



Isabel Crossing and No Net Loss Specific Plan Amendment Project

Environmental Impact Report Addendum State Clearinghouse # 2016042039

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1 Introduction and Project Summary

1.1 Project Title

Isabel Crossing and No Net Loss Specific Plan Amendment Project

1.2 Lead Agency/Project Sponsor Contact Information

City of Livermore
Community Development Department
1052 South Livermore Avenue
Livermore, California 94550

Contact: Jake Potter, Senior Planner
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1.3 Introduction and Background

The City of Livermore was the lead agency for the certified 2018 Environmental Impact Report (EIR) (State Clearinghouse [SCH] #2016042039) and the certified 2020 Supplemental Environmental Impact Report (SEIR) (SCH #2016042039) for the Isabel Neighborhood Specific Plan (INSP) and is the lead agency for this document. This document presents the results of environmental review for the Isabel Crossing and No Net Loss Specific Plan Amendment Project, which consists of changes to the development program for a portion of the Specific Plan area; these changes are henceforth referred to as the “proposed project” or “modified project.” The City has prepared this EIR Addendum pursuant to *CEQA Guidelines* Sections 15162 and 15164 because it has determined that “major revisions” to the prior 2018 EIR and 2020 SEIR are not required for the project. In accordance with CEQA, the analysis herein considers the changes in the proposed project compared to the original development program and buildout originally planned for the project site, henceforth known as the “original project,” that was analyzed in the 2018 EIR and 2020 SEIR; substantial changes with respect to the surrounding circumstances under which the proposed project is undertaken; and “new information of substantial importance” that shows that the project may cause a new, previously unanalyzed significant environmental effect, a substantial increase in the severity of previously analyzed significant impact, or that mitigation previously found to be infeasible is now feasible to reduce one or more significant effects of the project but the project proponent refuses to implement it.

1.4 Project Location and Setting

The project site includes three distinct areas. The Isabel Crossing Parcels (Assessor’s Parcel Numbers [APN] 903-0010-046 through -054) encompass approximately 45 acres located at the southwest corner of Isabel Avenue and Portola Avenue in the INSP area of Livermore in Alameda County. The Isabel Crossing Parcels are bounded by Isabel Avenue to the east, Portola Avenue to the north, Interstate 580 (I-580) to the south and existing office and commercial development to the west. The Isabel Crossing Parcels are located within the 3b and 3c Subareas of the INSP. Subareas 3b and 3c

are core areas of the INSP with a general objective of creating a vibrant residential neighborhood with retail uses that generate transit ridership.

The No Net Loss Parcels make up the remaining two areas of the project site. The Bay Area Rapid Transit (BART) "BART Parcel" (6.53 acres, APN 903-10-36-3) is located to the east of the intersection of I-580 and Isabel Avenue, and two contiguous "Comcast Parcels" (26.83 total acres, APNs 905-10-23 and 905-10-24) are located northwest of North Canyons Parkway at 3055 Triad Place, Livermore, California, 94551. The BART Parcel is bounded by undeveloped land planned for residential land uses to the east, Isabel Avenue to the north, and the I-580 offramp to the south and west. The BART Parcel is located within Subarea 3a of the INSP. Subarea 3a land uses include Office Core and Core Residential (60 to 100 dwelling units per acre [du/ac]). The Comcast Parcels are bounded by existing residences to the east, agricultural land and hills to the north, undeveloped parcels and North Canyons Parkway beyond to the south, and offices to the west. The Comcast Parcels are located within Subarea 1d of the INSP. Subarea 1d is designated for Business Park land uses.

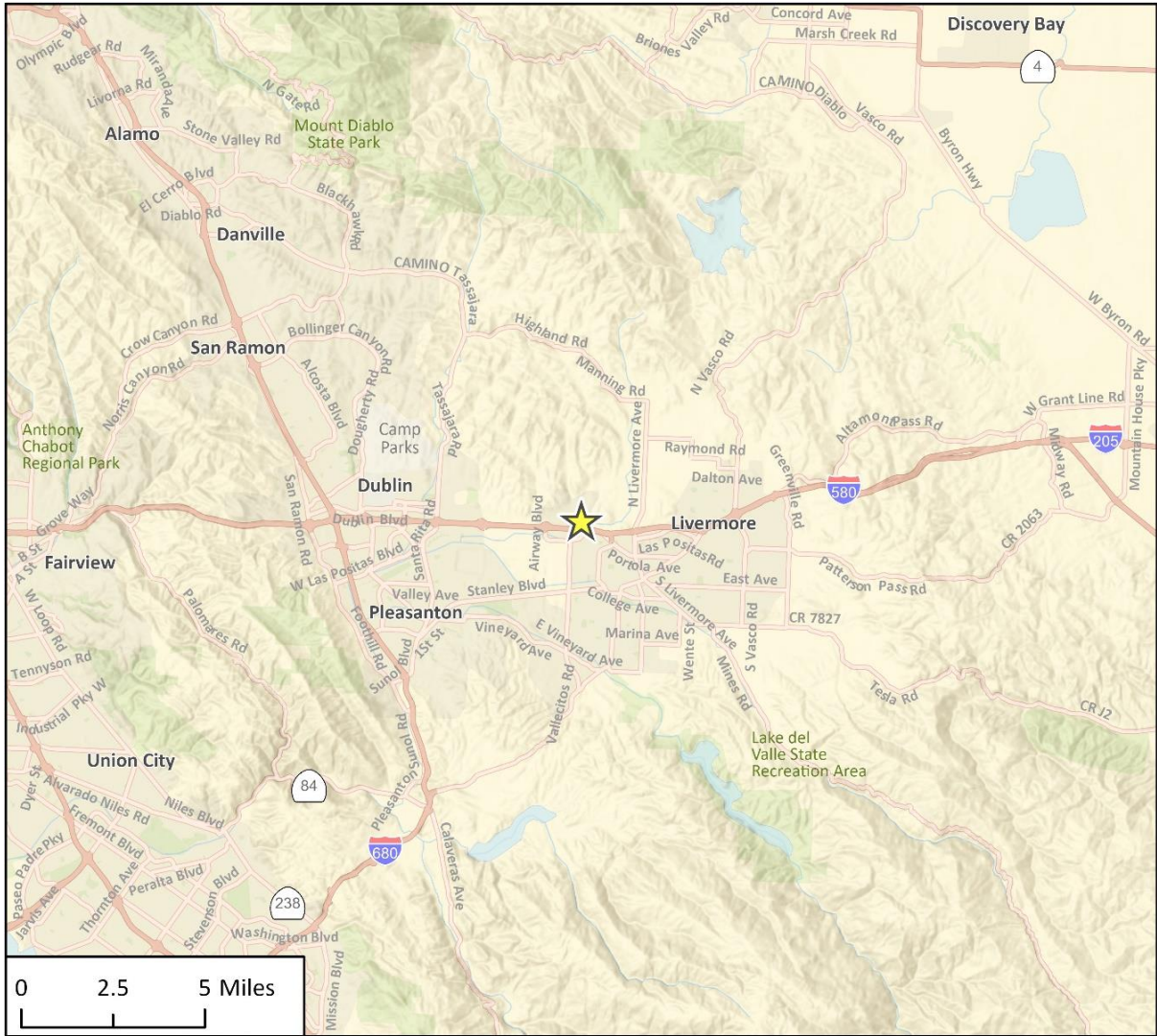
The INSP Planning Area is accessible through interstate highway (I-580), State Route 84, and Vasco Road. The Isabel Crossing Parcels are accessible from Portola Avenue, Isabel Avenue, and Shae Center Drive. The BART Parcel is accessible from Isabel Avenue. The Comcast Parcels are accessible via a driveway entrance that extends from North Canyons Parkway. The future Isabel Station for the Valley Link railway is located less than 0.25 mile to the southeast of the Isabel Crossing and BART Parcel portions of the project site. The Valley Link railway is a proposed 42-mile passenger rail project that will connect the Lathrop Altamont Commuter Express (ACE) rail station with the Dublin/Pleasanton BART station. The Isabel Crossing and BART Parcel portions of the project site is located within 0.5 mile of the proposed Isabel Station platform. Figure 1 shows the regional location of the project area and Figure 2 shows the location of the site in its vicinity context.

The Isabel Crossing Parcels have gently rolling topography that slopes slightly down toward its center, and currently undeveloped with sparse vegetation. Surrounding land uses include undeveloped land, open space, and residential townhouses to the north; office and commercial buildings to the west; undeveloped land designated for residential and office land uses to the east; and undeveloped land designated for institutional and education uses to the south beyond I-580.

The Bart Parcel is relatively flat, sloping slightly downward towards the east, and currently undeveloped with sparse vegetation. Surrounding land uses include undeveloped land designated for residential and office uses to the north, east, and west; and undeveloped land planned for educational/institutional uses to the south beyond I-580.

The Comcast Parcels are currently developed with existing office buildings and parking lots. The parcels are relatively flat in the southern portion and in the northern portion slope gradually upwards to the hills to the north of the parcels. Surrounding land uses include agriculture to the north; residential to the west; offices to the east; and undeveloped land planned for residential uses to the south.

Figure 1 Regional Location



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Fig 1 Regional Location

★ Project Location

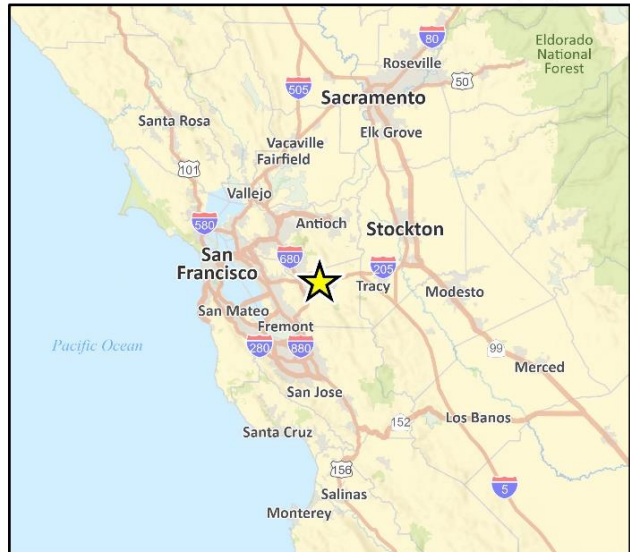


Figure 2 Project Location



1.5 Project Description

The proposed project consists of a currently proposed mixed-used development located on 45 acres (referred to as the “Isabel Crossing Project”), and a proposed land use designation change for three additional parcels totaling approximately 33 acres from commercial and office use to residential use for three parcels (referred to as “No Net Loss Specific Plan Amendment Project”). The individual project components are described in more detail below.

Isabel Crossing Project

The Isabel Crossing Project would consist of a mixed-used development located on 45 acres. The project applicant proposes to construct 1,299 dwelling units (townhomes and mid-rise multi-family apartments) and 74,362 square feet of neighborhood serving commercial space on the 45-acre site. Commercial spaces, including retail and grocery uses, would be located on the ground floor of multi-story mixed-use buildings, and would front streets internal to the project site. Residential units would range from 453 square feet to 2,402 square feet in size, and would include flat condos, apartments, and three-story townhomes. Commercial space would be on the street level of multi-story buildings with residential condos and apartments located above. Proposed amenities include a neighborhood park, a recreation center that includes a pool, and open space at the corners of the retail-lined street including a pocket plaza and a town square.

