Proposed Mitigated Negative Declaration

for the

Augustin Bernal Mountain Bike Trail Project

Proposed Project

The proposed project would develop an approximately 0.7-mile-long (3,700 linear feet) technical mountain bike trail within and adjacent to Augustin Bernal Community Park in the City in part replacing an existing unofficial user-created trail, and decommission 4,300 linear feet of other existing unofficial user-created trails. The new trail would consist of an appropriately designed and engineered trail to minimize erosion and user risks and reduce potential pedestrian/bicyclist conflicts on the multi-use trails in Augustin Bernal Community Park by encouraging some of the existing downhill mountain bike traffic currently using the multi-use trails to divert to the new trail. Other user-created trails would be decommissioned to minimize potential adverse effects to the vegetation and wildlife in the park. Construction of the proposed trail would require minor grading and vegetation clearing along the entire bike trail alignment. Decommissioning existing user-created trails would involve removing constructed features such as berms and jumps, rehabilitating soil, and broadcasting a seed mix to promote new vegetation growth. Refer to the attached Initial Study for additional project information, including figures of the project location, proposed trail alignment and design, proposed trails to be decommissioned, and existing site conditions.

Environmental Analysis

An Initial Study for the proposed Augustin Bernal Mountain Bike Trail project was prepared in accordance with CEQA (Section 21000 et seq., California Public Resources Code) and the CEQA Guidelines (Section 15000 et seq. Title 14, California Code of Regulations). The analysis in the Initial Study determined that the project could have potentially significant impacts to the following resource categories: Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Public Services, Recreation, and Tribal Cultural Resources. The Initial Study identifies the following mitigation measures to address these potential impacts:

Mitigation Measure BIO-1 - Special-Status Plant Compensatory Mitigation

Mitigation Measure CUL-1 - Treatment of Unanticipated Cultural Resources

Mitigation Measure CUL-2 - Treatment of Unanticipated Human Remains

Mitigation Measure GEO-1 – Erosion Control

Mitigation Measure GEO-2 - Treatment of Unanticipated Paleontological Resources

Mitigation Measure HAZ-1 – Management of Hazardous Materials During Construction

Determination

As demonstrated in the Initial Study, the City finds that, with implementation of the identified mitigation measures, there is no substantial evidence that the proposed project would have a significant effect on the environment. Therefore, the City has prepared this Proposed Mitigated Negative Declaration for the Augustin Bernal Mountain Bike Trail Project for adoption following public review of the attached Initial Study and supporting documentation.

Matt Gruber, City Landscape Architect; Engineering Department

4/13/2022

Date

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Initial Study
for the
Augustin Bernal Mountain Bike Trail Project

Prepared for:

THE CITY OF PLEASANTON

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APRIL 2022

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ALUCP	Airport Land Use Compatibility Plan
APE	area of potential effects
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
City	City of Pleasanton
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO2e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
EO	Executive Order
FERC	Federal Energy Regulatory Commission
FESA	federal Endangered Species Act
GHG	greenhouse gas
GWP	global warming potential
HOA	Homeowner's Association
IS	Initial Study
lbs/day	pounds per day
Ldn	day-night average sound level
Leq	equivalent sound level over a given period
LID	low-impact development
MLD	most likely descendent
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MT	metric ton
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NR	Natural Resources
NOx	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
PCE	primary constituent element

Acronym/Abbreviation	Definition
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in size
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns in size
project	Augustin Bernal Mountain Bike Trail Project
ROG	reactive organic gas
SOx	sulfur oxides
TAC	toxic air contaminant
TCR	tribal cultural resource
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compound

1 Introduction

1.1 Project Overview

The Augustin Bernal Mountain Bike Trail Project (project) would consist of development of an approximately 0.7-mile-long (3,700 linear feet) technical mountain bike trail within and adjacent to Augustin Bernal Community Park in the City of Pleasanton (City) and decommissioning of existing user-created trails. The development of the proposed trail is anticipated in the Pleasanton Trails Master Plan (City of Pleasanton 2019a). Mountain bike users already use the proposed trail location and have created several trails through this unofficial use. The purpose of the current project is to provide an appropriately designed and engineered trail to minimize erosion and user risks, reduce potential pedestrian/bicyclist conflicts on the multi-use trails in Augustin Bernal Community Park by encouraging some of the existing downhill mountain bike traffic on the multi-use trails to divert to the new trail, and decommission user-created trails to minimize potential adverse effects to the vegetation and wildlife in the park. The new technical trail would include turns, banked jumps, and grade changes, along with wayfinding signage identifying that the trail is only for mountain bike use. Access to the trail would be from other existing trails within Augustin Bernal Community Park and from the staging area parking lot at the end of Golden Eagle Way, as well as from trails within the adjacent Pleasanton Ridge Regional Park. Construction of the proposed trail would require minor grading and vegetation clearing along the entire bike trail alignment. Decommissioning existing user-created trails would involve removing constructed features such as berms and jumps, rehabilitating soil, and broadcasting a seed mix to promote new vegetation growth.

1.2 California Environmental Quality Act Compliance

This Initial Study has been prepared per the requirements of the California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code [PRC] Section 21000, et seq.), and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

1.3 Public Review Process

The Initial Study and the proposed Mitigated Negative Declaration is being circulated for public review for a period of 30 days, pursuant to CEQA Guidelines Section 15073(a). The City provided public notice at the beginning of the public review period.

This draft Initial Study is being routed to State agencies through the Office of Planning and Research under a Notice of Completion. The City posted a Notice of Intent to adopt a Mitigated Negative Declaration on the City's website and has provided the Notice of Intent to the County Clerk's office and via direct mailings and emails to other stakeholders, local agencies, and other parties that have expressed interest in the project.

After the 30-day public review period, the City will consider all comments received, revise the Initial Study as necessary, and schedule the project and the Proposed Mitigated Negative Declaration, including this

Initial Study, for consideration by the City Council. The City Council hearing will be publicly noticed prior to the public hearing. The City Council will accept any written and oral comments at the hearing and make a decision on the project.

Comments or questions may be addressed to Matt Gruber, City Landscape Architect; Engineering Department at 200 Old Bernal Avenue, Pleasanton, CA 94566 or via email at mgruber@cityofpleasantonca.gov.

2 Summary of Findings

2.1 Environmental Factors Potentially Affected

This Initial Study analyzes the environmental impacts of the project consistent with the format and analysis prompts provided in Appendix G of the CEQA Guidelines. The analysis determined that the project could have potentially significant impacts to the following resource categories: Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Public Services, Recreation, and Tribal Cultural Resources. The analysis determined that all potentially significant impacts would be less than significant with implementation of mitigation measures to avoid or minimize the impacts identified. Detailed analyses of impacts are provided under each resource section evaluated by this Initial Study.

2.2 Environmental Determination

The City of Pleasanton, as lead agency, finds that the Initial Study identifies potentially significant impacts, but that implementing the mitigation measures identified in Table 2-1 would avoid or minimize the impacts such that they would be less than significant. The project would result in no impacts that would remain significant following implementation of mitigation measures. All mitigation measures are identified in Table 2-1, below, and throughout Section 3 Initial Study.

Table 2-1. Mitigation Measures

Measure Number	Measure Text
BIO-1	**Special-Status Plant Compensatory Mitigation.** If special-status plants and/or bunchgrass/wildflower stands cannot be avoided without compromising trail integrity (e.g., if plants are in a cut-fill area required for drainage or slope stabilization), compensatory mitigation for unavoidable permanent impacts on special-status plant occurrences shall be required based on recommendations of a qualified botanist. Given the amount of available habitat in Augustin Bernal Community Park, it is expected that compensatory mitigation could be accomplished at the park. Compensatory mitigation shall include the following components, at a minimum: • The botanist shall prepare a special-status plant mitigation plan that includes seed/propagule collection methods, success criteria, 5 years of maintenance and monitoring, and adaptive management approaches. The special-status plant mitigation plan shall be implemented to document the success of creation of the new plant occurrence. Adequate funding for compensatory mitigation shall be provided on an agreed-to schedule. • Prior to unavoidable and permanent disturbance to any special-status plants, propagules shall be collected from the occurrence to be disturbed. This may

Table 2-1. Mitigation Measures

Measure Number	Measure Text
	include seed collection, cuttings, or seed-bearing topsoil salvage, and these propagules shall be used to establish a new population on suitable, unoccupied habitat. Transplantation of whole plants may be attempted, but shall not be used as the primary means for creating a new occurrence.
CUL-1	**Treatment of Unanticipated Cultural Resources.** To ensure that there will be no impacts to unanticipated cultural resources, the City or its contractors shall retain a qualified archaeologist to prepare Worker Environmental Awareness Training materials which shall be provided to all construction personnel prior to initiation of construction activities. This shall include notifying construction crew members of the potential to encounter archaeological material and how to recognize such material. In the unlikely event that cultural resources (sites, features, or artifacts) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop and the City contacted. A qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, shall be assigned to review the unanticipated find, and evaluation efforts of this resource for NRHP and CRHR listing will be initiated in consultation with the City. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole freshwater bivalves shell, burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by the presence of glass bottles and shards, ceramic material, building or domestic refuse, ferrous metal, or old features such as concrete foundations or privies. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA/NRHP, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. If the City determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), any affected tribe would be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered tribal cultural resources. Depending on the nature of the potential resource and Tribal recommendations, review by a qualified archaeologist may be required. Implementation of proposed recommendations shall be made based on the determination by the City that the approach is reasonable and feasible. All activities shall be conducted in accordance with regulatory requirements.
CUL-2	**Treatment of Unanticipated Human Remains.** In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, work shall halt in that

Table 2-1. Mitigation Measures

Measure Number	Measure Text
	area and the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the City, the disposition of the human remains.
GEO-1	**Erosion Control.** Erosion control measures shall be implemented in accordance with an erosion control plan. This could include measures for slope stabilization, dust control, and temporary and permanent erosion control devices/best management practices such as straw wattles, track out control devices, silt fencing, sediment traps, tarping of stockpiled soils, revegetation treatments or other measures specified by the erosion and dust control plan or as determined to be necessary by the project engineer.
GEO-2	**Treatment of Unanticipated Paleontological Resources.** In the event that paleontological resources (e.g., fossils) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist meeting the professional standards of the Society of Vertebrate Paleontology can evaluate the significance of the find and determine whether or not additional study is warranted. If the discovery is clearly not significant, the paleontologist may document the find and allow work to continue. If the discovery proves potentially significant under CEQA, additional work such as preparation of a paleontological treatment plan and monitoring in the area of the find may be warranted.
HAZ-1	**Management of Hazardous Materials During Construction.** The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications. • All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.

Table 2-1. Mitigation Measures

Measure Number	Measure Text
	• Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures. • A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction. • Project plans and specifications shall identify construction staging areas and designated areas where equipment refueling, lubrication, and maintenance may occur. Areas designated for refueling, lubrication, and maintenance of equipment shall be approved by the City. • In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City of Pleasanton. • Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures.

3 Initial Study Checklist

Project Title:

Augustin Bernal Mountain Bike Trail Project

Lead Agency:

City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566

Contact: Matt Gruber, City Landscape Architect; Engineering Department
Phone: 925.931.5672
Email: mgruber@cityofpleasantonca.gov

Project Sponsor:

City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566

Project Summary:

Replace an unauthorized, user-created mountain bike trail within the Augustin Bernal Community Park with a formal City-created downhill-only technical mountain bike trail and decommission other user-created trails. A portion of the new trail would cross land owned by the Golden Eagle Homeowner's Association between Augustin Bernal Community Park and the Agustin Bernal Community Park staging area and parking lot, at the end of Golden Eagle Way, subject to the Homeowner's Association granting of an access easement.

Project Location:

As shown in Figure 1, Regional Location, the project site is within and adjacent to the Augustin Bernal Community Park, which is a 237-acre park located in the southwestern portion of the City of Pleasanton. The project site is located in the southern portion of the park, east of the Castlewood Country Club. As shown in Figure 2, Project Vicinity, the trail begins between the northern and southern portions of Pleasanton Ridge Regional Park and ends at the Augustin Bernal Community Park staging area parking lot, at the end of Golden Eagle Way. The project site is located in Section 31, Township 3 South, Range 1 East, of the "Dublin" U.S. Geological Survey 7.5-minute quadrangle.

General Plan Land Use Designation and Zoning:

- General Plan Land Use Designation: Parks and Recreation, Agriculture and Grazing
- Zoning: Public, Planned Unit Development – Low Density Residential

PROJECT DESCRIPTION

Project Design and Use

The Augustin Bernal Mountain Bike Trail Project (project) would consist of development of an approximately 0.7-mile-long (3,700 linear feet) downhill-only technical mountain bike trail within and adjacent to Augustin Bernal Community Park in the City of Pleasanton (City). Mountain bike riders already use the proposed trail location and have created several trails through this unofficial use. The purpose of the current project is to provide an appropriately designed and engineered trail to minimize erosion and user risks, and to reduce potential pedestrian/bicyclist conflicts on the multi-use trails in Augustin Bernal Community Park.

The Pleasanton Trails Master Plan (City of Pleasanton 2019a) recognizes that the City's extensive trails system provides unique and highly valued recreation opportunities to its residents, contributes to the community identity, and supports public health. Although the City's trail network is robust and offers connections to regional facilities, the Master Plan identifies that there are important "gaps and unimproved segments that reduce the usability and enjoyability of the trails" (City of Pleasanton 2019a). As discussed in Section 1.6 and Appendix B of the Pleasanton Trails Master Plan, through the public outreach conducted during development of the plan, the City identified resident preferences and desired facilities, which includes more natural trail surfaces, closing gaps in the existing trail network, and constructing more trails dedicated to mountain bikes to meet user demand and reduce trail conflicts. In questionnaire responses, construction of the Augustin Bernal Mountain Bike Trail was specifically identified as one of the community's top priorities (City of Pleasanton 2019a). Thus, this project is proposed for construction because it is a high-priority connection that would contribute to the City's comprehensive vision for the full potential of the Pleasanton trail system and relieve pedestrian/bicyclist conflicts on the multi-use trails in Augustin Bernal Community Park.

As shown in Figure 3, Proposed Trail Alignment, the trail would include a range of features, such as turns, banks, jumps, and grade changes, and provide alternate trails or ride-around space on challenging features to accommodate trail riders with less experience. Grade reversals and berms would be used to provide for appropriate drainage and minimize erosion. Several sections of existing user-created trails and trail spurs would be decommissioned. Wayfinding signage would also be provided along the trail to identify that the trail is restricted to mountain bike use and to identify challenge levels for particular trail segments. The trail width would vary based on grade, topography, trail features, and needs for maintenance access. It would range from approximately 4 feet to 20 feet. Examples of these features are shown in Figure 4, Typical Trail Design. The complete trail design plans are provided in Appendix A.

The proposed trailhead would be on the Ridgeline Trail, which continues north through Augustin Bernal Community Park and south into the southern portion of Pleasanton Ridge Regional Park. It would also be near Thermalito Trail, which continues south into Pleasanton Ridge Regional Park. The proposed trail terminus is at the Augustin Bernal Community Park staging area. As shown in Figure 5, Existing Trails, beginning at the staging area, cyclists could follow existing multi-use trails to reach the proposed trail, specifically Golden Eagle Trail to Valley View Trail to Ridgeline Trail.

The proposed trail would require an access easement with the Golden Eagle Homeowner's Association (HOA) because the HOA owns land between the staging area parking lot and Augustin Bernal Community Park that the proposed alignment would cross. The easement is anticipated to extend approximately 50 feet on either side of the trail alignment to allow for construction and maintenance.

In addition to developing the proposed trail, the City also proposes to decommission approximately 4,300 linear feet of existing user-created trails, as shown in Figure 6. Trails to be Decommissioned. This would involve removing constructed features such as berms and jumps, rehabilitating soil, and broadcasting a seed mix to promote new vegetation growth.

Project Site Characteristics

The project site is located within Augustin Bernal Community Park, which is a destination for cyclists and hikers from the City of Pleasanton due to its nine major trails, as shown in Figure 4. Augustin Bernal Community Park is known to support a mosaic of vegetation communities and species, and scenic views and vistas (see Figure 7, Scenic Views), along with its biking and hiking trails. The three other biking trails within the park have slopes that range from an average of 5% to 9% downgrade (City of Pleasanton 2019a).

Currently, the project site hosts several unofficial trails and trail spurs. The use of unofficial trails that have not been designed has resulted in sections with higher risk of erosion and rutting, as well as improper banking and other deficiencies. Figures 8a and 8b, Existing Trail Condition Photos, provides examples of these degraded or deficient sections.

The parking lot on Golden Eagle Way was originally constructed in 1993 and was expanded in July 2018 in response to public input. Currently, the staging area contains 4 horse trailer spaces, 41 vehicle spaces, 2 ADA parking spaces, and a restroom. Golden Eagle Way is accessed via residential roads off of Foothill Boulevard and is accessible only to City residents and to non-residents who first obtain a no-fee permit card from the City.

Existing Land Use and Zoning

- General Plan Land Use Designation: Augustin Bernal Community Park is designated Parks and Recreation and the portion of land owned by Golden Eagle HOA that the trail would cross is designated Agriculture and Grazing (City of Pleasanton 2009a).
- Zoning: The Augustin Bernal Community Park and parking lot/staging area are zoned Public and the portion of land owned by Golden Eagle HOA that the trail would cross is zoned Planned Unit Development – Low Density Residential (City of Pleasanton 2018).

Surrounding Land Uses

The project site is surrounded by existing park and recreational facilities. Most of the trail would be contained within Augustin Bernal Community Park, but the lower third of the trail would cross Golden Eagle HOA property, subject to an access easement. To the west, north, and south is Pleasanton Ridge Regional Park, which consists of more than 9,000 acres and is owned and operated by the East Bay Regional Park District. To the south is Castlewood Country Club, a private golf course. Augustin Bernal Community Park lies on the western boundary of the City. The City boundaries extend approximately 4.75 miles to the north and approximately 5.75 miles to the east.

Construction Activities and Methods

Construction of the proposed project would require minor grading and vegetation clearing along the entire bike trail alignment. The trailbed and construction area for the proposed trail and the trails to be decommissioned covers approximately 0.76 acres. This includes the trailbed and trails to be decommissioned within the City's existing 237-acre Augustin Bernal Community Park and the portion of trailbed within the Golden Eagle HOA property. The City would need to obtain an access easement across the Golden Eagle HOA property to allow for trail construction and long-term use.

Construction activities and methodology would include the following:

- Clearing and grubbing of shrubs and groundcover vegetation and trimming of tree branches that could impede the vertical clearance along the trail. No tree removal is proposed. Cleared and grubbed vegetation may be chipped and spread on site or may be removed and disposed of off-site. Tree branches may be used on site to define trail edges and block access to existing unofficial trail spurs.
- Some rocks, existing downed tree branches, and existing downed tree trunks may be moved off of the trail surface and used to define trail edges, create trail features (jumps), and/or block access to existing unofficial trail spurs.
- Grading the trail surface to create a trailbed, berms, turns, jumps, and other trail features, as well as to create grade changes to provide for appropriate erosion and drainage control.
- It is assumed that construction activities would be performed continuously during daylight hours throughout a 3-month period between May 1 and October 15 in 2022 or 2023.

Decommissioning the user-created trails would include the following:

- Removing existing rock and any logs or wood edging where it occurs along the existing trail edges and redistributing those materials within the trail decommissioning area to mimic a random and natural layout.
- Refilling holes resulting from the decommissioning operations.
- Shallow-ripping soils to decrease compaction.
- Broadcasting native plant species seed mix to revegetate decommissioned areas. The seed mix would include common yarrow *(achillea millifolium)*, California brome *(bromus carinatus)*, Miner's lettuce *(claytonia perfoliate)*, blue wildrye *(elymus glaucus)*, Douglas iris *(iris douglasiana)*, sticky monkeyflower *(mimulus aurantiacus)*, purple needlegrass *(nasella pulchra)*, blue eyed grass *(sisyrinchium bellum)*, native clover *(trifolium ciliolaturm)*, and small fescue *(vulpia microstachys)*.

Grading

To construct the proposed project, nearly the entire trail would require grading to some extent, with grading cuts generally at a maximum of 0.5 feet in depth. It is expected that the majority of the soil removed would be reused on site to create grade changes, berms, and other trail features. It is estimated that the proposed project would require approximately 68 cubic yards of earthwork. Soils cuts and fills would be balanced on site, so no soil export would be needed. Up to 15 cubic yards of dirt and/or rock would be imported to build berms and other trail features.

Materials Storage Areas and Equipment Staging

Materials and equipment storage and staging would occur within the Augustin Bernal Community Park staging area and parking lot at the downhill end of the trail, and in an approximately 400-square-foot area at the uphill end of the trail. After construction, any materials not used or reused for the proposed project would be hauled off site and reused or disposed of in a landfill or recycled at a recycling facility.

On-Site Drainage and Erosion Control

The proposed project would implement commonly used best management practices for erosion control during construction, including fiber wattles and silt fencing, covering exposed soil piles, and mulching disturbed areas during construction. Proposed measures for construction erosion control are identified on Sheets N-1 and N-2 of the trail design plans provided in Appendix A. In addition, the project design incorporates grade changes and berms to control for erosion throughout ongoing use of the trail.

Lighting

All construction would occur in daytime hours and thus no nighttime artificial lighting would be required for construction. Sheet N-1 of the trail design plans notes that all construction would occur between 8 AM and 5 PM Monday through Friday. Lighting would not be required during operation because Augustin Bernal Community Park is open from dawn to dusk. There is no existing or proposed lighting at the Augustin Bernal Community Park staging area and parking lot.

Avoidance and Minimization Measures

The following avoidance and minimization measures (AMMs) would be incorporated as part of the project to avoid construction-related impacts on sensitive biological resources. These measures will be included in an Avoidance and Minimization Measures section within the Mitigation Monitoring and Reporting Program prepared for the project.

Special-Status Plants AMM: Conduct Botanical Survey. A qualified botanist shall survey the project site for special-status plant species in accordance with California Department of Fish and Wildlife protocols (CDFW 2018) prior to commencement of work. Target special-status plant species and their typical blooming periods include bent-flowered fiddleneck (*Amsinckia lunaris*; March through June), Hospital Canyon larkspur (*Delphinium californicum* ssp. *interius*; April through June), fragrant fritillary (*Fritillaria liliacea*; February through April), and Diablo helianthella (*Helianthella castanea*; March through June).

