfill, wastewater treatment plant, asphalt batch plant, or petroleum refinery, among many other sources. The BAAQMD CEQA guidelines establish screening distances from a variety of odor sources that range from one to two miles.

IV. BIOLOGICAL RESOURCES — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There is no habitat on the project site for sensitive or special-status wildlife species. The southern parcel has been developed with a single-family residence for over 100 years. Other than a patchy turf lawn, the site is lacking any ornamental landscaping that might provide limited foraging habitat for common urban wildlife, such as birds and rodents. (A street tree at the front of the site is located within the public right-of-way.) The northern parcel provides a small play and seating area enclosed by a wooden fence. Most of the parcel is covered by a sparse grass lawn. A few small bushes are planted adjacent to the fence; there is no other vegetation on the parcel.

The project site is in a fully urbanized area that provides no substantial natural habitat. Although wildlife species adapted to urban life, including sparrows and other common bird species as well as rodents, may forage in the trees and landscape plants in the project vicinity, no protected or special-status species occur in the area. The project site provides almost no foraging habitat of any

kind, and other residential properties in the area provide better foraging opportunities for urban wildlife species.

The limited extant vegetation on the project site would be removed during project construction. Any wildlife that is using the site on a periodic basis would readily be able to relocate to similar urban habitat nearby. Following project implementation, the amount of landscaping on the site would be increased substantially, with numerous trees and shrubs planted at the front and rear of the site, in the outdoor courtyard, and along the sides of the building, thereby enhancing the foraging opportunities on the site for urban wildlife species. The proposed project would no adverse effect on special-status wildlife species.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There is no riparian habitat or other sensitive habitat present on the project site. The proposed project would not adversely affect riparian habitat or other sensitive natural communities.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There is no wetland habitat or other habitat subject to regulation under Section 404 present on the project site, and there is no potential for the project to adversely affect such habitats.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with any established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: No native resident or migratory wildlife corridors or nursery sites are present on or in the vicinity of the project site. Therefore, the project would have **no impact** on nursery habitat for birds, mammals, or fish.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There are no trees present on the project site. Therefore, the project would have **no impact** with respect to conflicts with local policies or ordinances protecting biological resources.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site is not subject to any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans. As a result, the proposed project would result in **no impact** with respect to conflicts with such plans.

V. CULTURAL RESOURCES — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a) <i>Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: In order to be considered a significant historical resource as defined in Section 15064.5 of the *CEQA Guidelines*, a building must be at least 50 years old. In addition, Section 15064.5 defines an historical resource as, "... a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources," properties included in a local register of historical resources, or properties deemed significant pursuant to criteria set forth in *Public Resources Code* Section 5024.1(g). According to *CEQA Guidelines* Section 15064.5(a)(3), a lead agency can determine that a resource is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the determination is supported by substantial evidence in light of the whole record.

In order to be eligible for listing in the California Register of Historical Resources (CRHR), a property must meet at least one of the following criteria:

- Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Criterion 2: Is associated with the lives of persons important in our past;
- Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.¹²

In addition, to be eligible for the California Register, the resource must retain enough of its historic integrity to be recognizable as an historical resource, and typically must be at least 50 years old. Following the National Register of Historic Places integrity criteria, California Register regulations specify that integrity is a quality that applies to historic resources in seven ways: location, design, setting, materials, workmanship, feeling, and association.¹³

Protection of historic resources is also regulated locally by the Richmond Historic Structures Code (Chapter 6.06 of the *Richmond Municipal Code*), which is intended to promote the identification, protection, enhancement, and perpetuation of sites, places, buildings, and other structures in the

¹² California Resources Agency, *CEQA Guidelines*, Section 15064.5(a)(3), as amended September 27, 2016.

¹³ The definition of integrity under the California Register follows National Register of Historic Places criteria. Detailed definitions of the qualities of historic integrity are in National Register Bulletin 15, *How to Apply National Register Criteria for Evaluation*, published by the National Park Service.

City that reflect special elements of the City's historical, architectural, archaeological, cultural, or aesthetic heritage. The Code also provides the City with procedures for complying with CEQA as it pertains to historic cultural resources, while also providing property owners with due process for protecting their constitutional rights.¹⁴

The Richmond Historic Structures Code states that a structure, site, or other improvement, not already designated as such, may be designated a historic resource within the City or may be designated an historic district if it meets any of the following criteria:

1. It exemplifies or reflects valued elements of the City's cultural, social, economic, political, aesthetic, engineering, archaeological, or architectural history;
2. It is identified with persons or events important in local, state, or national history;
3. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;
4. It embodies distinguishing characteristics of an architectural style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
5. It is representative of the notable work of a builder, designer, or architect whose style influenced the City's architectural development.
6. A structure, site, or other improvement which meets any of the above criteria at the highest level, and whose loss would be a major loss to the City, may be designated a Richmond Historic Landmark.

Section 6.06.070 of the Historic Structures Code requires review and approval by the Historic Preservation Commission of all proposed projects involving major alteration of an historic resource, while Section 6.06.074 regulates demolition of historic resources. (Minor alterations are subject to review by the Zoning Administrator.) If a structure is not listed in the Richmond Historic Register but is more than 45 years old, demolition of the structure is also subject to review under CEQA and review and approval by the Historic Preservation Commission (HPC). As part of the review process, an evaluation of the property must be conducted by a qualified architectural historian and documented on DPR 523 series forms provided by the California Office of Historic Preservation. This documentation is not required if the property is located within the area covered by the City's Project PRISM Historic Resource Survey Report conducted in 2009.¹⁵ If a property located within the survey area is not identified as a potential historic resource on the national, California, or Richmond historic registers, a demolition permit is ministerial (i.e., does not require discretionary approval).

The Historic Structures Code establishes procedures and standards for reviewing proposed alterations to historic resources which, among other requirements, must conform with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitation of Historic Buildings. Decisions of the HPC may be appealed to the City Council. The HPC may also impose additional requirements to ensure preservation of a site, such as consultation with civic

¹⁴ City of Richmond, *Richmond Municipal Code*, Section 6.06.020.

¹⁵ Page & Turnbull, Inc., *Historic Resource Survey Report: Project PRISM, Richmond, CA*, October 2009.

groups, public agencies, and interested citizens; recommendations for acquisition of property by public or private bodies or agencies; and exploration of the possibility of moving one or more structures or features.

The project site is located within the survey area for Project PRISM (Preserve Richmond to Interpret and Support Memories) discussed above. The survey area was roughly bounded by Interstate 580 on the south, the Burlington Northern Santa Fe Railroad line on the west, and the Union Pacific Railroad and Amtrak lines on the east. The Project PRISM report did not identify the residence on the project site (257 3rd Street) as appearing eligible for individual listing on the National Register of Historic Places (NRHP) or on the California Register of Historic Resources (CRHR). However, after conducting an archival search for a previous proposal by BARM for a larger project that included the project site, the Northwest Information Center (NWIC) at Sonoma State University, which is part of the California Historical Resources Information System (CHRIS), recommended that a professional familiar with the architecture and history of Contra Costa County conduct an assessment of any structures constructed at least 45 years ago.¹⁶

Accordingly, the architectural historians Marjorie Dobkin and Ward Hill evaluated the residence at 257 3rd Street in April 2018, documenting the results on a DPR 523B form.¹⁷ A DPR 523A form was previously completed by Page & Turnbull in 2008 as part of the Project PRISM survey. The evaluation by Dobkin and Hill noted that the DPR 523A form indicated the house was constructed in 1910, based on records of the Contra Costa County Assessor and the City of Richmond Planning Division. However, Dobkin and Hill determined that the structure appeared on a 1905 Sanborn map, along with two small outbuildings in the rear of the lot (no longer extant). The DPR 523A form described the property as follows:

257 3rd Street is located on a 50' x 120' rectangular lot on the west side of 3rd Street between Bissell and MacDonald avenues. Built in 1910, 257 3rd Street is a 1-story, wood frame, single-family dwelling designed in a transitional Queen Anne style. The building is generally rectangular in plan, clad in vertical groove plywood, and capped by a compound gable and hip roof covered with asphalt shingles. The foundation is not visible. The primary façade faces east and features a porch on the north side. The entry is located near the center of the façade, covered by a metal security gate, and accessed by concrete steps. The entry is located within a porch that is covered by a hip roof supported by tapered square posts and surrounded by a solid wood railing. Fenestration consists of 2-over-1, fixed wood sashes and 1-over-1 double-hung wood sashes covered by metal security bars. Architectural features include a plain frieze at the roofline, a wood water table, pedimented gable ends clad with bevel wood siding and a tall brick chimney at the rear of the building. The lot is enclosed by a wood board fence and a two track concrete driveway leads down the north side of the house to a wood-frame, gable roofed garage at the northwest corner of the lot. The building appears to be in good condition

The historical evaluation by Dobkin and Hill concluded that the house at 257 3rd Street is not eligible for the California Register due to the following findings:

¹⁶ Northwest Information Center, Sonoma State University, *Record Search Results for the Proposed Bay Area Rescue Mission of Hope [sic], City of Richmond, Contra Costa County*, NWIC File No. 11-0878, March 21, 2012.

¹⁷ Marjorie Dobkin and Ward Hill, 257 Third Street, Richmond Historical Evaluation, California Department of Parks and Recreation Form DPR 523B: Building, Structure, and Object Record, March 2018.

- The house does not have significant associations with local themes or cultural patterns of significance, such as the industrial development or railroad history in Richmond (CRHR Criterion 1);
- No significant persons in local history lived in the house (CRHR Criterion 2). The earliest known occupant of the house, Robert L. Parker, a railroad conductor, was not a significant person in local history, nor were any of the various railroad workers who occupied the house after Parker left it in 1916;
- The house is not a sufficiently distinguished example of the Queen Anne Transitional style residence in the Richmond area (CRHR Criterion 3). Better examples of similar early 20th century houses that retain a higher level of historic integrity still survive in Richmond, particularly in the nearby proposed Bissell Avenue Historic District;
- The house was built using standard wood frame construction techniques common during the 20th century, and would not yield information important to history or prehistory (CRHR Criterion 4).

The historical evaluation also determined that the house at 257 3rd Street is not eligible for the Richmond Register because it does not meet any of the six criteria listed above. Specifically, the house:

- does not exemplify valued elements in the City’s cultural, social, economic, political, aesthetic, engineering, archaeological, or architectural history (Criterion 1);
- is not identified with persons or events important in local, state or national history (Criterion 2);
- does not reflect significant geographical patterns (Criterion 3);
- is not a good or particularly distinguished representative example of the Queen Anne Transitional architectural style in Richmond (Criterion 4). Although the house retains many original character-defining features, the historic integrity of the house has also been somewhat compromised, especially given that modern T-111 siding has replaced much of the original exterior siding, many original windows have been replaced, and the house has a large addition. Many better examples of houses in this style that retain a higher level of historic integrity still survive in Richmond.
- is an undistinguished example of the Queen Anne Transitional Style in Richmond; it is not a notable work of a builder, designer, or architect whose style influenced the City’s architectural development (Criterion 5);
- is not a structure that meets any of the above criteria at the highest level, and its loss would not be a major loss to the City of Richmond (Criterion 6).

The Zoning Administrator for the City of Richmond reviewed the historical evaluation by Dobkin and Hill and determined that the house at 257 3rd Street is not eligible for listing as an historical resource, and that demolition of the house may proceed.¹⁸ Therefore, implementation of the proposed project, including demolition of the existing residence at 257 3rd Street would have a ***less-than-significant impact*** on historic resources.

¹⁸ Richard Mitchell, Director of Planning and Building, City of Richmond Planning Division, letter to Sherwin Harris, Project Applicant, June 12, 2018.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|--------------------------|
| b) <i>Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: The San Francisco Bay area was occupied by Native Americans as far back as 3,000 to 4,000 years ago. Recorded archaeological sites in Richmond and the surrounding region indicate that at the time of initial Euroamerican incursion into the project area (circa 1770), the region was occupied by Native Americans who spoke Chochenyo.¹⁹ These people were a subset of the Penutian-speaking Bay Miwok (referred to as “Costanoans” by the Spanish) residing in northern California at the time the Spanish arrived in the region.²⁰ The Miwok territory encompassed much of the San Francisco Bay area and extended eastward to the Central Valley.

With the arrival of the Spanish at the turn of the nineteenth century, the Native Americans in the area were either forced from the area or conscripted to work on one of the large “rancherias” established in the region, where many Chochenyo died from overwork and introduced European diseases. By the beginning of the California Gold Rush in 1848, the Costanoan culture, including the Chochenyo subset, no longer survived in the region. Artifacts from the prehistoric occupation of the Bay Area by the Costanoans remain buried throughout the region, particularly in areas proximate to the historic margins of tidal marshlands around what is now San Francisco Bay, and near other water sources and at locations otherwise suitable for human subsistence habitation. Various Native American archaeological sites have been recorded within the City of Richmond, including sites that have been deemed eligible for the NRHP.²¹

An archival search was conducted by the Northwest Information Center (NWIC) at Sonoma State University, which is part of the California Historical Resources Information System (CHRIS), to evaluate the potential for significant archaeological resources to be present on the project site.²² The NWIC reported that no recorded archaeological resources are located in the project vicinity. Approximately 66 percent of the project site is included in an architectural study by Page and Turnbull, discussed in the preceding section addressing historical resources.

According to the NWIC, the project site is located about one-half mile from the historic shore margins of San Francisco Bay, an environment favored by Native American groups that were associated with the region. Due to this relative proximity and the Late Pleistocene alluvial fan deposits mapped within the project site, the NWIC concluded that there is a moderate potential for unrecorded Native American cultural resources to be present within the project site. To further

¹⁹ City of Richmond, *Honda Port of Entry at the Point Potrero Marine Terminal Draft Environmental Impact Report*, State Clearinghouse No. 2008022063, Volume I, July 2008.

²⁰ In anthropological literature, the Costanoans are often referred to as the Ohlone.

²¹ City of Richmond, *Richmond General Plan Update Draft Environmental Impact Report*, Section 3.5, Cultural Resources, February 2011.

²² Northwest Information Center, Sonoma State University, *Record Search Results for the Proposed Bay Area Rescue Mission Bridge of Hope Project (BARM Rescue Mission-2018)*, City of Richmond, Contra Costa County, California, NWIC File No. 11-0886, November 21, 2018.

explore this possibility, the City of Richmond reached out to Native American tribes affiliated with the project area to determine whether they had any knowledge of Native American cultural resources in the project area.

Pursuant to Assembly Bill (AB) 52, passed by the California Legislature in September 2014, the City sent a Tribal Consultation List Request to the Native American Heritage Commission (NAHC) on November 14, 2018 in order to identify Native American tribal groups who may be traditionally and culturally affiliated with the geographic area of the proposed project site. A response letter from the NAHC identified six tribal groups affiliated with the project area, including the following groups:

- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- North Valley Yokuts Tribe
- The Ohlone Indian Tribe
- Wilton Rancheria

The NAHC provided names and addresses of the chairperson or other representative of each of these groups. In accordance with AB 52, the City mailed letters to each of the representatives on December 11, 2018, offering them the opportunity to provide input regarding any concerns their tribes may have about the potential impacts implementation of the proposed project could have on tribal cultural resources. As of the time of publication of this Initial Study, the City had not received any responses from the tribal groups.

Due to the previously disturbed nature of the project site, the City believes there is limited potential for encountering archaeological resources during project construction, and has not conducted subsurface testing of the site or further investigation by an archaeologist during the environmental review of the proposed project. However, the possible presence of buried prehistoric cultural materials at the project site cannot be ruled out, and any disturbance to such resources, were they to exist, could result in a *significant, adverse impact* on archeological resources. Implementation of the following standard CEQA mitigation measure, required by Section 15064.5 of the *CEQA Guidelines*, would reduce the potential impact to a less-than-significant level:

Mitigation Measure CR-1: If any cultural artifacts are encountered during site grading or other project construction activities, all ground disturbance within 100 feet of the find shall be halted until the City of Richmond is notified, and a qualified archaeologist can identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). (Construction personnel shall not collect any cultural resources.) The results of any additional archaeological effort required through the implementation of Mitigation Measures CR-1 or CR-2 shall be presented in a professional-quality report, to be submitted to the project sponsor, the City of Richmond Planning and Building Services Department, and the Northwest Information

Center at Sonoma State University in Rohnert Park. The project sponsor shall fund and implement the mitigation in accordance with Section 15064.5(c)-(f) of the *CEQA Guidelines* and Public Resources Code Section 21083.2.

Mitigation Measure CR-2: In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and a qualified archaeologist shall notify the Office of the Contra Costa County Coroner and advise that office as to whether the remains are likely to be prehistoric or historic period in date. If determined to be prehistoric, the Coroner’s Office will notify the Native American Heritage Commission of the find, which, in turn, will then appoint a “Most Likely Descendant” (MLD). The MLD in consultation with the archaeological consultant and the project sponsor, will advise and help formulate an appropriate plan for treatment of the remains, which might include recordation, removal, and scientific study of the remains and any associated artifacts. After completion of analysis and preparation of the report of findings, the remains and associated grave goods shall be returned to the MLD for reburial.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|--------------------------|
| c) <i>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: Paleontological resources are the fossilized remains of vertebrate or invertebrate organisms from prehistoric environments found in geologic strata. They are valued for the information they yield about the history of the earth and its past ecological settings. They are most typically embedded in sedimentary rock foundations, and may be encountered in surface rock outcroppings or in the subsurface during site grading. There are no rock outcroppings at the project site, but a geotechnical investigation evaluating subsurface soils has not yet been completed for the proposed project.

On a larger scale, the project site is in an area mapped as having deep alluvial soils (undivided Quaternary deposits) underlain by an assemblage of Franciscan Complex deposits of interbedded clays, silts, gravel, and sands deposited by upland erosion and marine action during the post-glacial flooding of San Francisco Bay, about 12,000 years ago.²³ These types of deposits do not contain abundant fossil remains, and the majority of recorded paleontological resources in Contra Costa County have been found to the east of Interstate 680, which is located more than 16 miles east of the project site. However, while most vertebrate fossils (such as fragments of extinct bison, camels, mammoths, horses, and bony fish) in the County have been found on the slopes of the Diablo

²³ City of Richmond, *Richmond General Plan Update Draft Environmental Impact Report*, page 3.5-9, February 2011.

Range or in nearby valleys, invertebrate fossils (e.g., from snails, clams, and other marine organisms) have been encountered throughout the County.

Late Pleistocene and Holocene fossils have been recovered from marine sediments (older Bay mud) in Contra Costa County, including remains of petrified wood, marine mollusks and mammals, bony fishes, amphibians, reptiles, birds, a diversity of extinct land mammals such as ground sloths, mammoth, mastodon, deer, horse, camel, and bison, and microfossils such as radiolaria, foraminifera, diatoms, pollen, and spores.