Vehicular site access would be provided by two intersections along Portola Avenue, two intersections along Isabel Avenue, one intersection at the east end of Gateway Avenue where it meets Shea Center Drive, and one intersection along Shea Center Drive. The project would include internal roadways, pedestrian walkways, and a multi-use trail along the southern border of the site connecting the east end of the proposed Gateway Road to Shea Center Drive. Table 1 outlines characteristics of the proposed project compared to the development program and buildout for these subareas in the original project and Figure 3 illustrates the proposed plans and gross acreage of each parcel included in the proposed project.

Among its approvals, the Isabel Crossing Project requests one “incentive or concession” and a total of 12 “waivers or reductions” of “development standards” under the State and local Density Bonus law, which provides for relief from certain local zoning standards for development projects that provide affordable housing. Under these provisions, the Isabel Crossing Project seeks relief from certain standards adopted in the original INSP for the Isabel Crossing Project. This includes waiver requests for the parcels within the proposed project would exceed the height limits required in the INSP. Parcel S1 would exceed the height envelope by approximately 11.5 feet, Parcel C-2A would exceed the height envelope by approximately 8.5 feet at the north end of the building only, Parcel S3-A would exceed the height envelope by approximately 5.9 feet, and Parcel S3-B would exceed height requirements by approximately 20.5 feet. To accommodate the project, the applicant has requested the following waivers on specific parcels (parcel locations are shown in Figure 3):

- Parcel N1:
 - A waiver or reduction from the applicable INSP porch separation requirement for porches facing each other of 15 feet along paseos, where two particular porches in Parcel N1 are separated by 7.5 feet and 9.9 feet, respectively.

Isabel Crossing and No Net Loss Specific Plan Amendment Project

- **Parcels N2 and N3-A:**
 - A waiver or reduction from the applicable INSP dimension requirement for private open space, which requires a minimum of 75 square feet of open space per dwelling unit with minimum dimensions of 6 feet by 8 feet, and the project provides certain units that include private open space that is 17 feet and 3 inches by 5 feet and 0 inches, for a total area of approximately 86.25 square feet.
- **Parcel C1-B:**
 - A waiver or reduction from the applicable INSP front setback requirement of a 10-foot setback at the fourth floor of the proposed four-story apartment building; no setback is proposed (though decks are provided to break up the façades).
 - A waiver or reduction from the applicable INSP minimum 16-foot floor to ceiling ground floor height standard for ground floors of commercial uses within the retail/flex space overlay area; the proposed ceiling height is an average of approximately 14 feet.
- **Parcel C2-A:**
 - A waiver or reduction from the applicable INSP front setback requirement of a 10-foot setback at the fourth floor of the proposed five-story apartment building; no setback is proposed (though decks are provided to break up the façades).
 - A waiver or reduction of the applicable INSP height limit of 490 feet above mean sea level (MSL), where a maximum height of approximately 499 feet above MSL is provided for a portion of a building on the north end of Parcel C2-A.
 - A waiver or reduction from the applicable INSP minimum 16-foot floor to ceiling ground floor height standard for ground floors of commercial uses within the retail/flex space overlay area; the proposed ceiling height is an average of approximately 14 feet.
- **Parcel S1:**
 - A waiver or reduction from the applicable INSP minimum commercial FAR of 0.4:1, where an FAR of approximately 0.3:1 is provided.
 - A waiver or reduction of the applicable INSP height limit of 485 feet above MSL, where a maximum height of approximately 497 feet above MSL is provided.
- **Parcel S2 and S4:**
 - A waiver or reduction from the applicable INSP dimension requirement for private open space, which requires a minimum of 75 square feet of open space per dwelling unit with minimum dimensions of 6 feet by 8 feet, and the project provides certain units that include private open space that is 14 feet and 2 inches by 5 feet and 4 inches for a total area of approximately 73.3 square feet.
- **Parcel S3-A:**
 - A waiver or reduction of the applicable INSP height limit of 485 feet above MSL, where a maximum height of approximately 491 feet above MSL is provided.
- **Parcel S3-B:**
 - A waiver or reduction of the applicable INSP height limit of 475 feet above MSL, where a maximum height of approximately 496 feet above MSL is provided.

Table 1 Isabel Crossing Project Characteristics

Project Characteristic	Proposed Project	Original Project	Change (Proposed Project Compared to Original Project)
Non-residential Area			
Office	0 square feet	39,640 square feet ¹	-39,640 square feet
Commercial	74,362 square feet	167,185 square feet	-92,823 square feet
Common Area	2.56 acres	2.17 acres	+0.39 acres
Residential Units			
Market Rate	936 units	1,086 units	-150 units
Affordable	363 units	252 units	+111 units
Total	1,299 units	1,338 units²	-39 units
Maximum Building Height (feet above mean sea level)	498.5 feet	505 feet ³	-6.5 feet
Parking (stalls)	2,436	At least 2,142	+294

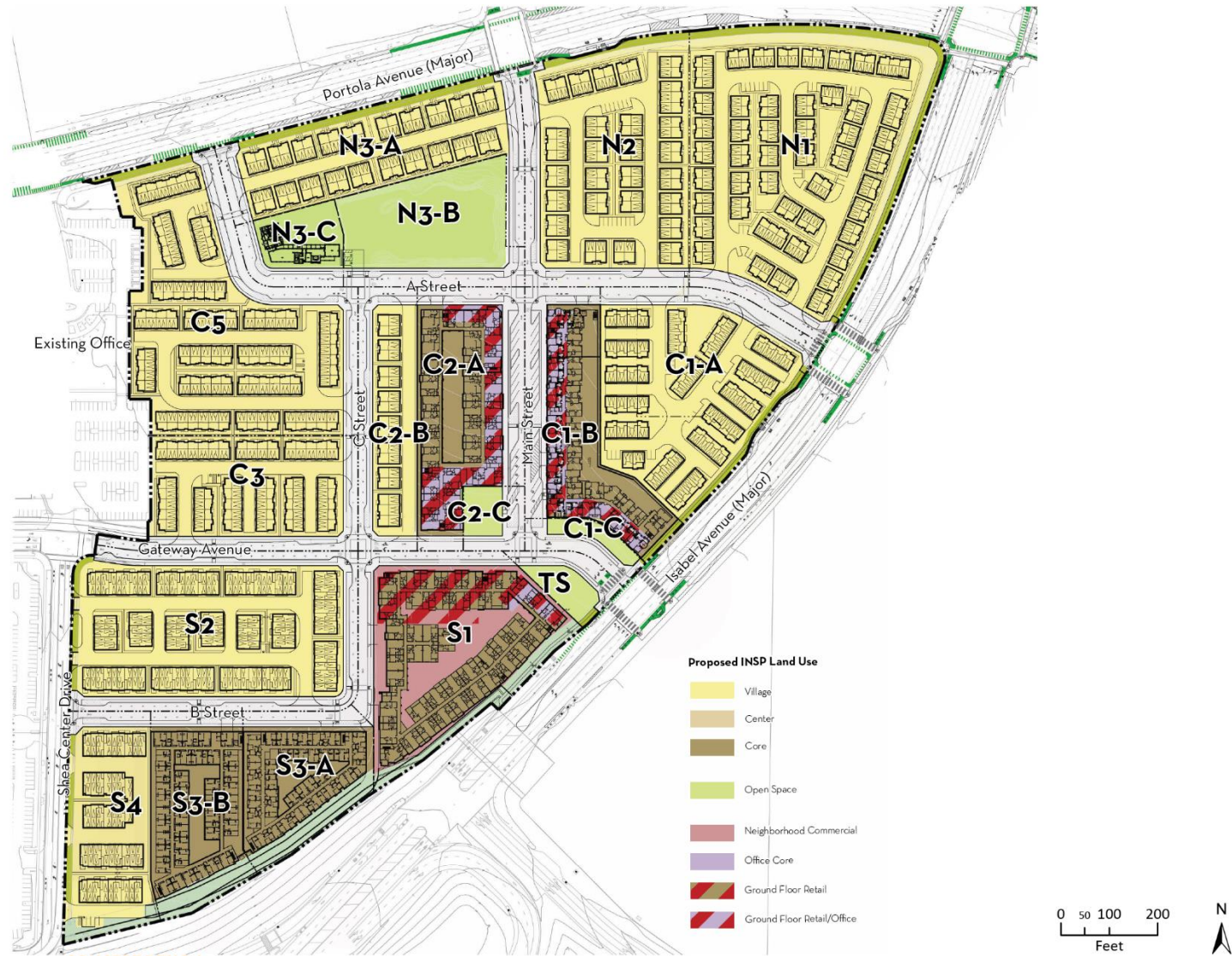
¹The office buildout for the project site was estimated using the acreage for proposed products within the Office Core area of the project site and a minimum floor area ratio of 1.0 as planned for the Office Core designation in the Land Use chapter of the INSP.

²The calculated target buildout of the project site considered in the INSP.

³The maximum height allowed in the project site.

Source: Appendix A; City of Livermore 2020a

Figure 3 Proposed Site Plan



Source: William Hezmal Halch
Architects, Inc. DBA WHA., 2023.

No Net Loss Specific Plan Amendment Project

Since certification of the INSP EIR, proposed and constructed developments in the INSP area have not met the anticipated unit counts identified in the INSP and/or City of Livermore Housing Element; therefore, the City desires to re-designate certain parcels within the INSP to ensure that there is adequate opportunity for the development of housing within the INSP area. The current shortfall of residential units is 344 units (including the Isabel Crossing Project, described above), with the trend of housing unit shortfalls anticipated to continue as the INSP area is built-out.

The project would amend the INSP to change the land use designation of the BART Parcel to Residential Core (60-100 du/ac). The existing Commercial Overlay/Flex Space designation would remain on a portion of the BART Parcel. The project would also include a future amendment to the INSP to change the land use designation of the Comcast Parcels to Village (25-40 du/ac; eastern half) and Transition (15-25 du/ac; western half). The proposed future land use designations of the Comcast Parcels would match the existing designations of parcels located immediately south of the Comcast Parcels. The intent of the proposed and future land use designation changes is to ensure no net loss of housing opportunity sites within the INSP area, in accordance with the City's adopted Housing Element. This Addendum addresses the anticipated buildout of the No Net Loss Parcels that could result from the proposed and future land use designation changes.

Re-designation of the BART and Comcast Parcels would result in the potential to develop up to 1,775 additional residential units compared with existing land use designations on these parcels. Comcast Parcel West (APN 905-10-23) would be able to develop 350 residential units; Comcast Parcel East (APN 905-10-24) would be able to develop 512 residential units; and the BART Parcel (APN 903-10-36-3) would be able to develop 913 units. This change would also result in a net loss of 1,531,486 square feet of existing and proposed office space on the No Net Loss Parcels.

Overall Growth Projections

Because constructed and currently proposed development, including the Isabel Crossing Project, would not meet the anticipated quantity of residential units identified in the INSP and/or Housing Element, the proposed land use designation change of the No Net Loss Parcels is required so that there is no net loss of residential unit capacity. The overall project would result in a net increase of 1,431 residential units and a net decrease of 1,531,486 square feet of office space, compared to what was analyzed in the 2018 EIR and 2020 SEIR for the INSP.

Consistency of the Project with Adopted Plans and Ordinances

Isabel Neighborhood Specific Plan Background

The INSP was adopted to guide future development of the area around the planned Valley Link rail station, which is planned for the median of I-580, just east of Isabel Avenue. The INSP covers approximately 1,138 acres and allows for development of 4,095 new multi-family housing units and approximately 2.1 million square feet of net new office, business park, and commercial development (including a neighborhood commercial center) (City of Livermore 2023). It also envisions three new neighborhood parks, pedestrian and bike facilities, and infrastructure improvements. The INSP Planning Area is currently developed with a range of residential, industrial, commercial, institutional, and open space uses; the project site remains undeveloped.