The botanist shall also survey for and map areas where native bunchgrasses and wildflowers dominate the herbaceous layer for avoidance during construction. Any special-status plant occurrences and native bunchgrass/wildflower stands shall be marked as Environmentally Sensitive Areas (ESAs) to be avoided during final field fitting of trail improvements and alignments, if possible. The botanist or another qualified biologist with native plant identification training shall be present on site during ESA marking to help guide the contractor in fence or flagging placement around any plants or native vegetation that can be avoided by construction. The botanist or biologist shall be inspect the ESAs on a weekly basis thereafter to confirm that plants and vegetation are adequately protected by construction activities.

Alameda Whipsnake AMM: Take Avoidance During Construction. The below measures shall be implemented to avoid take of Alameda whipsnake before and during construction.

- Construction contracts shall prohibit the use of monofilament plastic netting in erosion-control materials to avoid entrapment of snakes and other native wildlife.

- The City shall designate qualified biologists to monitor project construction. Biologists shall have appropriate training and experience with Alameda whipsnakes.

- A qualified biologist shall provide pre-project environmental awareness training to all construction crew members about the potential presence of Alameda whipsnake on the project site. The training shall include basic information on species identification and habitat, describe how the species may be encountered in the work area, and review all species protection measures.

- A qualified biologist shall be present on site during all ground-disturbing activities (e.g., vegetation clearing and grading). Prior to the clearing of shrubs or dense ground vegetation for the new trail, a biologist shall survey the work area to confirm that Alameda whipsnakes are absent before activities commence. Workers shall not clear any vegetation from a given trail section until it has been cleared by an approved biologist and without a qualified biologist present.

- Construction crews or an approved biologist shall inspect open trenches in the morning and evening for trapped Alameda whipsnakes and other reptiles.

- Qualified biologists shall have the authority to stop work if Alameda whipsnakes are found during construction. Any Alameda whipsnake found in a location where it may be at risk shall be allowed to leave the area on its own accord. The City shall report any Alameda whipsnake observations to the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife within 24 hours and initiate formal consultation under the federal Endangered Species Act and California Endangered Species Act, respectively.

Nesting Bird AMM: Conduct Pre-Construction Survey for Nesting Birds. No construction shall occur between March 1 and April 30. Prior to beginning project construction activities between May 1 and August 31, a pre-construction nesting bird survey shall be conducted by a qualified biologist within 7 days prior to construction activities to determine if any native birds are nesting on or near the project site (including a 300-foot buffer for raptors). If construction is paused between May 1 and August 31 for more than 14 days, an additional nesting bird survey shall be conducted within 7 days prior to resuming construction activities. If any active nests are observed during surveys, a suitable avoidance buffer shall be determined by the qualified biologist based on species, location, and planned construction activity. These nests shall be avoided until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist.

SURVEYS COMPLETED

Biological and cultural resource surveys were completed as part of the trail design to inform the final proposed trail alignment with a goal of avoiding sensitive environmental resources. The methodology and findings of the biological resources survey are reported in Section 3.4 of this Initial Study. The methodology and findings of the cultural resources survey are documented in the Cultural Resources Inventory Report which is Appendix C to this Initial Study. The Cultural Resources Inventory Report is confidential; additional information about this report may be obtained by contacting the City of Pleasanton.

PERMITS AND APPROVALS REQUIRED

The following approval would be required to carry out the proposed project. No approvals or permits from local, state, or federal agencies are anticipated to be necessary.

- Golden Eagle HOA: Access Easement

Environmental Factors Potentially Affected

As demonstrated in this Initial Study, the proposed project would result in potentially significant impacts in several environmental resource areas, however all of the project's impacts would be reduced to a less than significant level with implementation of the mitigation measures included in this Initial Study. Thus, while several of the environmental factors listed below would be potentially affected by this project, none would involve any impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages and thus all of the following checkboxes are blank.

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

Determination (To be completed by the Lead Agency)

On the basis of this 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 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Matt Gruber, City Landscape Architect; Engineering Department

4/26/2022

Date

3.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS –** Except as provided in Public Resources Code Section 21099, would the project**:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Setting

The project site crosses the City of Pleasanton's (City) Augustin Bernal Community Park, which is designated Parks and Recreation, and crosses land owned by Golden Eagle HOA that is designated Agriculture and Grazing (City of Pleasanton 2009a). The Augustin Bernal Community Park and parking lot/staging area are zoned Public, and the portion of land owned by Golden Eagle HOA that the trail would cross is zoned Planned Unit Development – Low Density Residential (City of Pleasanton 2018).

Augustin Bernal Community Park lies on the western boundary of the City. The City boundaries extend approximately 4.75 miles to the north and approximately 5.75 miles to the east. The project site is surrounded by existing park and recreational facilities. The majority of the trail would be contained within Augustin Bernal Community Park, and a portion of the trail would cross Golden Eagle HOA property, subject to an access easement. To the west, north, and south is Pleasanton Ridge Regional Park, which covers more than 9,000 acres and is owned and operated by the East Bay Regional Park District. To the south is the private Castlewood Country Club.

The project site is undeveloped and supports an unofficial mountain bike trail, with several unofficial trail spurs. The Augustin Bernal Community Park support a range of vegetation communities; the predominant vegetation community within the project site portion of the park is Coast live oak woodland. No formally

designated scenic vistas occur in the vicinity of the project site, but the site is visible from Interstate 680, which is a designated state scenic highway .

Impact Discussion

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

No formally designated scenic vista is identified in the vicinity of the project site, and the project site is not a component of any formally designated scenic vista. There are several scenic vistas available from the Augustin Bernal Community Park (see Figure 7) and Pleasanton Ridge Regional Park, and views of the parklands from surrounding public and private viewpoints are highly scenic. The project would create a linear trail through the project site, replacing the existing unofficial trail. The project would also involve decommissioning of approximately 4,300 linear feet of other existing unofficial, user-created trails, thus reducing the total amount of trail length within the park. The project would not alter views of Augustin Bernal Community Park because the project is designed to largely retain the forested characteristics of the site and does not include any tree removal. The project would result in no change to any formally designated scenic vista, would largely retain woodland features, and would be visually consistent with the surrounding park setting. Therefore, the project would have **no impacts** to scenic vistas.

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

Interstate 680, located east of the project site, is an officially designated state scenic highway (Caltrans 2021). The project would occur within the viewshed of Interstate 680, but the project would not require the removal of any trees. Vegetation removal and tree trimming would occur below the tree canopy and therefore would not be noticeable from Interstate 680. Because the trail would be substantially obscured by the existing oak woodland, construction of the mountain bike trail would not alter the overall view of the park from the designated scenic highway and the project would have **no impact** to scenic resources as viewed from a state scenic highway.

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

The project site is within an existing park, and the proposed mountain bike trail would be consistent with existing zoning. The Augustin Bernal Community Park supports a network of almost 5 miles of trails. The project site contains unofficial user-created trails, thus users of the adjoining areas of the park and the staging area/parking lot currently have views of the trail surface and bicyclists moving through the site. Project construction could temporarily degrade the existing visual character of the site and immediate surroundings as a result of disturbance associated with grading and construction activities. Construction equipment and materials could also contribute to temporary impacts to the visual quality of the site during construction. After construction, the project would not alter the existing character of the site because it would continue the existing use of the site and would require minimal vegetation removal and tree trimming. The park and

recreational uses would be visually consistent with the existing park development in the surrounding area and the project is consistent with existing zoning and City land use regulations. Because construction would result in temporary degradation of the visual character and quality of the site; this impact would be **less than significant**.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Project implementation would not introduce new sources of light and the trail would not include any reflective surfaces. All construction activities would occur in daytime hours thus no temporary nighttime lighting would be required. Therefore, the project would have **no impact**.

Mitigation Measures

No mitigation measures are required.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department 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 Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Setting

The project site is located on land designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as "Urban and Built up Land" and "Other Land," and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2021a). A portion of land owned by Golden Eagle HOA that the trail would cross is designated under the General Plan Agriculture and Grazing, while the zoning designation for this portion of the project site is Planned Unit Development – Low Density Residential. The Augustin Bernal Community Park carries the Agriculture zoning designation. The site does not support agricultural or timber operations, does not carry a zoning specific to forest land or timberland, and is not within a Timber Production zone. The project site is within an existing community park and supports an unofficial user-created mountain bike trail.

Impact Discussion

a) Would the project 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?

The project site is located on land designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as "Farmland of Local Importance" and does not include any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2021a). Therefore, the project would result in **no impact** to designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site does not include land subject to a Williamson Act contract (DOC 2021b). The Augustin Bernal Community Park carries the Agriculture zoning designation. Commercial and private recreation facilities are identified by the Pleasanton Municipal Code Zoning Ordinance as conditionally allowable within the Agriculture district. The proposed project would not alter the boundaries or uses of the Augustin Bernal Community Park. The project site does not support agricultural uses. Therefore, the project would have **no impact** resulting from any conflict with existing agricultural zoning or Williamson Act contracts.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The project site is within existing parkland that does not include forest or timberland land use or zoning designations. The project would not conflict with zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production land. The project would result in **no impact** to forest land or timberland.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project would not result in the loss of forest land or conversion of forest land to non-forest use. The project would involve construction of a new public mountain bike trail on land within the existing Augustin Bernal Community Park. It would not alter the vegetation community present within the project site, other than through minor vegetation removal and tree trimming. **No impact** related to the loss or conversion of forest land would occur with implementation of the project.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The Augustin Bernal Community Park and parking lot/staging area are zoned Agriculture, and the portion of land owned by Golden Eagle HOA that the trail would cross is zoned Planned Unit Development – Low Density Residential (City of Pleasanton 2009a, 2018). The project site and surrounding area do not support active agricultural or farmland uses, and the site is adjacent to existing urban development. The site is not zoned as forestland and does not support timber uses. Therefore, the project would have **no impact** with regards to the conversion of forestland or farmland to non-agricultural uses.

Mitigation Measures

No mitigation measures are required.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	

Setting

The project property is located within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD) and within the San Francisco Bay Area Air Basin (SFBAAB). The SFAAAB is designated non-attainment for the federal 8-hour ozone (O_3) and 24-hour $PM_{2.5}$ standards. The area is in attainment or unclassified for all other federal standards. The area is designated non-attainment for State standards for 1-hour and 8-hour O_3, 24-hour PM_{10}, annual PM_{10}, and annual $PM_{2.5}$. The significance thresholds utilized in this analysis to evaluate air quality impacts are based on the BAAQMD thresholds established in the BAAQMD CEQA Air Quality Guidelines (BAAQMD 2017a), as summarized in Table 3.3-1 below.

Table 3.3-1. Air Quality Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	*Average Daily Emissions (lbs/day)*	*Maximum Annual Emissions (tons/year)*
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
$PM_{10}/PM_{2.5}$ (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average, 20.0 ppm (1-hour average)	

Table 3.3-1. Air Quality Thresholds of Significance

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	*Average Daily Emissions (lbs/day)*	*Maximum Annual Emissions (tons/year)*
Risks and Hazards (Individual Project)	Compliance with Qualified Community Risk Reduction Plan or Increased cancer risk of >10.0 in 1 million Increased noncancer risk of >1.0 Hazard Index (chronic or acute) Ambient $PM_{2.5}$ increase >0.3 µg/m³ annual average Zone of Influence: 1,000-foot radius from property line of source or receptor		
Risks and Hazards (Cumulative)	Compliance with Qualified Community Risk Reduction Plan or Cancer risk of >100 in 1 million (from all local sources) Noncancer risk of >10.0 Hazard Index (chronic, from all local sources) Ambient $PM_{2.5}$ >0.8 µg/m³ annual average (from all local sources) Zone of Influence: 1,000-foot radius from property line of source or receptor		
Accidental Release of Acutely Hazardous Air Pollutants	None	Storage or use of acutely hazardous material located near receptors or new receptors located near stored or used acutely hazardous materials considered significant	
Odors	None	Five confirmed complaints to NSCAPCD per year averaged over 3 years	

Source: BAAQMD 2017a

Notes: lbs/day = pounds per day; tons/year = tons per year; ppm = parts per million; µg/m³ = micrograms per cubic meter; ROG = reactive organic gases; NO_x = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; CO = carbon monoxide.

In general, the BAAQMD significance thresholds for reactive organic gases (ROG), oxides of nitrogen (NO_x), particulate matter with an aerodynamic resistance diameter of 10 micrometers or less (PM_{10}), particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less ($PM_{2.5}$), and carbon monoxide (CO) address the first three air quality significance criteria listed above. The BAAQMD maintains that these thresholds are intended to maintain ambient air quality concentrations of these criteria air pollutants below state and federal standards and to prevent a cumulatively considerable contribution to regional nonattainment with ambient air quality standards. The TAC thresholds (cancer and noncancer risks) and local CO thresholds address the third significance criterion, and the BAAQMD odors threshold addresses the fourth significance criterion.

Impact Discussion

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

An area is designated as "in attainment" when it is in compliance with the federal and/or State standards. These standards are set by the U.S. Environmental Protection Agency or California Air Resources Board (CARB) for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or public welfare with a margin of safety. The project site is located within the SFBAAB, which is designated non-attainment for the federal 8-hour ozone (O_3) and

24-hour $PM_{2.5}$ standards. The area is in attainment or unclassified for all other federal standards. The area is designated non-attainment for State standards for 1-hour and 8-hour O_3, 24-hour PM_{10}, annual PM_{10}, and annual $PM_{2.5}$.

On April 19, 2017, the BAAQMD adopted the Spare the Air: Cool the Climate Final 2017 Clean Air Plan (BAAQMD 2017b). The 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. To protect public health, the 2017 Clean Air Plan includes all feasible measures to reduce emissions of O_3 precursors (ROG and NO_x) and reduce O_3 transport to neighboring air basins. In addition, the 2017 Clean Air Plan builds upon the BAAQMD efforts to reduce fine particulate matter and TACs. To protect the climate, the 2017 Clean Air Plan defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious greenhouse gas (GHG) reduction targets for 2030 and 2050, and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets.

The BAAQMD Guidelines identify a three-step methodology for determining a project's consistency with the current Clean Air Plan. If the responses to these three questions can be concluded in the affirmative and those conclusions are supported by substantial evidence, then the BAAQMD considers the project to be consistent with air quality plans prepared for the Bay Area.

The first question to be assessed in this methodology is "does the project support the goals of the Air Quality Plan?" The BAAQMD-recommended measure for determining project support for these goals is consistency with BAAQMD thresholds of significance. If a project would not result in significant and unavoidable air quality impacts, after the application of all feasible mitigation measures, the proposed project would be consistent with the goals of the 2017 Clean Air Plan. As indicated in the following discussion, with regard to air quality impact questions b) and c), the proposed project would result in less than significant construction and operational emissions. Therefore, the proposed project would be considered to support the primary goals of the 2017 Clean Air Plan and is consistent with the current Clean Air Plan.

The second question to be assessed in this consistency methodology is "does the project include applicable control measures from the Clean Air Plan?" The 2017 Clean Air Plan contains 85 control measures aimed at reducing air pollution in the Bay Area, including measures in the categories of stationary sources, transportation, buildings, energy, agriculture, waste, water, natural and working lands, and super-GHG pollutants. Projects that incorporate all feasible air quality plan control measures are considered consistent with the Clean Air Plan. The proposed project would construct an approximately 0.7-mile long, technical mountain bike trail. As a linear recreation facility, none of the control strategies of the 2017 Clean Air Plan are applicable to construction and operation of this project.

The third question to be assessed in this consistency methodology is "does the project disrupt or hinder implementation of any control measures from the Clean Air Plan?" Examples of how a project may cause the disruption or delay of control measures include a project that precludes an extension of a transit line or bike path, or proposes excessive parking beyond parking requirements. The proposed project would not create any barriers or impediments to planned or future improvements to transit or bicycle facilities in the area, nor would it include excessive

parking. Therefore, the proposed project would not hinder implementation of 2017 Clean Air Plan control measures.

In summary, the responses to all three of the questions with regard to Clean Air Plan consistency are affirmative and the proposed project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. This is a **less-than-significant** impact.

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

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate emissions from the project's construction and operation. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant and GHG emissions associated with construction and operational activities from a variety of land use projects, such as residential, commercial, recreational and industrial facilities. CalEEMod input parameters, including the project land use type and size and construction schedule, were based on information provided by the City and default model assumptions if project specifics were unavailable.

Construction. Construction of the project would involve the construction of the Augustin Bernal Mountain Bike Trail, an approximately 0.7-mile (3,700 linear feet) long, technical mountain bike trail, replacing an existing user-created trail, and decommissioning approximately 4,300 linear feet of other existing user-created trails. Construction activities and methodology would include clearing and grubbing of shrubs and groundcover vegetation and the trimming of tree branches that could impede the vertical clearance along the trail. Grading of the trail surface would be completed to create a trailbed, berms, turns, jumps, and other trail features as well as create grade reversals to provide for appropriate erosion and drainage control. Shallow ripping of soils within decommissioned areas would be conducted to reduce soil compaction. Construction activities are anticipated to occur continuously during daylight hours throughout a three-month period in late-spring/early-summer of 2022.

Sources of construction emissions at the project site would include: off-road construction equipment exhaust and fugitive dust associated with site preparation and grading activities. Detailed assumptions associated with project construction are included in Appendix B, Air Quality Modeling Results.

Average daily emissions were computed by dividing the total construction emissions by the number of active construction days, which were then compared to the BAAQMD construction thresholds of significance. Table 3.3-2 shows average daily construction emissions of O_3 precursors (ROG and NO_x), PM_{10} exhaust, and $PM_{2.5}$ exhaust during project construction.

Table 3.3-2. Average Daily Unmitigated Construction Emissions

Year	ROG	NO_x	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
	pounds per day			
2022	2.2	22.8	1.0	1.0
BAAQMD Construction Thresholds	*54*	*54*	*82*	*54*
Exceed Threshold?	**No**	**No**	**No**	**No**

Source: Appendix B
Notes: The values shown are average daily emissions based on total overall tons of construction emissions, converted to pounds, and divided by 65 actives workdays.
ROG = reactive organic gases; NOx = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

As shown in Table 3.3-2, air pollutant emissions during project construction would be well-below the significance thresholds. Therefore, criteria air pollutant emissions during construction would be **less than significant**.

Operations. Long-term air emissions impacts are associated with any change in permanent use of the project site by on-site stationary and off-site mobile sources that substantially increase vehicle trip emissions. No stationary sources of emissions are proposed as part of the project. Once completed, the proposed project would not generate significant vehicle or other emissions. Therefore, long-term operation of the proposed project would have a **less-than-significant** impact in relation to regional operational emissions.

In regard to localized CO concentrations, according to the BAAQMD thresholds, a project would result in a less-than-significant impact if the following screening criteria are met:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The project would generate minimal traffic trips as described in Section 3.17(b) and would comply with the BAAQMD screening criteria. Accordingly, project-related traffic would not exceed CO standards and therefore, no further analysis was conducted for CO impacts. This CO emissions impact would be **less than significant** for the project as well as the cumulative scenario.

Past, present, and future development projects may contribute to the region's adverse air quality impacts on a cumulative basis. Per BAAQMD CEQA Guidelines, by nature, air pollution is largely a cumulative impact; no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively

considerable. If a project exceeds the identified significance thresholds, its emissions would be considered cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, if the project's emissions are below the BAAQMD thresholds or screening criteria, then the project's cumulative impact would be **less than significant**.

As described previously, criteria pollutant emissions generated by short-term construction and long-term operations of the project would not exceed the BAAQMD significance thresholds. Thus, the project would have a **less-than-significant** cumulative impact in relation to regional emissions. In addition, project-related traffic would not exceed the BAAQMD CO screening criteria and would result in a **less-than-significant** cumulative impact with regard to localized CO.

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

The BAAQMD has adopted project and cumulative thresholds for three risk-related air quality indicators for sensitive receptors: cancer risks, noncancer health effects, and increases in ambient air concentrations of $PM_{2.5}$. These impacts are addressed on a localized rather than regional basis and are specific to the sensitive receptors identified for the proposed project. Sensitive receptors are groups of individuals, including children, the elderly, the acutely ill, and the chronically ill, that may be more susceptible to health risks due to chemical exposure, and sensitive-receptor population groups are likely to be located at hospitals, medical clinics, schools, playgrounds, childcare centers, residences, and retirement homes (BAAQMD 2017a). The closest existing sensitive receptors are receptors associated with the single-family residences located to the south on Castlewood Drive, both within approximately 320 feet of the trail alignment.

"Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period would contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology.(OEHHA 2015). In addition, some TACs have non-carcinogenic effects. TACs that would potentially be emitted during construction activities would be diesel particulate matter, emitted from heavy-duty construction equipment and heavy-duty trucks. Heavy-duty construction equipment and diesel trucks are subject to CARB air toxic control measures to reduce diesel particulate matter emissions. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, the duration of proposed construction activities (approximately 3-months) would only constitute a very small percentage of the total 30-year exposure period.

Regarding long-term operations, the project would develop a mountain bike trail which would not result in any long-term air quality impacts. The project would not include any stationary sources that would emit air pollutants or TACs.

In summary, the project would not expose sensitive receptors to substantial, long-term pollutant concentrations or health risk during construction or operations, and this impact would be **less than significant** for the project as well as the cumulative condition.

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

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. In general, odors are highest near the source, but disperse quickly resulting in reduced off-site exposure. Sensitive receptors located adjacent to the project site may be affected. However, construction activities would use typical construction techniques in compliance with Bay Area Air Quality Management District (BAAQMD) rules, and any odors associated with project construction activities would be temporary and would cease upon completion of construction. Therefore, impacts associated with odors during construction would be **less than significant**.

In regards to operations and land use compatibility, odor impacts are addressed qualitatively based on odor screening distances, as recommended by BAAQMD guidance. Certain highly odiferous sources have screening distances of 2 miles. These include wastewater treatment plants, sanitary landfills, and certain industrial facilities (petroleum refineries, asphalt batch plants, and chemical manufacturing). Other odor sources have screening distances of 1 mile and include recycling and waste transfer stations, coffee roasters, and food processing facilities. The project would involve construction of a bike trail, which would not result in sources commonly associated with odors. Therefore, impacts associated with odors generated from operations would be **less than significant**.