Fossils have been reported in the Franciscan Complex, mostly radiolarian chert beds containing microfossils of radiolaria—the silicon-based skeletons of single-celled planktonic marine organisms—which are important as stratigraphic markers. Limestone nodules and concretions in Franciscan shales, and the shales themselves, often contain radiolaria, foraminifera (another single-celled marine organism), gastropods (snails), pelecypods (clams), and plant microfossils (pollen and spores).

The Environmental Impact Report for the City’s recent General Plan Update identified the areas of the City underlain by undivided Quaternary deposits, including the project site, as having a High Sensitivity for both vertebrate and invertebrate paleontological resources, as defined by the Society of Vertebrate Paleontology.²⁴ If any unique paleontological resources are present at the project site, they could be damaged, destroyed, or lost during subsurface disturbance of the site during project construction. This would be a *potentially significant impact*. Implementation of the following mitigation measure would reduce this potential impact to a less-than-significant level:

Mitigation Measure CR-3: Prior to issuance of a grading permit for the project, a qualified paleontologist shall evaluate the potential for significant paleontological resources to be present at the project site and recommend appropriate measures to protect, recover, and evaluate such resources. Should paleontological resources be encountered during construction or site preparation activities, such works shall be halted in the vicinity of the find, and a qualified paleontologist shall be contacted to evaluate the nature of the find and determine if mitigation is necessary. All feasible recommendations of the paleontologist shall be implemented.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|--------------------------|
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: See Section V(b), above.

²⁴ *Ibid*, page 3.5-24.

VI. GEOLOGY AND SOILS — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</i> | | | | |
| <i>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project area is not located within an Alquist-Priolo fault zone mapped by the State Geologist;²⁵ the nearest fault zone is associated with the North Hayward Fault, located approximately 3 miles to the east.²⁶ No active faults have been identified or mapped within or in proximity to the site by the California Geological Survey or the Association of Bay Area Governments (ABAG).^{27 28} There is therefore no potential for fault rupture at the site.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>ii) Strong seismic ground shaking?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The San Francisco Bay Area is recognized by geologists and seismologists as one of the most seismically active regions in the United States. Similar to most urban locations throughout the Bay Area, the project site is potentially subject to very strong seismic ground shaking during

²⁵ In California, the Alquist-Priolo Earthquake Fault Zoning Act of 1972 (formerly the Special Studies Zoning Act) regulates development and construction of buildings intended for human occupation to avoid the hazard of surface fault rupture. This Act and supplemental amendments groups faults into the categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive. These classifications are qualified by the conditions that a fault must be shown to be “sufficiently active” and “well defined” by detailed site-specific geotechnical explorations in order to determine that building setback requirements might be established.

²⁶ California Division of Mines and Geology, James F. Davis, State Geologist, “State of California Special Studies Zones,” Richmond Quadrangle, Revised Official Map, effective January 1, 1982.

²⁷ California Geological Survey, Fault Activity Map of California (2010) [interactive map], accessed January 8, 2019 at: <https://maps.conservation.ca.gov/cgs/fam/>.

²⁸ Association of Bay Area Governments (ABAG), Bay Area Faults [map], 2003.

an earthquake on one of the major active earthquake faults that transect the region.²⁹ Major earthquakes have occurred on the Hayward, Calaveras, and San Andreas faults during the past 200 years, and numerous minor earthquakes occur along these faults every year. At least five known earthquakes of Richter magnitude (RM) 6.5, four of them greater than RM 7.0, have occurred within the San Francisco Bay Area within the last 150 years. This includes the great 1908 San Francisco earthquake (moment magnitude 7.8) and the 1989 Loma Prieta earthquake (RM 6.9).

According to a 2014 analysis by the Working Group on California Earthquake Probabilities (WGCEP), an expert panel co-chaired by U.S. Geological Society seismologists, there is a 72 percent probability that an earthquake of magnitude 6.7 or greater will occur in the San Francisco Bay Area in the next 30 years and a 20 percent probability that an RM 7.5 earthquake will occur (starting from 2014).³⁰ The WGCEP estimates there is a 14.3-percent chance of an RM 6.7 quake occurring on the Hayward fault in the next 30 years. It is therefore likely that a major earthquake will be experienced in the region during the life of the project that could produce strong seismic ground shaking at the project site.

A major earthquake on any of the active faults in the region could result in very strong to violent ground shaking. The intensity of earthquake ground motion would depend upon the characteristics of the generating fault, distance of the site to the earthquake epicenter and rupture zone, magnitude and duration of the earthquake, and site-specific geologic conditions. The California Geological Survey's seismic hazards evaluation of the City of Richmond indicates there is a 10-percent probability that seismic ground shaking will produce a peak horizontal ground acceleration of at least 0.65 g at the site within the next 50 years.³¹

Engineers use the estimated peak horizontal ground acceleration to design buildings for larger ground motions than are expected to occur during a 50-year interval in order to maximize a building's ability to withstand seismic ground shaking that may occur at a project site. New buildings are required to be designed in accordance with the California Building Code (CBC), which is expected allow a structure to withstand the peak horizontal ground acceleration and associated ground shaking that may occur at a project site.

Seismic design in compliance with the CBC would result in a project structure that would be expected to withstand seismic shaking and peak horizontal ground acceleration at the site that could result from a strong earthquake on the Hayward Fault or one of the other active faults in the region. Therefore, although strong seismic ground shaking could be experienced at the site during the life of the project, by complying with applicable building codes, the proposed building would be expected to maintain structural integrity and protect the occupants from injury.

There could still be potential for a particularly strong seismic event in the region to result in catastrophic structural failure of the proposed Bridge of Hope building, with potential to severely injure or kill building occupants. As previously noted, this risk pertains to virtually any development project within the seismically active San Francisco Bay Area. However, in

²⁹ Association of Bay Area Governments (ABAG), Resilience Program, Shaking Scenarios: Hayward (North & South) [interactive map], Accessed January 8, 2019 at: <http://gis.abag.ca.gov/website/Hazards/?hlyr=apZones>.

³⁰ Edward H. Field and Members of the 2014 Working Group on California Earthquake Probabilities, U.S. Geological Survey, California Geological Survey, *UCERF3: A New Earthquake Forecast for California's Complex Fault System*, USGS Open File Report 2015-3009, 2015.

³¹ California Department of Conservation, California Geological Survey, *Seismic Hazard Zone Report for the Richmond 7.5-Minute Quadrangle, Alameda County, California*, Ground Motion Interpolator (2008), Figure 3.3, 2003.

accordance with recent CEQA case law (e.g., *California Building Industry Association v. Bay Area Air Quality Management District* (Aug.12, 2016) 2 Cal.App.5th 1057), CEQA generally no longer considers an impact of the environment on a project to be a significant impact, unless a project would substantially exacerbate an existing hazard. Accordingly, this would be a ***less-than-significant impact***. However, the proposed building would be required to comply with the seismic design standards included in the 2016 California Building Code, which includes detailed structural design requirements intended to provide adequate structural integrity to withstand the maximum credible earthquake (MCE) and the associated ground motion acceleration. Compliance with the applicable building codes will maximize the structural stability of the proposed building and minimize the potential for damage and injury during a strong seismic event.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>iii) Seismic-related ground failure, including liquefaction?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Liquefaction occurs when clean, loose, saturated, uniformly graded, fine-grained soils are exposed to strong seismic ground shaking. The soils temporarily lose strength and cohesion due to buildup of excess pore water pressure during earthquake-induced cyclic loading, resulting in a loss of ground stability that can cause building foundations to fail. Soil liquefaction may also damage roads, pavements, pipelines, and underground cables. Soils susceptible to liquefaction include saturated, loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits.

Large construction projects located within a Zone of Required Investigation, as mapped by the California Geological Survey, are required to obtain site-specific geologic investigations, and may be subject to mitigation requirements. The zones are assigned to areas that are prone to liquefaction and landslides. The project site is not located within a Zone of Required Investigation.³² Furthermore, the site is mapped by the Association of Bay Area Governments (ABAG) as having Low Susceptibility to liquefaction.³³ Therefore, the project site does not appear to be particularly susceptible to liquefaction during strong seismic shaking. As noted above, design and construction of the project in accordance with applicable CBC seismic design requirements would maximize the ability of the proposed building to withstand seismic-related ground failure, including liquefaction. Given these requirements, potential exposure of the project to seismic-related ground failure would be a ***less-than-significant impact***.

³² California Geological Survey, Earthquake Zones of Required Investigation [interactive map], accessed January 8, 2019 at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

³³ Association of Bay Area Governments, Liquefaction Susceptibility [interactive map], accessed January 8, 2019 at: <http://gis.abag.ca.gov/website/Hazards/?hlyr=liqSusceptibility>.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|------------------------|--------------------------------|--|------------------------------|-------------------------------------|
| <i>iv) Landslides?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site is essentially level, with elevations ranging between 19 feet and 21 feet above mean sea level (msl).³⁴ The surrounding area is similarly level, and all properties within a 200-foot radius from the site have elevations of approximately 20 feet msl. Furthermore, the project vicinity is fully developed with urban uses, including buildings and pavements; there are no exposed slopes anywhere within the project vicinity. Therefore, there is no potential for landslide at the project site.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|--------------------------|
| <i>b) Result in substantial soil erosion or the loss of topsoil?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: Any construction project that exposes surface soils creates a potential for erosion from wind and stormwater runoff. Loose soil particles can be borne aloft by the wind or be entrained in water flowing across a site. The greater these forces are, the larger the volume of soil that can be carried away. Thus, the potential for erosion increases on large, steep, or windy sites; it also increases significantly during rainstorms. With a site area of less than one-quarter acre on a virtually level site that is not exposed to excessively windy conditions, the potential for soil erosion at the site is not high. However, stormwater runoff from the project site ultimately drains to San Francisco Bay, which is listed by the San Francisco Bay Regional Water Quality Control Board as having impaired water quality. Since any soil erosion occurring at the site would adversely affect water quality in the downstream receiving waters, uncontrolled soil erosion during project construction would be considered a **potentially significant impact** on the environment. The impact would be reduced to a less-than-significant level through implementation of the Stormwater Pollution Prevention Plan (SWPPP) required by Mitigation Measure WQ-1 and additional erosion controls required by Mitigation Measure WQ-2 (see Section IX).

³⁴ Google Earth imagery, April 2, 2018.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| c) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: As previously noted, there is no potential for landslide at the project site, and the potential for liquefaction is deemed to be low by the Association of Bay Area Governments. Lateral spreading, another form of seismic ground failure, is generally associated with liquefaction; since the potential for liquefaction at the site is low, the potential for lateral spreading is presumed to also be low.

Subsidence in the Bay Area is caused primarily by excessive groundwater or natural gas extraction, neither of which occur in the project vicinity.³⁵ The General Plan EIR indicates that the project site and surrounding areas are underlain by deep alluvium soils on top of the Franciscan assemblage. Alluvium is typically a mixture of inter-bedded stiff clays, silts, gravel, and sands. Portions of these soils are derived from the eastern hills and others were deposited by marine actions during the formation of San Francisco Bay. Alluvial soils can generally be unstable and subject to differential settlement.

Site-specific details on subsurface conditions at the site won't be known until a geotechnical investigation of the site has been completed. The City of Richmond requires a site-specific geotechnical investigation as part of an application for a building permit.³⁶ The required geotechnical investigation report will identify seismic hazards on the site, including the potential for lateral spreading, subsidence, and other seismic-related ground failure, and will include site and building design recommendations that will ensure the structural stability of the proposed site improvements.

As previously noted in Section VI-a-ii, due to recent CEQA case law, CEQA generally no longer considers an impact of the environment on a project to be a significant impact. However, the City of Richmond has adopted several General Plan policies aimed at minimizing the risk of injury, loss of life, and property damage from seismically-induced and other geologic hazards. Since these policies were adopted for purposes of reducing environmental impacts, conflicts with these policies *would* constitute a significant impact under CEQA.

Absent appropriate precautions and controls, the proposed project could be exposed to unstable soils that could threaten structural stability of the proposed residential shelter building and expose its occupants to risk of injury or death. This would conflict with Richmond General Plan policies, such as Goal SN1 (Risk Management of Natural and Human-Caused Disasters), Policy SN1.1

³⁵ City of Richmond, *Richmond General Plan Update Draft Environmental Impact Report*, page 3.7-15, February 2011.

³⁶ City of Richmond, Department of Planning and Building Services, *General Requirements for Submittal of Plans, Design Documents, and Specifications for Building Permit*, March 29, 2016.

(Geologic and Seismic Safety), and Action SN1.C (Geotechnical Review Guidelines). However, the required compliance with the City’s building permit process would avoid conflicts with these policies and would ensure that the project and its occupants would not be exposed to significant safety hazards related to unstable soils. This would therefore be a *less-than-significant impact*.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The General Plan EIR reports that expansive soils are prevalent in the project area. Expansive soils are prone to shrinking and swelling with seasonal fluctuations in soil moisture. Such soils can impair the structural integrity of building foundations, slabs-on-grade, and pavements unless appropriate site preparation measures are undertaken and foundations are properly designed and constructed. The required geotechnical investigation report referenced above will determine whether there are expansive soils on the site and, if so, will include site preparation and building design requirements that will ensure the structural stability of the proposed building.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site would be served by the existing municipal sewer system, tying into a sanitary sewer line in 3rd Street, and the proposed project would not require the use of a septic or alternative wastewater disposal system.

VII. GREENHOUSE GAS EMISSIONS — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) <i>Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Greenhouse gases (GHGs) refer to gases that trap heat in the atmosphere and contribute to global warming. The primary GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (NO_x), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). The majority of GHG emissions in the Bay Area come from transportation (39.7 percent), followed by industrial/commercial sources (35.7 percent) and electricity generation (14.0 percent). Construction equipment and other off-road equipment contribute 1.5 percent of the total GHG emissions.³⁷

As discussed in Section III-b, very low quantities of operational air emissions, including emissions of GHGs, would be generated by the project. The BAAQMD screening criteria discussed in Section III-b also include operational thresholds for GHGs. The operational thresholds are 78 dwelling units for the low-rise apartment category, 94 dwelling units for the retirement community category, and 143 dwelling units for the congregate care category. With an approximate equivalent of 70 dwelling units proposed by the project, the project would be below BAAQMD’s operational screening thresholds for all three of these comparative land use categories. As previously noted, these thresholds were designed to be highly conservative; they are thresholds at which BAAQMD can categorically assert there would be less-than-significant GHG impacts. Projects that exceed the thresholds would not necessarily have significant GHG impacts, but the emissions should be modeled in order to make a determination of significance.

In the case of the proposed project, it would not exceed any of the thresholds for similar types of land uses. Furthermore, the project would be least similar to the low-rise apartment category, which has the lowest screening threshold, because apartment dwellers typically generate a relatively large number of vehicle trips, which comprise the majority of their GHG emissions, whereas very few if any residents of the proposed homeless shelter would own personal vehicles. Thus, their trip-generation characteristics would be more similar to the retirement community or congregate care facility categories. The screening criteria for these categories are well above the size of the proposed project. Therefore, the project’s operational emissions of GHGs would have a ***less-than-significant impact*** on the air environment.

While there are no established thresholds of significance for construction emissions of GHGs, as is the case with criteria pollutants, the greatest potential for construction emissions of GHGs is during grading and paving activities and, consequently, the larger the area of disturbance, the greater the emissions of GHGs. Due to the limited area of disturbance and the limited amount of grading that would be required to prepare the small site, the potential for generation of GHGs

³⁷ Bay Area Air Quality Management District, *Bay Area Emissions Inventory, Summary Report: Greenhouse Gases, Base Year 2011*, Table F: 2011 Bay Area GHG Emissions by Sector, updated January 2015.

during project construction would be limited, and a quantified analysis of construction emissions of GHGs was deemed unwarranted. As discussed in Section III-b, the project would fall far below the threshold at which the BAAQMD recommends modeling of construction emissions of criteria air pollutants. It can therefore be reasonably presumed that the emissions of GHGs during project construction would be quite limited, and would not have a significant impact on the environment.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| b) <i>Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: In October 2016, The City of Richmond adopted a Climate Action Plan (CAP) intended to reduce GHG emissions in the City.³⁸ The CAP provides a roadmap for how the City will reduce energy consumption and GHG emissions to meet State GHG emissions targets established by Assembly Bill 32 (AB 32), which is the principal planning and policy document adopted for the purpose of reducing GHG emissions Statewide. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. AB 32 was extended in September 2016 by Senate Bill 32 (SB 32), establishing an expanded goal to achieve reductions in GHGs of 40 percent below 1990 levels by 2030. The new plan outlined in SB 32 involves increasing renewable energy use, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. The California Air Resources Board’s (CARB’s) *2017 Climate Change Scoping Plan Update* is designed to accomplish this goal.³⁹ Both AB 32 and SB 32 were passed to achieve GHG reduction goals established in 2005 by former Governor Arnold Schwarzenegger by Executive Order S-3-05, which also set a 2050 target of reducing GHG emissions to 80 percent below 1990 levels by that date.

The Richmond CAP builds on the goals and policies in the City’s General Plan and the Health in All Policies Strategy (HiAP) to further the City’s efforts to build health equity through the reduction of local GHG emissions, and to simultaneously ensure that the community is well prepared for the impacts of climate change. It elevates health equity priorities in the selection of climate action measures, building on the City’s existing policy framework to support a healthy, vibrant, and equitable City. The CAP identifies four overarching goals in support of these objectives, which are summarized by the following titles:

- GHG Emissions Reduction
- Healthy and Resilient Community
- Prosperous Local Economy
- Engaged Community and Educated Youth

³⁸ City of Richmond. *Climate Action Plan*, Adopted October 2016. <http://www.ci.richmond.ca.us/DocumentCenter/View/40636>.

³⁹ California Air Resource Board, *2017 Climate Change Scoping Plan*, November 2017. Accessed February 21, 2018 at <https://www.arb.ca.gov/cc/scopingplan/scopingplan2017.pdf>.

The four goals are supported by eight CAP objectives derived from the City's General Plan policies:

1. Energy Efficient Buildings and Facilities
2. Increase Use and Generation of Renewable Energy
3. Sustainable Transportation and Land Use
4. Zero Waste
5. Water Conservation
6. Green Infrastructure, Urban Forestry and Local Agriculture
7. Green Business and Industry
8. Resiliency to Climate Change

These eight objectives provide an organizing framework for 40 strategies set forth in the CAP. The strategies were reviewed as part of this environmental review and no project conflicts with the strategies or with the guiding CAP goals and objectives were identified.