Isabel Crossing and No Net Loss Specific Plan Amendment Project

The INSP underwent CEQA review in the form of an EIR (2018 EIR), which was certified in 2018. An update to the INSP was subsequently made to account for the Valley Link Rail Project, and an SEIR (2020 SEIR) was prepared to evaluate updates to the INSP. The SEIR was certified in 2020 and the INSP was adopted in November of 2020.

Isabel Crossing Project

The Isabel Crossing Project would be constructed within and would modify the approved development program for Subareas 3b and 3c of the INSP. Approved land uses in Subarea 3b include:

- Residential
 - Village: 25-40 du/ac
 - Center: 40-60 du/ac
 - Core: 60-100 du/ac
- Neighborhood commercial

Approved land uses in Subarea 3c include:

- Residential Core: 60-100 du/ac
- Office Core

Under the adopted INSP, Subareas 3b and 3c have a combined target buildout of 1,477 residential units. The Isabel Crossing project site is approximately 2.32 acres smaller than the full 3b and 3c Subareas; therefore, the buildout of the project site considered in the INSP is 1,338 residential units, which is greater than the 1,299 units proposed by the project. The Isabel Crossing project site includes the Neighborhood Commercial area of the INSP, which envisions a maximum buildout of 167,185 square feet of commercial space. The approximately 75,000 square feet of commercial space proposed by the project would not exceed the commercial space considered in the 2020 SEIR. The Isabel Crossing Project seeks a Specific Plan Amendment in a manner that enables the approval of the Isabel Crossing Project via an approved master site plan, which includes reductions of commercial and office space, a reconfiguration of the site plan and applicable zoning designations, and alternative compliance with affordable housing requirements. As mentioned above, the Isabel Crossing Project also seeks a Density Bonus law incentive to reduce any required office space and provide for waivers from certain applicable INSP development standards. Therefore, the proposed number of residential units and commercial space are less than, and are thus within, the intensity of development envisioned in the INSP for these subareas as analyzed in the 2018 EIR and 2020 SEIR.

No Net Loss Specific Plan Amendment Project

The No Net Loss Specific Plan Amendment Project would allow for the future development of higher density residential uses within Subareas 3a and 1d of the INSP and would modify the approved development program for those subareas. Approved land uses on the BART Parcel in Subarea 3a include:

- Residential Core: 60-100 du/ac
- Office Core

Approved land uses on the Comcast Parcels in Subarea 1d include:

- Business Park

The proposed land use designation change of the BART parcel would allow 913 units which is greater than is currently allowed in Subarea 3a. Subarea 1d is designated as Business Park which allows commercial and light industrial uses. Residential uses are not currently permitted on the Comcast Parcels. The City is proposing an amendment to the INSP to change the land use designation of the BART Parcel to Residential Core and the Comcast Parcels to Village and Transition (future change) to ensure that there is adequate opportunity for the development of housing within the INSP area.

State Density Bonus Law

Residential projects may in some cases use provisions of the State Density Bonus law (California Government Code Sections 65915 – 65918) to develop affordable and senior housing. The State Density Bonus law also includes incentives to make the development of affordable and senior housing economically feasible. These include waivers and concessions, such as exceptions to a zoning ordinance or other land use regulations. Projects providing sufficient affordable housing can avail themselves of any applicable combination of additional density and/or other waivers and incentives.

The Isabel Crossing Project would include 363 affordable housing units which is approximately 28 percent of the project's proposed residential buildout. Based on the percentage of affordable units, the project proponent is proposing to use the State Density Bonus law to request additional waivers and concessions, which were described above.

No Net Loss Law (Government Code Section 65863)

The purpose of Government Code Section 65863 (No Net Loss Law) is to ensure development opportunities remain available throughout the planning period to accommodate a jurisdiction's regional housing need allocation (RHNA), especially for lower- and moderate- income households. A jurisdiction may not take any action to reduce a parcel's residential density unless it makes findings that the remaining sites identified in its Housing Element sites inventory can accommodate the jurisdiction's remaining unmet RHNA by each income category, or if it identifies additional sites so that there is no net loss of residential unit capacity. If a jurisdiction approves a development of a parcel identified in its Housing Element sites inventory with fewer units than shown in the Housing Element, it must either make findings that the Housing Element's remaining sites have sufficient capacity to accommodate the remaining unmet RHNA by each income level, or identify and make available sufficient sites to accommodate the remaining unmet RHNA for each income category.

While existing and planned developments in the INSP area, including the Isabel Crossing Project, would result in a reduction of 344 units compared to what was originally planned under the INSP and accounted for in the City's Housing Element, the proposed No Net Loss Specific Plan Amendment Project would result in a net increase of 1,431 residential units compared to what was planned under the INSP and analyzed in the INSP 2018 EIR and 2020 SEIR.

1.6 Project Approvals

The City Council would need to take the following actions regarding the proposed Isabel Crossing Project:

- Adoption of this Addendum to the INSP EIR
- Approval of a Development Agreement
- Approval of a Density Bonus “Incentive and Concession” and “Waiver and Reduction” Requests
- Approval of a Conditional Use Permit (to allow residential uses in the INSP Neighborhood Commercial Zone)
- Approval of an Amendment to the INSP
- Site and Design Review
- Approval of a Vesting Tentative Tract Map
- Approval of a Master Sign Program Amendment
- General Plan Consistency Determination

The City Council would need to take the following actions regarding the proposed land use designation change of the BART Parcel:

- Adoption of this Addendum to the INSP EIR
- Approval of an Amendment to the INSP

The City Council would need to take the following actions regarding the future land use designation change of the Comcast Parcels:

- Adoption of this Addendum to the INSP EIR
- Approval of an Amendment to the INSP

1.7 Prior Environmental Document(s)

The INSP underwent environmental review in the form of an EIR certified by the City of Livermore in 2018. An update to the INSP was subsequently made to account for the Valley Link Rail Project, and an SEIR was prepared to evaluate updates to the INSP. The SEIR was certified by the City of Livermore in 2020.

- Isabel Neighborhood Plan Environmental Impact Report (2018 EIR), SCH #2016042039, certified April 2018.
- Isabel Neighborhood Plan Supplemental Environmental Impact Report (2020 SEIR), SCH #2016042039, certified June 2020.

1.8 Location of Prior Environmental Document(s)

City of Livermore, Planning Department Website:

<https://www.livermoreca.gov/departments/community-development/planning/specific-plans/isabel-neighborhood-specific-plan/insp-draft-and-final-environmental-impact-report-eir>

2 Overview of CEQA Guidelines Sections 15162 and 15164

CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when a project has a previously certified EIR.

CEQA Guidelines Section 15164 states that a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. *CEQA Guidelines* Section 15162(a) states that no Subsequent or Supplemental EIR shall be prepared for a project with a certified EIR unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR.
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR.
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
 - D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis pursuant to *CEQA Guidelines* Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR, that an addendum to the existing EIR would be appropriate, and no new environmental document, such as a new EIR, would be required. The addendum need not be circulated for public review but can be included in or attached to the Final EIR, and the decision-making body shall consider the addendum with the Final EIR prior to deciding on the project.

According to *CEQA Guidelines* Section 15164, an addendum to a previously certified EIR is the appropriate environmental document in instances when “only minor technical changes or additions are necessary” and when the new information does not involve new significant environmental

effects or a substantial increase in the severity of a significant effect beyond those identified in the previous EIR. *CEQA Guidelines* Section 15164 states that:

- a. The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- b. An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- c. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- d. The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- e. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record.

15162 Standard: Substantial Changes in the Project

Pursuant to *CEQA Guidelines* Section 15162(a)(1), Section 4, *Impact Analysis*, presents a discussion of whether the proposed project constitutes a substantial change in the project analyzed in the certified EIR that would require major revisions to the certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Please refer to Section 4, *Impact Analysis*, for a discussion of each impact and changes to such impacts resulting from project changes.

15162 Standard: Substantial Changes in the Circumstances

Pursuant to *CEQA Guidelines* Section 15162(a)(2), Section 4, *Impact Analysis*, presents a discussion of whether changes to the project site or the vicinity (environmental setting) have occurred subsequent to the certification of the EIR that would result in new significant impacts or a substantial increase in the severity of a previously identified significant impact that were not evaluated and mitigated by the previous EIR. Please refer to Section 4, *Impact Analysis*, for a discussion of each impact and change in circumstances related to such impacts.

15162 Standard: New Information of Substantial Importance

Pursuant to *CEQA Guidelines* Section 15162(a)(3), Section 4, *Impact Analysis*, includes a discussion of whether the proposed project would result in new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the INSP 2018 EIR and 2020 SEIR were certified. New information of substantial importance includes: (1) one or more significant effects not discussed in the previous EIR; (2) significant effects previously examined that are substantially more severe than shown in the previous EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. Please refer to Section 4, *Impact Analysis*, for a discussion of each impact and new information related to such impacts.

3 Environmental Effects and Determination

Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

- NONE
- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

Determination

Based on this analysis:

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in *CEQA Guidelines* Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

Isabel Crossing and No Net Loss Specific Plan Amendment Project

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in *CEQA Guidelines* Section 15162(a)(3). Therefore, the previously certified EIR is adequate and this evaluation serves as an ADDENDUM to the City of Livermore Isabel Neighborhood Plan Environmental Impact Report (2018 EIR) and Supplemental Environmental Impact Report (2020 SEIR), SCH # 2016042039.

Stephen Riley
Signature

6/28/24
Date

Stephen Riley
Printed Name

Planning Manager
Title

4 Impact Analysis

The analysis in this section of the potential impacts associated with the Isabel Crossing and No Net Loss Specific Plan Amendment Project compared with those of the approved INSP analyzed in the certified 2018 EIR and 2020 SEIR has been prepared using the CEQA checklist as a guide. This checklist is consistent with the format and environmental topics and questions of the checklist used in the Final EIR, but also includes recent updates to reflect the most recently adopted checklist provided in Appendix G of the 2023 *CEQA Guidelines*. The checklist considers the full range of environmental issues subject to analysis under CEQA (in rows), and then poses a series of questions (in columns) aimed at identifying the degree to which the issue was analyzed in the certified 2018 EIR and 2020 SEIR. The checklist also includes a column identifying whether there is new information of substantial importance, as defined by CEQA, relative to each environmental issue. The questions posed and addressed in the checklist are described below.

Where was Impact Analyzed in the EIR?

This column provides a cross-reference to the portions of the certified 2018 EIR and/or 2020 SEIR where information and analyses may be found relative to the environmental issue listed under each topic. The cross-references identified in this column correspond with page numbers and section numbers of the 2018 EIR and/or 2020 SEIR.

Are Major Revisions to the EIR Required?

In accordance with *CEQA Guidelines* Section 15162(a), this column indicates whether the proposed project would involve new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts, new information of substantial importance, or substantial changes in the circumstances that, in turn, would require major revisions of the 2018 EIR and/or 2020 SEIR.

Are There New or Substantially More Severe Significant Impacts?

In accordance with *CEQA Guidelines* Section 15162(a)(1), this column indicates whether the proposed project would involve new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts that were not discussed in the 2018 EIR and/or 2020 SEIR.

Do EIR Mitigation Measures Address and/or Resolve Impacts?

This column indicates whether mitigation measures from the 2018 EIR and/or 2020 SEIR would address and/or resolve impacts related to the modified project.

