



DATE: December 29, 2022

TO: Responsible Agencies, Trustee Agencies, and Interested Persons

FROM: Erik Nolthenius, Planning Manager, City of Brentwood

**SUBJECT: NOTICE OF PREPARATION OF A REVISED ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED BRIDLE GATE PROJECT**

The City of Brentwood is the lead agency for the preparation of a Revised Environmental Impact Report (REIR) for the Bridle Gate project (proposed project). The scope of the REIR has been proposed based on a determination by the City of Brentwood. The City of Brentwood has directed the preparation of a REIR in compliance with the California Environmental Quality Act (CEQA).

Once a decision is made to prepare a REIR, the lead agency must prepare a Notice of Preparation (NOP) to inform all responsible and trustee agencies that a REIR will be prepared (CEQA Guidelines Section 15082). The purpose of the NOP is to provide agencies with sufficient information describing both the proposed project and the potential environmental effects to enable the agencies to make a meaningful response as to the scope and content of the information to be included in the REIR. The City of Brentwood is also soliciting comments on the scope of the REIR from interested persons.

### **SCOPING MEETING**

A NOP scoping meeting will be held in person and virtually via Zoom to inform interested parties about the proposed project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the REIR. Further information on the date and time of the scoping meeting is provided below.

**REIR Scoping Meeting on the Bridle Gate Project**  
Tuesday | January 17, 2023 | 7:00 PM

In-Person Meeting:  
City of Brentwood Council Chambers  
150 City Park Way  
Brentwood, CA 94513

or

Virtual Meeting:  
Zoom: <https://www.brentwoodca.gov/planningmeetingonline>  
Phone: 1-669-444-9171 | Webinar ID: 865 8637 2302

## **PROJECT BACKGROUND**

On June 6, 2006, the City of Brentwood Planning Commission approved the first version of the Bridle Gate subdivision map. Commensurate with that approval, an IS/MND was adopted, which identified that all impacts resulting from the project could be reduced to a less-than-significant level with implementation of mitigation measures.

A revised version of the Bridle Gate Project was later proposed, and due to substantial changes to the project, an EIR was prepared in 2020. However, the City Council denied the project on March 9, 2021, and the EIR was not certified.

A third application for the project was submitted to the City of Brentwood in late 2021 and was deemed complete in June 2022. The City has determined that a REIR is the appropriate CEQA document for the current version of the Bridle Gate Project. A description of the revised Bridle Gate Project is discussed in further detail below.

## **PROJECT DESCRIPTION**

The following provides a description of the project site's current environmental setting, as well as the discretionary actions required for the proposed project and the proposed project components.