While the strategies generally require action by the City, the proposed project would be supportive of some of the strategies. For example, Strategy TL6 calls for expansion of car sharing, bike sharing, and ride sharing programs in Richmond and the Bay Area. The proposed project would include the provision of regular van shuttle transportation to ferry groups of project residents to and from the Alma Calton Educational Center, located about 1 mile from the project site, where adult residents would attend classes and utilize a computer lab, library, and resource center, while their children would be cared for in a child care facility. Although the shuttle van would be privately operated by BARM, it could also be seen as supportive to Strategy TL5, which calls for improvements in the efficiency of and access to public transit.

The project would increase the residential and employment density on the site, which would assist the City in meeting the performance goal established by CAP Strategy TL1, which calls for an increase in residential and employment density of 15 percent by 2030 as compared to business as usual.

The project would be required to provide and utilize separate containers for solid waste, recycling, and green waste, pursuant to Section 15.04.601.090 of the Richmond Zoning Ordinance. Compliance with this requirement would be supportive of Strategy SW1 (Establish a Zero Waste Framework), Strategy SW2 (Increase Participation in Recycling Programs and Incentives), and Strategy SW3 (Establish and Support Garbage Service Rates and Schedules that Maximize Participation in Composting and Recycling Programs). The performance goal of all three of these strategies is to divert 90 percent of all solid waste from landfill disposal by 2030.

The City does not have an ordinance requiring diversion of construction and demolition (C&D) debris from landfill disposal. (This is required of City-sponsored projects only.) However, the project applicant should be encouraged to recycle all C&D debris to the extent feasible, which would support CAP Strategy SW4, which promotes increased diversion of C&D debris from landfill disposal.

The project would be constructed in compliance with the California Green Building Standards Code, which requires design features for energy efficiency, water efficiency and conservation, and

material conservation and resource efficiency. Thus, the project would also support CAP Strategy EE3, intended to promote green building.

As summarized in the foregoing discussion, the project would not conflict with the City’s CAP, which was adopted for the purpose of reducing the emissions of GHGs. While there are Statewide plans and regulations that have also been adopted to reduce GHG emissions, such as emissions standards for vehicles and a low-carbon fuel standard, they are being implemented at the Statewide level, and compliance at the specific plan or project level is not addressed. The assumption is that AB 32 will be successful in reducing GHG emissions and reducing the cumulative GHG emissions Statewide by 2020. The State has taken these measures, because no project individually could have a major impact (either positively or negatively) on the global concentration of GHGs. Any project that would be in conflict with AB 32 State goals would have a significant impact due to this conflict. However, the proposed project would not conflict with the goals of AB 32.

VIII. HAZARDS AND HAZARDOUS MATERIALS — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) <i>Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The proposed project would not involve the routine transport, use, or disposal of hazardous materials. Small containerized quantities of hazardous household and yard care products would be stored and used on the site for cleaning and maintenance activities typical of office buildings, commercial kitchens, and hotels. The storage and use of these types of cleaning products and other household chemicals is typical of all residential, office, and commercial development, and would not constitute a significant hazard to the public or the environment.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| b) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: As discussed in Section VIII(a), above, the proposed project would not introduce hazardous materials beyond those generally found within residential and office uses, including containerized household cleaning products and yard care products. The proposed project would

not introduce the use or storage of new hazardous materials or new activities or processes with the potential to release hazardous substances into the environment.

Another potential source of exposure to hazardous materials could be the presence of hazardous chemicals in the soil or groundwater at the site, which could be exposed by disturbance of the site during project construction. Offsite sources of soil or groundwater contamination could also impact soil or groundwater at the site. To identify potential sources of contamination, two government databases were consulted:

- 1) **GeoTracker**, a database maintained by the State Water Resources Control Board (SWRCB) of permitted underground storage tanks (USTs), leaking underground storage tanks (LUSTs), cleanup sites, U.S. Department of Defense sites, oil and gas production sites, solid or hazardous waste disposal sites, and other sites with the potential to contaminate soil or groundwater, with an emphasis on groundwater. The database is operated under the Groundwater Ambient Monitoring and Assessment (GAMA) Program created in response to the Groundwater Quality Monitoring Act of 2001 (AB 599). The California Department of Pesticide Regulation, California Department of Water Resources, U.S. Geological Survey, San Francisco Bay Regional Water Quality Control Board and other regional water boards, and Lawrence Livermore National Laboratory also contribute to the GeoTracker database. GeoTracker GAMA integrates and geographically displays groundwater information from multiple sources through a publicly accessible portal. It provides analytical tools and reporting features to assess groundwater quality and water level information to identify potential groundwater issues in relationship to roads, satellite imagery, and terrain using Google-based maps. As of October 2015, GeoTracker reported more than 70.7 million standardized groundwater test results.⁴⁰
- 2) **EnviroStor**, a database and Geographic Information System (GIS) maintained by the California Department of Toxic Substances Control (DTSC) for identifying sites that have known or potential contamination, as well as facilities permitted to treat, store, or dispose of hazardous waste. The EnviroStor database includes Federal Superfund Sites (National Priorities List (NPL)), State Response Sites (including Military Facilities and State Superfund sites), Voluntary Cleanup Sites, School Cleanup Sites, Corrective Action Sites, Tiered Permit Sites, Permitted Hazardous Waste Facilities, Post-Closure and Hazardous Waste Facilities, and Historical Non-Operating Hazardous Waste Facilities. The database does not include hazardous waste generators or transporters.

The GeoTracker search results revealed that there are no active permitted USTs, LUST cleanup sites, or other hazardous materials release sites on the project block or within a 1,000-foot radius of the site as tracked by the SWRCB, Regional Water Quality Control Board, Department of Pesticide Regulation, Department of Water Resources, U.S. Geological Survey, or the Lawrence Livermore National Laboratory.⁴¹

⁴⁰ State Water Resources Control Board, Office of Public Affairs, Factsheet: GeoTracker GAMA, October 2015, Accessed January 9, 2019 at: https://www.waterboards.ca.gov/publications_forms/publications/factsheets/docs/geotrkgama_fs_2015oct.pdf.

⁴¹ California Environmental Protection Agency, State Water Resources Control Board, Groundwater Ambient Monitoring & Assessment Program (GAMA), GeoTracker GAMA Groundwater Data Sources, Accessed January 9, 2019 at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=257+3rd+Street,+Richmond,+CA>.

Five sites are identified within a 1,000-foot radius of the project site on the EnviroStor database compiled by DTSC.⁴² Only one of the sites is listed as active. Following is a brief summary of these contamination sites:

- **The Related Companies of California, LLC, 400 Macdonald Avenue.** This site is identified as a Voluntary Cleanup Site due to arsenic in the soil and tetrachloroethylene (PCE), trichloroethylene (TCE), and cis-1,2-dichloroethylene in the groundwater. The site was operated as a laundry in the first half of the 20th Century, which was likely the source of contamination. By 1959 the laundry buildings had been demolished and the site was vacant. The site is currently occupied by a senior apartment building. As of May 10, 2006, it was designated with a status of No Further Action. This status is assigned by DTSC after it has conducted an investigation (generally a Preliminary Environmental Assessment (PEA)) and determined that the property does not pose a problem to public health or the environment.
- **Electro Forming Co. – Richmond, 130 Nevin Avenue.** This property is identified as a State Response site. State Response sites are properties where DTSC has confirmed a release of hazardous materials; they are generally high priority and high potential risk. This site has an Active status, indicating that an investigation and/or remediation is currently in progress and that DTSC is actively involved, either in a lead or support capacity. Because this is an active cleanup site, additional information about the case is provided below.
- **Ford Clothes Cleaners, 105-111 Nevin Avenue.** This property is listed as an Evaluation site, which applies to sites where there is suspected but unconfirmed contamination. The Evaluation designation is also assigned to sites that have gone through a limited investigation and assessment process. The property was operated as a dry cleaner from 1953 until the late 1980's. Screening of the site was conducted by DTSC in 2008 that reported soil and groundwater sampling of adjacent properties from 2003 to 2006 that revealed groundwater contamination with tetrachloroethylene (PCE), a common dry cleaning agent. DTSC concluded that the sampling data were consistent with a release of PCE from 105-111 Nevin Avenue with subsequent westward migration in groundwater. It was noted that additional sampling is needed to delineate the contamination. This property is located about 700 feet northwest of the project site. Given the westward gradient of groundwater, the project site is not down-gradient from this historic release site, so it does not pose an environmental threat to the project site.
- **Former Richmond Substation S, Nevin Avenue west of 2nd Street.** This site is identified as a Voluntary Cleanup Site due to suspected contamination with heavy metals. In 1910, the site was part of a larger parcel of roughly 9,000 square feet owned by Richmond Power and Light Company, which operated a transformer facility on the site. From 1924 to 1974, Western Gas and Electric Company and Pacific Gas and Electric (PG&E) owned the entire parcel and used it as an electrical substation and service yard. In 1963, PG&E sold all but the northwestern corner of the larger parcel, which it continued to use as a service yard. In 1974, the adjacent property was purchased by Electro Forming Inc., which began metal plating and finishing operations that continue today. The site ground surface is currently covered with gravel and occupied by trailers and other

⁴² California Department of Toxic Substances Control, EnviroStor Sites and Facilities Database, Accessed January 9, 2019 at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=257+3rd+Street,+Richmond,+CA>.

equipment belonging to the adjacent plating facility. Remediation of the site was conducted between March 2008 and December 2009. On May 20, 2010 DTSC certified that all appropriate response actions had been completed and no further remedial action was necessary.

- **Lillie Mae Jones Plaza, 116 Macdonald Avenue.** This site had a history of use as an auto wrecking yard that apparently led to contamination of the soil with lead. Subsurface testing in 2006 confirmed there were elevated lead levels in the soil. Groundwater testing revealed levels of PCE in excess of the California Department of Public Health's Maximum Contaminant Level of 5.0 micrograms per liter. The site was listed as a Voluntary Cleanup Site by DTSC in January 2009. Remediation of the site was performed that year and into 2010. On May 20, 2010 DTSC certified that all appropriate response actions had been completed and no further remedial action was necessary.

Based on the preceding summaries, of the five sites listed on the EnviroStor database within 1,000 feet of the project site, only the Electro Forming Company site at 130 Nevin Avenue has any potential to pose an environmental threat to the proposed project. The site history narrative provided on the EnviroStor listing for this property indicates that the site was previously occupied by the Electro Forming Company, a metal plating business that conducted copper, brass, zinc, nickel, chromium, silver, and gold plating.

Compounds used in the plating activities at this site included chromic, muriatic, nitric, and sulfuric acids; zinc, sodium, potassium, copper, and zinc cyanides; chlorine; solvents; nickel salts and additives; and metal brighteners. As of 2013, Electro Forming was operating 36 process tanks and 17 process drums in its operations. Plating operations were shut down in 2014. As of May 2, 2006, the property had an Active cleanup status to address residual impacts in soil and groundwater at the property.

On December 6, 2007, DTSC issued an order to the property owner to remediate the contamination at the site.⁴³ The cleanup order documented a number of historic releases of hazardous materials at the site. They included the following:

- In October 1981, the Contra Costa County Department of Environmental Health (CCCDEH) observed a spill of roughly 55 gallons of chromic acid onto soil at the site. DEH also observed a leaking 550-gallon tank of caustic liquid containing copper and nickel.
- In a 1988 joint inspection with the City of Richmond Water Pollution Control Plant, CCCDEH noted an increase in chemical spillage from process tanks onto exposed soils, as indicated by staining and discoloration of soils in the back lot. CCCDEH also documented the presence of six 55-gallon drums labeled as "pickled liquor" on an adjacent lot. A Consent Decree and Final Judgment was issued in February 1988 for removal of contaminated soils and submission of a sampling plan to verify soil removal, installation of berms and concrete, and for payment of penalties.
- In 1992, 300 gallons of nitric acid leaked from an above ground tank in the shop yard. A reaction of the acid with iron equipment in the yard produced a cloud of gas. The Fire

⁴³ California Environmental Protection Agency, Department of Toxic Substances Control, *Imminent and Substantial Endangerment Determination and Order and Remedial Action Order in the Matter of Electro Forming Co., 130 Nevin Avenue, Richmond, CA 94801*, Docket No. I&SE 06/07-023, December 6, 2007.

Department set up a zone of restricted access and required nearby residents to shelter in place. Several people were taken to the hospital.

- Wastewater from Electro Forming Co. was originally discharged to the City of Richmond sewer system, but in 1986 the City suspended Electro Forming's industrial wastewater discharge permit after multiple violations, and the City revoked its access to City sewer lines in 1988. That year the company began operating an unauthorized wastewater treatment unit at the site. Spills and overflows from the plating tanks that previously discharged to the sanitary sewer were collected in three concrete sumps and then pumped to the wastewater treatment system, which used separate treatment processes for cyanide-containing and cyanide-free wastewater. The treatment system included a 150-cubic-foot sump, a 1,000-gallon sludge tank, and two 2,000-gallon settling tanks. Sludge from the wastewater treatment process was dried in a tank in the shop yard before being transferred to 55-gallon drums for storage in the boiler room. Spent plating solutions were also pumped from dip tanks to a rooftop evaporation system. The treatment area in the shop yard was enclosed on three sides by a 3-foot-tall cinder block wall and on the fourth side by a fence that faces 2nd Street. The 2007 cleanup order noted that this system is no longer in use.
- In 1985, in response to health complaints from workers, PG&E collected environmental samples at its facility adjacent to the west of the plating building at 130 Nevin Avenue. PG&E collected wipe samples from vents on the plating building that open out toward the PG&E substation and ground surface samples from 2 to 40 feet away from the plating building vents. The vent samples contained copper, lead, nickel, and zinc at up to 150,000, 15,000, 8,100, and 66,000 parts per million (ppm), respectively. The surface samples contained copper, lead, nickel, and zinc at 24,000, 16,000, 8,000, and 23,000 ppm, respectively. These readings demonstrate that airborne releases of hazardous materials have resulted from sanding and grinding operations.

During various investigations conducted at the site between 1981 and 2003 by DTSC, CCCDEH, or the San Francisco Bay Regional Water Quality Control Board (RWQCB), the following maximum concentrations of metals were documented, all exceeding the California Human Health Screening Levels (CHHSLs):

| | |
|-----------|------------|
| Chromium: | 67,000 ppm |
| Copper | 31,000 ppm |
| Lead | 16,000 ppm |
| Nickel | 3,500 ppm |
| Zinc | 23,000 ppm |
| Cadmium | 84 ppm |

Most of these contaminants are known carcinogens, and due to their presence at the site, DTSC issued the cleanup order at the end of 2007. A lengthy period of remediation planning followed and DTSC records contain many letters and other documents of correspondence with the property owner and consultants hired by the owner. Some soil and groundwater sampling have occurred intermittently between 2014 and July 2018. The most recent correspondence was a letter sent by DTSC to the property owner on December 19, 2018 requesting the removal of solid wastes (a combination of soil, ash, and debris) discarded at the site that showed concentrations of chromium about Resource Conservation and Recovery Act (RCRA) hazardous waste levels. The letter also

noted that paint on the external walls of the building would be classified as hazardous waste if the paint were removed or the building demolished.

The extensive documentation for this property on the EnviroStor database indicates that characterization activities are still occurring and full remediation of the site has yet to occur. However, there is no potential for soil contamination at the site to adversely affect construction workers or future occupants of the proposed Bridge of Hope project because 130 Nevin Avenue is located approximately 500 feet away from the project site. While contaminants in the site’s groundwater may have migrated offsite, the gradient of groundwater at 130 Nevin Avenue is toward the west or southwest, away from the project site.⁴⁴ Therefore, this property does not pose a hazard to the groundwater at the project site, which is upgradient from the Electro Forming Company site.

Based on the findings summarized above, there is no evidence that construction or operation of the proposed project would create a significant hazard to the public or the environment through the release of hazardous materials into the environment. This would therefore be a *less-than-significant impact*.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There is one school within one-quarter mile (1,320 feet) of the project site: Lincoln Elementary School, located at 29 6th Street, approximately 1,150 feet from the project site. However, the proposed project would not emit hazardous gases, waste, or other substances with a potential to pose a threat to students in this school or to residential properties in closer proximity to the site.

⁴⁴ APEX, *Soil and Groundwater Investigation Workplan, Electro Forming Company Richmond, 130 Nevin Avenue, Richmond, California*, Project No. 093-DTSC-102, June 20, 2018.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>d) Be located on a site which is included on a list of hazardous materials 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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 actually consists of several lists, including:

- A list of hazardous waste sites compiled by the California Department of Toxic Substances Control (DTSC);
- A list of contaminated water wells compiled by the California Department of Health Services (DHS) (subsequently reorganized into the California Department of Health Care Services and the California Department of Public Health);
- A list of leaking underground storage tank sites and solid waste disposal facilities from which there is a migration of hazardous waste, compiled by the State Water Resources Control Board (SWRCB); and
- A list of solid waste disposal facilities from which there is a migration of hazardous waste, compiled by the Local Enforcement Agency (LEA). These lists are consolidated by the Department of Resources Recycling and Recovery (CalRecycle).

Each of these lists must be updated at least annually, and must be submitted to the Secretary for Environmental Protection, the head of the California Environmental Protection Agency (CalEPA). DTSC maintains the EnviroStor database for purposes of complying with Section 65962.5, while the SWRCB maintains the GeoTracker database. Both of these databases were consulted during this environmental review. The project site is not listed on either the EnviroStor or GeoTracker databases. Additional information about the searches of these databases is provided in Section VIII-b, above. Since the project site is not listed on the EnviroStor or GeoTracker databases, there would be no impact related to hazardous materials sites compiled pursuant to Government Code Section 65962.5.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| e) <i>For a project 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 for people residing or working in the project area?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There are no airports within 2 miles of the project site; the nearest public airport is Oakland International Airport, in the City of Oakland, located approximately 16 miles southeast of the site.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| f) <i>For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There are no private airstrips in the vicinity of the project site. The nearest private airstrip is San Rafael Airport, formerly Smith Ranch Airport, located about 10 miles northwest of the project site.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| g) <i>Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: In the event of a large-scale disaster, emergency response to the site would be coordinated by City responders with other response in the City. The project site would provide adequate emergency access and egress via 3rd Street and Macdonald Avenue. Implementation of the project would not alter existing streets or otherwise interfere with emergency evacuation routes. The project would not conflict or interfere with implementation of an adopted emergency response plan or evacuation plan.⁴⁵

⁴⁵ Lieutenant Matt Stonebraker, Richmond Police Department, personal communication, February 20, 2019.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>h) Expose people or structures to significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project is located in an urbanized, fully built-out area with commercial and residential development in the vicinity of the site. There are no wildlands anywhere in the vicinity of the site. There is no potential for wildland fires at the project site.