Mitigation Measures

No mitigation measures are required.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting

The following terms are used in this section to describe the areas studied and potentially impacted by the project, from least to most inclusive:

- The "project site" refers to the area that would be physically affected by trail construction and improvement activities (including temporary disturbance). The project site also includes all staging areas.
- The "biological study area" includes the project site and adjacent lands in which indirect impacts on biological resources could occur, including disturbance from construction-related noise, vibration, and lighting.

Methodology

Literature Review

Special-status plant and wildlife species present or potentially present in the biological study area were identified through a literature search using the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2021a) and the California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (CNPS 2021a). Searches of the above-referenced databases were completed for the Dublin, Hayward, La Costa Valley, Livermore, and Niles U.S. Geological Survey 7.5-minute quadrangles. Following a review of these resources, Dudek determined the potential for each species to occur within the biological study area based on a review of vegetation communities and available land cover types, habitat types, soils, and elevation preferences, as well as the known geographic range of each species. Dudek also reviewed current and historical aerial photography in Google Earth to identify any potentially jurisdictional aquatic resources or species habitat features (e.g., ponds) based on aerial and topographic signatures.

For the purposes of this initial study, special-status species are defined as follows:

- Plants, fish, or wildlife listed, proposed for listing, or candidates for listing as threatened or endangered under Federal Endangered Species Act (FESA) (16 USC 1531 et seq.)
- Plants, fish, or wildlife listed as threatened or endangered, or proposed for listing, under the California Endangered Species Act (CESA) (California Fish and Game Code, Section 2050 et seq.)
- Fish or wildlife designated by CDFW as a California Species of Special Concern
- Wildlife designated as fully protected species under Sections 3511, 4700, 5050, and 5515 the California Fish and Game Code
- Wildlife on CDFW's Special Animals List (CDFW 2021b)
- Plants designated as rare under the California Native Plant Protection Act of 1977
- Plants with a California Rare Plant Rank of 1 or 2
- Rare, threatened, or endangered as described in the CEQA Guidelines, Section 15380

To identify "established native resident or migratory wildlife movement corridors" that could be impacted by the project (i.e., part d of the biological resources checklist in Appendix G to the CEQA Guidelines), Dudek biologists reviewed the Critical Linkages: Bay Area and Beyond report (Penrod et al. 2013) and applicable datasets (CDFW 2021c, 2021d) in CDFW's BIOS viewer (Version 5.89.14c).

Field Reconnaissance

Dudek wildlife biologist Matt Ricketts conducted a reconnaissance-level field assessment of the biological study area on April 12, 2021, from 9:30 a.m. to 2:00 p.m. Weather during the field reconnaissance was sunny, with an ambient temperature of approximately 65–70°F. The reconnaissance consisted of documenting vegetation communities and land cover types present on the project site, searching for potentially jurisdictional aquatic resources, and assessing habitat for special-status plant and wildlife species within the biological study area.

The reconnaissance was conducted by walking the entire trail alignment on foot and inspecting adjacent areas within 300 feet where access allowed. Inaccessible areas (e.g., steep slopes above or below existing informal trails) were scanned using binoculars (Pentax DCP-SF 8 x 43). Observations of dominant vegetation, wildlife species, habitat features, and drainage characteristics were recorded using digital data collection and field observation tools (e.g., Theodolite and Gaia GPS iOS apps), and a field notebook. Nomenclature for all plant species observed in the biological study area followed the Jepson Manual, Vascular Plants of California, Second Edition (Jepson Flora Project 2020).

The reconnaissance did not include formal mapping of CDFW vegetation communities; delineation of potential federal Clean Water Act Section 404 aquatic resources subject to U.S. Army Corps of Engineers jurisdiction; or focused surveys for special-status plant or animal species, including species listed under FESA and/or CESA. The reconnaissance was sufficient to generally describe features of the project site that could be subject to regulatory jurisdiction, including habitat for listed species.

Vegetation Communities

Coast live oak woodland is the dominant vegetation community in the biological study area. This vegetation community most closely resembles coast live oak (*Quercus agrifolia*) woodland alliance as defined by A Manual of California Vegetation, Online Edition (CNPS 2021b). The coast live oak woodland vegetation community within the project site is dominated by coast live oak, with valley oak (*Q. lobata*) as a secondary canopy species and an understory of various native and non-native herbaceous and annual grassland species. Disturbed areas subject to high levels of mountain bike use are dominated by non-native forbs such as purple vetch (*Vicia benghalensis*), Italian plumeless thistle (*Carduus pycnocephalus*), and longbeak stork's bill (*Erodium botrys*), and non-native annual grasses such as ripgut brome (*Bromus diandrus*), soft brome (*B. hordeaceus*), tall fescue (*Festuca arundinacea*), and Harding grass (*Phalaris aquatica*). Purple needle grass (*Nasella pulchra*), a native bunchgrass, occurs throughout the project site and ranges from sparse cover among non-native annual grasses and forbs to dense stands where it occurs with small patches of native scrub supporting coyote brush (*Baccharis pilularis*), poison oak (*Toxicodendron diversilobum*), and bush monkeyflower (*Diplacus aurantiacus*). Identifiable native wildflower and herbaceous species observed during the field reconnaissance include miner's lettuce (*Claytonia perfoliata*), Douglas iris (*Iris douglasiana*), common cow parsnip (*Heracleum maximum*), western blue-eyed grass (*Sisyrinchium bellum*), foothill deervetch (*Acmispon brachycarpus*), California buttercup (*Ranunculus californicus*), and Johnny-jump-up (*Viola pedunculata*). Small numbers of California buckeye (*Aesculus californica*), toyon (*Heteromeles arbutifolia*), and California bay (*Umbellularia californica*) were also observed throughout the woodland.

Wildlife

Twenty-seven wildlife species or their sign were observed during the April 2021 field reconnaissance: Sierran treefrog (*Pseudacris sierra*), western fence lizard (*Sceloporus occidentalis*), band-tailed pigeon (*Patagioenas fasciata*), white-throated swift (*Aeronautes saxatilis*), Anna's hummingbird (*Calypte anna*), turkey vulture (*Cathartes aura*), acorn woodpecker (*Melanerpes formicivorus*), hairy woodpecker (*Dryobates villosus*), Cassin's vireo (*Vireo cassinii*), Steller's jay (*Cyanocitta stelleri*), California scrub-jay (*Aphelocoma californica*), chestnut-backed chickadee (*Baeolophus inornatus*), violet-green swallow (*Tachycineta thalassina*), bushtit (*Psaltriparus minimus*), wrentit (*Chamaea fasciata*), white-breasted nuthatch (*Sitta carolinensis*), house wren (*Troglodytes aedon*), Bewick's wren (*Thryomanes bewickii*), American robin (*Turdus migratorius*), purple finch (*Haemorhous purpureus*), dark-eyed junco (*Junco hyemalis*), golden-crowned sparrow (*Zonotrichia atricapilla*), spotted towhee (*Pipilo maculatus*), orange-crowned warbler (*Leiothlypis celata*), yellow-rumped warbler (*Setophaga coronata*), Wilson's warbler (*Cardellina pusilla*), and black-headed grosbeak (*Pheucticus melanocephalus*).

The project site provides high-quality habitat for many other native wildlife species. Common amphibians or reptiles likely to occur, in addition to Sierran treefrog and western fence lizard, include arboreal salamander (*Aneides lugubris*), California slender salamander (*Batrachoseps attenuatus*), southern alligator lizard (*Elgaria multicarinata*), and common gartersnake (*Thamnophis sirtalis*). Mammal species expected to occur include black-tailed deer (*Odocoileus hemionus*), Virginia opossum (*Didelphis virginiana*), coyote (*Canis latrans*), striped skunk (*Mephitis mephitis*), and gray squirrel (*Sciurus griseus*).

Special-Status and/or Regulated Resources

Special-Status Plants

Based on the results of the literature review and April 2021 field reconnaissance, 26 special-status plant species were identified as occurring or potentially occurring in the project vicinity. Of these, 22 species were removed from consideration and are not expected to occur due to the lack of suitable habitat within or adjacent to the project site, or the project site being outside of the species' known elevation range. The remaining four species have moderate potential to occur based on the presence of woodland and scrub habitat, as summarized in Table 3.4-1. No special-status plants were identified during the April 2021 field reconnaissance, but a formal botanical inventory was not conducted.

Table 3.4-1. Special-Status Plant Species with Potential to Occur on the Project Site

Scientific Name	Common Name	Status (Federal/State/ CRPR)	Primary Habitat Associations / Life Form / Blooming Period / Elevation Range (feet)	Potential to Occur
Amsinckia lunaris	bent-flowered fiddleneck	None/None/1B.2	Coastal bluff scrub, cismontane woodland, valley and foothill grassland/annual herb/Mar–June/5–1,640	**Moderate potential to occur.** The project site is located within the species' known elevation range and suitable cismontane woodland (i.e., oak woodland) is present. The nearest CNDDB occurrence is approximately 12 miles northwest between Cull Canyon Creek and San Leandro Creek.
Delphinium californicum ssp. *interius*	Hospital Canyon larkspur	None/None/1B.2	Chaparral (openings), cismontane woodland (mesic), coastal scrub/perennial herb/Apr–June/640–3,590	**Moderate potential to occur.** The project site is located within the species' known elevation range and suitable cismontane woodland (i.e., oak woodland) is present. The nearest CNDDB occurrence is approximately 8 miles southeast on the east side of La Costa Creek.
Fritillaria liliacea	fragrant fritillary	None/None/1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland; often serpentinite/perennial bulbiferous herb/Feb–Apr/5–1,345	**Moderate potential to occur**. The project site is located within the species' known elevation range and suitable habitat is present. The nearest CNDDB occurrence is approximately 12 miles northwest at Lake Chabot Regional Park.
Helianthella castanea	Diablo helianthella	None/None/1B.2	Broadleafed upland forest, chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and	**Moderate potential to occur**. The project site is located within the species' known elevation range and

Table 3.4-1. Special-Status Plant Species with Potential to Occur on the Project Site

Scientific Name	Common Name	Status (Federal/State/ CRPR)	Primary Habitat Associations / Life Form / Blooming Period / Elevation Range (feet)	Potential to Occur
			foothill grassland; usually rocky, azonal soils; often in partial shade/perennial herb/Mar–June/197–4,265	suitable habitat is present. The nearest CNDDB occurrence is approximately 6.5 miles west at Garin Regional Park.

Sources: CDFW 2021a; CNPS 2021a
CNDDB = California Natural Diversity Database
California Rare Plant Rank (CRPR)
1B: Plants rare, threatened, or endangered in California and elsewhere
.2 Moderately threatened in California (20–80% occurrences threatened/moderate degree and immediacy of threat)

Special-Status Wildlife

Based on the results of the literature review (CDFW 2021a) and April 2021 field reconnaissance, 39 special-status wildlife species were identified as occurring or potentially occurring in the project vicinity. Of these, 31 species were removed from consideration due to the lack of suitable habitat within or adjacent to the project site, or the project site being outside of the species' known range. One of the remaining seven species (oak titmouse [*Baeolophus inornatus*]) is known to occur in the biological study area, and the other seven have moderate to high potential to occur (see Table 3.4-2). No special-status wildlife species were detected during the April 2021 site visit. Because of their legal status and potential occurrence in the biological study area, additional information on California red-legged frog (*Rana draytonii*) and Alameda whipsnake (*Masticophis lateralis euryxanthus*) is provided below.

Table 3.4-2. Special-Status Wildlife Species with Potential to Occur on the Project Site

Scientific Name	Common Name	Status (Federal/State)	Habitat	Potential to Occur
Amphibians				
Rana draytonii	California red-legged frog	FT/SSC	Lowland streams, wetlands, riparian woodlands, livestock ponds; dense, shrubby or emergent vegetation associated with deep, still or slow-moving water; uses adjacent uplands	**Low potential to occur.** The project site does not support aquatic breeding or non-breeding habitat. The nearest occurrence is approx. 1.1 mile northwest of the project site, where "metamorphs and adults were detected [in a pond] in 2016" (CDFW 2021a).

Table 3.4-2. Special-Status Wildlife Species with Potential to Occur on the Project Site

Scientific Name	Common Name	Status (Federal/State)	Habitat	Potential to Occur
Reptiles				
Masticophis lateralis euryxanthus	Alameda whipsnake	FT/ST	Open areas in chaparral and scrub habitat; also adjacent grassland, oak savanna, and woodland.	**Moderate potential to occur.** The project site is contiguous with high-quality scrub habitat, is within designated critical habitat for the subspecies (71 FR 58175), and there are multiple occurrences along Pleasanton Ridge (Swaim, pers. comm. 2021). No formal presence-absence surveys have been conducted on the site but City staff are aware of its potential presence and have not observed the species once in the last four years, despite actively looking for it (M. Gruber, pers. comm.).
Birds				
Accipiter cooperi	Cooper's hawk (nesting)	None/WL	Nests and forages in dense stands of live oak, riparian woodlands, or other woodland habitats, often near water.	**High potential to occur.** The project site contains high-quality nesting and foraging habitat for this species.
Elanus leucurus	white-tailed kite (nesting)	None/FP	Nests in woodland, riparian, and individual trees near open lands; forages opportunistically in grassland, meadows, scrubs, agriculture, emergent wetland, savanna, and disturbed lands.	**Moderate potential to occur.** The project site is suitable for nesting but lacks open areas for foraging. Such habitat is present along the ridgetop to the west and south, however.
Baeolophus inornatus	oak titmouse (nesting)	BCC/None	Nests and forages in oak woodlands; also open pine forest, pinyon	**High potential to occur.** Species observed during April

Table 3.4-2. Special-Status Wildlife Species with Potential to Occur on the Project Site

Scientific Name	Common Name	Status (Federal/State)	Habitat	Potential to Occur
			woodland, and riparian and chaparral with oak.	2021 survey. Nesting not confirmed, but site contains high-quality nesting habitat.
Mammals				
Antrozous pallidus	pallid bat	None/SSC	Grasslands, shrublands, woodlands, forests; most common in open, dry habitats with rocky outcrops for roosting, but also roosts in artificial structures and trees.	**Moderate potential to occur.** The project site contains coast live oaks with tree hollows that may be suitable for roosting.
Lasiurus blossevillii	western red bat	None/SSC	Forest, woodland, riparian, mesquite bosque, and orchards, including fig, apricot, peach, pear, almond, walnut, and orange; roosts in tree canopy.	**Moderate potential to occur.** The project site supports suitable habitat for this and other foliage-roosting bats.
Lasiurus cinereus	hoary bat	None/None[1]	Forest, woodland riparian, and wetland habitats; also juniper scrub, riparian forest, and desert scrub in arid areas; roosts in tree foliage and sometimes cavities, such as woodpecker holes.	**Moderate potential to occur.** The project site supports suitable habitat for this and other foliage-roosting bats.

Source: CDFW 2021a
Federal
BCC =Bird of Conservation Concern
FT = Federally Threatened
State
FP = Fully Protected
SSC = California Species of Special Concern
ST = State Threatened
WL = Watch List
[1] Western Bat Working Group Medium Priority

California red-legged frog

California red-legged frog is a federally threatened species and California Species of Special Concern that occurs primarily in coastal drainages of central California from Marin County south to northern Baja California, Mexico, and in isolated drainages in the Sierra Nevada, northern Coast, and northern Transverse Ranges. Like most amphibians, California red-legged frogs require aquatic habitats for breeding and adjacent riparian and upland habitats for movement and dispersal. Breeding sites include pools and

backwaters within streams, ponds, marshes, springs, and artificial impoundments such as stock ponds. During the non-breeding season, they need moist areas in which to take refuge from the heat and predators, such as intermittent or ephemeral streams with dense riparian vegetation, overhanging banks, and rootwads; springs or spring boxes; rodent burrows; and damp leaf litter in riparian woodlands. (Ford et al. 2013)

The USFWS designated 450,288 acres of critical habitat for California red-legged frog in 19 California counties on May 15, 2006 (71 FR 19243). Critical habitat for this species has been revised several times since 2006, with the most recent revision (and the one currently in effect) dated March 17, 2010 and comprising approximately 1,636,609 acres in 27 counties (75 FR 12816). Critical habitat designations include smaller discrete areas called primary constituent element (PCE), which describe aspects of physical or biological features on which the species is dependent. PCEs of designated California red-legged frog critical habitat are summarized as follows:

1. Aquatic Breeding Habitat: Standing bodies of fresh water (with salinities less than 4.5 ppt.), including natural and manmade (e.g., stock) ponds, slow-moving streams or pools within streams, and other ephemeral or permanent water bodies that typically become inundated during winter rains and hold water for a minimum of 20 weeks in all but the driest of years;
2. Aquatic Non-Breeding Habitat: Freshwater pond and stream habitats that may not hold water long enough for the species to complete its aquatic life cycle but which provide for shelter, foraging, predator avoidance, and aquatic dispersal of juvenile and adult California red-legged frogs. Other wetland habitats considered to meet these criteria include, but are not limited to: plunge pools within intermittent creeks, seeps, quiet backwaters within streams during high water flows, and springs of sufficient flow to provide mesic surface conditions during dry periods;
3. Upland Habitat: upland areas adjacent to or surrounding breeding and non-breeding aquatic and riparian habitat up to a distance of 1 mile in most cases (i.e., depending on surrounding landscape and dispersal barriers) including various vegetation types such as grassland, woodland, forest, wetland, or riparian areas that provide shelter, forage, and predator avoidance for the California red-legged frog; and,
4. Dispersal Habitat: Accessible upland or riparian habitat within and between occupied or previously occupied sites that are located within 1 mile of each other, and that support movement between such sites.

The project site does not overlap with any designated critical habitat units for California red-legged frog. Subunit ALA-1B of the Alameda and Contra Costa Counties critical habitat unit is approximately 2.7 miles northwest of the site.

California red-legged frog has low potential to occur on the project site during the rainy season (generally October to April). The closest known CNDDB occurrence is a 2016 observation of adults and metamorphs in a pond on Pleasanton Ridge approximately 1.1 mile to the northwest. Another pond visible on Google Earth aerial imagery approximately 0.9 mile northwest of the site also appears to be suitable for breeding. Individual red-legged frogs potentially breeding in these ponds could move through the project site when dispersing to or from these ponds to other breeding habitat on Pleasanton Ridge on rainy nights. The site does not contain any streams or ponds that provide aquatic breeding habitat, however, and the ephemeral drainages lack vegetation that remains moist year-round (e.g., seeps, riparian vegetation) and therefore do

not provide aquatic non-breeding habitat. Any frogs using the site as upland or dispersal habitat would therefore not be expected to remain on site for extended periods. Trail construction would occur only between May 1 and October 31.

Alameda Whipsnake

Alameda whipsnake is a slender, fast-moving snake that is a subspecies of the more common and widely distributed California whipsnake (*Masticophis lateralis*). Its current distribution has been described as five populations within a fragmented regional metapopulation in Alameda, Contra Costa, and small portions of northern Santa Clara and Western San Joaquin Counties (USFWS 2011), as follows:

- Sobrante Ridge, Tilden/Wildcat Regional Parks to the Briones Hills, in Contra Costa County (Tilden–Briones population).
- Oakland Hills, Anthony Chabot area to Las Trampas Ridge, in Contra Costa County (Oakland–Las Trampas population).
- Hayward Hills, Palomares area to Pleasanton Ridge, in Alameda County (Hayward–Pleasanton Ridge population).
- Mount Diablo vicinity and the Black Hills, in Contra Costa County (Mount Diablo–Black Hills population).
- Wauhab Ridge, Del Valle area to the Cedar Mountain Ridge, in Alameda County (Sunol–Cedar Mountain population).

Alameda whipsnake primarily occurs in coastal scrub and chaparral communities, but it also forages in a variety of other communities in the Inner Coast Range, including grasslands and open woodlands (Swaim 1994). Coastal scrub and chaparral communities serve as "core areas" that serve as the center of most whipsnake activity and provide concealment from predators and foraging opportunities, but verified whipsnake observations have been made up to 4.5 miles from coastal scrub and chaparral habitat (Alvarez et al. 2005). Rock outcrops and talus slopes are often associated with occupied Alameda whipsnake habitat because they provide crevices for egg-laying sites, thermal cover, shelter, and winter hibernacula, that shelter whipsnakes from predators. Brush piles, small rodent burrows, and deep soil crevices can also provide such habitat (Swaim 1994; USFWS 2011).

USFWS formally designated critical habitat for Alameda whipsnake on October 2, 2006 (71 FR 58175). PCEs of designated Alameda whipsnake critical habitat essential to the conservation of the subspecies include (1) scrub/shrub communities with a mosaic of open and closed canopy; (2) woodland or annual grassland communities contiguous to lands containing PCE 1; and (3) lands containing rock outcrops, talus, and small mammal burrows within or adjacent to PCE 1 and/or PCE 2.

The project site contains suitable habitat for Alameda whipsnake and is also within Unit 3 (Hayward-Pleasanton Ridge) of USFWS-designated critical habitat for Alameda whipsnake (71 FR 58175). Most of the existing unofficial bike trail passes through coast live oak woodland with closed to semi-open canopy (PCE 2) with occasional openings supporting small areas of coyote brush scrub (PCE 1). There is also a small patch of high-quality Alameda whipsnake habitat associated with California sage scrub (PCE 1) growing on the steep and rocky east-facing slope in the western portion of the biological study area between the existing trail segments. There are several known Alameda whipsnake occurrences on Pleasanton Ridge (Swaim, pers. comm. 2021), thus the project site is contiguous with occupied habitat and high-quality scrub

habitat likely to support the subspecies. Despite the presence of suitable habitat, the species has not been observed on the site during regular visits by the City biologist since 2018, despite their actively looking for it (Gruber, pers. comm. 2021).

Sensitive Vegetation Communities

Special-status or sensitive natural communities are vegetation communities that are of limited distribution statewide or within a county or region. CDFW's Vegetation Classification and Mapping Program (VegCAMP) works to classify and map the vegetation of California and determine the rarity of vegetation types. Communities with a state rarity ranking of S1 through S3 in CDFW's Natural Community list (CDFW 2020) are considered highly imperiled, and project impacts on high-quality occurrences of these communities are typically considered significant under CEQA. The CNDDB contains occurrences of sensitive natural communities based on Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986). Since the mid-1990s, CDFW and its partners (including the California Native Plant Society) have been working on classifying California vegetation using updated standards that comply with the National Vegetation Classification Standard. Current classification of vegetation alliances in California is codified in the Manual of California Vegetation online edition (CNPS 2021b).