### **Project Location and Setting**

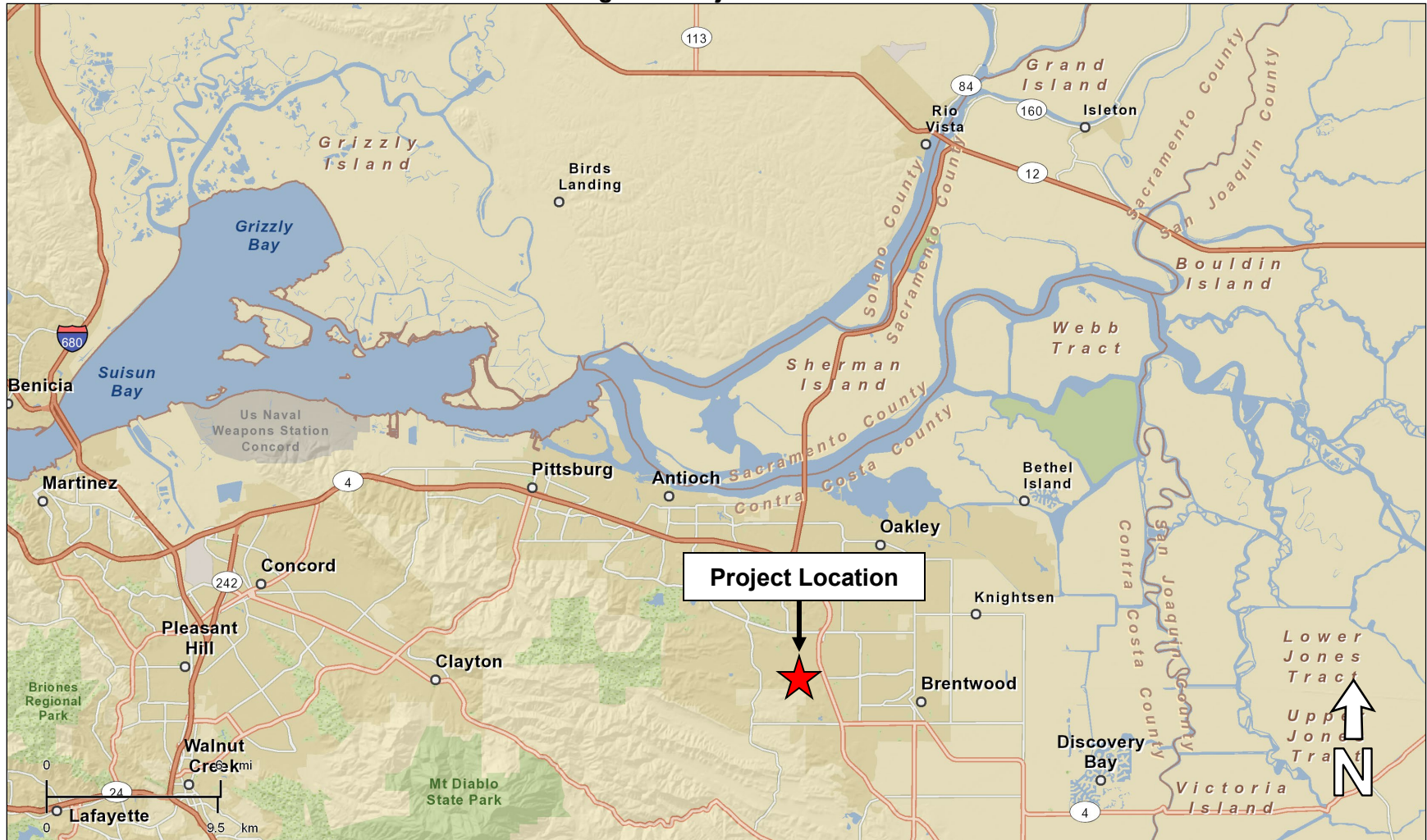
The project site consists of two parcels totaling approximately 126.81 acres (including the future right-of-way [ROW] for the Sand Creek Road extension) in the City of Brentwood (see Figure 1 and Figure 2) and is identified by the Contra Costa County Assessor's Parcel Numbers (APNs) 019-082-009 and 019-082-010. The project site is bounded by Old Sand Creek Road to the north, State Route (SR) 4 to the east, a single-family residential development (Brentwood Hills) to the south, and the edge of the Brentwood Planning Area and the City of Antioch's city limits to the west. A small segment of existing San Jose Avenue bounds the project site at its farthest southeastern corner. The western terminus of Sand Creek Road, constructed as part of the interchange with SR 4, is located adjacent to the eastern site boundary. According to the City's General Plan, the project site is designated Regional Commercial (RC) north of the Sand Creek Road alignment, Residential-Low Density (R-LD) south of the Sand Creek Road alignment, Permanent Open Space (P-OS) along the southwest boundary of the site, and Park (P) (see Figure 3). The site is zoned Planned Development No. 36 (PD-36). Sand Creek flows west to east through the northern portion of the project site and supports both native riparian vegetation and a variety of planted ornamentals. The remainder of the project site is currently vacant and covered with grasses and weedy vegetation.

According to the USGS Brentwood Quadrangle, the project site is located within the Brentwood Oil and Gas Field. Based on Phase I and Phase II Environmental Site Assessments prepared for the proposed project by ENGEO, Inc., the project site previously contained seven active oil production wells and an oil tank farm that facilitated oil production and waste treatment.<sup>1</sup> In addition, the site previously contained 24 active groundwater monitoring wells. The oil wells, tank farm, groundwater monitoring wells, and associated facilities have all been properly abandoned under the oversight of the California Regional Water Quality Control Board (RWQCB).

---

<sup>1</sup> ENGEO, Inc. *Phase One Environmental Site Assessment, Bridle Gate, Brentwood, California*. May 6, 2020.