IX. HYDROLOGY AND WATER QUALITY — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|--------------------------|
| <i>a) Violate any water quality standards or waste discharge requirements?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation:

Construction Impacts

Construction activities could potentially affect water quality as a result of erosion of sediment. In addition, leaks from construction equipment; accidental spills of fuel, oil, or hazardous liquids used for equipment maintenance; and accidental spills of construction materials are all potential sources of pollutants that could degrade water quality during construction. Stormwater runoff from the site is ultimately discharged, without treatment, to San Francisco Bay, which is on the list of impaired water bodies compiled by the San Francisco Bay Regional Water Quality Control Board (RWQCB) pursuant to the federal Clean Water Act. Because the State is required to develop action plans and establish Total Maximum Daily Loads (TMDLs) to improve water quality within these water bodies, uncontrolled discharge of pollutants into them is considered particularly detrimental.

Generally, new development that entails “land disturbance” of 1 acre or more requires the project sponsor to obtain coverage under Construction General Permit (CGP) Order 2009-0009-DWQ, administered by the RWQCB. Order 2009-0009-DWQ requires project sponsors to implement construction Best Management Practices (BMPs) at the project site and comply with numeric action levels (NALs) in order to achieve minimum federal water quality standards. The CGP requires control of non-stormwater discharges as well as stormwater discharges. Measures to control non-stormwater discharges such as spills, leakage, and dumping must be addressed through structural as well as non-structural BMPs.

With a site area of approximately 9,000 square feet (apx. 0.2 acre), the project would not be required to obtain coverage under the CGP. However, Section 12.22.090 of the Richmond Municipal Code requires all construction activities to conform to the requirements of the California Stormwater Quality Association's (CASQA) *Stormwater Best Management Practices Handbooks for Construction Activities and New Development and Redevelopment*, the Association of Bay Area Government's (ABAG) *Manual of Standards for Erosion and Sediment Control Measures*, the City's grading and erosion control ordinance, and other generally accepted engineering practices for erosion control as required by the City Manager for construction activities. The City Manager may establish controls on the rate of stormwater runoff from new developments and redevelopment as may be appropriate to minimize the discharge and transport of pollutants.

The CASQA and ABAG manuals referenced in Municipal Code Section 12.22.090 describe a variety of construction BMPs including temporary dikes and swales, sediment traps, sediment basins, straw bale dikes, silt fences, check dams, and more. The BMPs are intended to control all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity. To be effective, they must result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction sites.

Absent proper implementation of appropriate BMPs to control discharge of sediment and other pollutants from the site during construction of the project, construction-related activities could adversely affect water quality, which would be a ***potentially significant impact***. Implementation of Mitigation Measure WQ-1 would ensure that construction impacts on water quality remain less than significant.

Mitigation Measure WQ-1: In order to demonstrate compliance with Richmond Municipal Code Section 12.22.090, which requires erosion and pollution control during construction activities, the project sponsor shall prepare a Stormwater Pollution Prevention Plan (SWPPP), to be approved by the Richmond Department of Water Resource Recovery and implemented during project construction. Prior to issuance of a grading permit for the proposed project, the City of Richmond shall verify that the applicant has prepared a SWPPP in accordance with the requirements of Richmond Municipal Code Section 12.22.090. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) all non-stormwater discharges are identified and either eliminated, controlled, or treated; (3) site best management practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs are installed to reduce or eliminate pollutants after construction is completed. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's (CASQA) *Construction Handbook of Best Management Practices*, Caltrans stormwater quality construction site BMP handbook,

and/or any other or newer BMPs available since the release of the handbooks, as required given project needs.

Operational Impacts

Operational stormwater discharges from new development are regulated under the National Pollutant Discharge Elimination System (NPDES), administered by the RWQCB under authority of the U.S. Environmental Protection Agency pursuant to the federal Clean Water Act. In accordance with the NPDES, the RWQCB regulates stormwater discharges via municipal stormwater permits issued to the cities, counties, water districts, and flood control districts under its jurisdiction in the San Francisco Bay Area. In the City of Richmond, development projects must comply with NPDES Permit No. CAS612008, issued to the Contra Costa Clean Water Program (CCCWP) and other Bay Area jurisdictions by the RWQCB (NPDES Order No. R2-2015-0049). The revised Municipal Regional Stormwater Permit (MRP) was adopted on November 19, 2015 and became effective on January 1, 2016. This permit replaced the previous permit issued on October 14, 2009, which was formally rescinded by the RWQCB. The current MRP consolidates the multiple countywide permits previously issued to member agencies in the San Francisco Bay Area under a single MRP regulating stormwater discharges from municipalities and local agencies in Alameda, Contra Costa, San Mateo, and Santa Clara counties and the cities of Fairfield, Suisun City, and Vallejo.

Although the MRP imposes a variety of responsibilities for monitoring and protecting stormwater quality on member agencies, it also includes requirements for individual development projects. Specifically, Provision C.3 of the MRP requires any private or public development project that would create or modify 10,000 square feet or more of impervious surfaces to take measures to improve water quality of stormwater discharges from the project site (i.e., stormwater runoff), including providing treatment of 100 percent of the stormwater runoff from the site. The size threshold is reduced to 5,000 square feet for certain special land use categories, which include auto service facilities, retail gasoline outlets, restaurants, and uncovered parking lots. Where a redevelopment project would alter 50 percent or more of the impervious surfaces of a previously existing project that was not subject to Provision C.3 requirements, the entire project must be designed and operated in compliance with Provision C.3. The Provision C.3 requirements also pertain to construction or widening of roads, trails, and sidewalks.

In the new MRP, Provision C.3 also requires small projects with 2,500 square feet to 10,000 square feet of new and replaced impervious surfaces and detached single-family home projects that create and/or replace 2,500 square feet or more of impervious surfaces to install at least one of the following site design measures to reduce uncontrolled stormwater runoff:

- Direct roof runoff into cisterns or barrels for reuse;
- Direct roof runoff onto vegetated areas;
- Direct roof runoff from sidewalks, walkways, and/or patios onto vegetated areas;
- Direct roof runoff from driveways and/or uncovered parking lots onto vegetated areas;
- Direct roof runoff into a bioretention facility or above-ground planter box;
- Construct sidewalks, walkways, and/or patios with permeable surfaces;

- Construct bike lanes, driveways, and/or uncovered parking lots with permeable surfaces.

Although projects subject to Provision C.3 must include low-impact development (LID) measures to capture and perform onsite treatment of all stormwater from the site prior to its discharge, including rainwater falling on building rooftops, with a site area of 9,000 square feet the proposed project does not qualify as a Regulated Project, and therefore is not subject to the requirement for LID measures. However, it is subject to the requirement to provide at least one of the site design measures listed above.

Additionally, the project appears to be subject to Section 12.22.050 of the Richmond Municipal Code, which requires all development projects subject to the requirements of the MRP to prepare and implement a stormwater control plan (SCP) that meets the criteria in the most recent version of the Contra Costa Clean Water Program *Stormwater C.3 Guidebook-Stormwater Quality Requirements for Development Applications*. The SCP must include a maintenance plan for preventing failure of the stormwater controls, and a person(s) or organization responsible for maintenance of the SCP must inspect the facilities at least once a year. The stormwater management facilities must be designed in a manner to minimize the need for maintenance and reduce the chances of failure, in accordance with design guidelines outlined in the guidebook referenced above. Recorded covenants or easements granting access to stormwater management facilities for inspections and maintenance by the City, the Contra Costa Mosquito and Vector Control District, and the RWQCB must be provided by the property owner.

There are a number of characteristics of the proposed homeless shelter that would minimize adverse operational effects on stormwater quality. Most significantly, the site is relatively small and, as previously noted, is under the size threshold to qualify as a Regulated Project under the MRP. Furthermore, about 47 percent of the site would be landscaped and not be developed with impervious surfaces, allowing a substantial portion of the rain falling on the site to percolate into the underlying soils and groundwater. Because the site is located adjacent to a downtown core area and nearby bus stops, its walkability is significantly increased, reducing the need for automobile travel, which is a major source of stormwater pollutants. Parking lots are a particular source of these pollutants, and there would be no parking provided on the project site. Finally, the population to be served by the project—homeless mothers and their children—do not own automobiles for the most part, so they would not be operating private vehicles that would contribute stormwater pollutants. Their transportation needs would be met by the private van shuttle that would serve the project as well as public transportation, both of which help reduce the generation of transportation-related stormwater pollutants. Due to these factors, as well as the project’s required compliance with Provision C.3 of the MRP and Section 12.22.050 of the Richmond Municipal Code, including preparation of a SCP, the project would have a *less-than-significant impact* on water quality.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: Much of the City of Richmond, including the project site, is underlain by the East Bay Plain Groundwater Subbasin, which extends along the East Bay foothills to San Francisco Bay, and from the Richmond area south to the City of Hayward, where the Niles Cone Groundwater Subbasin begins.⁴⁶ Both of these subbasins are part of the Santa Clara Valley Groundwater Basin. The southern half of the East Bay Plain Subbasin is a confined, deep aquifer that extends more than 400 feet below the ground surface. This southern portion of the subbasin was historically used as a source of potable water until the 1920s. The East Bay Municipal Utility District (EBMUD) currently uses it as a storage basin, injecting drinking water into the basin during high rainfall years for storage and availability as a supplemental drinking water supply during drought years. The injection/extraction system uses an approximately 600-foot-deep well located in the City of San Leandro on property leased from the Oro Loma Sanitary District. The South East Bay Plain Groundwater Basin that EBMUD uses for storage begins just south of downtown Oakland and extends south to Hayward.

North of downtown Oakland, the East Bay Plain Subbasin thins out and becomes shallower; it cannot serve as a significant source of groundwater. The groundwater underlying the project site is not utilized for water supply by the City or EBMUD for municipal supplies. Furthermore, the proposed project would not pump groundwater at the project site and therefore would not deplete groundwater supplies. As discussed in Section IX-d, below, implementation of the project would not significantly increase impervious surface area at the project site, if at all. Therefore, the project would not reduce groundwater infiltration or prevent the percolation of rainwater to the groundwater table. The project would have no adverse effect on groundwater recharge or groundwater supplies.

⁴⁶ East Bay Municipal Utility District, *Urban Water Management Plan 2015*, page E-1, July 2016.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|--------------------------|
| c) <i>Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: Construction-related impacts relating to erosion or siltation both on and off-site are discussed in Section IX-a. Although construction of the project would have a ***potentially significant impact*** due to erosion and siltation, implementation of the project-specific SWPPP, as required by Mitigation Measure WQ-1, would mitigate the impact related to erosion and siltation during project construction to a less-than-significant level. Also noted in Section IX-a, runoff generated by newly impervious surfaces would be mitigated through compliance with the Municipal Regional Permit, which will require the project sponsor to implement at least one site design measure intended to reduce stormwater pollutants from being discharged from the site. These measures stipulated in the MRP would also serve to reduce the volume of stormwater runoff from the site, thereby reducing the potential for downstream erosion and siltation. The proposed project would therefore have a less-than-significant operational impact on existing drainage patterns. Additional information on the potential for erosion and increased siltation is provided in Section IX(a).

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| d) <i>Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The 9,000-square-foot project site is currently developed with approximately 4,790 square feet of impervious surfaces, representing about 53 percent of the total site area. As noted in Section IX-a, above, under the proposed project, about 47 percent of the site would be landscaped and not be developed with impervious surfaces, while about 53 percent of the site would be developed with impervious surfaces. Therefore, implementation of the project would result in approximately the same amount of impervious surfaces on the site as are currently present. This means that there would be virtually no increase in stormwater discharge from the site, even absent the required implementation of a site design measure that would have the effect of reducing stormwater discharge from the site, as discussed above. There is therefore no potential for the project to increase the risk of flooding on or off the site.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| e) <i>Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: Stormwater runoff from the project site currently flows offsite and into surrounding streets, where it is collected in catch basins and discharged into the City’s stormwater drainage system. As discussed in the preceding subsection, the proposed project would not increase the amount of impervious surfaces on the site, so there would be no increase in the amount or rate of stormwater discharged from the site. Furthermore, as noted in Section IX-a, as part of its compliance with the Municipal Regional Permit, the project sponsor will be required to implement at least one site design measure intended to reduce stormwater pollutants from being discharged from the site. The measures stipulated in the MRP would also serve to reduce the volume of stormwater runoff from the site, thereby incrementally reducing the amount of stormwater that gets discharged into the City’s stormwater drainage system. The project would have no adverse effect on stormwater drainage system.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|--------------------------|
| f) <i>Otherwise substantially degrade water quality?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: Potential degradations in water quality due to the proposed project were addressed in Section IX-a. With implementation of Mitigation Measure WQ-1, water quality impacts would be reduced to less than significant. No other impacts to water quality were identified during this environmental review.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| g) <i>Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project would not create new housing. See Section IX-h, below, for additional information regarding flood hazard areas in the project vicinity.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The majority of the project site is within a larger surrounding area mapped as Zone X by the Federal Emergency Management Agency (FEMA), which is the designation assigned to areas that have been determined to be outside the 0.2-percent annual chance flood plain (i.e., the 500-year flood plain).⁴⁷ There are no designated flood zones near the project site. The proposed project would have **no impact** from placing structures within a 100-year flood hazard area.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: According to the General Plan EIR, although portions of the City of Richmond are located within the dam failure inundation zone for the San Pablo Reservoir dam, the East Bay Municipal Utilities District (EBMUD) completed a seismic upgrade of the dam foundation and buttress in September 2010, and the dam is now fully operational.⁴⁸ On September 1, 2017 the California Department of Water Resources, Division of Safety of Dams (DSOD) released an updated classification and assessment of dams throughout the State. Nearly all of the 22 dams under EBMUD’s jurisdiction were given DSOD’s highest seismic rating of Satisfactory, including San Pablo and Briones reservoirs. The single exception was Lafayette dam, which was rated Fair due to the seismic vulnerability of its outlet tower. However, EBMUD has determined that in the event of a failure of the tower, there would be limited impacts to the Lafayette community (and none to the City of Richmond) for the following reasons:⁴⁹

- The Lafayette Reservoir is a small watershed that does not yield significant runoff from local rainfall. There is low likelihood that runoff could exceed the reservoir’s capacity should a tower failure occur, because EBMUD maintains reservoir levels to provide

⁴⁷ Federal Emergency Management Agency, Flood Insurance Rate Map, Contra Costa County, California and Incorporated Areas, Community Panel Number 06013C0236G, revised September 30, 2015.

⁴⁸ City of Richmond, *Richmond General Plan Update Draft Environmental Impact Report*, Section 3.9, Hydrology and Water Quality, February 2011.

⁴⁹ East Bay Municipal Utility District, “Latest Dam Assessment Confirms EBMUD Dams are Reliable” [Press Release], accessed January 24, 2019 at: <https://www.ebmud.com/about-us/news/press-releases/lat/>.

adequate runoff capacity. In the event of damage to the outlet, EBMUD would deploy portable pumps to further drain the reservoir if needed and then repair the outlet line.

- Should a failure cause the outlet structure to remain open, water flows through the outlet pipe are limited to approximately 5 cubic feet per second to Lafayette Creek. This flow rate is comparable to typical creek flows.
- Should the embankment or drain line deform or rupture during an earthquake, the drain line could cause erosion. To address this issue, EBMUD is lowering reservoir levels, reducing the amount of water that may need to be pumped out manually to reduce any erosion.

Furthermore, the project site is outside the dam failure inundation zone for Lafayette Reservoir, as determined by the California Office of Emergency Services.⁵⁰ A seismic retrofit of the dam tower is scheduled for 2022, but EBMUD is working with the DSOD to complete the work sooner.

The project site is depicted by the DSOD as within the dam failure inundation zone for Briones Reservoir. Geomatrix Consultants previously conducted a seismic evaluation of the dam, assessing its likely performance in the event of a maximum credible earthquake (MCE), deemed to be a Moment Magnitude 6.3 earthquake on the Sobrante Ridge segment of the Pinole fault.⁵¹ The evaluations performed by Geomatrix determined that even if the MCE resulted in a maximum fault offset of 1.7 feet that completely propagated through the dam embankment, the offsets should cause little to no distress to the dam. Geomatrix estimated the actual offset to be only about 6 inches, which would have no adverse effect on the performance of the dam embankment.

General Plan Policy SN1.E requires the City to meet regularly with EBMUD staff to discuss dam failure hazards and EBMUD’s Emergency Action Plan. The General Plan EIR concluded that with implementation of applicable General Plan policies, new development in the City would be exposed to a less-than-significant impact from dam failure inundation. Therefore, the proposed project would not expose people or structures to risks associate with inundation from a dam failure.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>j) Inundation by seiche, tsunami, or mudflow?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: A seiche is a free or standing wave oscillation(s) of the surface of water in an enclosed or semi-enclosed basin that may be initiated by an earthquake. The General Plan EIR reported that there are no designated seiche risk areas within the City. Therefore, there is no potential for inundation by seiche at the project site.

Debris flows, mudslides, and mudflows begin during intense rainfall as shallow landslides on steep slopes. The rapid movement and sudden arrival of debris flows can pose a hazard to life and

⁵⁰ California Office of Emergency Services, Dam Inundation Registered Images and Boundary Files in ESRI Shapefile Format, September 2015.

⁵¹ Geomatrix Consultants, Inc., *Safety Review of Briones Dam, Contra Costa County, California*, Project No. 9883.000, August 2005.

property during and immediately following a triggering rainfall. The project site is essentially flat, as is the surrounding area. There is therefore no potential for mudslides or debris flows.

Tsunamis (seismic sea waves) are long-period waves that are typically caused by underwater disturbances (landslides), volcanic eruptions, or seismic events. Although tsunamis are typically generated by seismic activity on subduction faults, such as those located in Alaska and Washington, local tsunamis can be generated by strike-slip faults, such as the San Andreas and Hayward faults in the Bay Area. Potentially damaging tsunamis can be generated hundreds or even thousands of miles away. Areas that are highly susceptible to tsunami inundation tend to be located in low-lying coastal areas such as tidal flats, marshlands, and former bay margins that have been artificially filled but are still at or near sea level. The project site is not located within a tsunami inundation area, as mapped by the California Emergency Management Agency as being.⁵² Therefore, the project would not be subjected to inundation by tsunami. Furthermore, the elevated pad upon which the project will be built makes it highly unlikely that sea level rise would cause inundation in this area.

X. LAND USE AND PLANNING — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| a) <i>Physically divide an established community?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site is located mid-block on a developed block defined by Macdonald Avenue on the north, 3rd Street on the east, Bissell Avenue on the south, and 2nd Street on the west. The project would be developed on an approximately 9,000-square-foot site that would be created by the merger of two adjacent parcels, and all development would be confined to this site. No new roadways would be constructed that could physically divide the existing neighborhood, nor would any other type of barriers be constructed that could otherwise impair existing circulation within the community. Therefore, implementation of the proposed project would not physically divide an established community.