The CNDDB documents three sensitive natural communities in the project vicinity: sycamore alluvial woodland, valley sink scrub, and valley needlegrass grassland (CNPS 2021a). The current terminology for these communities (i.e., using CDFW nomenclature consistent with the Manual of California Vegetation) is California sycamore woodland (*Platanus racemosa – Quercus agrifolia* woodland alliance), iodine bush scrub (*Allenrolfea occidentalis* shrubland alliance), and needle grass – melic grass grassland (*Nassella* spp. – *Melica* spp. herbaceous alliance). None of these communities or any other sensitive natural communities were observed on the project site during the April 2021 field reconnaissance.

Jurisdictional Aquatic Resources

No wetlands or waters supporting jurisdictional aquatic resources were observed on the project site during the April 2021 field survey. Aerial imagery further indicates that no aquatic features are present or historically have been present within the project site.

Wildlife Corridors and Habitat Linkages

The project site is in the "East Bay Hills-Diablo Range" critical linkage mapped by the Critical Linkages: Bay Area and Beyond project (Penrod et al. 2013). It is one of 14 landscape-level habitat linkages identified by Critical Linkages that, together with the Bay Area Open Space Council's Conservation Lands Network, provide a comprehensive plan for the preservation and maintenance of wildlife habitat connectivity throughout the nine-county Bay Area. The preliminary mapping of this linkage was based on the needs of bobcat (*Lynx rufus*), ringtail (*Bassariscus astutus*), and black-tailed deer, but it is also intended to serve several other species, such as American badger (*Taxidea taxus*), brush rabbit (*Sylvilagus bachmani*), California quail (*Callipepla californica*), white-tailed kite (*Elanus leucurus*), loggerhead shrike (*Lanius ludovicianus*), California red-legged frog (*Rana draytonii*), wrentit, and Alameda whipsnake.

Regulatory Context

Federal

Federal Endangered Species Act

The federal Endangered Species Act (FESA) of 1973, as amended (16 USC 1531 et seq.), serves as the enacting legislation to list, conserve, and protect threatened and endangered species, and the ecosystems on which they depend, from extinction. FESA is administered by the U.S. Fish and Wildlife Service (USFWS) for terrestrial and freshwater fish species, and by the National Marine Fisheries Service for marine and anadromous species. Section 9(a)(1)(B) of FESA prohibits the taking, possession, sale, or transport of any endangered fish or wildlife species. "Take" is defined to mean "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct" (16 USC 1532[19]). Harm is defined as "any act that kills or injures the species, including significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering" (50 CFR 17.3).

FESA also enables USFWS and the National Marine Fisheries Service to designate "critical habitat," which are geographic areas that contain "physical or biological features essential to the conservation of the species" and that "may require special management considerations or protection" (50 CFR 424.12). Areas shown on maps as critical habitat units, published in the Federal Register by USFWS or the National Marine Fisheries Service, are often larger than the areas that actually support habitat for the species. Only those areas within the critical habitat units that support the species' primary constituent elements are subject to FESA consultation and analysis of critical habitat effects. Primary constituent element (PCE) is a term introduced in the critical habitat designation regulations to describe aspects of ''physical or biological features.'' On May 12, 2014, USFWS and the National Marine Fisheries Service proposed to revise these regulations to remove the use of the term ''primary constituent element'' and replace it with the statutory term ''physical or biological features'' (79 FR 27066). However, the shift in terminology does not change the approach used in conducting a ''destruction or adverse modification'' analysis, which is the same regardless of whether the original designation identified PCE or physical or biological features, or both (81 FR 7220, February 11, 2016).

Migratory Bird Treaty Act

The Migratory Bird Treaty Act prohibits the intentional take of any migratory bird or any part, nest, or eggs of any such bird. Under the Migratory Bird Treaty Act, "take" is defined as pursuing, hunting, shooting, capturing, collecting, or killing, or attempting to do so (16 USC 703 et seq.). Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). Executive Order 13186 requires federal agencies to work with USFWS to develop a memorandum of understanding. USFWS reviews actions that might affect migratory bird species.

Clean Water Act

The Clean Water Act is the primary federal law that protects the physical, chemical, and biological integrity of the nation's waters, including lakes, rivers, wetlands, and coastal waters. Programs conducted under the Clean Water Act are directed at both point-source pollution (e.g., waste discharged from outfalls and filling of waters) and nonpoint-source pollution (e.g., runoff from parking lots). Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers regulates the discharge of dredged and/or fill material into "waters of the United States." The term "wetlands" (a subset of waters) is defined as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas" (33 CFR 328.3[b]). In the absence of wetlands, the limits of U.S. Army Corps of Engineers jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high water mark" (33 CFR 328.3[e]).

State

California Endangered Species Act

Under the California Endangered Species Act (CESA), the California Fish and Game Commission has the responsibility of maintaining a list of threatened and endangered species. CESA prohibits the take of state-listed threatened or endangered animals and plants unless otherwise permitted pursuant to CESA. Take under CESA is defined as any of the following: "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (California Fish and Game Code Section 86). Unlike FESA, CESA does not include harassment or harm (e.g., habitat degradation) in its definition of take. Species determined by the State of California to be candidates for listing as threatened or endangered are treated as if listed as threatened or endangered and are, therefore, protected from take. Pursuant to CESA, a state agency reviewing a project within its jurisdiction must determine whether any state-listed endangered or threatened species, or candidate species, could be potentially impacted by that project.

Clean Water Act Section 401 and the Porter-Cologne Water Quality Control Act

Under Clean Water Act Section 401, states have the authority to certify federal permits for discharges to waters under state jurisdiction. States may review proposed federal permits (e.g., Section 404 permits) for compliance with state water quality standards. The permit cannot be issued if the state denies certification. In California, the State Water Resources Control Board and the Regional Water Quality Control Boards are responsible for the issuance of Section 401 certifications.

The Porter-Cologne Water Quality Control Act is the primary state law concerning water quality. It authorizes the State Water Resources Control Board and Regional Water Quality Control Boards to prepare management plans, such as regional water quality plans, to address the quality of groundwater and surface water. The State Water Resources Control Board has authority over wetlands through Section 401 of the Clean Water Act, as well as the Porter–Cologne Act, California Code of Regulations Section 3831(k), and California Wetlands Conservation Policy. The Clean Water Act requires that an applicant for a Section 404 permit (to discharge dredge or fill material into waters of the United States) first obtain certification from the appropriate state agency stating that the fill is consistent with the state's water quality standards and criteria. In California, the authority to either grant certification or waive the requirement for permits is

delegated by the State Water Resources Control Board to the nine regional boards. The San Francisco Bay Regional Water Quality Control Board has authority for Section 401 compliance in the project area. A request for certification is submitted to the Regional Water Quality Control Board while an application is filed with the U.S. Army Corps of Engineers.

California Fish and Game Code

Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 protects all birds of prey (raptors) and their eggs and nests. Section 3511 states that fully protected birds or parts thereof may not be taken or possessed at any time. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the Migratory Bird Treaty Act.

Local

Pleasanton General Plan

Conservation and Open Space Element

Following are relevant goals, policies, and programs from the Pleasanton General Plan Conservation and Open Space Element (City of Pleasanton 2009b).

Goal 1: Practice sustainability to preserve and protect natural resources and open space.

Goal 2: Preserve and enhance the natural resources of the Planning Area, including plant and wildlife habitats, heritage trees, scenic resources, and watercourses.

Policy 1: Preserve and enhance natural wildlife habitats and wildlife corridors.

- **Program 1.3**: Preserve and enhance the resource value of wetlands through project development design measures. These measures should be based in part on jurisdictional wetlands delineation in accordance with current Army Corps of Engineers criteria, for projects which are known to have or that may have wetlands present within their boundaries.
- **Program 1.6**: Analyze potential impacts on wildlife populations and habitats before developing projects, using the California Environmental Quality Act (CEQA) process or other processes, as relevant.
- **Program 1.7**: Minimize active recreation–sports, games, exercising, and fishing–within natural habitat areas. Permit passive recreation such as hiking, bicycling, horseback riding, nature and cultural resource study, photography, and picnicking.
- **Program 1.8**: Design site sensitive recreation or interpretive facilities to minimize intrusion within natural public open space. Limit public access, including hiking trails, into sensitive habitat areas, when warranted.
- **Program 1.9**: Plant native species wherever possible in public and private landscaping, and provide wildlife habitat in new landscaping, where appropriate.

Policy 2: Preserve heritage trees throughout the Planning Area.

- **Program 2.1**: Strongly encourage preservation of heritage trees; where preservation is not feasible, the City will require tree replacement or a contribution to the Urban Forestry Fund. Allow no net loss of trees.

- **Program 2.2**: Follow the provisions of the City's Heritage Tree Ordinance, Pleasanton Municipal Code Chapter 17.16, Tree Preservation, when reviewing future development projects.

Policy 3: Preserve and enhance streambeds and channels in a natural state.

Pleasanton Municipal Code

Chapter 17.16 Tree Preservation Ordinance

The City's Tree Preservation Ordinance is intended to identify and preserve trees that enhance natural scenic beauty, promote quality development, maintain ecology, moderate effects of extreme temperatures, create identity, and combat air pollution through oxygen output. The Tree Preservation Ordinance also regulates under what circumstances and permitting procedures heritage trees may be removed, and how existing heritage trees should be protected during construction activities.

The Tree Preservation Ordinance defines a Heritage Tree as any species of tree that meets any of the following (City of Pleasanton 2021):

1. Any single-trunked tree with a circumference of 55 inches or more measured four and one-half feet above ground level.

2. Any multi-trunked tree of which the two largest trunks have a circumference of 55 inches or more measured four and one-half feet above ground level.

3. Any tree 35 feet or more in height.

4. Any tree of particular historical significance specifically designated by official action.

5. A stand of trees, the nature of which makes each dependent upon the other for survival or the area's natural beauty.

The Tree Preservation Ordinance requires the following construction performance standards to protect Heritage Trees (City of Pleasanton 2021):

A. Prior to the commencement of construction, install a sturdy fence at the dripline of any tree which will be affected by the construction and prohibit any storage of construction materials or other materials inside the fence. The dripline shall not be altered in any way so as to increase the encroachment of the construction.

B. Prohibit excavation, grading, drainage and leveling within the dripline of the tree unless approved by the director.

C. Prohibit disposal or depositing of oil, gasoline, chemicals or other harmful materials within the dripline or in drainage channels, swales or areas that may lead to the dripline.

D. Prohibit the attachment of wires, signs and ropes to any heritage tree.

E. Design utility services and irrigation lines to be located outside of the dripline when feasible.

F. Retain the services of a certified consulting arborist for periodic monitoring of the project site and the health of those trees to be preserved. The certified consulting arborist shall be present whenever activities occur which pose a potential threat to the health of the trees to be preserved (for example, when work occurs within the dripline of trees to be preserved).

G. The director shall be notified of any damage that occurs to a tree during construction so that proper treatment may be administered.

Impact Discussion

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

Special-Status Plants

The project would be constructed in coast live oak woodland and scrub communities that contain suitable habitat for four California Rare Plant Rank 1B species: bent-flowered fiddleneck (*Amsinckia lunaris*), Hospital Canyon larkspur (*Delphinium californicum* ssp. *interius*), fragrant fritillary (*Fritillaria liliacea*), and Diablo helianthella (*Helianthella castanea*). Although there are no known occurrences of these species near the project site, and habitat suitability adjacent to existing informal trails is low due to the prevalence of non-native species (e.g., vetch, non-native annual grasses) and disturbance from unofficial mountain bike use, their presence cannot be ruled out without a focused survey by a qualified botanist, which would be conducted as part of the project under the Special Status Plants AMM that is incorporated in the project design and construction methodology.

Clearing and grubbing of shrubs and ground vegetation and grading could result in the removal of special-status plant occurrences if any are found during the botanical survey required under the Special Status Plants AMM and cannot be avoided by project construction. Such direct impacts on special-status plants would be a significant impact before mitigation because the removal of undocumented occurrences would further contribute to statewide declines. Mitigation Measure (MM) BIO-1 requires that the City provide compensatory mitigation for any effects to special status plants through seed/propagule collection, planting, and conducting adaptive management, maintenance and monitoring for 5 years to attain identified species-specific success criteria. Implementation of MM BIO-1 would reduce this impact to less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

Special-Status Wildlife

California red-legged frog

The project site does not support aquatic breeding or non-breeding habitat for California red-legged frog but may be used as upland or dispersal habitat by any individuals breeding in the ridgetop ponds 0.9 to 1.1 miles to the north during the rainy season. Any frogs dispersing through the site would not be expected to remain for extended periods due to the lack of aquatic habitat. In addition, project construction would occur outside the rainy season when frogs would be on the move. Vegetation clearing and ground disturbance would therefore not result in injury or mortality of individual red-legged frogs. Impacts to potential California red-legged frog movement habitat from new trail construction would be offset by the decommissioning and restoration of existing unauthorized mountain bike trails. Therefore, impacts on California red-legged frog movement habitat would be **less than significant**.

Alameda Whipsnake

The project would be constructed in a coast live oak woodland and scrub mosaic suitable for Alameda whipsnake, although it has not been observed on the site to date by City staff. Clearing and grubbing of shrubs and ground vegetation would directly impact potential Alameda whipsnake movement habitat but would not result in injury or mortality of individual whipsnakes because of the Alameda Whipsnake AMM that has been incorporated in the project design and implementation methodology.

Hiking and biking trails in and near occupied Alameda whipsnake habitat do not cause as much mortality as motor vehicles, and Alameda whipsnakes can persist in areas bisected by hiking and biking trails; however, heavily trafficked and high-density trails can result in occasional disturbance and mortality of Alameda whipsnake (USFWS 2011). Miller and Alvarez (2016) reviewed 356 reported observations of Alameda whipsnake and found that 25% of these observations were in open habitat such as roads, trails, and parking areas. At least 13 of the observations in such areas included specimens that apparently succumbed to human-related mortality, including at least one killed by a mountain bike.

Mortality and disturbance of Alameda whipsnakes, if present, from future mountain bike use of the trail system would be an indirect impact of the project. Any Alameda whipsnakes currently occurring on or near the project site would be exposed to existing mountain bike traffic on the numerous informal dirt trails that permeate this portion of Augustin Bernal Community Park. The intent of the project is to formalize mountain bike use in the park to eliminate, or at least minimize, unauthorized use, which the City acknowledges as a current adverse effect on native vegetation and wildlife habitat in the park. Although the project would not entirely remove the risk of Alameda whipsnakes being harassed or killed by mountain bikes, it would not expand mountain bike use into other parts of the park, and would result in a net reduction in the total linear feet of trails within the park. The proposed trail would largely replace an existing unofficial, user-created trail. The total length of the new trail would be approximately 3,700 linear feet, of which approximately 1,070 linear feet would require new construction and 2,630 linear feet would replace the existing trail surface. In addition approximately 4,300 linear feet of other existing unofficial, user-created trails would be

decommissioned. Therefore, the project is not expected to substantially change Alameda whipsnake exposure to human recreational stressors (e.g., mountain bike traffic) from existing conditions, and indirect impacts from future use of the trail would be less than significant.

In summary, the project has been designed to minimize ground disturbance of oak woodland and would implement the Alameda Whipsnake AMM to avoid injury and mortality of individual Alameda whipsnakes. Decommissioning and restoration of existing unofficial user-created trails would offset direct impacts to existing oak woodland movement habitat and also reduce future mortality risk for any whipsnakes currently moving through the site by confining mountain bike traffic to a single trail system. The project would not impact any core scrub/shrub habitat for Alameda whipsnake. Therefore, impacts would be **less than significant**.

Special-Status Birds

The project would be constructed in coast live oak woodland and scrub that provides nesting habitat for many bird species, including oak titmouse, Cooper's hawk (*Accipiter cooperi*), and white-tailed kite. If conducted during the nesting season (March 1 through August 31), trimming of tree branches and moving downed tree branches or trunks could directly impact active oak titmouse nests, which nest in natural tree cavities. Direct impacts on Cooper's hawk or white-tailed kite nests are not expected because no trees would be removed, but construction-generated noise could cause indirect impacts if adults nesting within auditory range of construction perceive such disturbance as a threat and abandon eggs or recently hatched nestlings. The project would implement the Nesting Bird AMM to avoid such impacts, however, and there would therefore be **no impact** on native bird nests.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No riparian habitat or other natural communities considered sensitive by CDFW (2020) are present on the project site. Therefore, the project would have **no impact** on sensitive natural communities.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No state or federally protected wetlands are present on the project site. Therefore, the project would have **no impact** on such resources.

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

The project would occur in a critical habitat linkage identified as regionally important for wildlife movement and habitat connectivity (Penrod et al. 2013) but would not interfere substantially with wildlife movement through this linkage. The project would not create any new barriers (e.g., roads, structures) that would permanently alter existing wildlife movement patterns or introduce mountain

bike use into nearby open space. Any wildlife that currently move through the area are expected to have adapted to the moderate amount of unauthorized mountain bike traffic that already occurs on the project site, and the project would not significantly change this condition. Resident wildlife that regularly move through the area while foraging and dispersing may temporarily alter their movement patterns to avoid increased noise, vibration, human activity, and artificial lighting generated by the project during the approximately 3-month construction period and potentially several weeks after. Similarly, migratory wildlife (e.g., birds and bats) may avoid using areas exposed to increased disturbance activity as stopover habitat if the project were constructed during a fall or spring migration period. Such impacts would be temporary, however, and both native and migratory wildlife are expected to resume normal movement patterns soon after project construction is completed. Therefore, impacts from the project on wildlife movement and the East Bay Hills-Diablo Range habitat linkage would be **less than significant**.

The project would not impede the use of native wildlife nursery sites. As discussed in Section 3.4(a) above, project construction would occur during the nesting season. Trimming of tree branches and moving downed tree branches or trunks could affect active nest sites while construction-generated noise could cause indirect impacts to some nesting bird species if adults nesting within auditory range of construction perceive such disturbance as a threat and abandon eggs or recently hatched nestlings. However, implementation of the Nesting Bird AMM that is incorporated in the project design and construction methodology would ensure that such impacts are avoided and there would therefore be **no impact** on native bird nests.

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

The project would not conflict with any local policies protecting biological resources. No heritage trees protected by Chapter 17.16 of the Pleasanton Municipal Code would be removed. The project would add signage at the entrances of decommissioned trails to minimize intrusion within natural public open space, and has been designed to minimize impacts to native vegetation and wildlife habitat; decommissioned trails and temporarily disturbed areas would be restored to natural conditions. Therefore, the project would have **no impact** on local policies or ordinances protecting biological resources.

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

To date, there are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved Habitat Conservation Plans that cover the project site. Therefore, the project would not conflict with an adopted Habitat Conservation Plan and there would be **no impact**.

Mitigation Measures

MM-BIO-1 **Compensatory Mitigation for Loss of Special-Status Plants.** If any special-status plant occurrences found during the botanical survey cannot be avoided without compromising trail integrity (e.g., if plants are in a cut-fill area required for drainage or slope stabilization),

compensatory mitigation for unavoidable permanent impacts on special-status plant occurrences shall be required based on recommendations of a qualified botanist. Given the amount of available habitat in Augustin Bernal Community Park, it is expected that compensatory mitigation could be accomplished at the park. Compensatory mitigation shall include the following components, at a minimum:

- The botanist shall prepare a special-status plant mitigation plan that includes seed/propagule collection methods, success criteria 5 years of maintenance and monitoring, and adaptive management approaches. The special-status plant mitigation plan shall be implemented to document the success of creation of the new plant occurrence. Adequate funding for compensatory mitigation shall be provided on an agreed-to schedule.
- Prior to unavoidable and permanent disturbance to any special-status plants, propagules shall be collected from the occurrence to be disturbed. This may include seed collection, cuttings, or seed-bearing topsoil salvage, and these propagules shall be used to establish a new population on suitable, unoccupied habitat. Transplantation of whole plants may be attempted, but shall not be used as the primary means for creating a new occurrence.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Setting

Dudek staff completed a Cultural Resources Report (Appendix C) that evaluates the project's potential impacts on cultural resources. A records search was completed for the current area of potential effects (APE) and a 0.5-mile buffer by staff at the Northwest Information Center on March 25, 2021. The records search did not identify any cultural resources within the APE but based on previous studies within the records search area there is one identified cultural resource, the main clubhouse of the Castlewood Country Club, located approximately 0.45 miles east of the APE. Dudek consulted historic maps and aerial photographs to understand development of the APE (NETR 2021). Historic aerial photographs available

from 1946 to 2016, and historic maps available from 1906 to 2018 were inspected to observe previous development in the project APE. The APE is currently undeveloped. These maps and images indicate that the APE has never had any development within it.

On April 12, 2021, Dudek archaeologist William Burns conducted an intensive pedestrian survey of the APE. Survey was consistent with Secretary of the Interior Standards. Mr. Burns inspected the ground surface for cultural resources, including artifacts, features, and/or midden soils. Surface visibility within the APE was low (<5% visibility) due to vegetation, with the exception of the existing informal bike trail, which is highly disturbed from bike travel but allows for 100% ground visibility. No cultural resources were identified during the survey (Appendix C).

Impact Discussion

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

See Section 3.5(b), below. Impacts would be **less than significant with mitigation incorporated**.

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

A records search was completed for the current project site and a 0.5-mile radius on March 25, 2021 (Appendix C). The records search did not identify any cultural resources within the APE. Results of a Native American Heritage Commission (NAHC) Sacred Lands File search, provided March 2, 2021, did not identify resources within the search area, which included U.S. Geological Survey sections intersecting the project site and surrounding 0.5-mile buffer. No additional archaeological or built environment resources are previously documented on the project site. One cultural resource, the main clubhouse of the Castlewood Country Club, is located approximately 0.45 miles east of the APE. An intensive pedestrian survey conducted of the project site on April 12, 2021 did not identify any cultural resources. The project site is undeveloped, and surface visibility within the APE is low (<5% visibility) due to vegetation. Based on observation of present conditions and soil development in the area, there is a low potential for currently unidentified cultural material or deposits to be encountered during project implementation and/or future use of the area (Appendix C).