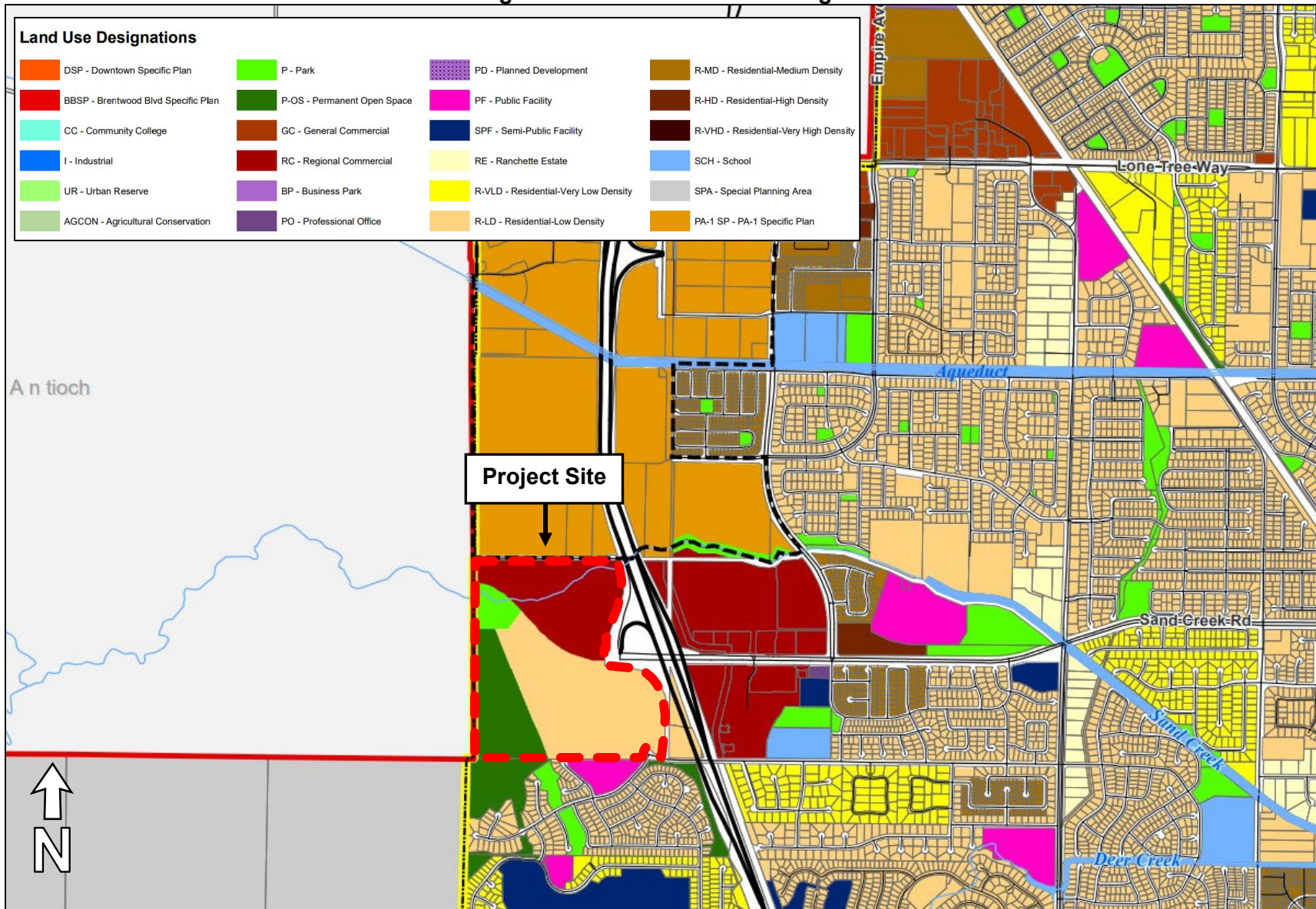
**Figure 1**  
**Regional Project Location**



**Figure 2**  
**Project Vicinity Map**



**Figure 3**  
**Existing General Plan Land Use Designation**



RWQCB letters dated December 19, 1996, July 7, 2000, and March 29, 2001 confirm that all of the former oil wells, tank farm, and monitoring wells were remediated, and further investigation and/or monitoring is not required.<sup>2</sup> Development of the proposed project would require the provision of appropriate setbacks from abandoned oil wells as dictated by the Brentwood Zoning Ordinance.

## **Proposed Project Components**

The proposed project would require approval of a Vesting Tentative Subdivision Map (VTSM) to develop 286 single-family residences, as well as associated improvements within the project site. The proposed project would also require approval of Design Review. Correspondence from City staff indicated that a Rezone is also required. The applicant disagrees, as discussed below. Each project component is discussed in detail below.

### Vesting Tentative Map

The proposed project would require approval of a Vesting Tentative Map (VTM) to develop 286 single-family residences, as well as associated improvements within the project site, including parks, open space, stormwater detention and treatment areas, utility connections, and construction of an internal roadway network on approximately 92.96 acres (see Figure 4). The 33.9 acres of land located north of the future Sand Creek Road extension would remain undeveloped. It should be noted that due to an update to the Assessor's Parcel Map that occurred subsequent to the proposed project's application submittal, the acreages for the project parcel shown in Figure 4 differ slightly from the acreages described above. However, the acreages recorded on the Assessor's Parcel Map will be used for the purposes of the analysis included in the REIR.

Each component of the VTSM is discussed in further detail below.

### *Single-Family Residential Development*

The proposed project would include subdivision of the project site to construct 286 single-family homes in the southeastern portion of the site. Lot sizes would range from 4,500 to 15,863 square feet (sf), with one- to three-story residences ranging from 1,592 sf to 2,392 sf. Overall, a total of 61.961 acres of the project site would be developed with residential uses. Therefore, buildout of the single-family residential development would result in a density of approximately 4.62 dwelling units per acre (du/ac).<sup>3</sup> It should be noted that while the density calculation is based on guidance included in the City's General Plan, the density calculation included herein differs from how density was calculated in the previous version of the Bride Gate Project, which use total site acreage, rather than only the portions of the site dedicated to residential use. However, the density calculation included herein is a conservative estimate.