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4.1 Aesthetics

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	Pages 3.5-8 through 3.5-10 of the 2018 EIR	No	No	N/A
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Pages 3.5-14 of the 2018 EIR	No	No	N/A
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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Pages 3.5-14 through 3.5-15 of the 2018 EIR	No	No	N/A
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Pages 3.5-15 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to aesthetics were analyzed on pages 3.5-8 through 3.5-15 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to aesthetics from the 2018 EIR. Aesthetic impacts related to scenic resources, visual character, and light and glare were determined to be less than significant, while impacts related to scenic vistas were determined to be significant and unavoidable despite implementation of Goal G-LU-2 of the INSP which requires the protection of existing scenic views to the extent possible and create new view corridors from within the INSP Planning Area.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental

documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

The 2018 EIR determined that impacts to scenic vistas would be significant and unavoidable due to the proposed height and intensity of development within the INSP planning area. The proposed project would be entirely within the INSP Planning Area analyzed in the 2018 EIR. As discussed in Section 1.5, *Project Description*, four of the Isabel Crossing Parcels in the proposed project would exceed the height limits required in the INSP pursuant to requested Density Bonus law “waiver and reduction” requests. Parcel S1 would exceed the height envelope by approximately 11.5 feet, Parcel C-2A would exceed the height envelope by approximately 8.5 feet at the north end of the building only, Parcel S3-A would exceed the height envelope by approximately 6.0 feet, and Parcel S3-B would exceed height requirements by approximately 20.5 feet. However, several of the proposed building heights would be reduced compared to the original project, and the overall impact on scenic vistas would be similar to and not substantially more severe than the original project. The height requirements would be consistent with INSP land uses after concessions and waivers approved under the proposed State Density Bonus. Figure 4 and Figure 5 show views of the project site from Isabel Avenue and Shea Center Drive. Development on the site would generally obscure views of the distant ridgelines regardless of the height increases proposed for the project.

Under the original project, building height was restricted to 490 to 495 feet above MSL for the BART Parcel (pursuant to Figure 2-4 of the INSP) and 30 feet in height for the Comcast Parcels (pursuant to the City’s General Plan Scenic Corridor Policy). The proposed land use designation change of the No Net Loss Parcels would not modify the height limitations, and as no specific development is proposed on the No Net Loss Parcels at this time, it is reasonably assumed that future development proposals on the No Net Loss Parcels would comply with the height limitations set forth in the City’s General Plan and INSP.

Therefore, the proposed project would not result in new or more severe impacts to scenic vistas beyond those identified in the 2018 EIR.

Figure 4 View of the Project Site Looking West from Isabel Avenue



Figure 5 View of the Project Site Looking North from Shea Center Drive



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

The 2018 EIR indicated that the portion of I-580 that passes through the INSP planning area is an Eligible State Scenic Highway, and the Gandolfo Farm is a historic resource within the INSP Planning Area. The hills north and south of I-580 comprise the scenic resources visible from I-580, and areas with existing trees along creeks in the INSP Planning Area would be maintained as open space. There are no significant rock outcroppings within the INSP Planning Area or project site.

The project site falls within a scenic corridor zone as identified in the 2018 EIR, and the project site is visible from I-580. However, development proposed under the Isabel Crossing Project would remain in areas designated for development under the INSP and would not be located on areas designated as open space, or on the Gandolfo Farm property. Similarly, future development of the No Net Loss Parcels facilitated by the proposed and future land use changes would occur in an area designated for development under the INSP and would not be located on the Gandolfo Farm property. The proposed project would not damage historic buildings, rock outcroppings, or trees within a State Scenic Highway beyond what was considered in the 2018 EIR for the original project. Therefore, the proposed project's impacts to scenic resources would be similar to those studied in the prior EIRs and would be less than significant. The proposed project would have no new or substantially more severe significant impacts related to scenic vistas beyond those described in the certified EIR.

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

The 2018 EIR determined that new development would be subject to development standards in Chapter 2: *Land Use* of the INSP that would regulate building height and setbacks to minimize the visual impacts of new construction and redevelopment and design standards and guidelines in

Chapter 5: *Urban Design* of the INSP, which address the street interface, building massing, architecture, colors, materials, landscaping, and signage.

The proposed project would be entirely within the project area for the original project. The modified project site has retained the same general appearance as was analyzed in the 2018 EIR for the original project. The Isabel Crossing Project would not substantially change the appearance of new development on the site compared to the original project analyzed in the 2018 EIR because the original project planned for new residential and commercial development on the Isabel Crossing Parcels, similar to the proposed project. The Isabel Crossing Project would be less dense than that studied in the prior EIRs, and there would be slightly more landscaping and open space, which would be an improvement to the visual character of the site compared with the original project.

The No Net Loss Specific Plan Amendment Project would allow future development of the BART and Comcast Parcels to be strictly residential use, as compared to the original project, which allowed for Business Park development on the Comcast Parcels and some Office Core development on the BART Parcel. While the allowed type of use and density of development would be modified under the No Net Loss Specific Plan Amendment Project, the proposed uses would be visually consistent with existing and planned surrounding development, which includes residential uses near the No Net Loss Parcels. In particular, the BART Parcel was designated for Residential Core (60-100 dwelling units per acre) and Office Core development and would be re-designated for exclusively Residential Core. While the Comcast Parcels would be re-designated to Village and Transition, parcels to the south and east of the Comcast Parcels are also designated for Village and Transition, and the land use change would be consistent with those adjacent designations.

Furthermore, INSP goals and policies would apply to the proposed project, like the original project. Therefore, the proposed project would result in no new or more severe impacts to visual character and quality beyond those identified in the 2018 EIR.

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

The 2018 EIR found that while new development under the original project would increase sources of light and glare (through street lights, buildings, and vehicles), compliance with Livermore General Plan policies for controlling outdoor artificial light and Chapter 15.18 of the Livermore Municipal Code would reduce potentially significant long-term light and glare impacts and design standards would further help to ensure that lighting for new development is held to high design standards for light pollution and glare reduction. The proposed project would not add new sources or light or glare to the project site beyond what was considered in the 2018 EIR for the original project, as all portions of the project site were anticipated for development and not designated for open space. Therefore, the proposed project would result in no new or more severe impacts to light and glare beyond those identified in the 2018 EIR.

4.2 Agriculture and Forestry Resources

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Page 3.14-7 of the 2018 EIR	No	No	N/A
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	Page 3.14-8 of the 2018 EIR	No	No	N/A
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))?	Page 3.15-1 of the 2018 EIR	No	No	N/A
d. Result in the loss of forest land or conversion of forest land to non-forest use?	Page 3.15-1 of the 2018 EIR	No	No	N/A
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?	Page 3.14-8 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to agriculture and forestry resources were analyzed on pages 3.14-7 through 3.15-1 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to agriculture and forestry resources from the 2018 EIR. Impacts related to the conversion of Prime Farmland and agricultural zoning were determined to be significant and unavoidable even with implementation of INSP policies. Impacts to existing farmland were determined to be less than significant with compliance with Chapter 8.16 of the Livermore Municipal Code. The 2018 EIR determined that there would be no impact on forest resources or land zoned for forest use.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located, 2) were not previously analyzed in a previous environmental documents as significant effects, 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents, and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*
- 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 2018 EIR identified one property, the Gandolfo property, as impacted by the conversion of Prime Farmland and Unique Farmland to non-agricultural use. The Isabel Crossing and No Net Loss Parcels do not include this property.

The 2018 EIR stated that there is one zoning district, PDR-01-001, in the INSP Planning Area that allows for agriculture uses. The Isabel Crossing and No Net Loss Parcels are not located within this agricultural zoning district.

The proposed project would be located on the same site as studied in the prior EIRs, on land designated as grazing land by the California Department of Conservation Farmland Mapping and Monitoring Program Important Farmlands Inventory. The Isabel Crossing and No Net Loss Parcels do not include Important Farmland and is not designated for agricultural uses. Therefore, the proposed project would result in no new or more severe impacts to Prime Farmland or Unique Farmland beyond those identified in the 2018 EIR.

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

The 2018 EIR stated that the INSP Planning Area does not contain forest resources or land zoned for forest use. Because the proposed project is entirely within the INSP Planning Area considered under the 2018 EIR, and no forest land is located on the Isabel Crossing or No Net Loss Parcels, the proposed project would result in no new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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4.3 Air Quality

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	Page 3.3-20 of the 2018 EIR Page 3.1-22 of the 2020 SEIR	No	No	No
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?	Pages 3.3-33 and 3.3-35 of the 2018 EIR Pages 3.1-36 and 3.1-43 of the 2020 SEIR	No	No	Yes
c. Expose sensitive receptors to substantial pollutant concentrations?	Pages 3.3-38, 3.3-40, and 3.3-44 of the 2018 EIR Pages 3.1-43, 3.1-45, and 3.1-49 of the 2020 SEIR	No	No	Yes
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Page 3.3-46 of the 2018 EIR Page 3.1-51 of the 2020 SEIR	No	No	No

Analysis in Previous Environmental Documents

Impacts to air quality were analyzed on pages 3.3-1 through 3.3-47 of the 2018 EIR and pages 3.1-1 through 3.1-52 of the 2020 SEIR. The certified 2018 EIR and 2020 SEIR determined that implementation of the INSP would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

The 2018 EIR and 2020 SEIR determined that development facilitated by the INSP, with the implementation of mitigation measures AQ-1 through AQ-3 (included below), in addition to the proposed 2018 EIR policies, would reduce construction-related emissions to a less-than-significant level. The INSP emissions in the 2018 EIR and 2020 SEIR would be generated from mobile sources (i.e., passenger vehicles) that are not regulated at the city level; therefore, no feasible mitigation measures are available to reduce these operational emissions. Operational impacts were

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determined to be significant and unavoidable. The 2018 EIR and 2020 SEIR found construction and operation may expose sensitive receptors to substantial toxic air contaminant concentrations. With the Implementation of mitigation measures AQ-1 and AQ-4 (shown below), construction emissions would be reduced and a project-level evaluation within 1,000 feet of sensitive receptors would be required; however, project-specific conditions could preclude the reduction of health risk below Bay Area Air Quality Management District (BAAQMD) thresholds. Therefore, toxic air contaminant (TAC) exposure was determined to be significant and unavoidable.

MM AQ-1: Require Construction Fleet to Use Renewable Diesel. All applicants proposing development of projects within the Planning Area shall require their contractors, as a condition of contract, to reduce construction-related exhaust emissions by ensuring that all off-road equipment operating for more than 20 total hours over the entire duration of construction activities shall operate on renewable diesel (such as Diesel high performance renewable). Renewable diesel is currently commercially available in San Francisco Bay Area.

MM AQ-2: Require Use of Diesel Trucks with 2010-Compliant Model Year Engines. All applicants proposing development of projects within the Planning Area shall require their contractors, as a condition of contract, to use diesel trucks that have 2010 model year or newer engines. In the event that 2010 model year or newer diesel trucks cannot be obtained, the contractor must provide documentation to the City showing that a good faith effort to locate such engines was conducted.

MM AQ-3: Require payment of mitigation fees to offset emissions exceeding BAAQMD's daily pollutant thresholds.

MM AQ-4: Require future projects located within 1,000 feet of receptors perform a construction health risk assessment (HRA). All applicants proposing development of projects within 1,000 feet of existing sensitive receptors, as defined by BAAQMD, shall prepare a site-specific construction HRA taking into account both project-level and cumulative health risks (including existing TAC sources). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level and cumulative thresholds (as appropriate), then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project-level and/or cumulative thresholds (as appropriate), additional feasible on- and offsite mitigation shall be analyzed by the applicant to help reduce risks to the greatest extent practicable.