The project would have no impact to known cultural resources. However, there is a low possibility for the project to inadvertently impact currently unidentified cultural resources. Archaeological protection measures for potential discoveries of cultural resources are identified in MM-CUL-1. With implementation of MM-CUL-1, impacts to archaeological resources would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

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

The project site does not have any association with a cemetery or mausoleum and was not used historically for burial or internment purposes. No known human remains or burial sites were

discovered through the Northwest Information Center records search, pedestrian survey of the project site, or NAHC Sacred Lands File search and subsequent tribal outreach (Appendix C). Construction of the project has a low potential for encountering unknown buried human remains based on the research findings above. However, the potential to encounter human remains still exists during ground-moving construction activities. As such, implementation of MM-CUL-2 is required to ensure that potential impacts would be less than significant by providing standard procedures in the event that human remains are encountered during project construction. Therefore, impacts would be **less than significant with mitigation incorporated**.

Mitigation Measures

MM-CUL-1 **Treatment of Unanticipated Cultural Resources.** To ensure that there will be no impacts to unanticipated cultural resources, the City or its contractors shall retain a qualified archaeologist to prepare Worker Environmental Awareness Training materials which shall be provided to all construction personnel prior to initiation of construction activities. This shall include notifying construction crew members of the potential to encounter archaeological material and how to recognize such material.

In the unlikely event that cultural resources (sites, features, or artifacts) are exposed during construction activities, all construction work occurring within 100 feet of the find shall immediately stop and the City contacted. A qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, shall be assigned to review the unanticipated find, and evaluation efforts of this resource for NRHP and CRHR listing will be initiated in consultation with the City. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole freshwater bivalves shell, burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by the presence of glass bottles and shards, ceramic material, building or domestic refuse, ferrous metal, or old features such as concrete foundations or privies. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA/NRHP, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. If the City determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), any affected tribe would be provided a reasonable period of time to conduct a site visit and make recommendations regarding future ground disturbance activities as well as the treatment and disposition of any discovered tribal cultural resources. Depending on the nature of the potential resource and Tribal recommendations, review by a qualified archaeologist may be required. Implementation of proposed recommendations shall be made based on the determination by the City that the approach is reasonable and feasible. All activities shall be conducted in accordance with regulatory requirements.

MM-CUL-2 **Treatment of Unanticipated Human Remains.** In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, work shall halt in that area and the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the City, the disposition of the human remains.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Setting

The proposed project would develop a mountain bike trail within an existing community park. No lighting or other sources of energy consumption are included in the project, other than energy consumption necessary during project construction.

Impact Discussion

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

Construction Energy Use

Electricity

Temporary electric power for as-necessary lighting and electronic equipment would be provided by Pacific Gas & Electric. The amount of electricity used during construction would be minimal since typical demand would be from electrically powered hand tools. The electricity used for construction activities would be temporary and minimal; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity. Impacts would be **less than significant**.

Natural Gas

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum," below. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas. Impacts would be **less than significant**.

Petroleum

Petroleum would be consumed throughout construction. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction. Transportation of construction materials and construction workers would also result in petroleum consumption. Heavy-duty construction equipment, vendor trucks, and haul trucks would use diesel fuel. Construction workers would likely travel to and from the project area in gasoline-powered vehicles. Construction is expected to take approximately 3 months. Once construction activities cease, petroleum use from off-road equipment and transportation vehicles would end. Because of the short-term nature of construction and relatively small scale of the project, the project's petroleum consumption would be negligible when compared to California's daily total use of approximately 1.8 million barrels of petroleum. As such, impacts would be **less than significant**.

Operational Energy Use

Anticipated energy use would primarily be attributed to visitors and maintenance vehicles traveling to and from the project site. The park is a recreational facility that does not use electricity or natural gas, and petroleum consumption associated with park visitors would be minimal in comparison with other types of development, such as commercial and industrial uses. Additionally, the project site supports an unofficial user-created trail. While construction of an official, appropriately designed trail is expected to increase use of the trail, the trail would serve a predominantly local

population because access to the park is limited to City residents or individuals who obtain a permit from the City. Thus, the increased usage of the park would not generate a substantial increase in petroleum consumption. Additionally, energy used from vehicles traveling to and from the project site would decrease over time as vehicles become increasingly efficient in accordance with the energy efficiency and greenhouse gas reduction standards. As such, energy use from project operations would be **less than significant**.

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

The project would follow applicable energy standards and regulations during the construction phases. Project operation would not require use of electricity or natural gas, and the increase in petroleum usage by trail users would not be substantial. All visitor vehicles and , maintenance equipment would be subject to all applicable regulations that implement state and local plans for renewable energy and efficiency. As such, the project would result in **no impact** from conflict with or obstruction of a state or local plan for renewable energy and energy efficiency.

Mitigation Measures

No mitigation measures are required.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Setting

The project site is located within and adjacent to Augustin Bernal Community Park and under the jurisdiction of the City of Pleasanton. There are several active faults near the project area: Calaveras, Concord Green Valley, Green Valley, Greenville, Hayward, Mt. Diablo Thrust Fault, and San Andreas Faults. The Calaveras Fault, which is a designated Alquist Priolo fault zone, runs along the eastern edge of the Augustin Bernal Community Park, with the staging area and parking lot partially within the fault zone. The Hayward Fault, located approximately 8 miles west of the park, is also a designated Alquist Priolo fault zone. As described in the General Plan, the City of Pleasanton is considered to have a moderate seismic risk in terms of fault hazard, seismic ground shaking, and liquefaction. Additionally, the General Plan identifies that the project site is located within an area of substantial landslide susceptibility (City of Pleasanton 2005).

Impact Discussion

a) ***Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

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.***

The California Geological Survey provides scientific information about the state's geology, seismology, and associated hazards. As part of their Seismic Hazards Program, areas

prone to geological hazards are mapped on their California Earthquake Hazards Zone Application (EQ Zapp) (DOC 2019). As noted in the Setting section above, there are several active faults near the project area, including the Alquist-Priolo designated Calaveras Fault immediately east of the project site and the Hayward Fault approximately 8 miles west of the site.

The project would not introduce a new use to the Augustin Bernal Community Park. The project proposes to construct a mountain bike trail to replace an unofficial user-created trail. As discussed further in Section 3.16(a), the proposed project could slightly increase use of the Augustin Bernal Community Park by providing an engineered mountain bike trail that could be used by mountain bikers with a wider range of experience and skill levels than the existing trail supports. However, the project is not expected to substantially increase trail use activity within the park overall because of the existing high volume of trail use at the park, including on the unofficial user-created trail that the proposed project would replace, and the potential to divert a portion of existing downhill mountain bike traffic on the park's multi-use trails to the new trail.

The project does not include any structures or new parking that would be likely to result pose substantial risk associated with seismic activity. Accordingly, risks associated with seismic events, including fault rupture, would be **less than significant**.

ii) Strong seismic ground shaking?

Ground shaking can result in structural failure and collapse of structures or cause non-structural building elements to fail, presenting a hazard to building occupants and contents. The project site is located in an area of moderate earthquake hazard. As noted above, the project would construct a mountain bike trail to replace an unofficial user-created trail and trail spurs, and the project would not substantially increase trail use activity within the park. The project would not construct any structures or parking areas. Although trail users could be exposed to strong seismic ground shaking, the project would not substantially increase risks associated with seismic activity because it would not substantially increase use of the park and therefore would not significantly increase the risk of loss, injury, or death involving strong seismic ground shaking. Thus, this impact would be **less than significant**.

iii) Seismic-related ground failure, including liquefaction?

Liquefaction generally occurs as a result of strong ground shaking in areas where granular sediment or fill material either contains or is located immediately above high moisture content. The ground shaking transforms the material from a solid state to a temporarily liquid state. Liquefaction is a serious hazard because buildings in areas that experience liquefaction may sink or suffer major structural damage. The project would not construct structures and would not increase the potential for liquefaction to occur within the park. Liquefaction typically occurs during or following heavy precipitation events, during which use of the proposed mountain bike trail would be very low. As the project would not substantially increase use of the park and use of the trail would be low during conditions under which liquefaction risks are highest, the project would not increase the risk of loss, injury, or death due to liquefaction. Thus, this impact would be **less than significant**.

iv) Landslides?

Landslides are downslope movements of materials including rock, soil, artificial fill, or combinations of such materials. The size and distance of landslide movements can greatly vary. The City of Pleasanton has identified areas within the City as higher risk areas for landslides and this includes the northeastern side of Pleasanton Ridge, which includes the project site. Recognizing this hazard, the General Plan designates the majority of the land on Pleasanton Ridge as Agricultural and Grazing and Parks and Recreation. The proposed project would construct a mountain bike trail to replace an unofficial user-created trail. The project would not introduce a new use to the Augustin Bernal Community Park, would not construct any new structures, and would not substantially increase trail use activity within the park. Thus, the proposed project is consistent with the General Plan in relation to minimizing exposure of people to risks associated with landslides.

Additionally, project construction would require minor grading, with grading cuts generally at a maximum of 0.5 feet in depth and a total of approximately 68 cubic yards of earthwork. All grading would be completed in accordance with the current CBC and City's grading and erosion prevention ordinance which would ensure that project grading does not create unstable slopes or increased risks of landslides. Thus, there would be **less-than-significant** impacts related to the risk of loss, injury, or death involving landslides.

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

Grading and construction would be completed in accordance with the CBC and in compliance with the National Pollutant Discharge Elimination System Waste Discharge Requirements from Small Municipal Separate Storm Sewer Systems (MS4s). BMPs implemented as part of the project would include measures to stabilize work areas including fiber wattles, silt fencing, concrete washout areas, soil stabilizers, revegetation, or other appropriate measures. These measures would ensure that soil erosion during grading and construction is prevented. The trail design plans also identify BMPs to be installed at the site during construction to provide long-term post-construction erosion control. Site stabilization and pollution prevention measures are noted on Sheets N-1 and N-2 of the trail design plans provided in Appendix A. In addition, implementation of MM-GEO-1 and BMPs would ensure that erosion is minimized through long-term drainage control, placement of erosion control mats, and seeding following construction. Therefore, impacts would be **less than significant with mitigation incorporated**.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

As discussed in response a) above, risks of seismic activity, landslide and liquefaction are known concerns for the project site. As previously discussed, all grading and construction would be completed in accordance with the CBC and the Pleasanton Municipal Code which would ensure that project grading would not create additional geologic and soil stability concerns. Further, the proposed project would not construct any structures or alter or substantially increase use of the Augustin Bernal Community Park and thus would not substantially increase exposure of people to

geologic and soil stability hazards. Therefore, the project would have a **less-than-significant** impact associated with an unstable geologic unit or soil.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils have a potential to undergo significant changes in volume in the form of either shrinking or swelling due to changes in moisture content. Periodic shrinking and swelling of expansive soils can cause extensive damage to buildings, other structures, and roads. Expansive soils are potentially present at or near the surface in areas in northern Pleasanton and along the northeastern portion of Pleasanton Ridge. As stated above, the project would not construct structures and would be constructed consistent with the CBC, and local code. Therefore, the project would have a **less-than-significant** impact associated with expansive soils.

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

The project would not include restrooms and would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the project would have **no impact**.

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

The project site contains no known paleontological resources or unique geologic features and is not within an area considered sensitive for these resources. There is some potential to uncover previously undiscovered paleontological resources during ground disturbing activities; however, implementation of MM-GEO-2 would ensure that the potential impacts associated with effects to unique paleontological or geological features would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

Mitigation Measures

MM-GEO-1 **Erosion Control.** Erosion control measures shall be implemented in accordance with an erosion control plan. This could include measures for slope stabilization, dust control, and temporary and permanent erosion control devices/best management practices such as straw wattles, track out control devices, silt fencing, sediment traps, tarping of stockpiled soils, revegetation treatments or other measures specified by the erosion and dust control plan or as determined to be necessary by the project engineer.

MM-GEO-2 **Treatment of Unanticipated Paleontological Resources.** In the event that paleontological resources (e.g., fossils) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist meeting the professional standards of the Society of Vertebrate Paleontology can evaluate the significance of the find and determine whether or not additional study is warranted. If the discovery is clearly not significant, the paleontologist

may document the find and allow work to continue. If the discovery proves potentially significant under CEQA, additional work such as preparation of a paleontological treatment plan and monitoring in the area of the find may be warranted.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Setting

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer). Gases that trap heat in the atmosphere are often called GHGs. The greenhouse effect traps heat in the troposphere through a threefold process: (1) short-wave radiation emitted by the Sun is absorbed by the Earth; (2) the Earth emits a portion of this energy in the form of long-wave radiation; and (3) GHGs in the upper atmosphere absorb this long-wave radiation and emit this long-wave radiation into space and back toward the Earth. This trapping of the long-wave (thermal) radiation emitted back toward the Earth is the greenhouse effect's underlying process.

Principal GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide, O_3, and water vapor. Some GHGs, such as CO_2, CH_4, and nitrous oxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely byproducts of fossil-fuel combustion, whereas CH_4 results mostly from off-gassing associated with agricultural practices and landfills. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2 include fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride, which are associated with certain industrial products and processes (CAT 2006).

The Intergovernmental Panel on Climate Change (IPCC) developed the Global Warming Potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons of CO_2 equivalent (MT CO_2e).

Regarding impacts from GHGs, the California Air Pollution Control Officers Association (CAPCOA) consider GHG impacts to be exclusively cumulative impacts (CAPCOA 2008); therefore, assessment of significance is based on a determination of whether the GHG emissions from a project represent a cumulatively considerable contribution to the global atmosphere. This analysis uses both a quantitative and a qualitative approach. The quantitative approach is used to address the first significance criterion listed above. The quantifiable thresholds developed by BAAQMD were formulated based on Assembly Bill (AB) 32 and California Climate Change Scoping Plan reduction targets; these strategies will reduce GHG emissions statewide. Thus, a project cannot exceed a numeric BAAQMD threshold without also conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, if a project exceeds a numeric threshold and results in a significant cumulative impact, it would also result in a significant cumulative impact with respect to consistency with a plan, policy, or regulation, even though the project may incorporate measures or have features that would reduce its contribution to cumulative GHG emissions.

The BAAQMD has established the following three separate thresholds of significance for operational emissions from nonstationary sources:

- Compliance with a Qualified Greenhouse Gas Reduction Strategy (i.e., if a project is found to be out of compliance with a Qualified Greenhouse Gas Reduction Strategy, its GHG emissions may be considered significant).
- 1,100 MT CO_2e per year (i.e., emissions above this level may be considered significant).
- 4.6 MT CO_2e per service population per year (i.e., emissions above this level may be considered significant). (Service population is the sum of residents plus employees expected for a development project.)

This analysis uses the quantitative threshold of 1,100 MT CO_2e annually. If the project GHG emissions would exceed this threshold, it would be considered to have a cumulatively considerable contribution of GHG emissions and a cumulatively significant impact on climate change.

Impact Discussion

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction. Construction of the project would result in GHG emissions, primarily due to the use of off-road construction equipment, on-road vendor (material delivery) trucks, and worker vehicles. Since the BAAQMD has not established construction-phase GHG thresholds, construction GHG emissions were compared to the BAAQMD operational GHG threshold. Construction is expected to require approximately 3 months to complete and to generate a total of 63.88 MT CO_2e, as shown in Table 3.8-1. A detailed depiction of the construction schedule – including information regarding equipment, trucks, and worker vehicles – is included in Appendix B.

Table 3.8-1. Estimated Annual Construction GHG Emissions

Construction Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons			
Year 1	63.44	0.02	0.00	63.88
			BAAQMD Threshold	1,100
			Threshold Exceeded?	No

Source: Appendix B
Notes: CO_2 = carbonp dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent;

Operations. The project would involve construction of a mountain bike trail. There would be no energy consumed at the project site and thus the project would not generate any GHG emissions other than from vehicle travel to and from the site. The proposed trail would replace an existing unofficial, user-created trail. The user-created trail is already subject to moderate usage. Once the proposed trail is completed, it is expected that there would be a slight increase in trail usage, which would create a minor number of new vehicle trips. As a local-serving recreation facility that would enhance the recreational opportunities already present at the Augustin Bernal Community Park, the project would not generate substantial increases in vehicle-miles-traveled in the project area. Thus, the project would not cause a long-term increase in GHG emissions.

In summary, the combined GHG emissions associated with project construction and operations would be well below BAAQMD's GHG threshold of 1,100 MT CO_2e per year. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and this would represent a **less-than-significant** GHG impact.

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

The City of Pleasanton's current Climate Action Plan (CAP), adopted in 2012, includes GHG emissions baseline, future projections, and reduction targets, GHG reduction goals, strategies, and supporting actions for a variety of sectors, recommended actions for preparing for climate change with climate adaptation measures, and a monitoring and implementation strategy (City of Pleasanton 2012). The proposed project would comply with the applicable measures outlined in the CAP, including creating and maintaining a safe, convenient, and effective system that encourages increased bicycle use.

The Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Relatedly, in the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the California Natural Resources Agency observed that "[t]he [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan (CARB 2014)."Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified

in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. To the extent that these regulations are applicable to the project, the project would comply will all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Regarding consistency with Senate Bill (SB) 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order (EO) S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the *First Update to the Climate Change Scoping Plan* that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the *First Update to the Climate Change Scoping Plan* states the following (CARB 2014):

> "This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under Assembly Bill 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions."

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-3-05. This is confirmed in *California's 2017 Climate Change Scoping Plan* (*2017 Scoping Plan*), which states, "This Plan draws from the experiences in developing and implementing previous plans to present a path to reaching California's 2030 GHG reduction target. The Plan is a package of economically viable and technologically feasible actions to not just keep California on track to achieve its 2030 target, but stay on track for a low- to zero-carbon economy by involving every part of the state (CARB 2017)."The *2017 Scoping Plan* also states that although "the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 statewide GHG target (80% below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals (CARB 2017)."

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would not exceed the BAAQMD's GHG threshold of 1,100 MT CO_2e per year, which was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

Since the specific path to compliance for the state in regards to the long-term goals will likely require development of technology or other changes that are not currently known or available,

specific additional mitigation measures for the project would be speculative and cannot be identified at this time. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32's 40% reduction target by 2030 and EO S-3-05's 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the above considerations, the project would have **no impact** due to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Mitigation Measures

No mitigation measures are required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site that 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Setting

Hazardous materials stored and used in the area surrounding the project area would likely be associated with common materials used in commercial and recreational activities, such as paints, cleaning solvents, bonding agents, and small quantity petroleum fuels and lubricants, as well as herbicides and pesticides used for common weed and pest control applications. A search of the State Geotracker and Envirostor databases determined that no active hazardous materials cleanup sites are located in proximity of the project site. Livermore Pleasanton Fire Department provides emergency response to the project site.

Impact Discussion

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

Construction of the project would involve the use of common hazardous materials used in construction, including petroleum-based fuels, hydraulic fluids, and lubricants used in vehicles and equipment. Large quantities of these materials would not be stored at or transported to the construction site. All construction waste materials would be disposed of in compliance with state and federal hazardous waste requirements and at appropriate facilities. Construction would comply with the requirements for storage, spill prevention and response and reporting procedures, and by implementing erosion control and pollution prevention measures included in the trail design plans (see Section 3.7, Geology and Soils, including MM-GEO-1; Section 3.10, Hydrology and Water Quality; and Appendix A). Additionally, MM-HAZ-1 requires specific measures for spill prevention and containment of hazardous materials on the project site during construction.

Long term use and maintenance of the proposed trail would also require minimal use of common hazardous materials for equipment fuels and fluids and for vegetation management. The project would not require routine transport, use, or disposal of large quantities of hazardous materials, and all hazardous materials needed for maintenance would be handled in accordance with state and federal regulations, consistent with the City's existing procedures.

With implementation of mitigation measures and requirements identified above, impacts associated with transport, use, or disposal of hazardous materials would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

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

Construction of the project would involve temporary use of hazardous materials, as discussed above. Storage, handling, and use of these materials would occur in accordance with standard construction BMPs to minimize the potential for spill or release and ensure that any such spill or release would be controlled on site. Construction plans and specifications would include standard construction BMPs for handling, storage, use and disposal of hazardous materials, such as requirement to contain materials inside buildings or under other cover, vehicle specifications for hazardous material transport and disposal, procedures for safe storage, and training requirements for those handling hazardous materials. All hazardous materials would be used and handled in accordance with the requirements for storage, spill prevention and response and reporting procedures. Additionally, MM-HAZ-1 requires specific measures for spill prevention and containment of hazardous materials on the project site during construction. Compliance with standard construction specifications, the Hazardous Substances Plan, and MM-HAZ-1 would ensure that impacts would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project site is not within 0.25 miles of a school. Therefore, the project would have **no impact**.

d) Would the project be located on a site that 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?

The project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, therefore, the project would have **no impact**.

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

The nearest airports to the project are Hayward Executive Airport and Livermore Municipal Airports. However, the project site is not within the airport land use plan area for either of these facilities.

The project would result in **no impact** associated with a safety hazard or noise exposure associated with airport operations.

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

The project would construct a new mountain bike trail within an existing community park to replace an existing user-created trail. As discussed in Sections 3.7(a) and 3.16(a), the project would not result in a substantial increase in trail use at the park and as discussed in Section 3.17(b), the project would not generate a substantial volume of traffic that could impede traffic flows during an emergency response or evacuation event. Additionally, the project does not include and would not require any modifications to existing roadways that could impede emergency response or evacuation activities. Construction and operation of the project would not affect an adopted emergency response plan or emergency evacuation plan; therefore, the project would have **no impact**.

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

The project is located adjacent to an urbanized area on a site surrounded with existing community park. The project site currently supports a variety of natural habitats, including oak woodlands and chaparral. Trails throughout the park, including the user-created trail that the proposed project would replace, are frequently used by the general public. The City currently performs vegetation treatments within the Community Park to maintain defensible space requirements and reduce the potential for wildfire and would continue to perform these treatments following development of the new trail. The proposed trail would not increase the risk of wildfire ignition. As discussed in Sections 3.7 and 3.16, the project would not result in a substantial increase in trail use, thus it would not substantially increase the number of people who may be exposed to hazards if a wildfire occurred in the project vicinity. Thus, the project would have a **less than significant** impact associated with increases in people's exposure to wildfire hazards and risks.

Mitigation Measures

MM-HAZ-1 **Management of Hazardous Materials During Construction.** The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications.

- All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.
- Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures.