### *Parks, Landscaping, and Open Space*

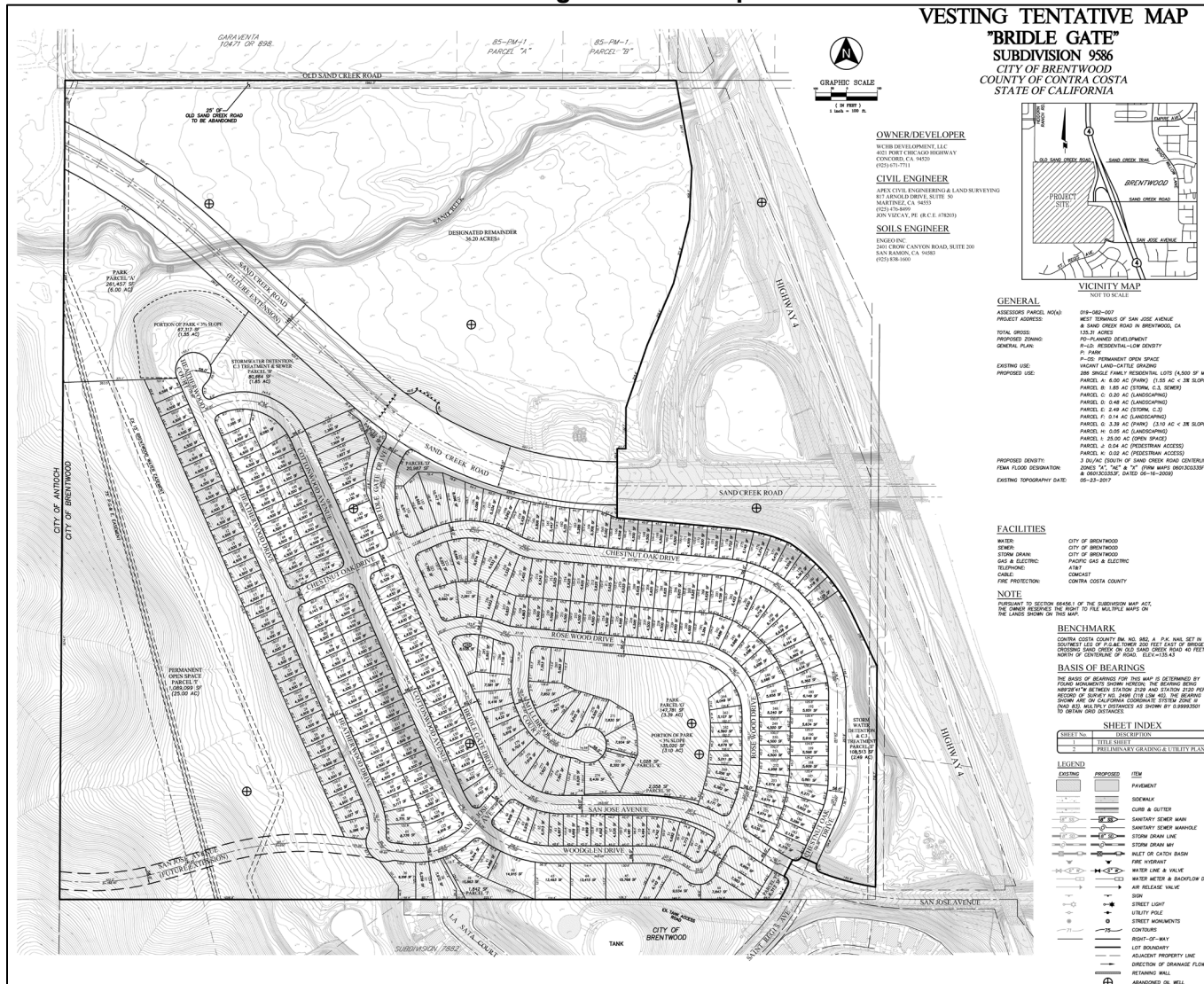
Two parcels totaling six acres (northwest portion of the site) and 3.39 acres (southeast portion of the site) would be dedicated to the City of Brentwood for use as public parks (see Figure 5, Parcel A and Parcel G).

---

<sup>2</sup> California Regional Water Quality Control Board, Central Valley Region. *Monitoring Well Abandonment, ENEA, Brentwood Oil and Gas Field, Contra Costa County*. March 29, 2001.

<sup>3</sup> 61.961 acres/286 single-family homes = 4.62 dwelling units per acre.