The following describes the analysis included in the 2018 EIR and 2020 SEIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located, 2) were not previously analyzed in a previous environmental documents as significant effects, 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents, and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

The California Clean Air Act requires that air districts create a 2017 Climate Action Plan (CAP) that describes how the jurisdiction will meet air quality standards. The most recently adopted air quality plan is the 2017 CAP. The 2017 CAP does not include control measures that apply directly to individual development projects. Instead, the control strategy includes control measures related to stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-greenhouse gas (GHG) pollutants. A project that would not support the 2017 CAP's goals would not be consistent with the 2017 CAP. On an individual project basis, consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the CAP's goals.

As noted on page 3.1-24 of the 2020 SEIR, the original project would not conflict with or obstruct implementation of the BAAQMD's 2017 CAP with the development of numerous policies that promote mixed-use and transit-oriented development. The proposed project would exceed development for the original project planned under the INSP. In addition, by adhering to INSP policies and design guidelines the proposed project would incorporate many of the 2017 Clean Air Plan control measures related to transportation, building energy, waste, and water sections discussed in Table 3.1-6 of the 2020 SEIR for the original project, such as trip reduction programs, transit efficiency, bicycle and pedestrian facilities, urban tree planting, and waste diversion. Therefore, the proposed project would not result in new or more severe impacts related to conflicts with applicable air quality plans beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

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?

Isabel Crossing Project

Construction

The Isabel Crossing Project would involve the construction of 39 fewer residential units and 92,823 square feet less commercial space than the project as considered in the 2020 SEIR. In addition, the proposed project would not include office space. Similar to the 2018 EIR and 2020 SEIR, with the implementation of mitigation measures AQ-1, AQ-2, and AQ-3 from the 2018 EIR and 2020 SEIR (included above), the proposed project's construction criteria pollutant impacts would be less than significant with mitigation incorporated. No new or substantially more severe significant effects would occur to air quality with the implementation of the proposed project.

Operation

Long-term operational emissions associated with the Isabel Crossing Project were estimated using the California Emissions Estimator Model (CalEEMod) version 2022.1. During operations, the proposed uses would result in emissions of criteria pollutants from area sources (i.e., consumer products, architectural coatings, and landscaping equipment), energy sources (natural gas usage), and mobile sources (vehicle use). Table 2 below compares the proposed Isabel Crossing Project to the original project planned for the Isabel Crossing Parcels under the INSP. Operational emissions of

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the proposed project would be less than the original project for nitrogen oxide, carbon monoxide (CO), particulate matter with a diameter no more than 10 microns, and particulate matter with a diameter no more than 2.5 microns because there would be less commercial retail space and no office land uses the proposed project, resulting in a corresponding decrease in emissions sources, such as vehicle trips. Reactive organic gas (ROG) emissions would increase three pounds per day compared to the original project since the proposed project would increase the total usable residential square footage, which would increase consumer product consumption. As shown in Table 3.1-7 in the 2020 SEIR, the original project's increase in ROG emissions compared to existing (2013) conditions would be 7 pounds per day below the BAAQMD threshold. Therefore, with the proposed Isabel Crossing Project increasing emissions by three pounds per day, emissions from the Isabel Crossing Project would be four pounds per day below the BAAQMD threshold. Therefore, the proposed Isabel Crossing Project would result in no new or more severe impacts related to air quality impacts and criteria pollutant emissions beyond those identified in the 2018 EIR and 2020 SEIR for the original project.

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Table 2 provides the net air quality emissions associated with the potential future development that could occur as a result of the proposed land use designation change of the BART Parcel and the future land use designation change of the Comcast Parcels, when combined with the Isabel Crossing Project and existing and planned development. The overall project would result in an increase of residential units and a decrease of commercial office space compared to the original INSP. Operational emissions would be lower for ROG, nitrogen oxide, CO, particulate matter with a diameter no more than 10 microns, and particulate matter with a diameter no more than 2.5 microns as compared to the original INSP. This is due to the reduced commercial office space, leading to a corresponding decrease in emissions sources, such as vehicle trips. Additionally, operational emissions would decrease due to reduced consumption of consumer products and natural gas energy consumption. As a result, the potential development of the No Net Loss Parcels when combined with the proposed development of the Isabel Crossing Parcels would not lead to a new or more severe impact related to air quality and criteria pollutant emissions beyond those already identified in the 2018 EIR and 2020 SEIR for the original project.

Table 2 Isabel Crossing Project Operational Emissions

Sources	Average Daily Emissions (lbs./day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Isabel Crossing Project					
2040 With Adopted INSP					
Mobile	12	30	337	164	42
Area	45	1	49	<1	<1
Energy	<1	7	3	1	1
Original Project Emissions	57	38	390	165	43
2040 With Isabel Crossing Project					
Mobile	10	26	287	139	36
Area	50	1	38	<1	<1
Energy	<1	3	1	<1	<1
Isabel Crossing Emissions	60	29	327	139	36
Net Difference From Adopted INSP on the Isabel Crossing Parcels	3	(9)	(63)	(26)	(7)
No Net Loss Specific Plan Amendment Project					
Decrease of 1,531,486 sf of Office Space					
Mobile	(27)	(27)	(261)	(100)	(26)
Area	(39)	(<1)	(33)	(<1)	(<1)
Energy	(1)	(10)	(8)	(1)	(1)
Total Emissions	(67)	(37)	(302)	(101)	(26)
Increase of 1,431 Residential Units¹					
Mobile	16	16	153	58	15
Area	37	1	40	<1	<1
Energy	<1	7	3	1	1
Total Emissions	54	24	197	59	16
Net Difference From Adopted INSP on the No Net Loss Parcels	(13)	(13)	(105)	(42)	(10)
Isabel Crossing and No Net Loss Specific Plan Amendment Project					
Total Net Emissions from the Isabel Crossing and No Net Loss Specific Plan Amendment Project Compared with the Adopted INSP	(10)	(22)	(168)	(68)	(17)

¹ The increase of 1,431 residential units from the No Net Loss Parcels accounts for the overall reduction in housing units in the INSP area from the proposal Isabel Crossing Project and other planned and constructed projects in the INSP area.

Lbs./day = pounds per day; ROG = reactive organic gases; NO_x = nitrogen oxide; CO = carbon monoxide; PM₁₀ = particulate matter with a diameter no more than 10 microns; PM_{2.5} = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide BAAQMD = Bay Area Air Quality Management District.

Notes: Parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: Average daily and annual emissions. See Table 2.5 "Operations Emissions by Sector, Unmitigated". See CalEEMod worksheets in Appendix B. Numbers may not add up due to rounding.

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

The proposed project would involve the development of land uses and associated sensitive receptors near roadways that could emit substantial pollutant concentrations, similar to the original project analyzed in the 2018 EIR and 2020 SEIR. Implementation of the Isabel Crossing and No Net Loss Specific Plan Amendment Project would reduce the vehicle miles traveled (VMT) and average daily vehicle trips compared to the original project. As shown in Table 2, the proposed project would emit less CO emissions from mobile sources compared to the original project. Therefore, no new or significant increase in CO exposure would be anticipated under the proposed project.

Construction and operational activity from the proposed project would generate TAC emissions that could expose new and existing sensitive receptors to substantial pollutant emissions. Without project specific details, such as construction equipment, building footprints, and construction schedule, it would be speculative to determine construction impacts on sensitive receptors. With the implementation of mitigation measures AQ-1, AQ-2, and AQ-4, provided above, the proposed project would reduce construction TAC emissions and exposure to sensitive receptors. However, project-specific conditions may prevent the reduction of health risk below adopted thresholds; therefore, construction impacts would be significant and unavoidable, similar to the findings of the 2018 EIR and 2020 SEIR. Development under the proposed project may involve new stationary sources of TACs and could expose sensitive receptors to TAC emissions. Stationary sources would be subject to the permit authority of BAAQMD. Consistent with the 2020 SEIR, project-specific details could preclude the reduction of health risk below BAAQMD thresholds. However, no more stationary sources of TACs are proposed than under the original project. Therefore, there would be no new or more severe impacts related to exposure of sensitive receptors to air pollution beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

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

The proposed project would not involve the use of construction equipment or materials that were not accounted for in the original project and analyzed in the SEIR. The proposed project would occur within the same proximity to existing residences as the construction activities anticipated for the original project and the proposed project would involve similar operational uses to those evaluated for the original project in the 2018 EIR and 2020 SEIR. Therefore, no new odors beyond those analyzed in the 2018 EIR and 2020 SEIR for the original project would result from the proposed project.

4.4 Biological Resources

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Pages 3.7-26 through 3.7-35 of the 2018 EIR	No	No	Yes
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Pages 3.7-35 through 3.7-37 of the 2018 EIR	No	No	Yes
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?	Pages 3.7-37 through 3.7-39 of the 2018 EIR	No	No	Yes
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?	Page 3.7-39 of the 2018 EIR	No	No	N/A

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Page 3.7-40 of the 2018 EIR	No	No	Yes
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?	Page 3.7-39 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to biological resources were analyzed on pages 3.7-26 through 3.7-40 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to biological resources from the 2018 EIR. The 2018 EIR determined that impacts related to adverse effects on special-status species, riparian habitat, sensitive natural communities, federally-protected wetlands and other waters regulated under Section 404 of the Clean Water Act, and the potential to conflict with local policies or ordinances protecting biological resources would be less than significant with mitigation. The 2018 EIR determined that impacts related to the movement of wildlife species would be less than significant and there would be no impact regarding the potential to conflict with the provisions of an adopted conservation plan.

The 2018 EIR determined that operational impacts to special-status wildlife would be less than significant with implementation of INSP policies. The 2018 EIR determined that construction associated with future development in the INSP Planning Area could affect special-status plant and wildlife species; however, impacts would be less than significant with the implementation of INSP policies and the following mitigation measures:

MM-BIO-1: Prepare and implement a salvage, relocation, or propagation and monitoring plan for special-status plant species.

If impacts to special-status plant species are unavoidable, prepare and implement a salvage, relocation, or propagation and monitoring plan for special-status plant species. If a protocol-level botanical survey reveals the presence of special-status plant species in the Planning Area, all directly affected areas of special-status plants will be documented by a qualified botanist or ecologist retained by project proponents prior to issuance of grading permits, consistent with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities State of California (CDFW, 2009). Documentation will include density and percent cover; key habitat characteristics, including soil type, associated species, hydrology, and topography; and photographs of preconstruction conditions. Impacts to rare (California Rare Plant Rank 1 and 2) native plant species will be avoided where feasible. If impacts to such species are unavoidable, the

project proponent will notify USFWS and/or CDFW and a qualified botanist or restoration ecologist will prepare a salvage, relocation, or propagation and monitoring plan in coordination with USFWS and/or CDFW prior to construction to address affected special-status plant species. At least two surveys by a qualified botanist or ecologist per monitoring year.

- At least 80 percent of the planted area must support vegetation composition and density consistent with reference population conditions.
- At least 80 percent of the planted area must support target species amounts similar to reference feature conditions.
- A minimum of five consecutive years of monitoring to ensure success criteria are met
- Remedial actions to restore intended ecological function of planted areas that fail to meet the success criteria for three consecutive years.

MM-BIO-2: Avoid nesting birds where feasible.