- A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction.
- Project plans and specifications shall identify construction staging areas and designated areas where equipment refueling, lubrication, and maintenance may occur. Areas designated for refueling, lubrication, and maintenance of equipment shall be approved by the City.
- In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City of Pleasanton.
- Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	☐	☒	☐	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☒	☐	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting

The project would construct a mountain bike trail descending the easterly slope of the Pleasanton Ridge. There are no streams or natural drainage courses within or adjacent to the project site. As shown in Figure 1, there is one primary drainage slightly north of the project site, within the Augustin Bernal Community Park. This drainage flows eastward as a tributary to Arroyo de la Laguna, east of Foothill Boulevard. Arroyo de la Laguna continues south and then west into the City of Fremont, generally along the same alignment as State Route 84, until it enters Alameda Creek and ultimately the San Francisco Bay.

Impact Discussion

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

Soil disturbance during grading and construction could potentially result in erosion and sedimentation of downstream water bodies. Erosion and sedimentation affect water quality and interfere with photosynthesis; oxygen exchange; and the respiration, growth, and reproduction of aquatic species. In addition to sediment, other pollutants associated with construction activity could include heavy metals, oil/grease, fuels, debris/trash from construction-related materials, and concrete curing compounds. Sediment can also be a carrier for these pollutants if such pollutants impact on-site soils and are subsequently transported off site.

Because the area of ground disturbance would be less than 1 acre, grading and construction would not be subject to the State Construction General Permit and would not require completion and implementation of a Stormwater Pollution Prevention Plan. However, the City would implement typical BMPs to minimize soil erosion and associated adverse effects to water quality, including measures to stabilize work areas including fiber wattles, silt fencing, concrete washout areas, soil

stabilizers, revegetation, or other appropriate measures. Site stabilization and pollution prevention measures are noted on Sheets N-1 and N-2 of the trail design plans provided in Appendix A.

In the absence of proper drainage controls and vegetation cover following grading and construction, long-term erosion-induced sedimentation of downstream water bodies could occur. However, implementation of MM-GEO-1 would ensure that erosion is minimized through long-term drainage control, placement of erosion control mats, and seeding following construction. With implementation of the site stabilization and pollution prevention measures identified in the trail design plans and in MM-GEO-1, construction and operational impacts to downstream drainages would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. With implementation of MM-GEO-1, impacts from degradation of water quality or violation of water quality standards during construction and project operation would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

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

The project would not rely on any groundwater sources and would not develop or use a groundwater supply well. Further, the project does not include any paving or other new impervious surfaces that could interfere with groundwater recharge. Thus, the project would not contribute to the depletion of groundwater supplies through use of groundwater or reduction of groundwater recharge and the project would have **no impact** associated with the potential to impede sustainable groundwater management.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on or off site?

Construction activities for the proposed project would occur over approximately 3 acres. Minor grading and vegetation removal would be required but no new impervious surfaces would be created. Under the existing condition, the project site supports unofficial user-created trails that have not been appropriately engineering to manage stormwater. This results in substantial erosion, as shown in the site photographs in Figures 7a and 7b. By replacing the user-created trail with an engineered trail that incorporates grade reversals to effectively allow stormwater to flow off of the trail surface and into adjacent vegetation, the project would reduce the extent of erosion that is currently occurring on the trail surface. Further, allowing stormwater to flow into adjacent vegetation would reduce runoff velocities, which in turn would prevent reduce the potential for erosive scour along the sides of the trail. In addition, implementation of MM-GEO-1 would ensure that erosion is minimized through long-term drainage control, placement of erosion control mats, and seeding following construction. As a result, impacts would be **less than significant with**

mitigation incorporated and the project would not result in substantial erosion or siltation on or off site.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

As discussed above, the project would not create any new impervious surfaces and the project design would ensure that runoff velocities would not increase, thus the project would not result in any on- or off-site flooding. Implementation of the trail project would result in **no impact** associated with flooding on or off site.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

As discussed above, the project would not create any new impervious surfaces and the project design would ensure that runoff velocities would not increase, thus the project would not result in any increase in stormwater runoff and thus would not result in the capacity of existing or planned stormwater drainage systems being exceeded.

As discussed in Section 3.10(a), the City would implement typical BMPs to minimize soil erosion and associated adverse effects to water quality, including measures to stabilize work areas including fiber wattles, silt fencing, concrete washout areas, soil stabilizers, revegetation, or other appropriate measures. Site stabilization measures are noted on Sheets N-1 and N-2 of the trail design plans provided in Appendix A. BMPs implemented during construction would include measures to stabilize work areas including fiber wattles, silt fencing, concrete washout areas, soil stabilizers, revegetation, or other appropriate measures. As discussed in Section 3.9, Hazards and Hazardous Materials, construction of the project would involve temporary use of common hazardous materials used for construction purposes. However, implementation of MM-GEO-1, as well as appropriate materials handling and spill prevention measures required by MM-HAZ-1, would ensure that water quality would not be degraded by materials used during construction or inadvertent release of those materials. Following construction, the project would not be expected to release pollutants into the storm drain system because trail use would not require the use of any water pollutants.

The project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, and with implementation of the identified mitigation measures, the project would not introduce polluted runoff. Impacts would be **less than significant with mitigation incorporated**.

iv) impede or redirect flood flows?

The project site is located in Federal Emergency Management Agency Flood Insurance Rate Maps (Nos. 06001C0318G and 06001C0319G) and is not located within a 100-year or 500-year flood hazard zone (FEMA 2021). The project would have **no impact** on flood flows.

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

Seiche and tsunami are short duration earthquake-generated water waves in large enclosed bodies of water and the open ocean, respectively. The extent and severity of a seiche or tsunami would be dependent upon ground motions and fault offset from nearby active faults. The project site is not located adjacent to any large bodies of water and is not located downstream of a dam. In addition, the project site is not located within a 100-year or 500-year flood hazard zone (FEMA 2021). Therefore, the project is not located within a flood hazard, tsunami, or seiche zone, and is not expected to be inundated. The project would have **no impact**.

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

The project would have no impact on groundwater and would therefore have no impact on a groundwater management plan. As discussed above, the project would not require the use of groundwater, would not interfere with groundwater recharge, and would not introduce water pollutants into stormwater runoff. Therefore, the project would not adversely affect water quality or groundwater supplies. The project would have **no impact** due to conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan.

Mitigation Measures

See Section 3.7 for MM GEO-1 and Section 3.9 for MM HAZ-1.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Setting

The project site is surrounded by existing park and recreational facilities. The majority of the trail would be contained within Augustin Bernal Community Park, and a portion of the trail would cross Golden Eagle HOA property, subject to an access easement. To the west, north, and south is Pleasanton Ridge Regional Park,

which covers more than 9,000 acres and is owned and operated by the East Bay Regional Park District. To the south is Castlewood Country Club. Augustin Bernal Community Park lies on the western boundary of the City. The city boundaries extend approximately 4.75 miles to the north and approximately 5.75 miles to the east.

Impact Discussion

a) Would the project physically divide an established community?

The project would construct a new official mountain bike trail within the existing Augustin Bernal Community Park, replacing several existing unofficial user-created trails. The project site is adjacent to existing single family residential areas to the east, and the existing Park to the north, south, and west. There is no residential land uses within the Park or within the portion of the Golden Eagle HOA-owned land that the trail would cross; thus there are no established communities immediately adjacent to any portion of the proposed trail. Therefore, implementation of the project would not result in the division of an established community and the project would have **no impact**.

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

The project would construct a new mountain bike trail within existing parkland and open space. The project would not require any changes in the land use or zoning designations. Land use on the project site is regulated by the City of Pleasanton General Plan, and the City Zoning Ordinance. This Initial Study finds that the project would result in potentially significant environmental effects in the areas of biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, public services, recreation, and tribal cultural resources. However, these potential impacts are typical of most construction projects throughout California and do not indicate that the project would be inconsistent with the City's General Plan, Municipal Code, or other plans and regulations. The project would have **no impact**.

Mitigation Measures

No mitigation measures are required.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Setting

The site does not support any mining activities and is not zoned specifically for mineral extraction or preservation and is not known to provide access to important mineral resources.

Impact Discussion

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

See Section 3.12(b), below.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The project would construct a new mountain bike trail to replace several existing unofficial user-created trails. The City's General Plan states that the California Division of Mines and Geology has designated sand and gravel land in and adjacent to the Pleasanton Planning Area as an Aggregate Resource Area of Regional Significance. Accordingly, the General Plan Map "designates about 1,750 acres of regionally significant sand and gravel deposits in the eastern Planning Area for Sand and Gravel Harvesting" (City of Pleasanton 2005). The General Plan does not identify any known mineral resources or deposits within or near the project site. As there are no known mineral resources underlying the project site, implementation of the project would not result in a loss of availability of any known mineral resource. The proposed project would result in no loss of availability of any locally important mineral resources delineated on a local general plan or other land use plan; the project would have **no impact.**

Mitigation Measures

No mitigation measures are required.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Setting

The project site is within an existing park next to urbanized areas within the City of Pleasanton. People using the existing trails within the Augustin Bernal Community Park and Pleasanton Ridge Regional Park are considered to be noise-sensitive receptors. Other noise-sensitive receptors near the project site are the single-family residences within the Golder Eagle subdivision and the Castlewood subdivision as well as the Castlewood Country Club golf course. Typical noise sources within the project vicinity include traffic on local roads and noise generated at the Augustin Bernal Community Park staging area and parking lot.

Impact Discussion

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

Construction Noise

The project site is surrounded by both residential and recreational land uses. The primary source of noise in the immediate vicinity is roadway noise along Golden Eagle Way. Construction activities could increase noise levels temporarily in the vicinity of the project. Actual noise levels would depend on the type of construction equipment involved, distance to the source of the noise, time of day, and similar factors. Construction noise is complex to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time, condition of each piece of equipment, and number of pieces of equipment that will actually operate on site. Although the anticipated construction noise levels would be readily noticeable to adjacent residences and park goers, construction noise would be regulated through Pleasanton City Code. Pursuant to Article 9.04 of the Pleasanton City Code, noise from construction activities is exempt from noise level requirements of the Code, provided that construction equipment is fitted with factory-installed muffling devices and is properly maintained and that construction occurs during the following periods:

- Monday through Saturday, 8:00 a.m. to 8:00 p.m,
- Sunday and holidays, 10:00 a.m. to 6:00 p.m.

Construction activities for the project would occur between the permitted hours and would comply with other City Code requirements; thus construction noise would result in a **less-than-significant** impact.

Operational Noise

After construction, operational noise from the project site would consist of noise from vehicle trips associated with the project as well as on-site activities. On-site activities at the proposed park would result in relatively low noise levels. No public address or other amplified sound system would be installed as part of the project. Furthermore, no team sports fields or courts are proposed, and the trail would be closed between dawn and dusk. Therefore, operation of the project would have a **less-than-significant impact**.

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

Construction activities may expose persons to excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2020). Information from Caltrans indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inches per second begin to cause annoyance. Heavier pieces of construction equipment, such as bulldozers, have peak particle velocities of approximately 0.089 inches per second or less at a distance of 25 feet (FTA 2018).

Groundborne vibration typically attenuates over short distances. Construction can also affect nearby buildings by inflicting damage from vibration. However, construction vibration associated with this project would not result in structural building damage. Building damage typically occurs

at vibration levels of 0.5 inches per second or greater for buildings of reinforced-concrete, steel, or timber construction. The heavier pieces of construction equipment used for this project would include backhoes, front-end loaders, and flat-bed trucks. Pile driving, blasting, or other special construction techniques would not be used for construction of the project; therefore, excessive groundborne vibration and groundborne noise with the potential to adversely affect nearby buildings would not be generated. Once operational, the project would not generate groundborne vibration. As such, no building damage would be expected to occur as a result of project-related vibration during construction or operation, and impacts would be **less than significant**.

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

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, the proposed project would have **no impact**.

Mitigation Measures

No mitigation measures are required.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

The project site supports an existing unofficial user-create mountain bike trail. No residences exist within the site. Single-family residences are present east of the project site within the Golden Eagle subdivision and the Castlewood subdivision.

Impact Discussion

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

The project would construct a mountain bike trail to replace several existing unofficial user-created trails. The project would not require extension of any infrastructure into unserved areas that would promote growth; the project site is within an area of existing urban development already served by infrastructure. The project would not create new residences or commercial land uses that could create new employment opportunities. The project would create a local-serving recreational facility to meet the identified needs of existing City residents consistent with the City's Trails Master Plan. Since the project would result in no population growth associated with new home construction or creation of a large number of new jobs, and would not extend infrastructure into new areas, it would not induce unplanned population growth and thus would result in **no impact**.

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

The project would construct a mountain bike trail to replace several existing unofficial user-created trails. No housing currently exists on the project site thus no housing would be displaced by the proposed project. The project would not introduce any new land uses that could displace residents from existing residential uses in areas adjacent to the project site. Therefore, the project would result in **no impact** associated with construction of replacement housing due to displacement of people or existing housing.

Mitigation Measures

No mitigation measures are required.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) 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 public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☐	☒

Setting

Fire protection and emergency services to the project site are provided by Livermore Pleasanton Fire Department for fire protection services. Law enforcement response is provided by City of Pleasanton Police Department.

Impact Discussion

a) ***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 public services:***

Fire protection?

Police protection?

Schools?

Other public facilities?

The project would create a local-serving recreational facility to meet the identified needs of existing City residents constructing an appropriately designed mountain bike trail to replace several existing unofficial user-created trails. The project would not result in any population growth because it would not construct new residences or new commercial land uses that could create new employment opportunities and would not extend infrastructure into unserved areas. Further, the project would not substantially increase use of the Augustin Bernal Community Park or the Pleasanton Ridge Regional Park. Thus, the project would not increase demand for or require construction of new facilities for most public services, and therefore would have **no impact** associated with fire protection, police protection, schools, or other public facilities.

Parks?

The project would construct a new trail within the Augustin Bernal Community Park and could result in adverse physical impacts during construction, as evaluated throughout the rest of this Initial Study. As found herein, the project could result in adverse impacts to biological and cultural

resources, geology and soils, and hydrology and water quality; however all of these impacts would be reduced to less than significant levels with implementation of the mitigation measures identified in this Initial Study. Thus, the impact of the proposed modification of an existing community park would be **less than significant impact with mitigation incorporated**.

The project would slightly increase use and associated maintenance requirements of the Augustin Bernal Community Park. Routine maintenance activities would include repairing any damaged trail sections or features and trimming vegetation to maintain a clear path of travel for trail users. These activities would not lead to new adverse environmental effects.

Mitigation Measures

Refer to the following:

- MM BIO-1 in Section 3.5;
- MMs CUL-1 and CUL-2 in Section 3.5;
- MMs-GEO-1 and GEO-2 in Section 3.7; and
- MM-HAZ-1 in Section 3.9.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☒	☐	☐

Setting

The project site is currently used as an unofficial mountain bike trail within the existing Augustin Bernal Community Park. The public responses to questionnaires used to inform development of the City's Trails

Master Plan identified Augustin Bernal Community Park as one of the most popular existing parks, indicating that the trails throughout the park receive moderate to heavy use.

Impact Discussion

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?

The proposed project would not directly result in any population growth because it would not construct any residences. As discussed in Section 3.14(a), the project would also not induce growth because it would not construct any employment-generating land uses or extend infrastructure into unserved areas. Thus, the project would not increase the use of other neighborhood and regional parks.

The project could slightly increase use of the Augustin Bernal Community Park by providing an engineered mountain bike trail that could be used by mountain bikers within a wider range of experience and skill levels. The existing unofficial user-created trail that the proposed trail would replace has many deficiencies, such as poor transitions between slopes and deep ruts (Figures 8a and 8b), as well as many challenging sections. The proposed project would remediate these deficiencies and provide alternate paths or ride-arounds for some of the more challenging sections to accommodate users with less experience. Further, the City would decommission several additional trail segments that cover approximately 4,300 linear feet, thus the project would result in a net reduction in the total linear feet of trails within the park. The proposed trail would largely replace an existing unofficial, user-created trail. The total length of the new trail would be approximately 3,700 linear feet, of which approximately 1,070 linear feet would require new construction and 2,630 linear feet would replace the existing trail surface. In addition, approximately 4,300 linear feet of other existing unofficial, user-created trails would be decommissioned. The project is not expected to substantially increase trail use activity within the park overall because of the existing high volume of trail use at the park, including on the unofficial user-created trails that the proposed project would replace and decommission, and the net reduction in total trail length.

The project could lead to incremental increases in physical deterioration of other trails and amenities within the Augustin Bernal Community Park due to the potential for a slight increase in mountain bike trail use. However, the proposed project is consistent with the City's Trails Master Plan and the City has anticipated the need for increased maintenance activities within the park, thus the potential for incremental increases in physical deterioration of the park would not result in an adverse environmental effect and this impact would remain **less than significant.**

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

The project would develop an official mountain bike trail that would help to reduce potential safety concerns between trail users. The project includes no residential development and would not directly or indirectly induce substantial population growth in the project area that would require

additional recreation facilities or generate increased demand for recreational facilities. The project would construct a new recreational facility within the Augustin Bernal Community Park. As discussed in Section 3.15(a), the analysis throughout this Initial Study demonstrates that construction of this project could result in adverse physical impacts to biological and cultural resources, geology and soils, and hydrology and water quality. On-going maintenance of the new trail would not lead to new adverse environmental effects. The impacts due to project construction would be **Less Than Significant Impact With Mitigation Incorporated** because all of these impacts would be reduced to less than significant levels with implementation of the mitigation measures identified in this Initial Study.

Mitigation Measures

Refer to the following:

- MM BIO-1 in Section 3.5;
- MMs CUL-1 and CUL-2 in Section 3.5;
- MMs-GEO-1 and GEO-2 in Section 3.7; and
- MM-HAZ-1 in Section 3.9.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Setting

Local access to the Augustin Bernal Community Park is provided via Golden Eagle Way and regional access to the park is provided via Interstate 680.

Impact Discussion

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

The proposed project would construct an engineered mountain bike trail within an existing Community Park to replace the unofficial user-created mountain bike trail and trail spurs within the site. The project would not directly or indirectly induce substantial population growth and associated traffic in the project area. As discussed in Section 3.16(a), the project could slightly increase use of the Augustin Bernal Community Park by providing an engineered mountain bike trail that could be used by mountain bikers within a wider range of experience and skill levels. The project could slightly increase traffic volumes on local streets but would not change traffic volumes or transportation patterns in the project vicinity in a way that could increase the need for or deteriorate performance of transportation facilities. Therefore, the project would have **no impact** due to conflicts with circulation system-related programs, plans, ordinances, or policies.

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

CEQA Guidelines Section 15064.3 requires consideration of potential environmental effects resulting from increases in the number of vehicle miles traveled (VMT). The CEQA Statute provides that the intent of evaluating a project's effects related to VMT is to support three statutory goals: "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099).

Traffic generated by the proposed project during construction would be temporary, lasting approximately three months. Construction traffic would also be nominal because there would generally be fewer than 20 workers onsite daily, and most equipment and materials would be delivered to the site at the beginning of construction and stockpiled, avoiding the need for delivery traffic to occur throughout the construction period. Thus, construction traffic would not affect VMT in the project area.

The Technical Advisory for Evaluating Transportation Impacts In CEQA (OPR 2018), states that off-road facilities that serve non-motorized travel, such as Class I bike paths, trails, and multi-use paths are not likely lead to a substantial or measurable increase in vehicle travel. As discussed in Section 3.16(a), the proposed project would slightly increase use of the existing Augustin Bernal Community Park, and thus could result in some new vehicle trips to and from the park. However, the proposed project is a local-serving recreation facility, and as such, is not expected to generate a substantial number of new vehicle trips within the region. Additionally, the Technical Advisory provides that "small projects," meaning those that would generate fewer than 110 trips per day, may be determined to be unlikely to result in significant VMT impacts. If each trail user arrived at the

staging area singly, the total of 110 daily trips would require 55 additional trail users each day. The City anticipates that the trail would receive much less daily use, particularly during the week. The net new trips generated by the proposed project would not be significant and not cause a significant increase in VMT. Therefore, the proposed project's impacts to VMT would be **less than significant**.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Access to the project site is provided by Golden Eagle Way. The project does not require any modifications to Golden Eagle Way or any other public or private roads. The project would expand the existing recreational uses within Augustin Bernal Community Park but would not introduce any new uses and therefore would not introduce new types of vehicles to the road network. No other potential hazards related to roadway or access design features were identified or evaluated. The project is expected to have **no impact** associated with hazards due to roadway geometry or incompatible roadway uses.

d) Would the project result in inadequate emergency access?

Emergency access would be maintained on all public roads at all times during project construction and operation. As discussed in Section 3.15(a), during operation, the project site would be served adequately by Golden Eagle Way during an emergency. The project would not change or reconstruct existing roadways and would result in no impediment to existing emergency access in the area. The project would result in **no impact** due to inadequate emergency access.

Mitigation Measures

No mitigation measures are required.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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:				
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	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

Setting

The project is subject to compliance with Assembly Bill (AB) 52 (California Public Resources Code [PRC] Section 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires the CEQA lead agency to notify any groups (who have requested notification) who are traditionally or culturally affiliated with the geographic area of the project. AB 52 requires lead agencies to consult with California Native American Tribes that request such consultation prior to completing environmental review in accordance with CEQA. AB 52 provides for the inclusion of California tribes' expertise regarding cultural resources and a process for governing bodies to incorporate tribal knowledge into the CEQA review process. Accordingly, the City sent notification letters to eight Native American tribes who are traditionally or culturally affiliated with the project area. None of the tribes have requested consultation and none have identified any concerns regarding the known or potential presence of tribal cultural resources in the project vicinity.

Additionally, Dudek contacted the NAHC on February 19, 2021, to request a search of the Sacred Lands File. The NAHC responded on March 2, 2021, indicating that the search failed to identify any Native American resources in the vicinity of the project and provided a list of individuals and organizations to contact that may have additional information. Dudek has not followed up contacting these individuals and organizations.

Impact Discussion

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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) 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)?

No known tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k) have been identified through the AB 52 notification process or the cultural resources investigation conducted on the project site. However, as discussed in Section 3.5(b), there is a potential to encounter cultural resources, including tribal cultural resources, during project construction. Evaluation and protection measures for potential discoveries of tribal cultural resources are identified in MM-CUL-1. With implementation of MM-CUL-1, impacts to tribal cultural resources would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated.**

ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

No tribal cultural resources, as defined in PRC Section 21074, have been identified within the project site or in its immediate vicinity to date. It is possible that ground disturbing activities associated with the project, such as grading, could uncover previously undiscovered tribal cultural resources. Implementation of MM-CUL-1 would ensure that appropriate protocol and BMPs are followed to ensure appropriate evaluation and treatment of any tribal cultural resources that may be uncovered during construction activities and that project impacts to tribal cultural resources would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

Mitigation Measures

Refer to Section 3.5 for MM-CUL-1.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Setting

The project site would be entirely within the existing Augustin Bernal Community Park that is owned and maintained by the City of Pleasanton.