**Figure 4  
Vesting Tentative Map**

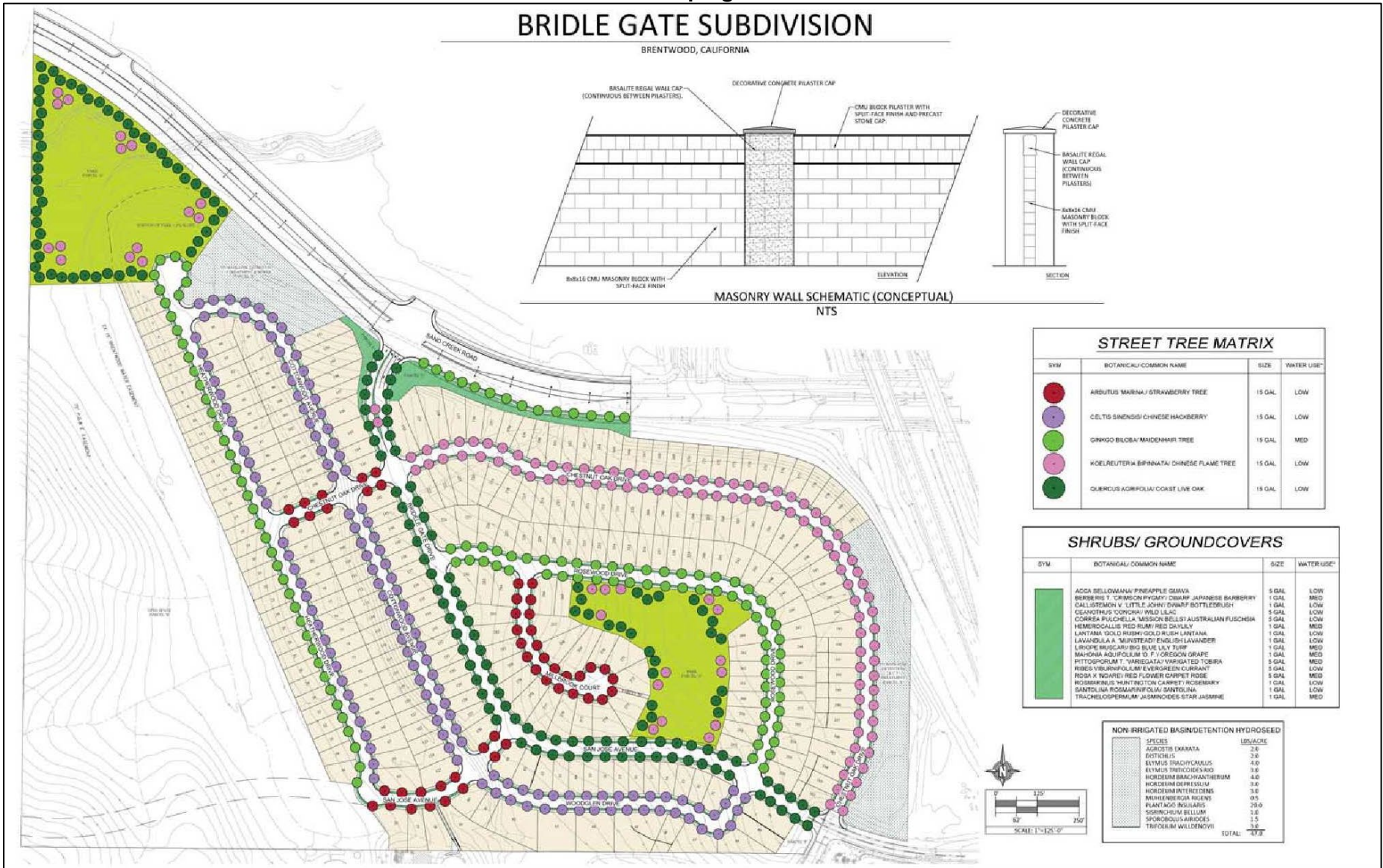


Note: The project site acreage in the map shown above has been updated pursuant to an update to the Assessor's Parcel Map that occurred subsequent to the proposed project's application submittal.

**Figure 5  
Landscaping Plan**

**BRIDLE GATE SUBDIVISION**

BRENTWOOD, CALIFORNIA





The parks would provide recreational amenities for residents of the proposed single-family subdivision. Landscaping elements would be provided throughout the proposed park areas and all other developed portions of the site consistent with City requirements.

As discussed previously, Sand Creek currently flows from west to east through the northern portion of the proposed project site. However, the 33.9 acres of land located north of the future Sand Creek Road extension (see below for road extension details), which includes the majority of the portion of Sand Creek located within the site, would remain undeveloped. The remainder of the portion of Sand Creek located within the project site would be located within the proposed six-acre park. An additional 25 acres of permanent open space (Parcel I) would be located within the southwestern portion of the site.