Proponents (or their contractors) of specific projects under the proposed Plan shall conduct construction activities outside the bird nesting season (February 1 to August 31) to the extent feasible. If construction initiation is unavoidable during this time, the project proponent or its contractor will retain a qualified wildlife biologist with demonstrated nest-searching experience to conduct preconstruction surveys for nesting birds (including raptors, but excluding burrowing owl) within 300 feet and including the near-term or longer-term improvements environmental footprints. Adjacent lands outside the development footprints will be scanned with binoculars from the limit of ground-disturbance and publicly accessible areas. Preconstruction surveys will occur no more than three days prior to the onset of ground-disturbing activities (including clearing, grubbing, and staging) at each development area. If active nests are found in the development footprints, the biologist will establish a no-disturbance buffer around the nest and mark the buffer perimeter with high visibility fencing, flagging, or pin flags. The size of the buffer will be based on the species' sensitivity to disturbance and planned work activities in the vicinity; typical buffer sizes are 250 feet for raptors and 50 feet for other birds. The buffer will remain in place until the nest is no longer active, as determined by the biologist. Buffers for any nests found outside but within 300 feet of the development sites will be established based on the biologist's best professional judgment whether the work would result in nest abandonment. If a lapse in construction activities of 15 days or longer at a previously surveyed environmental footprint occurs, another preconstruction survey will be conducted. If structure demolition activities cannot occur outside of the nesting season, the project proponent or its contractor will remove inactive nests from the structure to be demolished and install nest exclusion measures (e.g., fine mesh netting, panels, or metal projectors) outside of the nesting season. All exclusionary devices will be monitored and maintained throughout the breeding season to ensure that they are successful in preventing the birds from accessing the cavities or nest sites. No more than three days prior to structure demolition activities, a qualified biologist will conduct a preconstruction survey of all potential nesting habitat on the structures to be demolished/modified and the surrounding areas for the presence of active

nests. If active nests are found on the structures or in the affected area, then demolition/modification activities will not proceed until the biologist verifies that all nests on the structures are inactive. After all surveys and/or nest deterrence activities are completed at each development footprint, the biologist will complete a memorandum detailing the survey effort and results and submit the memorandum to the project proponent within seven days of survey completion.

MM-BIO-3: Avoid burrowing owl nesting where feasible.

Prior to any construction activity planned during the fall and winter non-nesting season (September 1 through January 31) or at any time during the construction process, proponents of projects proposed within the Planning Area will retain a qualified wildlife biologist to conduct a preconstruction survey for burrowing owls. Surveys will be conducted at each area of suitable habitat that will be disturbed no more than seven days prior to ground-disturbing activities and will cover all suitable burrowing owl habitat subject to disturbance pursuant to CDFW's Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game, 2012). If any burrowing owls are found within the disturbance area, the project proponent will notify CDFW and will proceed under CDFW direction. If construction is planned to occur during the nesting season (February 1 through August 31), the project proponent will retain a qualified wildlife biologist to conduct a breeding season burrowing owl survey in the year prior to construction. The survey will be conducted to determine if there is a breeding pair within approximately 500 feet of each development footprint, unless the biologist determines that a smaller survey buffer around the construction footprint is warranted based on preexisting background disturbance and conditions. Survey visits will be timed in accordance with CDFW guidelines (California Department of Fish and Game, 2012). This will provide the project team advance notice of nesting owls in the development area and allow ample time to discuss appropriate avoidance measures with CDFW. In addition, preconstruction surveys will be conducted no more than seven days prior to ground disturbance in all areas of the development footprint supporting burrowing owl habitat. If the biologist identifies the presence of a burrowing owl nest in an area scheduled to be disturbed by construction, a 660-foot no-activity buffer will be established and maintained around the nest while it is active. Surveys and buffer establishment will be performed by qualified wildlife biologists, and buffers will be coordinated with CDFW by contacting the appropriate CDFW personnel, and will be subject to CDFW review and oversight.

MM-BIO-4: Avoid tricolored blackbird breeding habitat where feasible.

If construction activities in or within 300 feet of freshwater emergent wetland habitat occur during the breeding season (February 1 through August 31), the project proponent will retain a qualified biologist to conduct surveys for the presence of a tricolored blackbird nesting colony or nests. If an active nest colony or nest is observed by the qualified biologist, then a no-disturbance buffer of 250 feet will be established until the end of the breeding season or until the nesting colony or nest is determined inactive by the biologist. Nest buffers may be reduced if site-specific conditions reduce the possibility of near-term or longer-term improvements disturbance, as determined by the qualified biologist in coordination with CDFW.

MM-BIO-5: Avoid western pond turtle where feasible.

Prior to the start of construction within western pond turtle habitat (i.e., any undeveloped areas within 400 feet of riverine aquatic habitat, freshwater emergent wetlands, vernal pools, or seasonal wetlands), proponents of proposed projects within the Planning Area shall retain a biologist approved by the CDFW to survey for western pond turtles. Surveys will be conducted at each habitat area no more than seven days prior to the initiation of ground disturbance at that location. If preconstruction surveys identify active nests, the biologist will establish 50-foot no-disturbance buffer zones around each nest using temporary orange construction fencing with a four-inch-tall gap below the fence. The fencing will be permeable to young turtles and allow them to move away from the nest following hatching. The buffer zones and fencing will remain in place until the biologist has confirmed that the young have left the nest. If non-nesting pond turtles are found in the footprint, the biologist will remove and relocate them to suitable habitat outside the environmental footprint. Relocation sites will be subject to CDFW approval.

MM-BIO-6: Avoid San Joaquin kit fox and American badger where feasible.

Within one year but no less than three months prior initiating construction, proponents of specific projects within the Planning Area will retain qualified biologists to identify potential kit fox and badger dens in the development footprint and surrounding 200 feet. The biologist will prepare a report summarizing the survey observations and results, including maps depicting the locations of potential badger dens and, if possible, occupancy. The report will be submitted to the project proponent and CDFW. Prior to construction, the project proponent will retain qualified biologists to implement preconstruction surveys of previously identified potential kit fox and badger dens to determine if they are natal kit fox or American badger dens no less than 14 days and no more than 30 days before the initiation of construction at each development footprint (e.g., one week ahead of the construction crew for linear components). Construction activities will not occur within 100 feet of a potential den during the natal period (February 1 to September 30). If a known den or natal den is present within the permanent construction footprint or within 200 feet of the construction footprint during the natal period (100-foot buffer during the non-natal period), the kit fox or badger will be excluded outside of the natal period (from November 1 to January 31). A summary report will be prepared by the biologists and submit to the project proponent and CDFW following completion of all kit fox or badger avoidance and exclusion activities.

MM-BIO-7: Avoid California tiger salamander, western spadefoot and California red-legged frog where feasible.

Proponents of specific projects within the Planning Area shall retain a USFWS and/or CDFW approved biologist (as appropriate) to identify and flag (pin flags or 4-foot lath) all suitable aquatic habitat for California tiger salamander, western spadefoot and California red-legged frog outside of but adjacent to development footprints and ground-disturbance areas prior to staging, vegetation clearing, grading, or other construction activities. The project proponent or its contractor will protect habitat areas by installing orange exclusion and erosion control fencing at the maximum practicable distance from the work site or, if feasible, at least 500 feet

from the aquatic habitat edge, wet or dry, to make it easily visible by construction crews. A qualified biologist will conduct a preconstruction survey each morning before construction activities begin and continue to monitor ground-disturbing construction activities where suitable habitat occurs during all phases of construction to remove any California tiger salamander, western spadefoot and California red-legged frogs found in the development footprint. Individual salamanders and frogs will be moved immediately to a relocation site that is a minimum of 330 feet from the construction boundary. The relocation site will be determined in coordination with USFWS and/or CDFW prior to the commencement of construction activities. Construction activities near drainages and wetland complexes identified as potential movement corridors shall take place between July 1 and October 1, when the California tiger salamander, western spadefoot and California red-legged frog are least likely to be present in the development area. To discourage California tiger salamander, western spadefoot and California red-legged frogs from entering the improvements areas via ditches, the ditches will be equipped with lightweight, one-way flow gates.

MM-BIO-8: Avoid Callippe silverspot butterfly where feasible.

Prior to construction, proponents of specific projects within the Planning Area will retain a qualified botanist or biologist with experience in identifying *Viola pedunculata*, the host plant for Callippe silverspot butterfly, to identify and flag (with pin flags or 4-foot lath) any *Viola pedunculata* individuals during its blooming season (February to April) when the species is readily identifiable in and within 50 feet of the near-term and longer-term improvements that will affect California annual grassland. The locations of *Viola pedunculata* outside of the ground disturbance area of the near-term or longer-term improvements will be included on grading plans and avoided by construction personnel. The biologist will document the number and density of host plants that are unavoidable in development footprints. This information shall be compiled in a report and submit to USFWS prior to initiation of ground disturbance. The project proponent or its contractor will adhere to the following host plant avoidance measures:

- No herbicide application will occur within 100 feet of host plant populations. Spot application to cut stumps, frilled stems, or injection into stems is acceptable. No broadcast herbicide applications will be used.
- Cut trees that are removed in the vicinity of host plants will be hand carried rather than dragged to disposal areas.
- Avoid or minimize the removal of host plant, *Viola pedunculata*.
- Avoid work in suitable habitat during the flight and mating season (mid-May to mid-July) to the extent feasible.

MM-BIO-9: Avoid roosting bats where feasible.

If tree removal and trimming cannot be conducted between September 15 and October 30, proponents of projects implemented under the proposed Plan will retain a qualified biologist to examine trees to be removed or trimmed for suitable bat roosting habitat no more than 2 weeks before removal and trimming. High-quality habitat features (large tree cavities, basal hollows, loose or peeling bark,

larger snags, palm trees with intact thatch, etc.) will be identified and the area around these features searched for bats and bat signs (e.g., guano, culled insect parts, urine staining, etc.). Mixed willow riparian scrub and stands of mature broadleaf trees should be considered potential habitat for solitary foliage-roosting bat species. Passive monitoring using full spectrum bat detectors may be needed if identification of bat species is required. Survey methods will be discussed with CDFW prior to the start of surveys. Measures to avoid and minimize impacts on sensitive bats species will be determined in coordination with CDFW and may include the following:

- Tree removal will be avoided between April 1 and September 15 (the maternity period) to avoid effects on pregnant females and active maternity roosts (whether colonial or solitary).
- All tree removal will be conducted between September 15 and October 30, which corresponds to a time period when bats have not yet entered torpor or would be caring for nonvolant (non-flying) young.
- Each tree will be removed in pieces rather than felling the entire tree.
- If a maternity roost is located, whether solitary or colonial, that roost will remain undisturbed until September 15 or a qualified biologist has determined the roost is no longer active.
- If avoidance of nonmaternity roost trees is not possible, and tree removal or trimming must occur between October 30 and September 15, qualified biologists will monitor tree trimming and removal. If possible, tree trimming and removal should occur in the late afternoon or evening when it is closer to the time that bats would normally arouse. Prior to removal and trimming, each tree will be shaken gently and several minutes should pass before felling trees or limbs to allow bats time to arouse and leave the tree. The biologists will search downed vegetation for dead and injured bats. The presence of dead or injured bats that are species of special concern will be reported to CDFW. The biologist will prepare biological monitoring report, which will be provided to the project proponent and CDFW.

The 2018 EIR determined that changes resulting from future development under the INSP would result in a potentially significant impact on riparian vegetation. However, with implementation of the proposed Plan policies, and mitigation measures listed below, this impact would be reduced to a less than significant level:

MM-BIO-10: Avoid and protect riparian habitat during construction.

Proponents of specific projects under the proposed Plan will ensure that a qualified resource specialist (i.e., biologist, botanist, or ecologist) will clearly identify riparian habitat to be preserved abutting the development area and outside of the direct construction area with high-visibility construction fencing or markers (e.g., lathe or pin flags) before site preparation. Construction will not encroach upon sensitive natural communities identified by the resource specialist. The resource specialist will use the project's verified wetland delineation, soils data, and land cover data to confirm the location of riparian habitat boundaries based on existing conditions at the time of the avoidance marking. Exclusion fencing or markers will be installed before construction activities are initiated, and the fencing will be maintained

throughout the construction period. No construction activity, traffic, equipment, or materials will be permitted in fenced sensitive natural community areas. Exclusion fencing and markers will be removed following completion of construction activities. All conditions imposed by State and federal permits for individual improvements will be clearly identified in the construction plans and specifications and monitored during and after construction to ensure compliance.