Impact Discussion

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

The proposed project would construct a mountain bike trail and does not include any new facilities that would require water supply, wastewater collection and treatment, energy, or telecommunication. As discussed in Section 3.16(a), the project would not directly or indirectly increase the City's population and does not include any non-recreational land uses. Thus the project would not result in an increase in utility service demand by City residences or businesses. As discussed in Section 3.10(b), the project would not result in an increase in stormwater drainage. The project would have **no impact** associated with requiring new, relocated, or expanded utility service facilities and infrastructure.

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

The project would construct a downhill mountain bike trail to replace an existing user-created trail. The project would not include any facilities or land uses that require water supply. The project would not increase water supply demand and would not reduce the amount of water available to the City. Therefore, the project would have a **no impact** on water supply availability.

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

The project would construct a downhill mountain bike trail to replace an existing user-created trail. The project would not include any facilities or land uses that require wastewater collection and/or treatment. Therefore, the project would have **no impact** associated with wastewater treatment capacity.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Some debris would be generated during construction of the project. However, the amount of waste generated would be minor and would be mulched and reused onsite wherever possible. Use and maintenance of the trail would also generate only minor amounts of solid waste. No impact would occur associated with solid waste exceeding State or local standards and all solid waste would be handled in accordance with solid waste reduction goals and recycling mandates. Impacts associated with solid waste generated by the project would be **less than significant**.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Project construction would generate solid waste in the form of organic material and soil. The amount of waste generated would be minor and would be mulched and reused onsite wherever possible. Park operations would not generate large quantities of solid waste. Solid waste transport and disposal would comply with all applicable regulations for solid waste handling, disposal, and recycling and **no impact** would result from non-compliance with applicable statutes and regulations.

Mitigation Measures

No mitigation measures are required.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Setting

The project site is within the service area of Livermore Pleasanton Fire Department. California Department of Forestry and Fire Protection (CAL FIRE) mapping identifies the project site as a Very High Fire Hazard Severity Zone in a State Responsibility Area (CAL FIRE 2021).

Impact Discussion

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project would construct a new mountain bike trail within and adjacent to the existing Augustin Bernal Community Park. The project would not increase traffic in the project area in a way that could impede emergency response and does not include any structures or features that would physically interfere with implementation of emergency response or evacuation plans. The project would rely on access via existing roadways and would not alter any public streets in such a way that would impair emergency response. The project would not increase population that could result in

indirect effects associated with impairing implementation of emergency response or evacuation plans. Therefore, impacts from the project would be **less than significant**.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project site is located within a Very High Fire Hazard Severity Zone, as mapped by CAL FIRE (CAL FIRE 2021). Urbanized areas and existing development exist adjacent to the project site on the south and is surrounded by the existing Augustin Bernal Community Park to the north, west, and east. The project site currently supports an informal mountain bike trail on the site is frequently used by the general public. The City would perform vegetation treatments on the site to maintain the trail and defensible space requirements and reduce the potential for wildfire and would continue to perform these treatments following development of the project. The developed trail would be subject to vegetation management to further reduce the potential for wildfire ignition and spread, and the project would facilitate better access for emergency responders if a fire occurs. It is anticipated that the project would reduce the potential risk to people and property from wildfire and that **no impact** would result from increased fire hazard or pollution generated from wildfire.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project would rely on an existing road for access to the parking lot and access to the trailhead. The Project would not require the installation or maintenance of a new road, fuel break, utilities, or emergency water source. Vegetation maintenance and maintenance of defensible space would continue to occur as it does in the existing condition and impacts associated with elevated risk of fire as a result of park operations and maintenance would be **less than significant**.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site is located within a Very High Fire Hazard Severity Area Zone, as mapped by CAL FIRE (CAL FIRE 2021), Topography on site is highly sloped and would be subject to post-fire slope instability or landslides, rapid runoff, or drainage changes resulting in flooding if a fire were to occur. The project does not propose any structures that would expose people or other structures to significant risks and would not alter on-site topography in such a way that would increase the risks to off-site people or structures. As discussed above, the project would be expected to reduce the risk of wildfire occurring on the project site, and would therefore reduce associated post-fire risks related to geologic instability and changes in runoff. Impacts from changes resulting from the project would be **less than significant**.

Mitigation Measures

No mitigation measures are required.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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

The project site could support special-status plant species and the endangered Alameda Whipsnake. With implementation of the AMMs incorporated in the project design and construction plans identified in Section 3.0 Project Description as well as MM-BIO.1 identified in Section 3.4 Biological Resources, the project would not reduce habitat for fish or wildlife species, threaten to eliminate a plant or animal community, or adversely affect rare or endangered species. Implementation of the AMMs and MM-BIO.1 would ensure that project impacts to biological resources would be less than significant.

As discussed in Section 3.5, Cultural Resources, no known cultural resources would be affected by the project, though known resources exist within ½ mile of the project site. Implementation of MM-CUL.1 would ensure that appropriate measures are implemented to ensure that impacts to any inadvertent discovery of cultural resources during ground- disturbing activities remains less than significant. MM-CUL.2 would ensure compliance with applicable regulations and appropriate protocol should human remains be unearthed during project construction. With implementation of mitigation measures impacts would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

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

The project would construct a downhill-only technical mountain bike trail to replace an existing user-created trail within and adjacent to Augustin Bernal Community Park and would decommission several other existing unofficial user-created trail segments within the park. The proposed project would not generate cumulatively considerable levels of air pollutants or greenhouse gas emissions, alter the vegetation communities present within the project site, create any new impervious surfaces, increase stormwater runoff or create new sources of water pollution, or directly or indirectly lead to population growth that could increase demands for public services and utilities or generate substantial increases in traffic. Cumulative impacts of the project and other similar projects would result in less than significant effects with implementation of the mitigation measures identified throughout this Initial Study. Therefore, impacts would be **less than significant with mitigation incorporated**.

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

The project would be consistent with applicable local ordinances and policies related to land use, noise, and protection of natural resources and the environment, as disclosed by this Initial Study. The analyses of impacts provided throughout this Initial Study demonstrates that the project would not result in any substantial adverse effects on human beings because it would not substantially increase risks associated with seismic activity and soil stability, generate air pollutant emissions that could cause adverse health effects, generate noise levels that could result in annoyance or disruption to typical activities, expose people to hazardous materials or wildfire risk, or result in decreases in or interruption of public and utility services in the City.

4 References and Preparers

4.1 References Cited

Alvarez, J, M. Shea, and A. Murphy. 2005. "A Compilation of Observations of Alameda Whipsnakes Outside of Typical Habitat." *Transactions of the Western Section of the Wildlife Society* 41:21–25; 2005.

BAAQMD (Bay Area Air Quality Management District). 2017a. *California Environmental Quality Act Air Quality Guidelines.* Updated May 2017. http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

BAAQMD. 2017b. *Spare the Air: Cool the Climate - Final 2017 Clean Air Plan.* April 19, 2017. http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en.

CAL FIRE (California Department of Forestry and Fire Protection). 2021. California Fire Hazard Severity Zone Viewer. Accessed March 2021. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414.

Caltrans (California Department of Transportation). 2020. *Transportation and Construction Vibration Guidance Manual*. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. April 2020.

Caltrans. 2021. "California State Scenic Highways." Accessed June 2021. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

CAPCOA (California Air Pollution Control Officers Association). 2008. *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008.

CARB (California Air Resources Board). 2014. *First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006*. May 2014. Accessed June 2021. http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

CARB. 2017. *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*. November 2017. Accessed June 2021. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

CAT (California Climate Action Team). 2006. Climate Action Team Report to the Governor Schwarzenegger and the Legislature. Sacramento, California. March 2006. http://www.climatechange.ca.gov/climate_action_team/reports/2006report/2006-04-03_FINAL_CAT_REPORT.PDF.

CDFW (California Department of Fish and Wildlife). 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. March 20, 2018.

CDFW. 2020. "California Natural Community List." Accessed September 9, 2020. https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

CDFW. 2021a. California Natural Diversity Database. CDFW, Biogeographic Data Branch. https://map.dfg.ca.gov/rarefind/view/RareFind.aspx.

CDFW. 2021b. *Special Animal List*. April 2021. State of California Natural Resources Agency Department of Fish and Wildlife Biogeographic Data Branch California Natural Diversity Database.

CDFW. 2021c. BIOS: Linkage Design for the California Bay Area Linkage Network. Accessed June 7, 2021.

CDFW. 2021d. BIOS: Landscape Blocks for the California Bay Area Linkage Network. Accessed June 7, 2021.

City of Pleasanton. 2009a. "Pleasanton General Plan Land Use Map 2005–2025." Adopted July 21, 2009. https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23897.

City of Pleasanton. 2009b. Pleasanton General Plan 2005–2025: Conservation and Open Space Element. Adopted July 21, 2009. https://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=23910.

City of Pleasanton. 2012. *City of Pleasanton Climate Action Plan*. http://www.cityofpleasantonca.gov/civicax/filebank/blobdload.aspx?BlobID=24757.

City of Pleasanton. 2018. "Parcel Zoning Map." June 19, 2018. https://dev.cityofpleasantonca.gov/gov/depts/cd/planning/zoning/map.asp.

City of Pleasanton. 2019a. Pleasanton Trails Master Plan

City of Pleasanton. 2019b. "Tree Preservation Ordinance." Chapter 17.16 of the Pleasanton Municipal Code. Last updated 2019. https://qcode.us/codes/pleasanton/view.php?topic=17-17_16&frames=on.

City of Pleasanton 2021. Pleasanton Municipal Code.

CNPS (California Native Plant Society). 2021a. "Inventory of Rare and Endangered Plants." Online edition, v8-03. Sacramento, California: CNPS, Rare Plant Program. http://www.rareplants.cnps.org.

CNPS. 2021b. *A Manual of California Vegetation*, Online Edition. https://vegetation.cnps.org/.

DOC (California Department of Conservation). 2010. "2010 Fault Activity Map of California." Accessed February 2021. https://gis.data.ca.gov/datasets/6724f0fc640e4e9aba3b849a47da4c3a.

DOC. 2015. "Alquist-Priolo Fault Zone Map." Accessed February 2021. https://www.conservation.ca.gov/cgs/geohazards/eq-zapp.

DOC. 2019. California Earthquake Hazards Zone Application. Last updated April 4, 2019. https://www.conservation.ca.gov/cgs/geohazards/eq-zapp.

DOC. 2021a. "Placer County Important Farmland 2021." California Department of Conservation, Division of Land Resource Protection. Farmland Mapping and Monitoring Program. Accessed February 2021. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/pla12.pdf.

DOC. 2021b. "Placer County Williamson Act FY 2013/2014." California Department of Conservation, Division of Land Resource Protection. Land Conservation Act. Accessed February 2021. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Placer_w_13_14_WA.pdf.

FEMA (Federal Emergency Management Agency). 2021. FEMA Flood Map Service Center. Accessed April 2021. https://msc.fema.gov/portal/search?AddressQuery=auburn%2C%20ca#searchresultsanchor.

Ford, L.D., P.A. Van Hoorn, D.R. Rao, N.J. Scott, P.C. Trenham, and J.W. Bartolome. 2013. *Managing Rangelands to Benefit California Red-legged Frogs & California Tiger Salamanders*. Livermore, California: Alameda County Resource Conservation District.

Gruber, M. 2021. "Record of conversation with City biologist." Email from M. Gruber (City of Pleasanton) to Sean O'Brien (Dudek). September 29, 2021.

Holland, R.F. 1986. *Preliminary Descriptions of the Terrestrial Natural Communities of California.* Nongame-Heritage Program, California Department of Fish and Game. October 1986.

IPCC. 2014. Climate Change 2014 Synthesis Report: A Report of the Intergovernmental Panel on Climate Change. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Accessed June 2021. http://www.ipcc.ch/report/ar5/syr/.

Jepson Flora Project. 2020. *Jepson Manual, Vascular Plants of California, Second Edition*. Berkeley, California: University of California. http://ucjeps.berkeley.edu/IJM.html.

Miller, A., and J. Alvarez. 2016. "Habitat Use and Management Considerations for the Threatened Alameda Whipsnake (Masticophis lateralis euryxanthus) in Central California." *Western Wildlife* 3:29–32, 2016.

NETR (National Environmental Title Research LLC). 2021. Historic Aerials. Accessed May 2021. http://www.historicaerials.com/.

NRCS (United States Department of Agriculture, Natural Resources Conservation Service). 2021. *Web Soil Survey*. Accessed April 5, 2021. https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm.

OEHHA (Office of Environmental Health Hazard Assessment). 2015. *Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments*. February 2015.

Penrod, K., P.E. Garding, C. Paulman, P. Beier, S. Weiss, N.Schaefer, R. Branciforte, and K. Gaffney. 2013. *Critical Linkages: Bay Area & Beyond*. Produced by Science & Collaboration for Connected Wildlands, Fair Oaks, California, in collaboration with the Bay Area Open Space Council's Conservation Lands Network. https://www.dropbox.com/s/gsvzzzd75m0yzxs/Critical%20Linkages%20Full%20Report.pdf?dl=0.

USFWS (U.S. Fish and Wildlife Service). 2011. *Alameda Whipsnake (Masticophis lateralis euryxanthus) 5-Year Review: Summary and Evaluation*. U.S. Fish and Wildlife Service, Sacramento, California. September 2011.

4.2 List of Preparers

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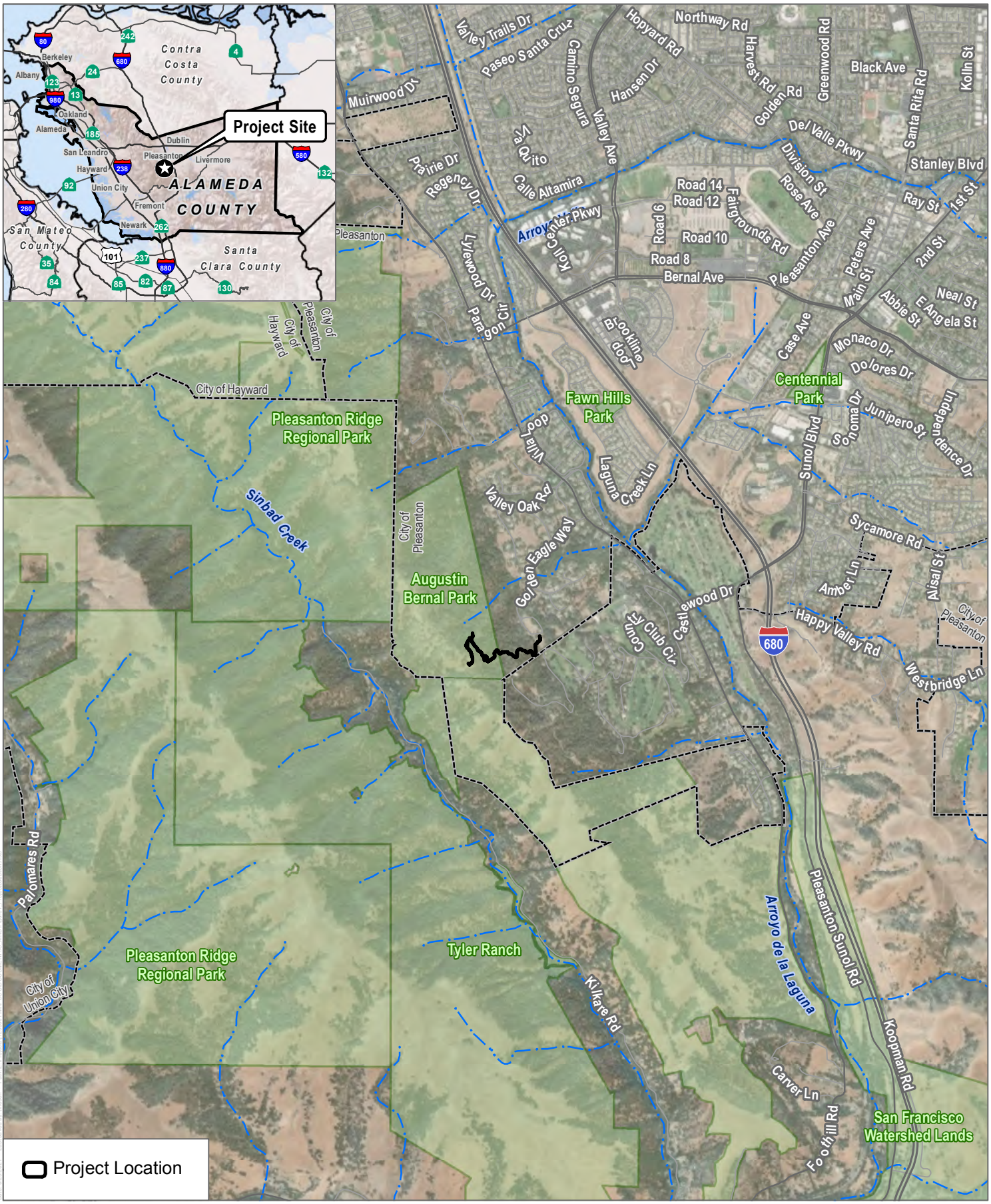

FIGURE 1

Project Location

Augustin Bernal MTB Project

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SOURCE: ESRI 2021; Open Street Map 2021

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0 550 1,100 Feet

FIGURE 2

Project Site

Augustin Bernal MTB Project

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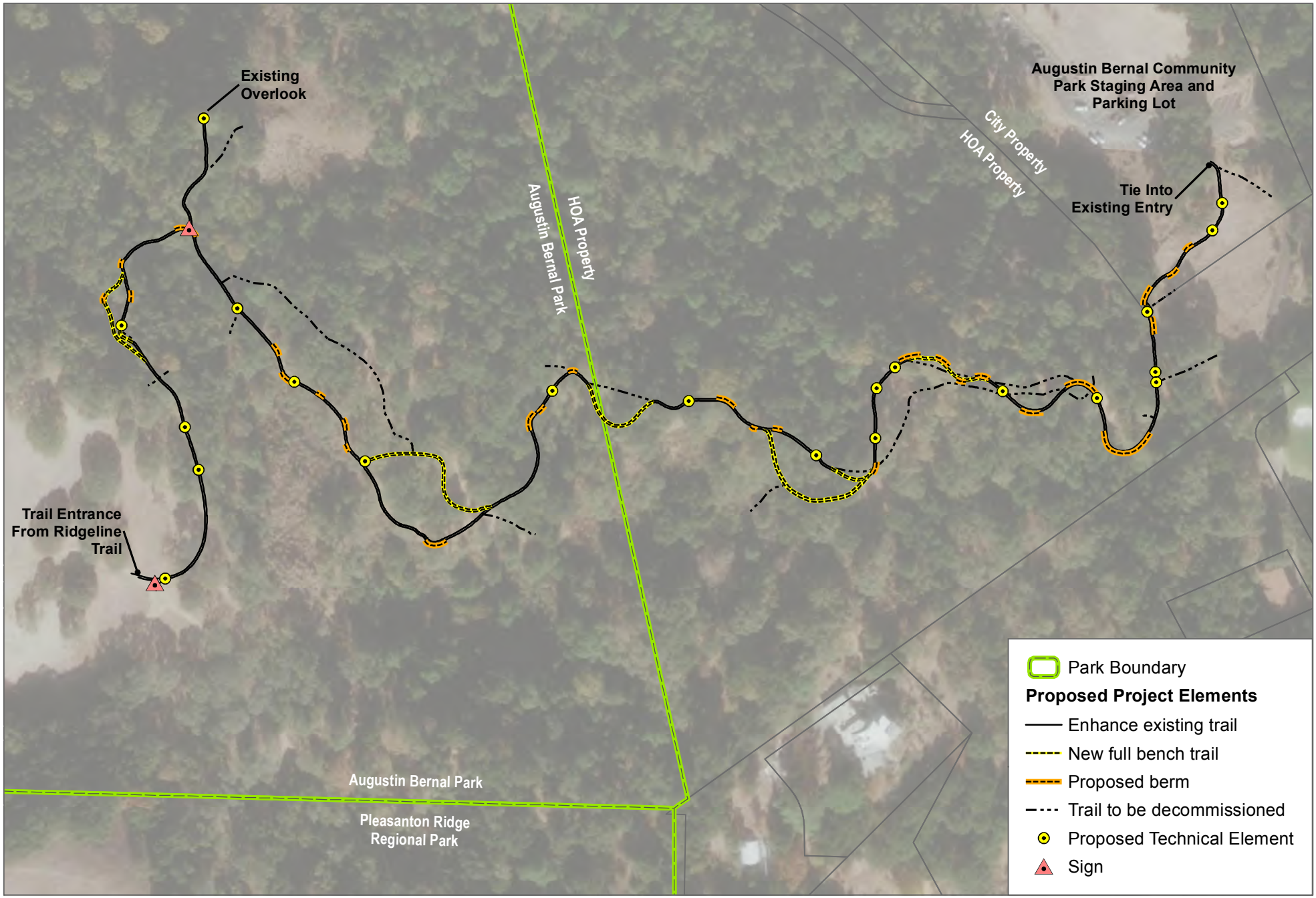