### *Utilities and Drainage*

Water and sewer service for the proposed project would be provided by the City of Brentwood. The proposed project would include the extension of 16-inch water and 8-inch sewer lines within the portion of Sand Creek Road along the project frontage, which would then be connected to additional lines constructed within internal streets to serve the proposed development areas (see Figure 6).

Stormwater draining off impervious areas such as roofs, parking areas, and streets within the project site would be transported through new 15- to 18-inch storm drains to two bio-retention basins located in the northwestern portion of the site, southeast of the proposed six-acre park (Parcel B), and along the southeast boundary of the site (Parcel E), respectively.

### *Access and Circulation*

The proposed project would include construction of new internal roadways and the extension of San Jose Avenue to the west. It should be noted that a separate City-initiated capital improvement project will extend Sand Creek Road from the westerly existing terminus of SR 4 to Heidorn Ranch Road to the northwest. The future Sand Creek Road extension will extend along the northern boundary of the proposed single-family residential portion of the project and connect to one of the new internal roadways to provide site access. Site access would also be provided by the proposed extension of San Jose Avenue.

An internal circulation system would be provided throughout the proposed single-family residential subdivision. Each internal roadway would be designed to meet current City standards and would include sidewalks on both sides. Pedestrian access would be provided in the form of sidewalks and trails throughout the proposed development, in conformance with City standards.