MM-BIO-11: Compensate for loss of riparian habitat.

For direct effects on woody riparian trees that cannot be avoided, proponents of specific projects under the proposed Plan will compensate for the loss of riparian habitat to ensure no net loss of habitat functions and values. Compensation ratios will be based on site-specific information and determined through coordination with the appropriate State and federal agencies during the permitting process. At a minimum, the compensation ratio will be 2:1 (e.g., two acres restored/created/enhanced or credits purchased for every 1 acre removed) for permanent impacts and 1:1 for temporary impacts (where riparian habitat will regenerate to pre-activity character within one year). Compensation may be a combination of offsite restoration or mitigation credits. The project proponent or its contractor will develop a restoration and monitoring plan that describes how riparian habitat will be enhanced or recreated and monitored over at least 5 years, or as determined by the appropriate State and federal agencies. If the project proponent identifies suitable onsite areas (adjacent to the permanent construction footprint) that are outside the development footprint and chooses to compensate onsite or in the project's vicinity, a revegetation plan will be prepared. The revegetation plan will be developed prior to the removal of existing riparian vegetation and will be conducted onsite or in the near-term or longer-term improvements vicinity to the extent feasible; however, mitigation site selection will avoid areas where future development or maintenance are likely. The revegetation plan will be prepared by a qualified botanist or restoration specialist with experience in riparian restoration and reviewed by the appropriate agencies. The revegetation plan will specify the planting stock appropriate for each riparian land cover type and each mitigation site, ensuring the use of genetic stock from the corresponding development area by project. The plan will employ the most successful techniques available at the time of planting. Success criteria will be established as part of the plan and will include a minimum of 70 percent revegetation success after three years, 80 percent revegetation success at the end of five years, and 75 percent vegetative coverage after five years. The project proponent or its contractor will retain a qualified botanist, restoration ecologist, or biologist with experience in riparian restoration to monitor the plantings as necessary for five years. The project proponent or its contractor will be responsible for maintaining the plantings, including managing invasive plants (as defined by the California Invasive Plant Council) and other weeds, and implementing irrigation and plant protection if necessary. The project proponent or its contractor will submit annual monitoring reports to the regulatory agencies issuing permits related to habitat effects, including CDFW, USACE, and USFWS. Replanting will be necessary if success criteria are not met, and replacement plants subsequently will be monitored and maintained to meet the success criteria. The riparian habitat

mitigation will be considered successful when the sapling trees established meet the success criteria, the habitat no longer requires substantial active management, and vegetation is arranged in groups that, when mature, replicate the area, natural structure, stratification, and species composition of similar riparian habitats in the region.

The 2018 EIR determined that changes resulting from future development under the INSP would result in a potentially significant impact on wetlands and other waters; however, impacts would be less than significant with implementation of INSP policies and the following mitigation measures:

MM-BIO-12: Avoid and protect wetlands during construction.

Proponents of specific projects under the proposed Plan will ensure that a qualified resource specialist (i.e., wetland biologist, ecologist, or soil scientist) will clearly identify wetland areas to be preserved abutting the development area and wetland areas outside of the direct construction area with high-visibility construction fencing or markers (e.g., lathe or pin flags) before site preparation. Construction will not encroach upon jurisdictional wetlands identified by the resource specialist. The resource specialist will use the development footprint and verified wetland delineation to confirm the location of wetland boundaries based on existing conditions at the time of the avoidance marking. Exclusion fencing or markers will be installed before construction activities are initiated, and the fencing will be maintained throughout the construction period. No construction activity, traffic, equipment, or materials will be permitted in fenced wetland areas. Exclusion fencing and markers will be removed following the completion of construction activities. All conditions imposed by the projects' State and federal permits will be implemented as part of the construction, with ultimate enforcement oversight by applicable State and federal agencies. The conditions will be clearly identified in the construction plans and specifications and monitored during and after construction to ensure compliance.

MM-BIO-13: Compensate for impacts on jurisdictional wetlands and non-wetland waters of the United States (aquatic resources) prior to near-term and longer-term improvements impacts during construction.

If projects impact jurisdictional wetlands and non-wetland waters, proponents of these specific projects under the proposed Plan will develop an aquatic resource (wetlands and non-wetland waters of the United States) mitigation plan, subject to approval by the USACE, which will ensure no net loss of wetlands from development impacts. The plan will detail the amount and type of wetlands (based on the projects' verified wetland delineation) that will be compensated for (through preservation, creation, or restoration) for impacts on existing wetlands and non-wetland waters of the United States (aquatic resources), and outline the monitoring and success criteria for the compensation wetlands and non-wetland waters of the United States. Additional enhancement options include fish barrier removal, riparian restoration, floodplain restoration, and streambank layback to improve overall ecologic function and connectivity of wetland and non-wetland waters. Enhancement sites will be located as near the impact location as possible but, in the event that local enhancement opportunities are not available, such activities will occur within the same stream system or watershed to provide improved ecologic

function and connectivity of wetlands and non-wetland waters affected by development activities.

Monitoring and success criteria applicable to created or restored wetlands will require the following:

- At least two surveys by a qualified wetland biologist, botanist, or ecologist per monitoring year.
- At least 80 percent of the created or restored features support vegetation consistent with reference feature conditions.
- At least 80 percent of the created or restored features support hydrologic regimes similar to reference feature conditions.
- A minimum of five consecutive years of monitoring to ensure success criteria are met.
- Remedial actions to restore intended ecological function of created or restored features that fail to meet the success criteria for three consecutive years.
- Once the plan is approved, the project proponent will implement the aquatic resource compensation measures prior to the initiation of development construction. The project proponent will be responsible for funding compensatory mitigation, monitoring of the created or restored features per the mitigation plan, and any remedial actions necessary. All conditions that are attached to the State and federal permits will be implemented as part of the development project, with ultimate enforcement oversight by applicable State and federal agencies. The conditions will be clearly identified in the construction plans and specifications and monitored during and after construction to ensure compliance.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

The 2018 EIR determined that operational impacts to special-status wildlife would be less than significant with implementation of INSP policies and construction associated with future development in the INSP Planning Area could affect special-status plant and wildlife species; however, impacts would be less than significant with the implementation of INSP policies and mitigation measures MM-BIO-1 through MM-BIO-9.

The biological resource assessment (BRA) (WRA 2023; included as Appendix C) prepared to assess current conditions on the Isabel Crossing Parcels determined that 12 protected species that were with potential to occur according to the 2018 EIR no longer have potential to occur, or are now unlikely to occur, on the Isabel Crossing Parcels. Unless otherwise specified below, the Isabel Crossing Parcels do not provide suitable habitat for these species:

- Big-scale balsamroot (*Balsamorhiza macrolepis*; California Rare Plant Rank 1B.2)
- Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*; California Rare Plant Rank 1B.1): not observed in protocol-level surveys (October 2022), assumed absent
- Prostrate vernal pool navarretia (*Navarretia prostrata*; California Rare Plant Rank 1B.2)
- Callippe silverspot butterfly (*Speyeria callippe*; Federal Endangered): outside of known range, no serpentine soils are present that could support host plants
- Tricolored blackbird (*Agelaius tricolor*; State Threatened, CDFW Species of Special Concern)
- California tiger salamander (*Ambystoma californiense*; Federal Threatened, State Threatened)
- California red-legged frog (*Rana draytonii*; Federal Threatened, CDFW Species of Special Concern)
- Western pond turtle (*Actinemys marmorata*; CDFW Species of Special Concern)
- Townsend's big-eared bat (*Corynorhinus townsendii*; CDFW Species of Special Concern, WBWG High Priority): no suitable habitat
- Hoary bat (*Lasiurus cinereus*; WBWG Medium Priority): no suitable habitat
- American badger (*Taxidea taxus*; CDFW Species of Special Concern)
- San Joaquin kit fox (*Vulpes macrotis mutica*; Federal Endangered, State Threatened)

The BART Parcel is currently undeveloped, and may also provide suitable habitat for special-status species, similar to the Isabel Crossing Parcels, as noted above. The BART Parcel remains vacant grassland, with no substantial changes to the property having occurred since the 2018 EIR.

The Comcast Parcels are currently developed with commercial/office buildings and associated surface parking lots. The Comcast Parcels remain substantially unchanged since the 2018 EIR, with site changes limited to the growth of landscaped vegetation.

The proposed project would be entirely within the INSP Planning Area analyzed in the 2018 EIR for the original project. The project site is not located in a critical habitat for threatened or endangered species (USFWS 2022). The nearest critical habitat area for the California red-legged frog is approximately 0.2 miles northeast of the Comcast Parcels (USFWS 2022). The proposed Isabel Crossing Project would involve excavation for building foundations, associated utilities, and amenities such as a pool, which are not substantially different from expected projects discussed in the 2018 EIR. Future development of the BART and Comcast Parcels would result in a similar level of ground disturbance. The proposed level of disturbance and project footprint would not exceed what was analyzed in the 2018 EIR.

Mitigation measures MM-BIO-2 and MM-BIO-3 and INSP policies described in the 2018 EIR for the original project would continue to apply to the proposed Isabel Crossing Project. Due to the findings of the 2023 BRA, mitigation measures MM-BIO-1, -4, -5, -6, -7, -8, and -9 are not required for the proposed Isabel Crossing Project. Therefore, because under current conditions there are fewer biological resources on the site and because the level of disturbance would not be increased, the proposed project would not result in new or more severe impacts related to special-status wildlife beyond those identified in the 2018 EIR for the original project.

No specific development projects are proposed on the No Net Loss Parcels at this time. Future development would be required to adhere to applicable mitigation measures from the 2018 EIR as well as applicable INSP policies, including P-ENV-21, which requires that new development inventory sensitive resources and develop adequate measures to avoid or mitigate impacts for any parcel that may include special-status species. Therefore, the proposed project would not result in

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new or more severe impacts related to protected wetlands beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR determined that changes resulting from future development under the INSP would result in a potentially significant impact on riparian vegetation. However, with implementation of the INSP policies and mitigation measures MM-BIO-10 and MM-BIO-11, impacts would be less than significant.

As described in the 2023 BRA (WRA 2023; included as Appendix C), the Isabel Crossing project site does not contain any riparian habitat or other sensitive natural communities. Mitigation measures MM-BIO-10 and MM-BIO-11 are not required for the Isabel Crossing Project.

No specific development projects are proposed on the No Net Loss Parcels at this time. Future development would be required to adhere to INSP Policies P-ENV-21, which requires that new development inventory sensitive resources and develop adequate measures to avoid or mitigate impacts for any parcel that may include special-status species; and P-ENV-23, which requires that development activities either obtain compensatory habitat mitigation through the East Alameda County Conservation Strategy (EACCS), or use the mitigation prescribed in EACCS as a basis for near-term and longer-term mitigation and obtain coverage under separate applicable State and federal permits from CDFW and USFWS. Therefore, with implementation of relevant mitigation measures and INSP policies, there would be no new or more severe impacts to these biological resources beyond those identified in the 2018 EIR.

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

The 2018 EIR determined that changes resulting from future development under the INSP would result in a potentially significant impact on wetlands and other waters; however, impacts would be less than significant with implementation of INSP policies and mitigation measures MM-BIO-12 and MM-BIO-13.