SOURCE: ESRI 2021

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0 100 200 Feet

FIGURE 3

Proposed Trail Alignment

Augustin Bernal MTB Project

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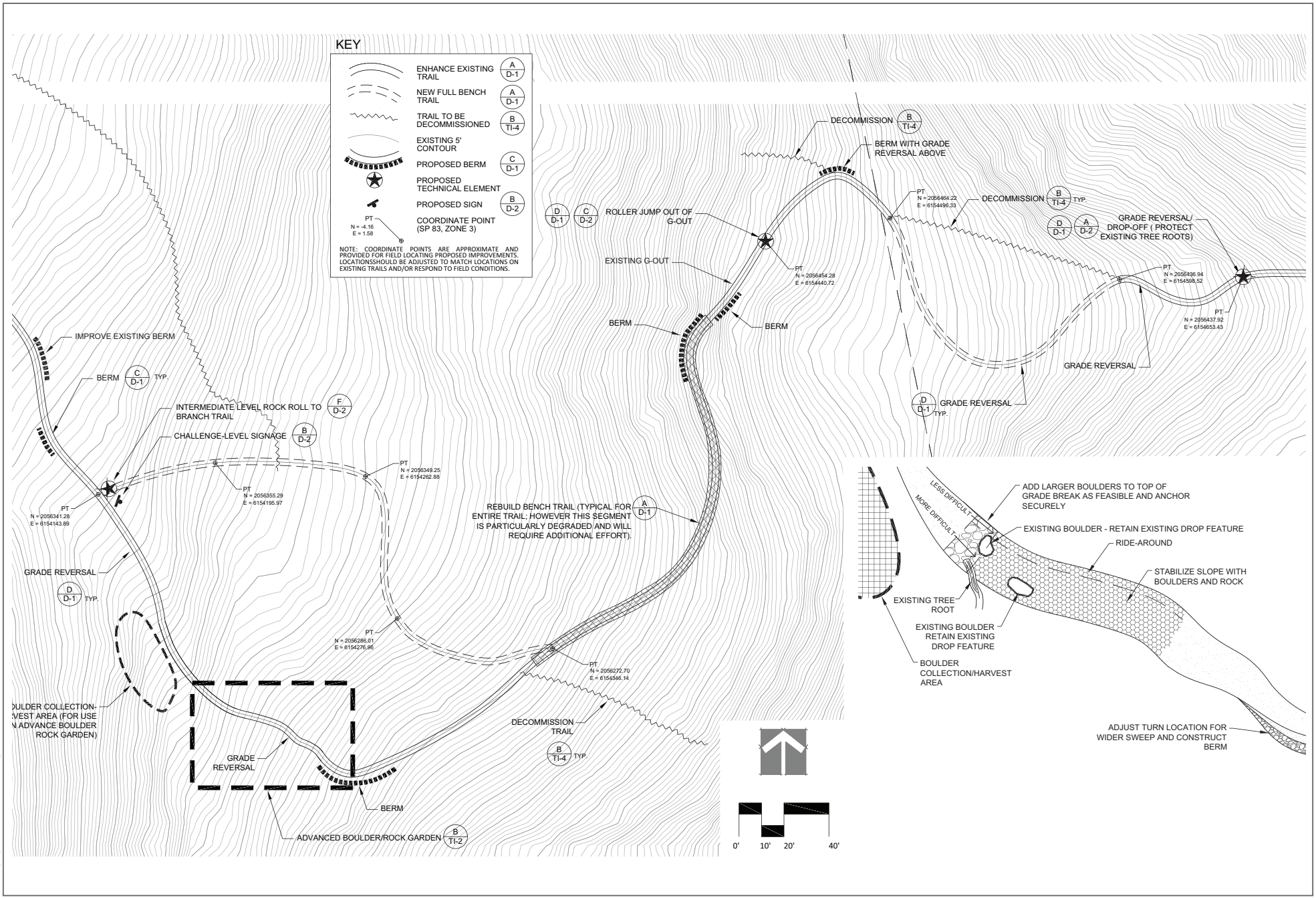

FIGURE 4

Detailed Typical Trail Design

Augustin Bernal MTB Project

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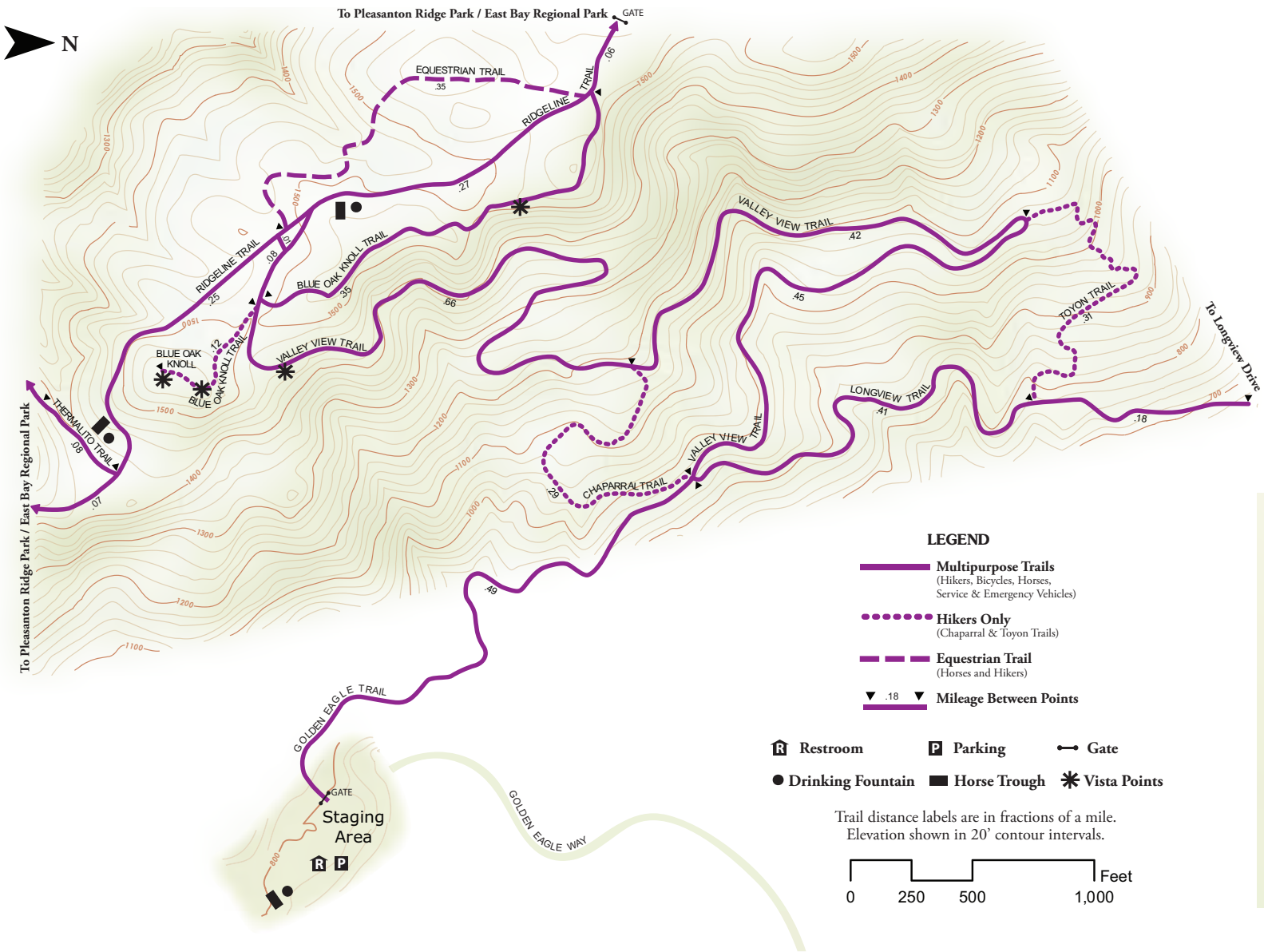
Augustin Bernal Community Park



LEGEND

- **Multipurpose Trails** (Hikers, Bicycles, Horses, Service & Emergency Vehicles)
- **Hikers Only** (Chaparral & Toyon Trails)
- **Equestrian Trail** (Horses and Hikers)
- .18 **Mileage Between Points**

R **Restroom** P **Parking** **Gate**

● **Drinking Fountain** **Horse Trough** ✱ **Vista Points**

Trail distance labels are in fractions of a mile.
Elevation shown in 20' contour intervals.

0 250 500 1,000 Feet

TRAIL	MILES
Longview Trail	.59
Golden Eagle Trail	.49
Valley View Trail	1.61
Chaparral Trail	.29
Toyon Trail	.31
Ridgeline Trail	.66
Equestrian Trail	.35
Blue Oak Knoll Trail	.47

Golden Eagle Staging Area to Blue Oak Knoll via Valley View Trail 2.23
This route has an ±750' elevation gain

Source: City of Pleasanton 2021

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FIGURE 5
Existing Trails
Augustin Bernal MTB Project

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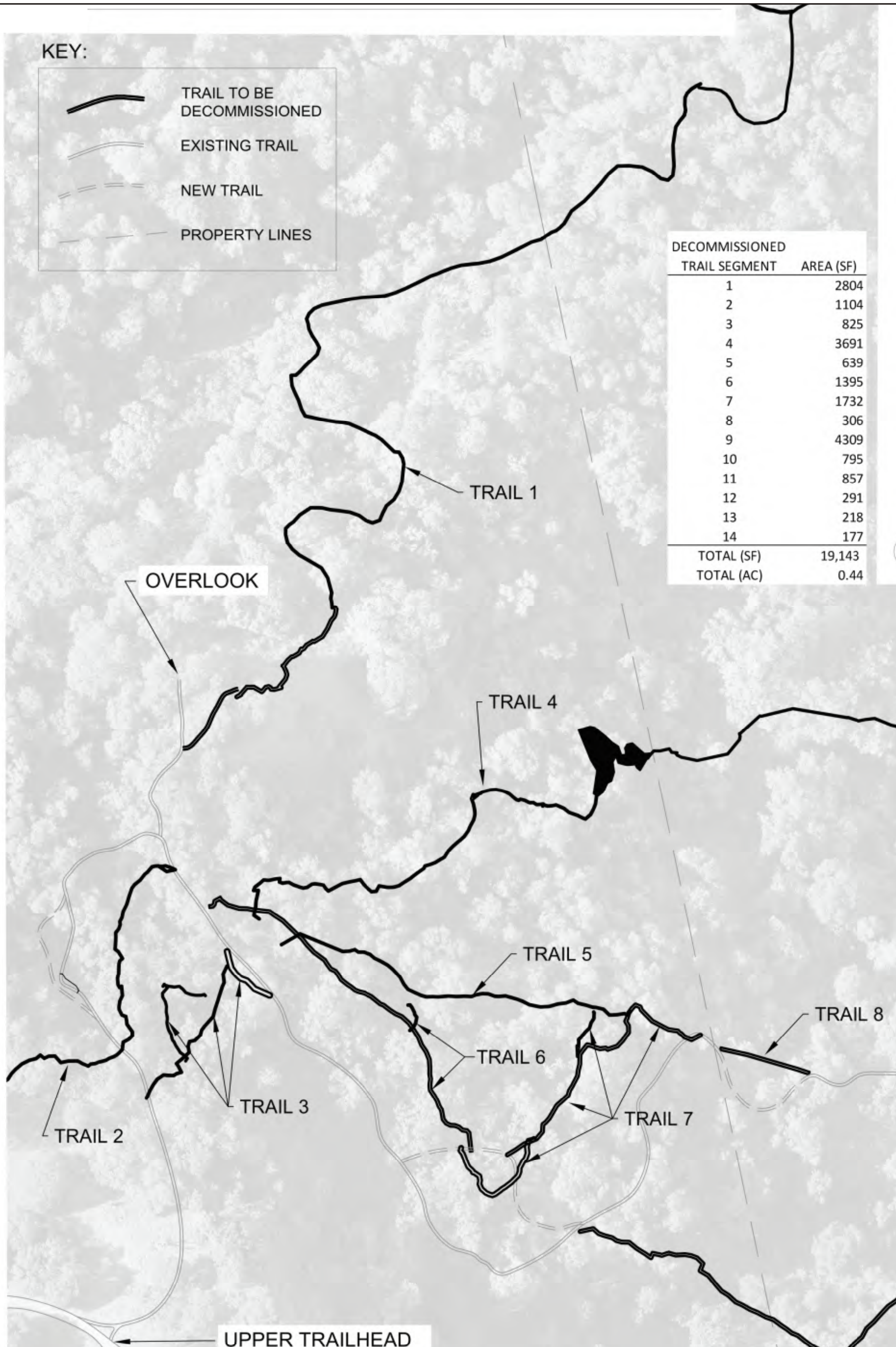
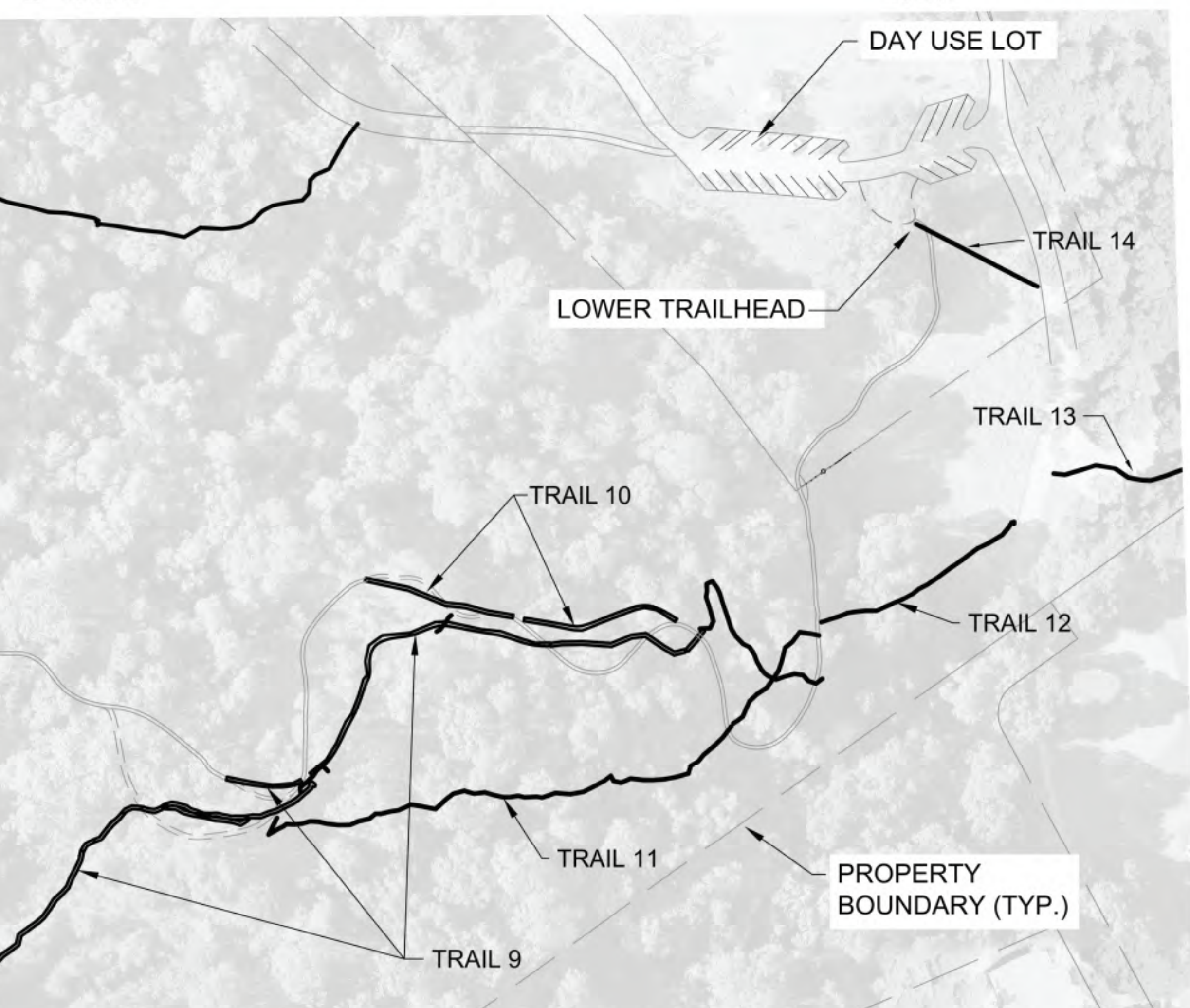
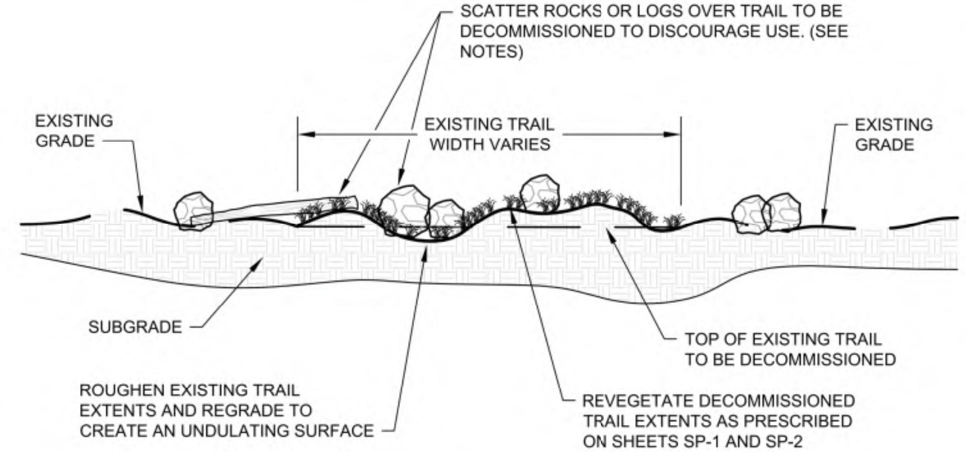



DECOMMISSIONED TRAIL SEGMENT	AREA (SF)
1	2804
2	1104
3	825
4	3691
5	639
6	1395
7	1732
8	306
9	4309
10	795
11	857
12	291
13	218
14	177
TOTAL (SF)	19,143
TOTAL (AC)	0.44



NOTES:

1. CONDUCT SOIL REHABILITATION ACCORDING TO THE SPECIAL PROVISIONS ON SHEET SP-2.
2. REMOVE EXISTING CONSTRUCTED FEATURES.SUCH AS BERMS OR JUMPS ON THE TRAIL TO BE DECOMMISSIONED. REDISTRIBUTE ANY REMOVED ROCKS OR LOGS ALONG DECOMMISSIONED TRAIL IN NATURALISTIC PATTERNS. UTILIZE ADDITIONAL ROCKS/LOGS FROM NEARBY AREAS TO DISCOURAGE TRAIL USE FOLLOWING DECOMMISSIONING.
3. BROADCAST SEED MIX OVER REHABILITATED SOIL IN DECOMMISSIONED TRAIL AREAS. REFER TO SHEET DC-1 FOR SEED MIXES, SPECIES AND SEEDING RATES. REFER TO THE SPECIAL PROVISIONS ON SHEETS SP-1 AND SP-2.

B TRAIL DECOMMISSIONING

NO SCALE SECTION

REVEGETATION SEED MIX

ACHILLEA MILLIFOLIUM	COMMON YARROW	83%	0.3	0.3
BROMUS CARINATUS	CALIFORNIA BROME	85%	13.1	15.4
CLAYTONIA PERFOLIATA	MINER'S LETTUCE	14%	0.4	2.5
ELYMUS GLAUCUS	BLUE WILDRYE	85%	8.5	10.0
IRIS DOUGLASIANA	DOUGLAS IRIS	80%	6.6	8.2
MIMULUS AURANTIACUS	STICKY MONKEYFLOWER	2%	0.1	1.4
NASELLA PULCHRA	PURPLE NEEDLEGRASS	68%	12.3	18.0
SISYRINCHIUM BELLUM	BLUE EYED GRASS	71%	1.1	1.6
TRIFOLIUM CILIOLATUM	NATIVE CLOVER	65%	4.1	6.3
VULPIA MICROSTACHYS	SMALL FESCUE	85%	2.2	2.6
		TOTAL SEEDING RATE	48.7	66.3

TRAIL DECOMMISSIONING NOTES

1. ALL DECOMMISSIONED TRAILS SHALL BE SHALLOW RIPPED TO DECREASE COMPACTION AND SEEDED WITH THE SEED MIX ON THIS SHEET. SEE SHEET SP-2 FOR ADDITIONAL NOTES ON REVEGETATION.
2. TRAILS GENERALLY VARY FROM 18-INCHES TO 3-FEET WIDE, WITH SOME LOCATIONS OF WIDER WIDTH/DISTURBANCE.
3. REMOVE EXISTING ROCK AND ANY LOGS OR WOOD EDGING WHERE IT OCCURS ALONG THE EXISTING TRAIL EDGES AND REDISTRIBUTE WITHIN THE TRAIL DECOMMISSIONING AREA TO MIMIC A RANDOM AND NATURAL LAYOUT, TYP.
4. THE REFILLING OF HOLES RESULTING FROM THE DECOMMISSIONING OPERATIONS WILL BE CONSIDERED A SUBSIDIARY OBLIGATION OF THE CONTRACTOR.
5. BEFORE BEGINNING ANY WORK, THE CONTRACTOR SHALL REVIEW THE SITE AND EXAMINE THE PLANS TO FULLY UNDERSTAND THE REQUIRED WORK. AT ALL TIMES, AVOID DAMAGE TO EXISTING TREES, VEGETATION AND OTHER ITEMS TO REMAIN IN PLACE, TO BE REUSED, OR TO REMAIN THE PROPERTY; ANY DAMAGED ITEMS SHALL BE REPAIRED OR REPLACED BY THE CONTRACTOR AT NO ADDITIONAL COST TO THE ASSOCIATION.
6. BEFORE THE START OF DECOMMISSIONING OPERATIONS, THE CONTRACTOR SHALL STAKE OR OTHERWISE FIELD IDENTIFY/MARK TRAIL AREAS TO BE DECOMMISSIONED FOR APPROVAL.
7. AT NO TIME SHALL ANY EXISTING UTILITIES OR OTHER INFRASTRUCTURE BE REMOVED, DEMOLISHED, OR OTHERWISE DAMAGED DURING CONSTRUCTION.

FIGURE 6

Trails to be Decommissioned

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Photo 1: Northward view of Pleasanton Ridge Regional Park from top of trail.

Photo 2: Eastward view over Pleasanton from top of trail.

Photo 3: Northeast view across Augustin Bernal Park and Pleasanton from overlook near top of trail.

Photo 4: Southeast view across Castlewood Country Club and towards Pleasanton from lower portion of trail.

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FIGURE 7

Scenic Views

Augustin Bernal MTB Project

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Photo 1: Deeply rutted section.

Photo 2: Hazardous jump showing rutting and erosion.

Photo 3: Steeply sloped section showing erosion.

Photo 4: User created jump causing ruts and erosion in tree root zone.

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FIGURE 8A

Existing Trail Condition Photos

Augustin Bernal MTB Project

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Photo 5: Banked turn showing erosion.

Photo 6: Jump showing exposed tree roots and erosion.

Photo 7: Narrow section causing vegetation loss.

Photo 8: Rutted section in tree root zone.

FIGURE 8B

Existing Trail Condition Photos

Augustin Bernal MTB Project

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