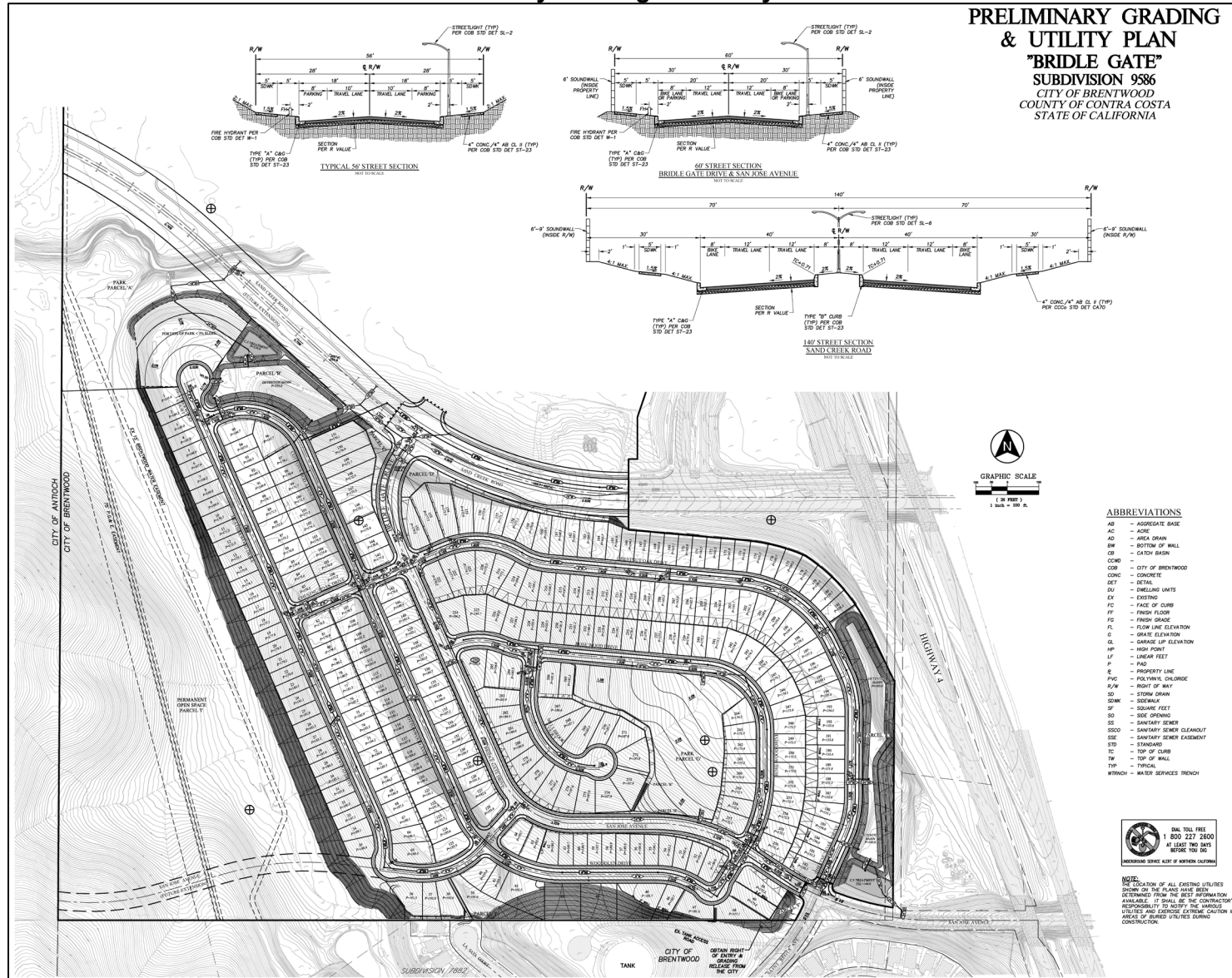
### Design Review

In accordance with the Brentwood Zoning Ordinance, all proposed structures are subject to design review approval by the Planning Commission in order to foster a good design character through consideration of aesthetic and functional relationships to surrounding development. Therefore, because the proposed project would include the development of 286 single-family residences, the proposed project would be subject to Design Review approval.

### Rezone

As discussed above, correspondence from City staff has indicated that a Rezone to amend PD-36 is required. The applicant disagrees. The City anticipates the REIR will address issues with respect to any potential rezoning.

**Figure 6  
Preliminary Grading and Utility Plan**



## **Discretionary Actions**

Implementation of the proposed project would require the following discretionary actions by the City of Brentwood Planning Commission and/or City Council:

- Rezone to amend PD-36;<sup>4</sup>
- Vesting Tentative Subdivision Map; and
- Design Review.

## **ENVIRONMENTAL EFFECTS**

The environmental analysis for the proposed project will focus on the following areas: Aesthetics; Air Quality, Greenhouse Gas Emissions, and Energy; Biological Resources; Hazards and Hazardous Materials; Noise; and Transportation. In addition, the REIR prepared for the proposed project will include a discussion of Effects Not Found to be Significant; Statutorily Required Sections; and Alternatives to the Proposed Project. The following section describes each of the technical Chapters of the REIR in further detail.

Information will be drawn from the City of Brentwood General Plan and General Plan EIR, technical studies prepared, and any other information pertinent to the project area. Consistent with CEQA and the requirements of the City of Brentwood, each environmental chapter will include an introduction, existing environmental setting, regulatory context, and impacts and mitigation measures.

### **Air Quality, Greenhouse Gas Emissions, and Energy**

The air quality and greenhouse gas (GHG) analysis for the proposed project will rely on an Air Quality Technical Report and GHG Reduction Plan prepared for the proposed project.

The Air Quality, Greenhouse Gas Emissions, and Energy chapter will include a quantitative assessment of short-term (i.e., construction) and long-term (i.e., operational) increases of criteria air pollutant emissions of primary concern (i.e., ROG, NO<sub>x</sub>, and PM<sub>10</sub>) for the proposed project. The construction analysis will account for construction of new buildings and infrastructure. Additionally, the significance of air quality impacts will be determined in comparison to Bay Area Air Quality Management District (BAAQMD)-recommended thresholds of significance. The chapter will also address toxic air contaminant (TAC) emissions. The project's cumulative contribution to regional air quality will be discussed, based in part on the modeling conducted at the project level. Mitigation measures will be incorporated to reduce any significant air quality impacts, and anticipated reductions in emissions associated with proposed mitigation measures will be quantified.

The GHG analysis included in the Air Quality Technical Report and GHG Reduction Plan prepared for the proposed project will use CalEEMod to produce an estimate of GHG emissions for the project, including indirect emissions (e.g., electricity, natural gas). Emissions will be expressed in units of carbon dioxide equivalents. With respect to Assembly Bill (AB) 32 and Senate Bill (SB) 32, the chapter will use guidance from the BAAQMD to determine significance of impacts and will document the relevance of the thresholds.

The chapter will also address whether the proposed project could result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy

---

<sup>4</sup> See comments on potential rezone above.

resources during project construction or operation, and will evaluate whether the project would conflict with or obstruct a state or local plan for renewable energy.

## **Biological Resources**

The Biological Resources chapter of the REIR will summarize the setting and describe the potential project effects to plant communities, oak woodlands, wildlife, and wetlands, including adverse effects on rare, endangered, candidate, sensitive, and other special-status species for the project site. Analysis in the chapter will be based on a Planning Survey Report prepared for the proposed project. The project site is within the East Contra Costa County Habitat Conservation Plan/Natural Community Conservation Plan (ECCC HCP/NCCP) boundary; thus, an evaluation of the potential for the proposed development of the project site to conflict with the provisions of the adopted ECCC HCP/NCCP will be included in the chapter. Mitigation measures for all identified impacts will be developed consistent with applicable laws and regulations.

It should be noted that the City of Brentwood, the project applicant, and the East Contra Costa County Habitat Conservancy have agreed upon a Multi-Party Mitigation and Land Dedication in Lieu of Development Fee Agreement, dated January 6, 2020. The Agreement requires the project applicant to dedicate land and pay a development impact fee to mitigate any potential impacts to biological resources within the scope of the ECCC HCP/NCCP. Compliance with the terms of this agreement would satisfy the requirements of the ECCC HCP/NCCP and any species and/or habitat mitigation requirements thereunder.