⁵² California Emergency Management Agency, Tsunami Inundation Map for Emergency Planning, State of California, County of Contra Costa, Richmond Quadrangle/San Quentin Quadrangle, July 31, 2009.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| b) <i>Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation:

General Plan: Land Use

The General Plan land use designation of the site is Low Density Residential, which is one of nine land use classifications defined in the General Plan that allow residential uses. The *Richmond General Plan 2030* utilizes a “place-based” approach to land use and zoning inspired by a return to traditional rural-to-urban development patterns. This approach is intended to work in concert with Richmond’s place-based street classification system set forth in the Circulation Element to promote high-quality street design and influence the character and connectivity of public and private spaces throughout the City.

The Low Density Residential category is applied to attached and detached single-family residential development located in level to moderately sloped areas. Neighborhood mixed-use development is allowed at neighborhood nodes. Existing multi-family residential structures may remain and may be improved without increasing densities, or may revert to single-family residential uses. This land use designation allows a density of 5 to 15 dwelling units per acre and building heights up to 35 feet.

Although the proposed project is a residential land use use, a standard residential density calculation is not applicable, due to the nature of the project, which would feature multi-bed dormitory rooms for single homeless adult women, as well as four-bed rooms that would each be occupied by a family consisting of a homeless mother and her children. The project would be an expansion of BARM’s existing campus on Macdonald Avenue. As such, it could be considered consistent with the more transitional development allowed at neighborhood nodes within the Low Density Residential designation. It will be up to the City’s decision makers to make a final determination of General Plan consistency, but for purposes of this environmental review, the project is considered consistent with the allowable use and density for this General Plan designation.

General Plan Policies

All of the *Richmond General Plan 2030* policies were reviewed to identify those applicable to the proposed project and evaluate the project’s consistency with those policies. First, the project would further the goals expressed in Land Use and Urban Design Goal LU1, which calls for improvement of the urban fabric by crafting development strategies that emphasize high-density, mixed-use

infill development and a safe, vibrant, economically-sustainable environment that takes advantage of existing infrastructure and public facilities. The proposed project would essentially be an infill development that would expand the existing social services infrastructure provided on the BARM campus. The attractively designed and landscaped building would provide a vibrant addition to the neighborhood. This would also further Goal LU2, which calls for creating healthy and viable neighborhoods that provide safe places for people of all ages, ethnicities and abilities to live, work and play. Goal LU2 encourages development of neighborhood nodes that increase convenient access to local services and amenities, which the project would do by providing direct, convenient access to BARM's campus facilities and programs. The project would be consistent with several of the policies supporting these goals.

For example, the project would support Land Use and Urban Design Policy LU1.1, intended to provide higher-density and infill mixed-used development affordable to all incomes on vacant and underutilized parcels throughout the City. The project would redevelop an essentially vacant and underutilized parcel and an adjacent parcel with a single-family home with higher density transitional housing. A similar policy in the Energy and Climate Change Element, Policy EC4.1, which pertains to particular areas of the City including the Macdonald Avenue commercial corridor, would also be advanced by the project.

The project would also further the City's objectives expressed in Land Use and Urban Design Policy LU1.3, which reads in part: "Maintain high-quality facilities and infrastructure to serve diverse community needs. Upgrade, maintain and expand infrastructure to meet current and future needs and provide an effective and consistent level of services and utilities in all neighborhoods." The project would be consistent with Policy LU6.1, which promotes walkability and public transit by encouraging mixed-use, higher-density development close to community amenities.

The project would especially be consistent with various policies promulgated in the Education and Human Services Element of the General Plan. BARM would coordinate with the West Contra Costa Unified School District (WCCUSD) in enrolling school-age children of the Bridge of Hope clients, which would support Policy EH1.1, calling for supporting the WCCUSD in providing high-quality K-12 learning for children and youth. The project would provide child care, supporting Policy EH1.3, which reads: "Collaborate with service providers to create place for high-quality and affordable pre-school and childcare centers, especially for you children up to five years of age." Other Education and Human Services Element policies that would be furthered by project implementation include Policy EH2.1, Job Skills Training; Policy EH2.2, Mentorship and Apprenticeship; Policy EH2.3, Concurrent Enrollment; Policy EH3.1, Child and Family Services; Policy EH3.2, Youth and Teenage Services; and Policy EH3.5, Equitable and Affordable Access.

The project could be considered consistent with Housing Element Goal H-1, which promotes a balanced supply of housing types, densities, and prices to meet the needs of all income groups. It would also support Housing Element Goal H-2, Better Neighborhoods and Quality of Life; Goal H-3, Expanded Housing Opportunities for Special Needs Groups; and Goal H-4, Equal Housing Access for All. It would be especially supportive of Policy H-3.6, which states: "Actively seek to expand emergency, transitional, and supportive housing to address homelessness in Richmond." Policies in the Community Health and Wellness Element that also pertain to the provision of housing to meet the needs of all income levels and a broad range of population groups (e.g., policies HW5.1, HW5.2, and HW5.5) would also be supported by the project.

All policies in the *Richmond General Plan 2030* were reviewed during the land use and planning analysis of the proposed project, and no policy conflicts were identified while, as discussed above, the project would help the City achieve the objectives set forth in numerous policies contained in a number of different General Plan elements. The project would be consistent with the General Plan.

Other Planning Documents

The project site is not located within the planning area of any of the City's specific plans or area plans. There is no potential for the project to conflict with the *City of Richmond Pedestrian Plan*. Although the *City of Richmond Bicycle Master Plan* designates 2nd Street as a proposed future Class III bike route, there is no potential for the proposed project to conflict with implementation of that bike route or otherwise conflict with the Bicycle Master Plan. No other local or regional planning documents were identified as being applicable to the proposed project.

Zoning Regulations

Two different sets of zoning regulations apply to the project site: the City's traditional zoning ordinance and a set of form-based codes that apply only to designated "livable corridors" comprised of several of the City's commercial corridors and surrounding areas. Each set of regulations is discussed below. The project is in compliance with the applicable development standards in the CM-1 zoning district as well as those in the T4N transect zone of the Form-Based Code (FBC). The FBC has not been formally adopted into the Zoning Ordinance; however, pursuant to Article 15.04.304 of the Zoning Ordinance, projects located within an IS zone shall apply for a CUP to elect conformance with the anticipated zoning changes. This project meets all zoning requirements and utilizes the parking standards outlined in the FBC.

Form-Based Code

The *Richmond Livable Corridors Form-Based Code* establishes standards for building types and forms, streets, and open space as well as more project-specific standards for landscaping, parking, and signage. These standards are intended to build and improve upon the City's character by ensuring that proposed development is compatible with both existing development and future development on neighboring properties. The goal is to produce an environment of desirable community character that is consistent with the General Plan.

Transect Zones: The Form-Based Code (FBC) is organized around walkable transect zones, defining allowed uses and setting standards for each zone. It is based on a spectrum of urban to rural landscapes ranging from natural or preserved open space lands to rural, sparsely settled lands to residential neighborhoods of varying density to a high-density urban core. Any new or changed structures or uses located within one of the City's defined transect zones is subject to the FBC regulations. In the case of conflicts between the FBC and other provisions of the Richmond Municipal Code, the more restrictive regulation applies.

T4N Transect Zone: The regulating plan for the form-based code shows the project site to be in a T4 Neighborhood (T4N) transect zone, one of eleven transect zones defined in the FBC. This replaces the Single-Family Low Density Residential (RL2) zoning district that previously applied to the site. The intent of the T4N transect zone is to provide a walkable, predominantly single-family neighborhood that integrates appropriate medium-density building types, such as duplexes, mansion apartments, and bungalow courts within walking distance to transit and commercial areas.

Allowed Uses in the T4N Zone: Table 15.05.040.A of the FBC lists land uses that are permitted or that are allowed by a Minor Use Permit or a Conditional Use Permit. Among the principal permitted uses in the T4N zone are urban agriculture, schools, single- and multi-family residential homes, single-room occupancy (SRO) hotels, small family day care homes, home occupations (with limitations), small in-home residential care facilities, and bed and breakfast lodging. Homeless shelters and transitional housing for ten or fewer persons are also a principal permitted use in the T4N zone, while those with more than ten residents require a Conditional Use Permit (CUP). Institutional residential homes with no more than eight residents are also allowed, subject to a CUP.

The project would not conflict with any plans or policies that were adopted for purposes of avoiding or reducing an environmental impact.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>c) Conflict with any applicable habitat conservation plan or natural community conservation plan?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There is no adopted habitat conservation plan (HCP) applicable to the City of Richmond.

XI. MINERAL RESOURCES — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: No regionally significant mineral deposits have been mapped on or in the vicinity of the project site. The site is within a large area classified as Mineral Resource Zone MRZ-1 by the California Department of Conservation’s Division of Mines and Geology (DMG).⁵³ The MRZ-1 designation is assigned to areas where sufficient data exists for a determination that no significant mineral deposits exist, or where it is judged that there is little likelihood for their presence. Furthermore, the site is in a fully developed, urbanized area where mineral extraction would not

⁵³ California Department of Conservation, Division of Mines and Geology, Generalized Mineral Land Classification Map of the South San Francisco Bay Production-Consumption Region (Plate 1 of 29), 1996.

be practical. Therefore, the project would not have an effect on the availability of mineral resources.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The Richmond General Plan does not identify any local mineral resources in the project vicinity, and the Richmond General Plan EIR reports that the City’s significant sectors of sandstone and shale aggregates are located in the San Pablo-Potrero Hills Ridge Area, well away from the project site. The map of geology and mineral resource sectors presented in the General Plan EIR indicates that the project site is underlain by Alluvium, and the EIR reports that the alluvial soils run deep. In any event, the project site and vicinity has been developed with residential and commercial uses for many decades, and mineral extraction, were such resources to be present, would not be practical. The Conservation, Natural Resources, and Open Space Element of the General Plan calls for the preservation of mineral resources in undeveloped areas that have been designated by DMG as having Statewide or regional significance for possible future extraction (Policy CN2.8). As discussed in Section XI-, above, this condition does not apply to the project site. Therefore, there is no potential for the project to have an adverse effect on the availability of significant mineral resources.

XII. NOISE — *Would the project result in:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| <i>a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation:

Introduction to Noise Descriptors

Noise is defined as unwanted sound. Airborne sound is a rapid fluctuation of air pressure above and below atmospheric pressure. Sound levels are usually measured and expressed in decibels (dB) with 0 dB corresponding roughly to the threshold of hearing.

Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. The method commonly used to quantify environmental sounds consists of evaluating all of the frequencies of a sound in accordance with a weighting that reflects the facts that human hearing is less sensitive at low frequencies and extreme high frequencies than in the mid-range frequency. This is called "A" weighting, and the decibel level so measured is called the A-weighted sound level (dBA). In practice, the level of a sound source is conveniently measured using a sound level meter that includes an electrical filter corresponding to the A-weighting curve. Typical A-weighted levels measured in the environment and in industry are shown in Table N-1 for different types of noise.

Although the A-weighted noise level may adequately indicate the level of environmental noise at any instant in time, community noise levels vary continuously. Most environmental noise includes a conglomeration of noise from distant sources that create a relatively steady background noise in which no particular source is identifiable. To describe the time-varying character of environmental noise, the statistical noise descriptors, L_{01} , L_{10} , L_{50} , and L_{90} , are commonly used. They are the A-weighted noise levels equaled or exceeded during 1 percent, 10 percent, 50 percent, and 90 percent of a stated time period. A single number descriptor called the L_{eq} is also widely used. The L_{eq} is the average A-weighted noise level during a stated period of time.

In determining the daily level of environmental noise, it is important to account for the difference in response of people to daytime and nighttime noises. During the nighttime, exterior background noises are generally lower than the daytime levels. However, most household noise also decreases at night and exterior noise becomes very noticeable. Further, most people sleep at night and are very sensitive to noise intrusion. To account for human sensitivity to nighttime noise levels, a descriptor, DNL (day/night average sound level), was developed. The DNL divides the 24-hour day into the daytime of 7:00 AM to 10:00 PM and the nighttime of 10:00 PM to 7:00 AM. The nighttime noise level is weighted 10 dB higher than the daytime noise level.

The Community Noise Equivalent Level (CNEL) is another 24-hour average which includes both an evening and nighttime weighting, adding 5 decibels to the average noise levels during the evening and 10 decibels to the average noise levels during the nighttime period. CNEL and DNL descriptors are similar and are often used interchangeably. Noise standards established in the Richmond General Plan are expressed using the CNEL descriptor. For obvious reasons, the DNL and CNEL descriptors are only relevant in cases where residential or other noise-sensitive land uses are nearby.

Noise levels that are generally considered acceptable or unacceptable can characterize various environments. Lower levels are expected in rural or suburban areas than would be expected in commercial or industrial zones. Nighttime ambient levels in urban environments are about 7 decibels lower than the corresponding average daytime levels. The day-to-night noise level difference in rural areas away from roads and other human activity can be considerably less. Noise levels above 45 dBA at night can result in the onset of sleep interference.⁵⁴ At 70 dBA, sleep interference becomes considerable.

⁵⁴ U.S. Environmental Protection Agency, *Community Noise*, 1971.

Table N-1
Typical Noise Levels

| Noise Level (dBA) | Outdoor Activity | Indoor Activity |
|-------------------|--|--|
| 90+ | Gas lawn mower at 3 feet, jet flyover at 1,000 feet | Rock Band |
| 80-90 | Diesel truck at 50 feet | Loud television at 3 feet |
| 70-80 | Gas lawn mower at 100 feet, noisy urban area | Garbage disposal at 3 feet, vacuum cleaner at 10 feet |
| 60-70 | Commercial area | Normal speech at 3 feet |
| 40-60 | Quiet urban daytime traffic at 300 feet | Large business office, dishwasher next room |
| 20-40 | Quiet rural, suburban nighttime | Concert hall (background), library, bedroom at night |
| 10-20 | | Broadcast/recording studio |
| 0 | Lowest threshold of human hearing | Lowest threshold of human hearing |

Source: (modified from Caltrans Technical Noise Supplement, 2011)

Regulatory Framework

In most urban areas, automobile and truck traffic are the primary source of environmental noise. Traffic activity generally produces an average sound level that remains fairly constant over time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, State, and local agencies regulate different aspects of environmental noise. Federal and State agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

Local regulation of noise involves implementation of general plan policies and noise ordinance standards. Local general plans identify general principles intended to guide and influence development plans, and noise ordinances set forth the specific standards and procedures for addressing particular noise sources and activities. General plans recognize that different types of land uses have different sensitivities toward their noise environment. Residential areas are generally considered to be the most sensitive type of land use to noise, while industrial/commercial areas are generally considered to be the least sensitive. Hotels are less sensitive than residential areas, but more sensitive to noise than most industrial/commercial uses. Local noise ordinances typically set forth standards related to construction activities, nuisance-type noise sources, and industrial property-line noise levels. The proposed project is similar to multi-family residential development, and is assumed to have similar noise sensitivity.

City of Richmond Municipal Code

Section 15.04.840.010 of the Richmond Municipal Code (and Chapter 9.52, the Community Noise Ordinance) establishes exterior noise limits that are not to be exceeded more than 30 minutes in any hour, as measured at the property line. In the case of residential zoning districts (the project is in an RL2, Single Family Low Density Residential district), the standards establish a maximum noise level of 60 dBA as measured at the property line or district boundary. This limit is reduced to 50 dBA between the hours of 10:00 p.m. and 7:00 a.m.

Richmond Municipal Code Chapter 9.52, the Community Noise Ordinance generally regulates noise as follows:

It shall be unlawful for any person, corporation, firm or association to make, create or continue, or cause, permit, maintain, or suffer to be made or continued, any loud, raucous, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area or that exceeds the maximum dBA levels set forth herein or that violates any provision of this chapter. The standard for determining whether a violation of the provisions of this chapter exists may include, but is not limited to, the following:

- (a) The volume, level and intensity of the noise;
- (b) Whether the nature of the noise is usual or unusual;
- (c) Whether the origin of the noise is natural or unnatural;
- (d) The level and intensity of the background noise, if any;
- (e) The proximity of the noise to residential dwellings;
- (f) The proximity of the noise to residential sleeping facilities;
- (g) The nature and zoning of the area within which the noise emanates;
- (h) The density of the inhabitation of the area within which the noise emanates;
- (i) The time of day or night the noise occurs;
- (j) The duration of the noise;
- (k) Whether the noise is recurrent, intermittent, a cumulative period, or constant;
- (l) Whether the noise is produced by a commercial or non-commercial activity; and
- (m) Whether the noise can be heard more than twenty-five (25) feet away from any adjoining property boundary line in a residential district;
- (n) The intrusiveness of the noise;
- (o) Whether it is a mobile noise source;
- (p) The number of persons affected by the noise; or
- (q) Whether noise exceeds the maximum dBA levels set forth in 9.52.100 or 9.52.110.

Similar to the standards set forth in Section 15.04.840.010, the alternative standards referenced in Section 9.52.100 establish maximum noise levels that should not be exceeded more than 30 minutes in any hour as measured at a property line or zoning district boundary, but they are not the same as the standards in Section 15.04.840.010. For single-family and multi-family residential

districts, the limits are 55 dBA. In addition, a noise level of 50 dBA must not be exceeded more than 5 minutes in any hour at any boundary of a residential zone between the hours of 10:00 p.m. and 7:00 a.m., though these restricted hours may be modified by a Conditional Use Permit. These alternative noise standards may be applied by the enforcing police officer responding to a noise complaint, who has the discretion to apply either the Section 15.04.840.010 standards or the alternative Section 9.52.100 standards.

Construction and demolition noise are regulated separately by Municipal Code Section 9.52.110, which states that, where technically and economically feasible, temporary construction activity shall be conducted in such a manner that the maximum sound levels at affected properties shall not exceed the dBA levels shown in Table N-2.

Table N-2
City of Richmond Construction Noise Limits

| Time Period | Single-Family Residential Zoning Districts | Multi-Family Residential Zoning Districts | Commercial and Industrial Zoning Districts |
|---|---|--|---|
| Maximum Sound Levels for Mobile Construction Equipment (intermittent, short-term operation of less than 15 days) | | | |
| Weekdays 7:00 a.m. to 7:00 p.m. | 75 dBA | 80 dBA | 85 dBA |
| Weekends & Holidays 9:00 a.m. to 8:00 p.m. | 60 dBA | 65 dBA | 70 dBA |
| Maximum Sound Levels for Stationary Construction Equipment | | | |
| Weekdays 7:00 a.m. to 7:00 p.m. | 60 dBA | 65 dBA | 70 dBA |
| Weekends & Holidays 9:00 a.m. to 8:00 p.m. | 55 dBA | 60 dBA | 65 dBA |

Source: City of Richmond, Municipal Code, Section 9.52.110.