## **Hazards and Hazardous Materials**

The Hazards and Hazardous Materials chapter will summarize the setting and describe any potential for existing or possible hazardous materials within the project area. The chapter will rely on a Phase I and II Environmental Site Assessment for use in the analysis. The Phase I and II Environmental Site Assessment will address the off-gassing of the existing oil and gas wells. The chapter will also assess the potential for the proposed project to create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.

## **Noise**

The Noise chapter of the REIR will be based on a project-specific Environmental Noise Assessment. The chapter will address potential noise impacts resulting from project construction and operation, including existing and future traffic noise levels on the local roadway network. Noise-sensitive land uses or activities in the project vicinity will be identified and ambient noise and vibration level measurements on, and in the vicinity of, the project site will be conducted to quantify existing background noise and vibration levels for comparison to the predicted project-generated levels. Noise exposure levels will then be compared to applicable significance criteria in the City of Brentwood General Plan, the City's Noise Ordinance, and CEQA. Feasible and appropriate mitigation measures to avoid or reduce adverse impacts will be identified, as needed.

## **Transportation**

The Transportation chapter of the REIR will be based on a Traffic Study and associated Memorandum prepared specifically for the prior Bridle Gate Project, as well as a VMT Assessment prepared for the proposed project. Impact determination for CEQA purposes will be based on vehicle miles traveled (VMT), consistent with CEQA Guidelines Section 15064.3, which became effective statewide on July 1, 2020. The VMT analysis will be quantitative in nature and will be

prepared consistent with City of Brentwood and Contra Costa Transportation Authority (CCTA) current guidance regarding analysis of VMT.

The proposed project's impacts to alternative modes of transportation such as pedestrian, bicycle, and transit facilities will be assessed based on their significance criteria contained in the adopted City of Brentwood and CCTA guidelines. The REIR chapter will also include an analysis of the proposed project's potential impacts related to conflicting with applicable programs, policies, and ordinances addressing the circulation system, vehicle safety hazards, and emergency access. Feasible and appropriate mitigation measures to avoid or reduce adverse impacts will be identified, as needed.

### **Effects Not Found to be Significant**

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Accordingly, the Effects Not Found to be Significant chapter of the REIR will include abbreviated discussions of impacts determined not to be significant.

### **Statutorily Required Sections**

Pursuant to CEQA Guidelines Section 21100(B)(5), the Statutorily Required Sections chapter of the REIR will address the potential for growth-inducing impacts of the proposed project, focusing on whether removal of any impediments to growth would occur with the proposed project. A summary of the significant and unavoidable impacts identified within the REIR will be included in this chapter, as well as a discussion of significant irreversible impacts. The chapter will generally describe the cumulative setting for the proposed project; however, a detailed description of the subject-specific cumulative setting, as well as analysis of the cumulative impacts, will be included in each technical chapter of the REIR.

### **Alternatives Analysis**

In accordance with Section 15126.6(a) of the CEQA Guidelines, the REIR will include an analysis of a range of alternatives, including a No Project Alternative. Consideration will be given to potential off-site locations consistent with CEQA Guidelines, Section 15126.6(f)(2), and such locations will be determined in consultation with City staff. If it is determined that an off-site alternative is not feasible, the REIR will include a discussion describing why such a conclusion was reached. The project alternatives will be selected when more information related to project impacts is available in order to be designed to reduce significant project impacts. The chapter will also include a section of alternatives considered but dismissed, if necessary. The Alternatives Analysis chapter will describe the alternatives and identify the environmentally superior alternative. The alternatives will be analyzed at a level of detail less than that of the proposed project; however, the analyses will include sufficient detail to allow a meaningful comparison of the impacts. Such detail may include conceptual site plans for each alternative, basic quantitative traffic information (e.g., trip generation), as well as a table that will compare the features and the impacts of each alternative.

### **SUBMITTING COMMENTS**

To ensure that the full range of issues related to this proposed project is addressed and that all significant issues are identified, written comments are invited from all interested parties. Written

comments concerning the scope of the proposed CEQA analysis for the proposed project should be submitted to [enolthenius@brentwoodca.gov](mailto:enolthenius@brentwoodca.gov) or directed to the name and address below:

Erik Nolthenius, Planning Manager  
City of Brentwood Community Development Department  
150 City Park Way  
Brentwood, CA 94513  
[enolthenius@brentwoodca.gov](mailto:enolthenius@brentwoodca.gov)  
(925) 516-5137

Written comments are due to the City of Brentwood at the location addressed above by 5:00 PM on January 30, 2023.