Additional City of Richmond construction noise standards are set forth in Section 15.04.840.110 of the Zoning Ordinance, which requires adherence to the following Construction Operation Standards:

During the construction of a project, all portions of the site shall be watered as necessary to reduce emissions of dust and other particulate matter and all stockpiles shall be covered. Streets shall be made dirt free at the completion of construction. All construction and transport equipment shall be muffled in accordance with State and Federal laws. Construction and transport equipment shall be operated so as to minimize exhaust emissions. Grading and pile driving operations within ¼ mile of residential units shall be limited to between 7 a.m. and 7 p.m., or as otherwise restricted as part of an approval. All

water run-off from construction site shall be controlled. During construction trucks and equipment should be running only when necessary.⁵⁵

Richmond General Plan

The Public Safety and Noise Element of the Richmond General Plan incorporates the community noise exposure guidelines recommended by the Governor's Office of Planning and Research. For single-family residential land uses, CNEL noise levels up to 65 dB are considered Normally Acceptable, while noise exposure up to 75 dB is Conditionally Acceptable, subject to an assessment of appropriate noise-insulation features. For multi-family residential uses the Normally Acceptable limit is 70 dBA and the Conditionally Acceptable limit is 75 dBA.

Existing Conditions

The primary existing noise source in the project area is traffic on the arterial roadway located 125 feet to the north of the site, i.e., Macdonald Avenue. Overflights from aircraft flying into and out of Oakland International Airport and San Francisco International Airport are periodic sources of noise, but the City of Richmond is not within the mapped 65-dBA CNEL noise impact areas of either airport.

The nearest location for which recent noise measurement data was available was a short-term (15-minute) mid-day measurement taken by PBS&J in 2006 on Macdonald Avenue at 29th Street. Based on 2007 traffic volume counts, this stretch of Macdonald Avenue has more than double the daily traffic volume along Macdonald Avenue in the vicinity of the project site (12,600 vehicles per day versus 5,700 vehicles per day).⁵⁶ Since a doubling of traffic is required to cause a perceptible 3-dBA increase in ambient sound level, it can be presumed that the reported noise level at Macdonald Avenue and 29th Street is approximately 3 dBA louder than the sound level at Macdonald Avenue near the project site. The former was reported as 64.5 dBA L_{eq} , so the sound level on Macdonald Avenue at 3rd Street is presumed to be 61.5 dBA L_{eq} .⁵⁷ This is reinforced by a noise contour map presented in the General Plan EIR, which shows Macdonald Avenue west of Harbour Way to be within a 60-dBA CNEL noise contour.⁵⁸ The sound level along 3rd Street is lower, due to substantially lower traffic volumes as well as slower traffic speeds. In addition, due to the residential nature of this side street, it is expected that truck traffic, which inherently generates more noise than passenger cars, is a small fraction of the traffic traveling on 3rd Street. Traffic volumes along 3rd Street are certainly less than half of what they are Macdonald Avenue near 3rd Street, so existing sound levels can be presumed to be 58.5 dBA or lower.

Nearby existing noise-sensitive land uses in the project area are single-family residences along 3rd Street, as well as multi-family and senior housing located on Macdonald Avenue to the west and east, respectively, of the project site. There are also noise-sensitive residential uses currently present on the project site itself, and approval of the proposed project would increase the number of these sensitive receptors on the site.

⁵⁵ City of Richmond, Zoning Ordinance, Section 15.04.840.110.

⁵⁶ City of Richmond, *Richmond General Plan 2030 Draft Environmental Impact Report*, Table 3.14-4: Existing Traffic Counts, Capacities, and Levels of Service, page 3.14-11, February 2011.

⁵⁷ City of Richmond, *Richmond General Plan 2030 Draft Environmental Impact Report*, Table 3.10-3: Summary of Noise Monitoring Data at Representative Locations, page 3.10-6, February 2011.

⁵⁸ City of Richmond, *Richmond General Plan 2030 Draft Environmental Impact Report*, Figure 3.10-2: Existing Noise Contours Within the City of Richmond, page 3.10-10, February 2011.

Impact of Project-Related-Traffic Noise on Existing Sensitive Receptors

As noted above, a doubling of traffic is generally required to cause a perceptible 3-dBA increase in ambient sound level where vehicle traffic is the primary noise source. The proposed project would generate a very low volume of traffic, as discussed in more detail in Section XVI, Transportation/Traffic; it would be a very small fraction of existing traffic volumes on Macdonald Avenue. Therefore, there is no potential for the project to cause a perceptible increase in the existing ambient noise in the vicinity of the project site. Other sources of noise from the project would be temporary noises that are commonly accepted aspects of an urban environment. Such noises could include operation of a lawn mower and other landscaping equipment, trash collection, and voices of residents. The Richmond Noise Ordinance specifically exempts trash collection activity from the noise limits promulgated in the Noise Ordinance. Based on the above considerations, any minor incremental increase in noise that would be caused by proposed project operations would not exceed applicable noise standards, and would be a ***less-than-significant impact***. Noise from project construction is addressed separately in Section XII(d), below.

Impact of Existing Noise Levels on Proposed Residences

As discussed above, the presumed sound level at the site is 58.5 dBA L_{eq} or lower. This is approximately equivalent to a CNEL noise level of 58.5 dBA.⁵⁹ The existing noise level at the site is therefore within the 65-dBA CNEL acceptable noise level for single-family residential land use set forth in the General Plan, as well as the 60-dBA 30-minute noise limit established for this use in Section 15.04.840.010 of the Richmond Municipal Code. This noise level would be appropriate for the proposed Bridge of Hope homeless shelter.

Although project residents could be exposed to noise levels above the 55-dBA standard established in the alternative standards referenced in Section 9.52.100 of the Municipal Code, due to the existing sound level at the site of 58.5 dBA L_{eq} or lower, this is an existing condition that the proposed project would not exacerbate. Furthermore, interior noise levels would be at least 25 dBA lower with windows closed and at least 15 dBA lower with windows open, well under the 45-dBA standard for the interior of habitable spaces with closed windows established in Title 24, Part 2 of the California Code of Regulations. Finally, the 55-dBA standard is an alternative standard that can be applied when determining a noise violation, but is not the primary standard applicable to the project. Therefore, the proposed project would have a ***less-than-significant impact*** related to exposure of people to noise levels in excess of applicable local, State, or federal standards.

⁵⁹ U.S. Department of Transportation, Federal Aviation Administration, Fundamentals of Noise and Sound, accessed January 12, 2019 at: https://www.faa.gov/regulations_policies/policy_guidance/noise/basics/.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There are no significant sources of groundborne noise or vibration in the vicinity of the project site, such as railroad or subway operations. Blasting or pile driving, which have the potential for creating vibration during project construction, are not expected to be required for the project.⁶⁰ Project operations would just entail activities typically associated with residential uses, and would not include activities or equipment that could cause excessive vibration on or off site.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The noise that would be generated by onsite operations is discussed in Section XII(a), above. The noise that would be generated by the project would have no discernable effect on the ambient noise levels in the project vicinity.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Construction of the project is expected to create high noise levels for a temporary, short-term period. As previously noted, the City of Richmond regulates temporary construction noise through its Community Noise Ordinance promulgated in Chapter 9.52 of the Municipal Code. Section 9.52.110 states that, where technically and economically feasible, temporary construction noise within single-family residential zoning districts should be limited to 75 dBA weekdays between the hours of 7:00 a.m. to 7:00 p.m. On weekends and legal holidays between 9:00 a.m. to 8:00 p.m. the noise limit is 60 dBA.

⁶⁰ Jamie Ung Almeida, Job Captain, Dahlin Group, personal communication, January 14, 2019.

Site grading would be expected to be the noisiest phase of project construction. Based on typical construction equipment sound levels, site grading would be expected to generate noise levels of about 87 to 88 dBA at 50 feet from the equipment. Construction of the proposed building would generate noise levels of about 81 to 88 dBA at a distance of 50 feet from the source. With the nearest residence located immediately adjacent to the project site, occupants of this residence could therefore experience elevated exterior noise levels of up to 88 dBA. Interior noise levels could be around 63 dBA with windows closed, which the residents could find annoying.

While the expected construction noise levels would be excessive, they would be temporary, and are typical of all construction projects. Most California jurisdictions generally exempt construction noise from their adopted interior and exterior noise standards, and rely on restrictions on construction hours to mitigate construction noise impacts. The City of Richmond takes a more stringent approach, setting the daytime construction noise limits cited above. Although project construction hours are expected to comply with the allowable hours defined by the Noise Ordinance, building demolition, site grading, and early stages of building construction would all likely exceed construction noise limits at the nearest offsite residential receptors. Construction noise would therefore be a *potentially significant impact*. Implementation of Mitigation Measures N-1 through N-3 would ensure that short-term construction impacts associated with the proposed project would be mitigated to a less-than-significant level.

It is possible that construction of the project would exceed the noise limits codified in the City's Community Noise Ordinance. While project construction hours are expected to comply with the allowable hours defined by the Noise Ordinance, because site grading activities would occur up to the boundaries of the site, the 85-dBA limit could potentially be exceeded at the property line. While project construction hours are expected to comply with the allowable hours defined by the Noise Ordinance, it would conflict with the noise limit provisions of the ordinance. However, the noise levels would be expected to exceed 85 dBA at the property line only for brief periods, and generally only by 1 or 2 decibels. Because there are no sensitive receptors with the potential to be disturbed in the project vicinity, noise generated during project construction would be considered a *less-than-significant impact*.

Mitigation Measure N-1: Noise-generating construction activities shall be limited to the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 8:00 p.m. on weekends and public holidays. No grading or other noisy construction activities shall be performed weekends or public holidays.

Mitigation Measure N-2: The project sponsor shall require the construction contractor to equip all construction equipment driven by internal combustion engines with intake and exhaust mufflers which are in good condition, appropriate for the equipment, and no less effective than those originally installed by the manufacturer. Construction contracts shall also require construction contractors to comply with all relevant provisions of applicable local noise policies and ordinances.

Mitigation Measure N-3: The project applicant shall prepare and implement a construction-related noise mitigation plan, subject to approval by the City of Richmond Planning Division. The plan shall designate construction staging areas that are located the maximum feasible distance from

residential receptors, and shall identify other feasible and appropriate measures to minimize construction noise impacts on adjacent noise-sensitive land uses.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>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 expose people residing or working in the project area to excessive noise levels?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project site is not located within the area governed by an airport and use plan or within 2 miles of an airport.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There are no private airstrips in the vicinity of the project.

XIII. POPULATION AND HOUSING — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| <i>a) Induce substantial 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)?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The proposed project would directly generate population growth through the provision of a homeless shelter for women and children. However, the proposed facilities would

provide temporary housing, and would therefore have a different effect on population growth than typical residential development. The project would provide transitional housing for up to 114 women and children at any one time and would have 10 employees. A substantial portion of the clients and some number of employees would be existing Richmond residents. While this number can't be determined definitively, for purposes of this analysis, a population increase of 90 persons is conservatively assumed for the City of Richmond.

According to the California Department of Finance, the population of Richmond in January 2018 was 110,967 people.⁶¹ The Association of Bay Area Governments (ABAG) projects the City's population to be about 115,600 by 2020, when the proposed project is assumed to become operational.⁶² Based on the estimate of 90 new residents resulting from implementation of the proposed project, the project would increase Richmond's current population by about 0.08 percent. However, the actual population growth would likely be less than 90 people, as noted above. The General Plan EIR concluded that implementation of the General Plan would result in annual growth in the City's population of 1,206 residents. If the proposed project in fact increased the City's population by 90 persons, this would be about 7.4 percent of the expected annual population growth.

The small incremental increase in population caused by the project would not be a substantial change in population. The project would not result in the extension of roads or other infrastructure, would not result in the development of vacant land,⁶³ and would not entail or require the construction of new homes, other than the transitional housing shelter itself. Any new residents among the 10 project employees would be expected to find housing opportunities within the City's existing housing stock. For these reasons, the project's incremental effect on population growth would be a *less-than-significant impact*.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| b) <i>Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There is an existing single-family residence on the project site that is already owned by the Bay Area Rescue Mission. The house is currently occupied by three graduates from BARM who are participating in BARM's aftercare program. Prior to project construction, these residents would be relocated into one of the neighboring facilities on the adjacent BARM campus or into permanent housing.⁶⁴ The relocation of these few residents would not necessitate the construction of replacement housing elsewhere; the project would have no effect on housing.

⁶¹ California Department of Finance, Demographic Research Unit, Table E-1: City/County Population Estimates with Annual Percent Change, May 1, 2018.

⁶² City of Richmond, Richmond General Plan Update Draft Environmental Impact Report, page 3.2-3, February 2011.

⁶³ Although the northern project parcel does not have significant development on it, other than a storage shed, it is actively used by BARM residents and employees and is not considered vacant.

⁶⁴ Sherwin Harris, Director, Bridge of Hope, Bay Area Rescue Mission, personal communication, January 24, 2019.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| c) <i>Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: See Section XIII-a, above.

XIV. PUBLIC SERVICES - *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 following public services:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|----------------------------|--------------------------------|--|-------------------------------------|--------------------------|
| a) <i>Fire protection?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Fire response to the project site would be provided by the Richmond Fire Department (RFD), which operates seven stations located throughout the City of Richmond’s geographical area of 56 square miles. The nearest fire stations to the project site are Station No. 62, located at 1065 7th Street, approximately 0.8 mile to the north, and Station No. 67, located at 1131 Cutting Boulevard, approximately 0.8 mile to the southeast. Due to the proximity to these stations, response time to the site in the event of an emergency would be under 5 minutes, within the Department’s response time goal established in the General Plan of responding to 85 percent of emergency calls within 6 minutes or less.

The proposed project would not cause a substantial increase in demand for fire protection services. The project would replace an existing single-family home, currently occupied by BARM program graduates, with a two-story, 9,553-square-foot building that would be constructed using modern methods and materials. The building design and construction would be required to comply with all applicable fire codes, subject to verification by the Richmond Building Division. The project would not be at undue risk for fire. In the unlikely event a fire was to occur at the site, it would be a one-time event that could be responded to by the RFD without the need for constructing new or expanded fire-fighting facilities. Therefore, the project’s potential impact on fire protection services would be *less than significant*.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|------------------------------|--------------------------------|--|-------------------------------------|--------------------------|
| b) <i>Police protection?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Police protection would be provided to the project by the Richmond Police Department (RPD), which operates out of a central station at 1701 Regatta Boulevard and has a force of 170 sworn officers.⁶⁵ The RPD currently has a staffing ratio of 1.7 sworn officers per 1,000 residents. The RPD has an average response time of roughly 2 to 3 minutes for Priority 1 calls, such as shootings, robberies, burglaries, and assaults. In 2018, the Department responded to 91,982 calls for service; a breakdown by type of call was not available.⁶⁶

The City of Richmond is divided into nine police beats; the project site is located within Beat 6, the Central District. This beat is staffed at all times with one fully equipped officer per shift. The RPD’s response time to the site would be approximately 7 to 13 minutes, depending on the priority of the call.

The project site is located in a busy neighborhood, and implementation of the project could incrementally increase response times on calls for police protection services.⁶⁷ The General Plan EIR evaluated the impact on police services from implementation of the General Plan. General Plan policies require regular monitoring of response times and general level of service, with police staffing, facilities, and equipment to be augmented as necessary to maintain acceptable response times. The EIR concluded that the impact on police services from implementation of the General Plan would be less than significant. The proposed project would be consistent with the General Plan and, therefore, the project’s potential impact on police protection services would also be *less than significant*.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--------------------|--------------------------------|--|-------------------------------------|--------------------------|
| c) <i>Schools?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Public school services in the City of Richmond are provided by the West Contra Costa Unified School District (WCCUSD), which serves the cities of Richmond, El Cerrito, San Pablo, Pinole, and Hercules and the unincorporated areas of Bayview-Montalvin Manor, East Richmond Heights, El Sobrante, Kensington, North Richmond and Tara Hills. WCCUSD operates 38 elementary schools, five middle schools, eight high schools, two adult education schools, and

⁶⁵ Lieutenant Matt Stonebraker, Richmond Police Department, personal communication, February 20, 2019.

⁶⁶ *Ibid.*

⁶⁷ *Ibid.*

other education programs.⁶⁸ Within the City of Richmond, the WCCUSD operates 25 public schools and two adult schools.

Although the project would not create new permanent housing, it would create transitional housing for up to 22 mothers with children, and the Bay Area Rescue Mission would work with the West Contra Costa Unified School District (WCCUSD) to enroll school-age children residing at the Bridge of Hope. In addition, the project would have ten employees, some of whom could be new residents to the City who could also have school-age children.

A conservative estimate of the number of new school students that could be generated by the project was made by assuming full occupancy of the project by 22 mothers, each having three children, resulting in 66 students that would be distributed among elementary schools, middle schools, and high schools within the WCCUSD. It was also conservatively assumed that all project employees would be new residents with school-age children who would incrementally increase demand for school services in the City of Richmond. Because new families could be located anywhere in Richmond, it is unknown what schools might be affected. This discussion therefore focuses on the project’s potential impacts on the school district overall.

The number of new students that could be generated by project employees was estimated using student generation rates provided by the WCCUSD. The WCCUSD currently utilizes the following student generation rates for new single-family residential development to determine the impact of new development on schools:⁶⁹

| <u>Grade Level</u> | <u>Single-Family Generation Rate</u> | <u>Multi-Family Generation Rate</u> |
|--------------------|--------------------------------------|-------------------------------------|
| K–6 | 0.231 | 0.269 |
| 7–8 | 0.024 | 0.010 |
| 9–12 | 0.082 | 0.154 |
| Total | 0.337 | 0.433 |

Assuming the higher of these rates, employees of the proposed project could generate three elementary school students, less than one middle school student, and less than one high school student. The distribution reflected in the multi-family generation rate was applied to the theoretical 66 student living in the transitional housing facilities, resulting in approximately 41 K-6 students, 1 middle school student, and 24 high school students. Rounding up, the students generated by project clients and employees could total up to 44 K-6 students, 2 middle school students, and 25 high school students, though the actual number would undoubtedly be smaller.

Since new households that could be created as a result of the jobs created by the proposed project would likely live in various parts of the City, it is likely that the maximum of 71 new students that could be generated by these new households would be distributed among different schools, thereby minimizing the impact on any one school. District-wide enrollments have been declining in recent years, and further significant declines are projected through at least the 2025-2026 school year.

⁶⁸ West Contra Costa Unified School District, Schools Directory, accessed April 9, 2018 at: <https://www.wccusd.net/domain/96>

⁶⁹ Jack Schreder & Associates for West Contra Costa Unified School District, *School Facility Needs Analysis for West Contra Costa Unified School District*, Table 1: Student Generation Factors, December 17, 2018.

The WCCUSD’s most likely projections show District-wide enrollment declining from 28,273 students in the 2015-2016 school year to 24,893 students in the 2025-2026 school year.⁷⁰ A drop of nearly 600 students is projected between the 2017-2018 school year and the 2018-2019 school year. Furthermore, the WCCUSD’s Long-Range Facilities Master Plan indicates that its elementary schools are projected to be only 79 percent utilized in the 2019/2020 school year.⁷¹ Projected utilization rates for middle schools and high schools for this school year are 72 percent and 74 percent, respectively. In these conditions, the addition of up to 71 new students to the District would not adversely affect school capacity and would not require the construction of new school facilities.

Furthermore, pursuant to Senate Bill 50, which became effective in 1998, payment of the School Facilities Mitigation Fee has been deemed by the State legislature to be full and complete mitigation for the impacts of a development project on the provision of adequate school facilities. The proposed project would be required to pay the applicable School Facilities Mitigation Fee, which is based on the number of new housing units developed and/or the square footage of new commercial development. The current fee for new commercial development, assumed to apply to the project, is \$0.61 per square foot.⁷² With payment of whatever applicable School Facilities Mitigation Fee is determined by the WCCUSD, the project would have a *less-than-significant impact* on schools.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-----------|--------------------------------|--|-------------------------------------|--------------------------|
| d) Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: As noted in Section XII-a, above, it has been conservatively assumed that the project could increase the population of Richmond by up to 90 people, though the actual number is likely to be much lower. Ninety new residents to a city with a population of approximately 111,000 people (an increase of 0.08 percent), not all of whom would patronize Richmond parks, would have a negligible effect on the demand for park services. There is no potential for the incremental increase in demand for park services due to project implementation to require the construction or expansion of park facilities, and therefore, there would be no adverse physical effects associated with such construction.

⁷⁰ Jack Schreder & Associates for West Contra Costa Unified School District, *Demographic Analysis & Facility Capacity Study*, Table 16: District-wide 10-Year Most Likely Enrollment Projection, September 4, 2015.

⁷¹ West Contra Costa Unified School District (WCCUSD), *Long Range Facilities Master Plan*, Section 4: Facility Utilization Report, July 2016.

⁷² Jack Schreder & Associates for West Contra Costa Unified School District, *School Facility Needs Analysis for West Contra Costa Unified School District*, Level I Fees, December 17, 2018.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|------------------------------------|--------------------------------|--|-------------------------------------|--------------------------|
| <i>e) Other public facilities?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: The small potential increase in the population of Richmond that could result from project implementation would have a negligible effect on the demand for other public facilities, such as libraries. There is no potential for this potential incremental increase in demand for libraries or other public facilities to require the construction of new facilities or expansion of existing facilities, and therefore, there would be no adverse physical effects associated with such construction.

XV. RECREATION —

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: As discussed in Section IX-d, above, the project would have a minor effect on the population of Richmond, and negligible effect on the demand for existing parks or other recreational facilities.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The proposed project does not include construction of any recreational facilities.

XVI. TRANSPORTATION/TRAFFIC — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| a) <i>Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Vehicular access to the project site would be from 3rd Street via Macdonald Avenue. Regional freeway access would be provided by Interstate 580 (I-580), which is located about one-half mile south of the site, and by the Richmond Parkway, which is located about one-third mile west of the site.

Based on 2007 traffic counts reported in the Richmond General Plan EIR, Macdonald Avenue between the Richmond Parkway and Harbour Way operates at Level of Service (LOS) A, which designates free-flowing traffic operations with minimal congestion. Weekday field observations conducted on November 14, 2018 as well as previous observations made on March 6, 2012 confirmed that traffic on Macdonald Avenue in the vicinity of the project continues to be extremely light, and nowhere near utilizing available roadway capacity.

The Institute of Transportation Engineers (ITE) does not publish traffic trip generation rates for homeless shelters or transitional housing. However, the City of San Diego prepared a *Trip Generation Manual* that includes a Homeless Shelter category, which provides a basis for the analysis presented in this section. San Diego’s *Trip Generation Manual* compiles the results of trip generation studies made by ITE, the City of San Diego, and the San Diego Association of Governments (SANDAG). It assigns a trip generation rate for homeless shelters of two daily trips per bed.⁷³

This is assumed to be a highly conservative estimate, because the majority of residents of the proposed project are not expected to own vehicles. This is confirmed by a parking demand study prepared for the project by Fehr & Peers. As part of the study, the transportation consultants surveyed 89 residents of the existing BARM facilities on Macdonald Avenue and determined that only four residents (4 percent) owned vehicles.⁷⁴ The project sponsor has also stated that most

⁷³ City of San Diego, San Diego Municipal Code, Land Development Code, *Trip Generation Manual*, Revised May 2003.

⁷⁴ Fehr & Peers, *Bay Area Rescue Mission Bridge of Hope Parking Demand Study*, January 24, 2019.

BARM clients do not own vehicles, and typically arrive at the campus by bus or by being transported by someone else.⁷⁵

Based on the trip generation rate for homeless shelters published in San Diego's *Trip Generation Manual*, the project's 114 beds would result in 228 daily vehicle trips, which clearly overstates the traffic that would be generated by the project, even recognizing that most or all of the ten employees could travel to and from work in private automobiles.

In order to provide a more realistic estimate of the project's expected daily vehicle trips, an adjustment was made. Of the total 114 beds proposed for the Bridge of Hope project, 88 of the beds would be provided in 4-bed family units reserved for women and their dependent children. Because each of these units would be reserved for a mother and her children, not all beds would be occupied in cases where a mother had one or two children. (The project sponsor estimates that there would typically be 85-percent occupancy in the project.) Since there would be just one adult resident (i.e., a potential driver) in each of the 22 family units, for purposes of determining trip generation, the 88 beds provided in the 22 family units are more realistically counted as 22 beds. Therefore, the count of adult-occupied beds would be a maximum of 48 beds. Applying the referenced trip generation rate to this number results in an estimated 96 daily vehicle trips that could be generated by the project. However, given the low percentage of vehicle ownership among BARM clients, this is still assumed to overestimate the number of trips that would actually be generated.

Traffic counts were collected on Macdonald Avenue during preparation of the General Plan EIR. The average daily traffic volume on Macdonald Avenue between the Richmond Parkway and Harbour Way was 5,700 vehicles. The highly conservative estimate of project-generated trips would be about 1.7 percent of this daily traffic. It would be spread out at different times over the day.

Most of the land uses reported in San Diego's *Trip Generation Manual* had between 7 and 15 percent of their daily vehicle trips occurring during the PM peak hour, the most traffic-congested time of day, with residential uses generating between 8 and 12 percent of total trips during this time period. Based on this guideline, it is assumed that 10 percent of the proposed project's trips would occur during the PM peak hour, or roughly 10 trips. This number of trips would not have the potential to cause the level of service on Macdonald Avenue to degrade below LOS A.

While the City of Richmond previously employed a Level of Service standard of LOS D for assessing potential traffic impacts to roadways and intersections, under which the proposed project would clearly have a less-than-significant impact on traffic, the *Richmond General Plan 2030* establishes a new place-based circulation classification system.

Integral to this classification system is the identification of priority, allowable and prohibited types of travel for each particular accessway type. Where a certain travel type is designated as a Priority, streets must accommodate this type. Where a travel type is designated as Allowable, that type should be considered if it can be accommodated. Incorporating an allowable travel type is not required, but should be evaluated based on the character and function of a particular street. Where a travel type is designated as Prohibited, it is not allowed on that particular street type.

⁷⁵ *Ibid.*

The proposed project would be located on a Residential street, but would be accessed via Macdonald Avenue, which is a Community Activity Street. However, with no on-site parking, project traffic on 3rd Street would be limited. The Circulation Element of the General Plan indicates that automobile travel is an Allowable mode on both Residential and Community Activity streets, indicating that the proposed use is an appropriate use for the site.

Given this consistency with the City’s place-based circulation classification system and the fact that the project would not cause a degradation in traffic conditions on Macdonald Avenue, the project would have a *less-than-significant impact* on traffic.

During project construction, traffic would be generated by construction workers traveling to and from the project site, as well as by deliveries of construction materials. The construction traffic would be temporary and would not appreciably affect traffic conditions on area roadways; it would be less than the traffic that would be generated by future project operations, evaluated above. Therefore, the impact of the project’s construction truck trips would be less than significant and no mitigation is required.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: A study of Congestion Management Program (CMP) roadways and freeway segments overseen by the Contra Costa County Transportation Authority (CCTA), the applicable congestion management agency, was not required for the project because it would generate fewer than 100 peak-hour trips, the CCTA threshold for CMP analysis. The project would not conflict with the Contra Costa County CMP.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The proposed project would have no effect on air traffic patterns.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: There would be no on-site parking and no vehicle circulation on the project site. Vehicle access to the site would be from 3rd Street, but the access would be just to the site frontage; there would be no vehicle travel on the site itself. The project would not alter 3rd Street or other streets in the vicinity. It would remove the existing private driveway on the southern project parcel, and would not create any new intersections or alter any existing intersections. No changes are proposed by the project with the potential to create or increase traffic safety hazards.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <i>e) Result in inadequate emergency access?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The project would have no effect on emergency access to the site, which would continue to be from 3rd Street via Macdonald Avenue. On-site circulation for fire trucks and other emergency vehicles is not an issue because there would be no vehicle travel on the site, which would be fully developed with the proposed building and surrounding landscaping. The proposed two-story building would not present constraints to the use of fire-fighting apparatus at the site. Furthermore, prior to project approval, the Richmond Fire Department will be required to sign off on the adequacy of the project plans as they pertain to site access and fire safety issues.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety to such facilities?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: AC Transit provides bus service to the project area, with three bus lines located within two short blocks of the project site. Line 72M travels the length of Macdonald Avenue, with a stops located at 1st and 4th Streets. Line 72M provides service from Point Richmond to and from downtown Oakland, stopping at the Richmond, El Cerrito del Norte, El Cerrito Plaza, 19th Street (Oakland), and 12th Street (Oakland) Bay Area Rapid Transit (BART) stations.

Line 376 travels between the El Cerrito del Norte BART station and the City of Pinole, stopping at the Richmond BART/Amtrak station and the Richmond Parkway Transit Center north of Hilltop Mall. In the project vicinity, Line 376 turns onto Macdonald Avenue at 6th Street, with a bus stop at 7th Street, then continues east on Macdonald to 22nd Street before jogging over to 23rd Street. Line 76 also turns onto Macdonald Avenue at 6th Street, stop at 7th Street, then continues east on Macdonald to Harbour Way, turns south on Harbour Way, then east on Cutting Boulevard. It provides service between the El Cerrito del Norte BART station and Hilltop Mall.

Project residents and employees would utilize these public transit facilities providing service to the immediate area and the larger East Bay. However, with BARM providing free shuttle service to and from the Alma Calton Educational Center at 2114 Macdonald Avenue (about 1 mile east of the project site), where most of the BARM programs that residents participate in would be located, the use of paid transit service by project residents would likely be quite limited. AC Transit would be able to accommodate any incremental increase in transit demand created by the project with existing capacity. The proposed project would not conflict with any policies or plans pertaining to public transit or other alternative modes of transportation.

XVII. TRIBAL CULTURAL RESOURCES — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>Cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code 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:</i> | | | | |
| <i>a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <i>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (s) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: As previously discussed in Section V-c, the project site is located about one-half mile from the historic shore margins of San Francisco Bay, an environment favored by Native American groups that were associated with the region. Due to this relative proximity and the Late Pleistocene alluvial fan deposits mapped within the project site, the NWIC concluded that there is a moderate potential for unrecorded Native American cultural resources to be present within the project site. To further explore this possibility, the City of Richmond reached out to Native American tribes affiliated with the project area to determine whether they had any knowledge of Native American cultural resources in the project area.

Pursuant to Assembly Bill (AB) 52, passed by the California Legislature in September 2014, the City sent a Tribal Consultation List Request to the Native American Heritage Commission (NAHC) on November 14, 2018 in order to identify Native American tribal groups who may be traditionally and culturally affiliated with the geographic area of the proposed project site. A response letter from the NAHC identified six tribal groups affiliated with the project area, including the following groups:

- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- North Valley Yokuts Tribe
- The Ohlone Indian Tribe
- Wilton Rancheria

The NAHC provided names and addresses of the chairperson or other representative of each of these groups. In accordance with AB 52, the City mailed letters to each of the representatives on December 11, 2018, offering them the opportunity to provide input regarding any concerns their tribes may have about the potential impacts implementation of the proposed project could have on tribal cultural resources. As of the time of publication of this Initial Study, the City had not received any responses from the tribal groups.

Potential impacts to historic resources were previously addressed in Section V-a. Regarding tribal cultural resources, due to the previously disturbed nature of the project site, the City believes there is limited potential for encountering such resources during project construction, and has not conducted subsurface testing of the site or further investigation by an archaeologist during the environmental review of the proposed project. However, the possible presence of buried prehistoric cultural materials at the project site, including tribal resources, cannot be ruled out, and any disturbance to such resources, were they to exist, could result in a **significant, adverse impact** on tribal cultural resources. Implementation of Mitigation Measures CR-1 and CR-2 (see Section V) would reduce this potential impact to a less-than-significant level.

XVIII. UTILITIES AND SERVICE SYSTEMS — *Would the project:*

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| a) <i>Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: Wastewater from the project would be treated at the Richmond Municipal Sewer District’s (RMSD) Wastewater Treatment Plant (WWTP) located at 601 Canal Boulevard, approximately 1.2 miles southwest of the project site. The RMSD provides wastewater collection service to approximately 68,000 Richmond residents. Veolia Water West Operating Services, Inc., an independent company, operates, maintains, and manages the WWTP as well as the wastewater and stormwater collections systems for a significant portion of the City of Richmond, including the project site. The wastewater treatment plant is permitted by the Regional Water Quality Control Board (RWQCB) and effluent from the plant is regularly monitored to ensure that water quality standards are not violated.

In May 2017 the RMSD adopted an updated *Sewer System Management Plan* (SSMP) to comply with RWQCB sanitary sewer overflow (SSO) reporting requirements and also to ensure the WWTP meets the General Waste Discharge Requirements (Statewide WDRs) established by the State Water Resources Control Board (SWRCB). The SSMP lays out a detailed operation, maintenance, and training program for complying with the Statewide WDRs. It also includes an Overflow Emergency Response Plan and plans for ensuring adequate collection and treatment capacity and for monitoring needs for system upgrades. Other goals of the SSMP are to minimize the frequency and severity of SSOs and to mitigate the impacts of SSOs.

Based on a search of violation reports over the past five years, the San Francisco Bay Regional Water Quality Control Board (RWQCB) shows one National Pollutant Discharge Elimination System (NPDES) violation for the WWTP in the past five years.⁷⁶ On March 31, 2016 a Category 1 violation was logged for an elevated biochemical oxygen demand (BOD). With a monthly average limit of 30 milligrams per liter (mg/L), a BOD value of 40.3 mg/L was logged at the effluent outfall, which extends about 4,700 feet offshore of Point Richmond. A corrective action of increased monitoring and consultation with experts was implemented to address this violation of effluent limitations for regulated pollutants. No other violations were reported over the past five years.

Wastewater generated from the project site would consist of typical sewage flows from residential and commercial development, i.e., wastewater from toilets, sinks, and showers. It would be discharged into the City's existing wastewater collection system below City streets and conveyed to the WWTP for treatment. There are no aspects to the project's anticipated wastewater flows with the potential to cause an exceedance of the wastewater treatment requirements of the RWQCB.

The WWTP plant operator is responsible for complying with the applicable wastewater treatment requirements. As indicated by the search results, the Richmond WWTP is generally in compliance with these requirements, as confirmed by the San Francisco Bay RWQCB. Therefore, there is no potential for the project to cause the WPCP to exceed wastewater treatment requirements.

⁷⁶ California Environmental Protection Agency, State Water Resources Control Board, California Integrated Water Quality System project (CIWQS), Violation Reports, accessed January 28, 2019 at: <https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/CiwqsReportServlet?inCommand=reset&reportName=PublicVioSummaryReport>.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|--------------------------|
| b) <i>Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation:

Wastewater Facilities

The WWTP discussed in the preceding section has a dry-weather treatment capacity of 24 million gallons per day (mgd) and wet-weather capacities for primary/secondary treatment and primary treatment of 24 mgd and 40 mgd, respectively.⁷⁷ Dry-weather influent flows average 7 mgd, well below capacity. However, wet-weather flows peak as high as 56 mgd, due to infiltration and inflow. To address this, modifications to the facilities were implemented in 1988 to provide primary treatment and disinfection for wet-weather flows in excess of the plant’s secondary treatment capacity. The plant can store up to 3.6 million gallons of primary treated effluent during peak flows. After peak flows subside, the stored wastewater is returned to the headworks for full secondary treatment.

The *Richmond General Plan 2030 Draft Environmental Impact Report* (EIR) estimated future wastewater treatment demand in the City based on future water demand projected by the East Bay Municipal Utility District (EBMUD), the City’s water supplier. Wastewater generation is typically 70 to 90 percent of water consumption, with the variance being largely attributable to landscape application. The EIR conservatively assumed that wastewater generation would be 90 percent of the City’s water consumption. The EIR concluded that development allowed under the General Plan would create additional demand for wastewater treatment that could exceed the capacity of the existing treatment facilities. Because new development is required to pay sewer service fees that would be used to fund any required improvements to wastewater treatment facilities, the EIR concluded that impact on treatment capacity (Impact 3.13-4) would be less than significant. This conclusion was also based on the fact that any request for service resulting from new development would be subject to a site-specific evaluation of the existing wastewater system’s capacity to service the development. If improvements to the existing wastewater system are required or additional facilities are needed, the property developer would be required to pay its fair share of the cost of the needed improvements.

The General Plan EIR also concluded in Impact 3.13-3 that uncertain future construction or expansion of wastewater treatment facilities or collection systems could cause significant environmental impacts that, absent project-specific mitigation measures, could result in a significant and unavoidable impact. The City adopted Mitigation Measure 3.13-3 to reduce the magnitude of the impact; this measure requires future projects to incorporate project-specific

⁷⁷ City of Richmond, *Richmond General Plan 2030 Draft Environmental Impact Report*, Section 3.13, Public Utilities, February 2011.

mitigation measures to reduce impacts from the construction of new wastewater collection and treatment facilities.

Because the proposed project would be consistent with the Richmond General Plan, and the impact of General Plan development on wastewater treatment and collection facilities was previously addressed, the proposed project would not cause a new impact. However, Mitigation Measure 3.13-3 would continue to apply. Therefore, in order to incorporate this mitigation requirement into the proposed project, the project is considered to have a *potentially significant impact* on wastewater treatment and collection capacity. Implementation of the following mitigation measure would reduce the impact to a less-than-significant level:

Mitigation Measure US-1: In consultation with the City of Richmond Department of Public Works, the project engineer shall verify that existing wastewater treatment and collection facilities are available to accommodate the wastewater that would be generated by the proposed project. If existing capacity is not adequate, the applicant shall pay a fair share of the cost of needed improvements. If on-site or immediately downstream improvements are necessary, the City shall identify any additional project-specific mitigation measures necessary to reduce impacts from the construction of new wastewater collection and treatment facilities to a less-than-significant level, and the measures shall be implemented by the project applicant prior construction of the proposed project.

Water Facilities

Water service is currently provided to the project site by the East Bay Municipal Utility District (EBMUD), which serves approximately 1.4 million people in Contra Costa and Alameda counties, encompassing a service area of 332 square miles. The District operates six water treatment plants within its service area. The project area is served primarily by the Orinda Water Treatment Plant (WTP), the District's largest treatment plant with a capacity of 200 mgd. As needed, the area is also served by the Sobrante WTP, a seasonal plant. Systemwide, the EBMUD has water treatment capacity of 375 mgd.⁷⁸

The Orinda WTP provides flocculation, filtration, chloramine disinfection, fluoridation, and corrosion control. EBMUD regularly tests for more than 100 contaminants, and in 2017 met or surpassed every public health requirement set by the State Water Resources Control Board (SWRCB) and the U.S. Environmental Protection Agency (USEPA).⁷⁹ The plant was shut down between November 2016 and April 2017 for facility upgrades that did not include an expansion of treatment capacity. During this closure, alternative treatment was provided primarily by the District's El Sobrante and Walnut Creek treatment plants.⁸⁰ With District-wide annual water demand of 190 mgd, projected to reach 230 mgd by 2040, the treatment capacity of 375 mgd is more than adequate to meet existing and projected demand.⁸¹ Because EBMUD's future demand

⁷⁸ East Bay Municipal Utility District, *2017 Annual Water Quality Report*, [undated].

⁷⁹ *Ibid.*

⁸⁰ Kathryn Horn, Community Affairs Representative, East Bay Municipal Utility District, personal communication, April 11, 2017.

⁸¹ East Bay Municipal Utility District (EBMUD), *2015 Urban Water Management Plan*, Table 4-1: Mid-Cycle Demand Projections, July 2016.

projections are based on the adopted general plans of the cities and counties in the EBMUD service area, and the proposed project is consistent with the Richmond General Plan, the water demand from the project can be presumed to be included in EBMUD’s future water demand projections. Since the total projected demand in 2040 would be well below the available treatment capacity, no expansion of water treatment facilities would be required. Therefore, the proposed project would have a *less-than-significant impact* on water treatment capacity.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <i>c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Explanation: The proposed project would not affect existing offsite stormwater drainage facilities. As discussed in more detail in Sections IX-a and IX-d, implementation of the project would not increase the amount of impervious surfaces on the site and, therefore, the rate and volume of stormwater discharge from the site would not increase (and, in fact, it would be incrementally decreased by the required site design measure described in Section IX-a). The project would have no effect on stormwater drainage facilities.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <i>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: As noted in Section XVII(b), above, water supplied to the City of Richmond by EBMUD. More than 90 percent of the water delivered to EBMUD’s customers originates from the Mokelumne River watershed in the Sierra Nevada, with the remainder collected from protected watershed lands in the East Bay area.⁸² The District has water rights to a maximum of 325 million gallons per day (mgd) of Mokelumne River water, subject to availability of Mokelumne River runoff, senior water rights of other users, and downstream fishery flow requirements.⁸³ Local runoff provides 15 to 25 mgd of EBMUD’s water supply during normal rainfall years, but it provides a negligible amount during drought years. Although the water supply is currently adequate to meet demand within the EBMUD, in the long term, the Mokelumne River supply cannot meet projected customer demand, even with mandatory water use restrictions.

⁸² *Ibid*, Section 1.4: Mokelumne Watershed and Hydrology, July 2016.

⁸³ *Ibid*, page 8.

EBMUD's planning to ensure an adequate water supply during both wet and dry years is based on future growth projections through 2040, determined by a *2040 Demand Study* completed in 2009, based on land use projections from local planning agencies. The District-wide land use analysis was conducted prior to the 2007-2009 economic recession, when there was an expectation that the economic expansion occurring prior to the recession would continue. Therefore, increased water demand associated with economic and population growth is likely to occur more slowly than projected in EBMUD's *2040 Demand Study*. The adjusted planning-level demand is 217 mgd in 2020 and 230 mgd in 2040, which does not reflect projected reductions as a result of conservation and recycling programs.⁸⁴

EBMUD's *Urban Water Management Plan 2015* (UWMP), prepared in compliance with the California Urban Water Management Planning Act of 1983, documents the District's planning activities to ensure adequate water supplies to meet existing and future demands for water. Its drought planning is based on modeling of rainfall runoff that occurred in 1976 and 1977, the driest recorded two-year period, and also factors in the runoff from the 2014-2015 drought. EBMUD typically uses a three-year drought planning sequence (DPS) to assess the adequacy of its water supply. The first and second years of the DPS are modeled on the actual runoff that occurred in 1976 and 1977, respectively, and the third year is the average runoff from those two years, or 185 thousand acre-feet (TAF).⁸⁵

The UWMP determined that EBMUD would have sufficient water supplies to meet customer demand through 2040 during normal years and up to two dry years of a multi-year drought, but would need supplemental water supplies to meet projected demand during a third dry year after 2020 (supplies would be adequate through 2020). During a third year of drought there would be shortfalls of 2 TAF, 13 TAF, 24 TAF, and 48 TAF in 2025, 2030, 2035, and 2040, respectively.⁸⁶ There would be sufficient excess supply during normal years for the District to recharge groundwater, either locally or at the off-site Semitropic Groundwater Bank, for later use during dry years.

During multi-year droughts when demand could exceed supply by up to 10 percent, EBMUD would rely on local and off-site groundwater storage to make up the shortfall. If there were insufficient local groundwater storage or the District was unable to recover its full contractual amount from the Semitropic Groundwater Banking Program, the District would look to secure additional supplies through a California Department of Water Resources (DWR) drought water bank or similar water purchase/transfer program.

Water shortages during prolonged droughts or due to short-term emergencies would also be addressed through implementation of EBMUD's Water Shortage Contingency Plan (WSCP), required by Section 10632 of the California Water Code. EBMUD adopted its first WSCP in 1992 and it has continued to evolve since then. It was last updated in the 2010 UWMP to reflect the 2007-2010 drought, the completion of the Freeport Regional Water Facility (discussed below), and numerous other changes, and is updated again in the current UWMP.

⁸⁴ *Ibid*, pages 51-52.

⁸⁵ An acre-foot is the amount of water necessary to cover 1 acre of land to a depth of 1 foot, and is equivalent to 325,851.43 gallons, or 43,560 cubic feet

⁸⁶ EBMUD (July 2016), *op. cit.*, Table 4-5.

In order to meet projected demand during future drought years, in 2006 the EBMUD modified a prior contract executed in 2000 with U.S. Bureau of Reclamation (USBR) for delivery of Central Valley Project (CVP) water from the American River. The Long Term Renewal Contract (LTRC) that EBMUD executed with the USBR allows EBMUD to take delivery of CVP water during dry periods from an intake in the Sacramento River rather than the American River. Pursuant to the original contract, the Freeport Regional Water Authority (FRWA), a joint powers agency created by EBMUD and the Sacramento County Water Agency (SCWA) in 2002, developed the Freeport Regional Water Project (FRWP), bringing it online in 2011. Among other facilities, the FRWP includes a 185-mgd water intake (with fish screens) and pumping plant on the Sacramento River near Freeport, approximately 20 miles of 72-inch-diameter pipeline, and two 100-mgd inline pumping plants to transport Sacramento River water to EBMUD's Mokelumne Aqueducts.

The LTRC provides for delivery of up to 133,000 AF in a single qualifying year, not to exceed a total of 165,000 AF in three consecutive qualifying years. Qualifying years are those in which EBMUD's total stored water supply is forecast as of March 1 to be below 500 TAF on September 30 of that year. EBMUD exercised its LTRC for the first time during the 2014-2015 drought and delivered CVP water to its customers. The District received 18,641 acre-feet of CVP supply in 2014 and another 33,250 acre-feet of CVP water in 2015.⁸⁷

In addition to these water supply sources, since 2010 EBMUD has been operating the Bayside Groundwater Facility to provide an additional water supply source during droughts. During normal rainfall years, potable water is injected into the South East Bay Plain Groundwater Basin (SEBPGB) in the vicinity of the City of Hayward. The District can draw on this stored water during dry years via extraction wells that can produce 2 mgd over a 6-month period. This supplemental supply can produce about 1,120 AF/year (AFY), which the District plans to expand in the future. Although the injection of surplus water into the SEBPGB is expected to exceed the quantity of water extracted during dry years, as of preparation of the current UWMP, EBMUD had not yet made groundwater injections due to the five-year drought that was ongoing at that time.⁸⁸

The District also continues to explore a variety of other long-term supplemental water supplies, including expansion of surface water storage in the Contra Costa Water District's Los Vaqueros Reservoir, partnerships with other water agencies, and the possibility of a jointly-owned regional desalination facility to produce potable water from ocean, Bay, and/or brackish water.

Pursuant to EBMUD's Water Supply Availability and Deficiency Policy 9.03, by March 1st of each year the District presents to the EBMUD Board of Directors a preliminary assessment evaluating the adequacy of that year's water supply. Following this preliminary assessment, the Board of Directors adopts a final Water Supply Availability and Deficiency Report before May 1st that updates the water supply projections based on the April 1st snow survey by DWR. Based on these reports, the Board of Directors decides whether to declare a water shortage emergency and implement a drought management program, institute mandatory water use reductions, and/or obtain/pursue supplemental supplies. The preliminary report can also be used as the basis for requesting CVP water that year if EBMUD's water supply is projected to be deficient. EBMUD

⁸⁷ *Ibid*, Sections 1.4 and 1.5.

⁸⁸ *Ibid*, page 63.

continues to monitor the water supply throughout the year and assess the effects on demand of any voluntary or mandatory rationing policy.

The WSCP contains a variety of other provisions for addressing water supply shortfalls, including demand reduction strategies and agreements obtaining emergency water supplies from neighboring agencies, including the Contra Costa Water District (CCWD), San Francisco Public Utilities Commission (SFPUC), Dublin San Ramon Services District (DSRSD), and City of Hayward (Hayward).

The proposed project is well under the water demand threshold established by Senate Bill 610 (2001), requiring preparation of a Water Supply Assessment (WSA) during environmental review of projects over a certain size. Among other thresholds, a project is required to prepare a WSA if it would: (1) be a business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space, (2) be a hotel or motel having more than 500 rooms, or (3) would demand an amount of water equal to, or greater than, the amount of water needed to serve a 500-dwelling unit project.⁸⁹ With transitional housing for 22 mothers with children and 48 single adults and no kitchen, the proposed project would create a small incremental increase in water demand far below that of a 500-unit residential project or 500-room hotel, and this demand would not cause a substantial effect on the availability of regional water supplies. The *2040 Demand Study* on which EBMUD's UWMP is based factors in growth in the region, based on general plan projections of the cities and counties in the EBMUD service area. Because the proposed project would be consistent with the Richmond General Plan, water demand from the project can be assumed to be factored into EBMUD's long-range water supply planning.

The latest Urban Water Management Plan (UWMP) prepared by EBMUD in 2016 indicates that the District would have sufficient supplies through the planning horizon year of 2040 during average rainfall years, during a single severe drought year (modeled on 1977, the driest year on record), and during a second year of severe drought. During a third drought year (modeled on the 2013-2015 drought years), supplies would be sufficient through 2020, but by 2025 demand would exceed supply beginning in the third year of drought in every modeled three-year period from 2025 through 2040.

As required by State law, EBMUD must update its UWMP every five years. The District is continually working on developing new water supplies and managing demand through conservation and water recycling programs, and each updated UWMP revises the District's drought planning based on changing conditions and evolving methodologies. As stated in the current UWMP, the District is committed to ensuring the appropriate level of water service reliability to meet water demands during normal, dry, and multiple dry years. The incremental demand that would be generated by the proposed project was included in future water demand projections. The project would not result in the need for new water supplies or infrastructure that was not already planned. Therefore, the project's impact on water supply and water treatment and distribution facilities would be *less than significant*.

⁸⁹ California Code of Regulations, Title 14, Chapter 3, Article 10, Section 15155.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| e) <i>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?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: See Section XVII(b), above.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| f) <i>Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: Solid waste generated in the City of Richmond is currently disposed of at the Potrero Hills Landfill in Solano County. As of early 2011, the landfill had an approved capacity that would add 35 years to the remaining capacity of 10 years that was estimated at that time.⁹⁰ In addition, the City has access to numerous other regional waste disposal facilities used by the West Contra Costa Integrated Waste Management Authority (WCCIWMA), of which the City of Richmond is a member. Given the collective capacities of these facilities, there is more than sufficient landfill capacity to accommodate the City's landfill disposal needs through buildout of the General Plan in 2030. The Richmond General Plan EIR concluded that buildout envisioned in the General Plan would not require or result in construction or expansion of landfill disposal capacity. Operation of the proposed project would result in an incremental increase in the amount of solid waste currently generated at the site. However, it would represent a minute fraction of the City's total waste stream and an even smaller portion of the regional waste stream being disposed of at Potrero Hills Landfill. There is no potential for the waste generated by the project to exceed existing disposal capacity or require the development of new disposal facilities. Therefore, the project would have a ***less-than-significant impact*** on landfill disposal capacity.

⁹⁰ City of Richmond, *Richmond General Plan Update Draft Environmental Impact Report*, Section 3.13, Public Utilities, February 2011.

XVIV. MANDATORY FINDINGS OF SIGNIFICANCE —

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|--------------------------|
| a) <i>Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: There is a possibility for prehistoric cultural resources to be buried under the site, and they could be damaged during subsurface disturbance of the site during project construction. Similarly, if paleontological resources are present, they could also be damaged or destroyed during construction. However, mitigation measures have been identified to ensure that these potential impacts would be less than significant.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| b) <i>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.)</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Explanation: No significant cumulative impacts were identified for the proposed project. The less-than-significant cumulative impacts of the project are discussed in the sections on air quality and greenhouse gases.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|--------------------------|
| c) <i>Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?</i> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Explanation: Although potential impacts on air quality and water quality during project construction could indirectly cause adverse effects on human beings, implementation of the mitigation measures identified in this Initial Study for those impacts would ensure that these potential impacts would not be significant.

REPORT PREPARATION

This Initial Study/Mitigated Negative Declaration was prepared under the direction of Douglas Herring & Associates, with assistance from the City of Richmond.

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MITIGATION MEASURES

Air Quality

Mitigation Measure AQ-1: The property owner/applicant shall require the construction contractor to reduce the severity of project construction period dust and equipment exhaust impacts by complying with the following control measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Cultural Resources

Mitigation Measure CR-1: If any cultural artifacts are encountered during site grading or other project construction activities, all ground disturbance within 100 feet of the find shall be halted until the City of Richmond is notified, and a qualified archaeologist can identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s). (Construction personnel shall not collect any cultural resources.) The results of any additional archaeological effort required through the implementation of Mitigation Measures CR-1 or CR-2 shall be presented in a professional-quality report, to be submitted to the project sponsor, the City of Richmond Planning and Building Services Department, and the Northwest Information Center at Sonoma State University in Rohnert Park. The project sponsor shall fund and implement the mitigation in accordance with Section 15064.5(c)-(f) of the *CEQA Guidelines* and Public Resources Code Section 21083.2.

Mitigation Measure CR-2: In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and a qualified archaeologist shall notify the Office of the Contra Costa County Coroner and advise that office as to whether the remains are likely to be prehistoric or historic period in date. If determined to be prehistoric, the Coroner's Office will notify the Native American Heritage Commission of the find, which, in turn, will then appoint a "Most Likely Descendant" (MLD). The MLD in consultation with the archaeological consultant and the project sponsor, will advise and help formulate an appropriate plan for treatment of the remains, which might include recordation, removal, and scientific study of the remains and any associated artifacts. After completion of analysis and preparation of the report of findings, the remains and associated grave goods shall be returned to the MLD for reburial.

Mitigation Measure CR-3: Prior to issuance of a grading permit for the project, a qualified paleontologist shall evaluate the potential for significant paleontological resources to be present at the project site and recommend appropriate measures to protect, recover, and evaluate such resources. Should paleontological resources be encountered during construction or site preparation activities, such works shall be halted in the vicinity of the find, and a qualified paleontologist shall be contacted to evaluate the nature of the find and determine if mitigation is necessary. All feasible recommendations of the paleontologist shall be implemented.

Hydrology and Water Quality

Mitigation Measure WQ-1: In order to demonstrate compliance with Richmond Municipal Code Section 12.22.090, which requires erosion and pollution control during construction activities, the project sponsor shall prepare a Stormwater Pollution Prevention Plan (SWPPP), to be approved by the Richmond Department of Water Resource Recovery and implemented during project construction. Prior to issuance of a grading permit for the proposed project, the City of Richmond shall verify that the applicant has prepared a SWPPP in accordance with the requirements of Richmond Municipal Code Section 12.22.090. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) all non-stormwater discharges are identified and either eliminated, controlled, or treated; (3) site best management practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs are installed to reduce or eliminate pollutants after construction is completed. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's (CASQA) *Construction Handbook of Best Management Practices*, Caltrans stormwater quality construction site BMP handbook, and/or any other or newer BMPs available since the release of the handbooks, as required given project needs.

Noise

Mitigation Measure N-1: Noise-generating construction activities shall be limited to the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 8:00 p.m. on weekends and public holidays. No grading or other noisy construction activities shall be performed weekends or public holidays.

Mitigation Measure N-2: The project sponsor shall require the construction contractor to equip all construction equipment driven by internal combustion engines with intake and exhaust mufflers which are in good condition, appropriate for the equipment, and no less effective than those originally installed by the manufacturer. Construction contracts shall also require construction contractors to comply with all relevant provisions of applicable local noise policies and ordinances.

Mitigation Measure N-3: The project applicant shall prepare and implement a construction-related noise mitigation plan, subject to approval by the City of Richmond Planning Division. The plan shall designate construction

staging areas that are located the maximum feasible distance from residential receptors, and shall identify other feasible and appropriate measures to minimize construction noise impacts on adjacent noise-sensitive land uses.

Utilities

Mitigation Measure US-1: In consultation with the City of Richmond Department of Public Works, the project engineer shall verify that existing wastewater treatment and collection facilities are available to accommodate the wastewater that would be generated by the proposed project. If existing capacity is not adequate, the applicant shall pay a fair share of the cost of needed improvements. If on-site or immediately downstream improvements are necessary, the City shall identify any additional project-specific mitigation measures necessary to reduce impacts from the construction of new wastewater collection and treatment facilities to a less-than-significant level, and the measures shall be implemented by the project applicant prior construction of the proposed project.

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