An aquatic resources delineation was prepared for the Isabel Crossing Parcels to assess current conditions and is included as Appendix D. During site visits in January and October 2022, qualified biologists observed and delineated a small stand of cattails (*Typha domingensis*) an obligate wetland plant species. Hydric soil indicator, surface water, and saturation indicators were met in October, meeting USACE's technical criteria for a wetland. On revisiting historic imagery, WRA determined that cattails were absent between 2008-2021, suggesting the wetland was created from a broken irrigation line; this human-made isolated wetland is unlikely to be federally jurisdictional. This feature is not adjacent to a stream or other water body and would therefore not be regulated by the CDFW. The Isabel Crossing Project would not require grading or ground disturbance that would substantially exceed that planned for the original project, and development intensity and building footprints would not exceed development discussed in the 2018 EIR for the original project.

If it is determined that the wetland is jurisdictional, INSP policies and mitigation measures described in the 2018 EIR would still apply to the proposed Isabel Crossing Project.

No specific development projects are proposed on the No Net Loss Parcels at this time; however, future development would be required to adhere to applicable mitigation measures from the 2018 EIR, and applicable INSP policies, including Policy P-ENV-21, which requires that new development inventory sensitive resources and develop adequate measures to avoid or mitigate impacts for any parcel that may include special-status species habitat; Policy P-ENV-25, which requires that project proponents or their contractors install exclusion fencing and erosion control measures prior to any ground disturbance within 50 feet of wetlands; and Policy P-ENV-26, which requires that construction within 300 feet of freshwater marsh or streambank habitat take place during the non-breeding season for tricolored blackbirds. Therefore, with implementation of relevant mitigation measures and INSP policies, there would be no new or more severe impacts to protected wetlands beyond those identified in the 2018 EIR.

- 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 2018 EIR determined that due to existing human activity and visitation, and existing human and vehicle noise, the INSP Planning Area does not likely serve as a habitat corridor and development in the INSP Planning Area is unlikely to interfere with wildlife species movement, therefore, impacts would be less than significant.

The Isabel Crossing and No Net Loss Parcels are located entirely within the INSP Planning Area analyzed in the 2018 EIR for the original project. The proposed Isabel Crossing Project would involve excavation for building foundations, associated utilities, and amenities such as a pool, which are not substantially different from the level of development analyzed in the 2018 EIR. No specific development projects are proposed on the No Net Loss Parcels at this time, however, development from the proposed Isabel Crossing Project and future development that would be allowed by the No Net Loss Specific Plan Amendment Project would not exceed the development footprint identified in the INSP and analyzed in the 2018 EIR. Therefore, the proposed project would not result in new or more severe impacts related to special-status wildlife beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR determined that the removal of regulated trees without a permit or appropriate compensation would result in a significant impact, however, impacts would be less than significant with implementation of INSP Policy P-ENV-28, which requires project proponents to compensate for tree removal during construction, including obtaining a tree removal permit; and developing a tree avoidance, minimization, and replacement plan.

The proposed project is entirely within the INSP Planning Area analyzed in the 2018 EIR for the original project. The City of Livermore Tree Preservation Ordinance in Section 12.20 of the Livermore Municipal Code protects native tree species with a trunk circumference of 24 inches or more and non-native trees with a trunk circumference of 60 inches or more. The Isabel Crossing Parcels include trees that have not been identified as native or non-native, but have a trunk circumference greater than 24 inches; these trees are located along the west side of the project site along Shea Center Drive. If these trees are removed, the City's tree preservation ordinance would be applicable to the proposed project, and INSP Policy P-ENV-28 would continue to apply. No specific development projects are proposed on the No Net Loss Parcels at this time; however, future

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development would be required to adhere to applicable mitigation measures from the 2018 EIR, and applicable INSP policies, including Policies P-ENV-21, which requires that new development inventory sensitive resources and develop adequate measures to avoid or mitigate impacts for any parcel that may include special-status species habitat; and P-ENV-28, which requires consistency with the City of Livermore's Street Tree and Tree Preservation Ordinance Chapter 12.20. Therefore, the proposed project would not result in new or more severe impacts related to conflicts with local policies and ordinances beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR determined that the INSP Planning Area is not located within an adopted conservation plan area; therefore, there would be no impact regarding the potential to conflict with adopted conservation plans.

The proposed project is entirely within the INSP Planning Area analyzed in the 2018 EIR for the original project, and the Isabel Crossing and No Net Loss Parcels are not located on any new Natural Wildlife Conservation Plan or California Natural Community Conservation Plan areas (CDFW 2023a, 2023b).

The proposed project is also covered by the East Alameda County Conservation Strategy (2011) which includes the City of Livermore. As described in the 2018 EIR, projects within the INSP Planning Area are required to be consistent with this Conservation Strategy through INSP Policy P-ENV-23. Therefore, the proposed project would not conflict with this plan. The proposed project would not result in new or more severe impacts related to adopted conservation plans beyond those identified in the 2018 EIR for the original project.

4.5 Cultural Resources

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
Would the project:					
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Pages 3.13-14 through 3.13-15 of the 2018 EIR	No	No	Yes
b.	Cause a substantial adverse change in the significance of an archaeological pursuant to §15064.5?	Pages 3.13-16 of the 2018 EIR	No	No	Yes
c.	Disturb any human remains, including those interred outside of formal cemeteries?	Page 3.13-18 through 3.13-19 of the 2018 EIR	No	No	Yes

Analysis in Previous Environmental Documents

Impacts to cultural resources were analyzed on pages 3.13-14 through 3.13-19 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to cultural resources from the 2018 EIR. The 2018 EIR determined that the implementation of the Isabel Neighborhood Plan would cause a substantial change to the significance of a historical resource and impacts would be significant and unavoidable even with implementation of INSP policies. Impacts to archeological and paleontological resources were determined to be less than significant. Impacts to human remains were determined to be less than significant with implementation of P-ENV-37, which specifies the protocol in the event of the discovery of human remains, including ceasing excavation, contacting the county coroner, and contacting the Native American Heritage Commission if necessary.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*
- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*
- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

Cultural resources are site-specific. The project would involve construction of a mixed-use development on the Isabel Crossing Parcels and a land use designation change to allow for future residential uses on the No Net Loss Parcels. Previous and current efforts to identify cultural resources within the Isabel Crossing Parcels did not result in the identification of historic built environment resources, archaeological resources, or human remains. Records search results did not indicate the presence of recorded cultural resources within the Isabel Crossing or No Net Loss Parcels. The Isabel Crossing Project would involve significant excavation for building foundations, associated utilities, and amenities such as a pool, which are not substantially different from expected projects discussed in the 2018 EIR. However, background and archival research as well as results from a negative Sacred Lands File and records search conducted for this project in September and October 2023 indicate that the area is not sensitive to containing subsurface archaeological resources or human remains. Future development of the No Net Loss Parcels would result in similar levels of ground disturbance to the Isabel Crossing Project. Future development on the No Net Loss Parcels would be required to comply with INSP Policy P-ENV-37, which requires a project-level cultural resources study. Both the Isabel Crossing Project and future development of the No Net Loss Parcels would be required to comply with INSP Policies P-ENV-37 and P-ENV-40, which address potential impacts to archaeological resources and human remains respectively. Therefore, the proposed project would not result in new or more severe impacts related to cultural resources beyond those identified in the 2018 EIR for the original project.

4.6 Energy

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Pages 3.4-22 through 3.4-29 of the 2018 EIR Pages 3.3-24 through 3.3-31 of the 2020 SEIR	No	No	N/A
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	N/A	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to energy were analyzed on pages 3.4-22 through 3.4-29 of the 2018 EIR and pages 3.3-24 through 3.3-31 of the 2020 SEIR. Energy impacts were determined to be less than significant in the 2018 EIR and the 2020 SEIR.

The following describes the analysis included in the 2018 EIR and 2020 SEIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The 2018 EIR and 2020 SEIR determined that the original project would not result in the unnecessary consumption of energy resources.

As discussed in Section 4.14, *Population and Housing*, the proposed Isabel Crossing Project would result in fewer residents on the Isabel Crossing Parcels than the original project and would not exceed the commercial or office space planned for the original project. Development facilitated by the proposed and future land use designation changes on the No Net Loss Parcels would have the potential to increase the number of residential units compared with the INSP; however, the commercial and office space would be reduced. The proposed Isabel Crossing Project, as well as

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future development of the No Net Loss Parcels, would not involve the use of unusual construction equipment or materials that were not accounted for in the original project and analyzed in the 2018 EIR and 2020 SEIR. Similar to the original project, the proposed Isabel Crossing Project and future development of the No Net Loss Parcels would be required to comply with applicable State and local energy efficiency, renewable energy, green building, water conservation, and solid waste diversion plans and requirements for new development. The proposed project would be required to comply with the policies in the INSP that encourage renewable energy production, bicycle and pedestrian trips, and carpooling. The proposed project would therefore result in no new or more severe impacts related to wasteful, inefficient, or unnecessary consumption of energy resources; or the potential to conflict with state or local plans for renewable energy or energy efficiency beyond that identified in the 2018 EIR or 2020 SEIR for the original project.

4.7 Geology and Soils

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Page 3.12-15 of the 2018 EIR	No	No	N/A
2. Strong seismic ground shaking?	Pages 3.12-15 through 3.12-16 of the 2018 EIR	No	No	N/A
3. Seismic-related ground failure, including liquefaction?	Page 3.12-16 of the 2018 EIR	No	No	N/A
4. Landslides?	Pages 3.12-16 through 3.12-17 of the 2018 EIR	No	No	N/A
b. Result in substantial soil erosion or the loss of topsoil?	Pages 3.12-17 through 3.12-18 of the 2018 EIR	No	No	N/A
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?	Page 3.12-18 of the 2018 EIR	No	No	N/A

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
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?	Pages 3.12-18 through 3.12-19 of the 2018 EIR	No	No	N/A
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Page 3.12-19 of the 2018 EIR	No	No	N/A
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Page 3.13-17 through 3.13-18 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to geology and soils were analyzed on pages 3.12-15 through 3.13-18 of the 2018 EIR. Impacts to paleontological resources were analyzed on pages 3.13-17 through 3.13-18 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to geology and soils from the 2018 EIR. The 2018 EIR determined that seismic activity, unstable soil, expansive soils, and paleontological resources would be less than significant and that there would be no impact regarding soils incapable of supporting septic tanks.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

The 2018 EIR determined that there are no known active faults within the INSP planning area; therefore, there would be no impact resulting from the rupture of a known earthquake fault. Because the Isabel Crossing and No Net Loss Parcels are entirely within the INSP Planning Area

considered under the 2018 EIR, the proposed project would result in no new or more severe impacts beyond those identified in the 2018 EIR for the original project.

a.2 Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The 2018 EIR determined that compliance with existing CBC requirements, Caltrans standards, and standard industry practices would reduce potential impacts from ground shaking to the extent feasible and impacts would be less than significant.

Because the Isabel Crossing and No Net Loss Parcels are entirely within the INSP Planning Area considered under the 2018 EIR, the proposed project would result in no new or more severe impacts beyond those identified in the 2018 EIR for the original project. The proposed project would increase residential density and decrease commercial/office space compared with development planned for the INSP. Therefore, the proposed project would not result in new or more severe impacts from risk of loss, injury, or death related to seismic ground shaking risks beyond those identified in the 2018 EIR.

a.3 Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

The 2018 EIR determined that in areas of moderate risk of liquefaction where buildings or roadways would be constructed, impacts from ground failure resulting from liquefaction would be addressed through site-specific geotechnical studies prepared in accordance with CBC requirements or Caltrans standards and standard industry practices. These studies would reduce potential impacts related to ground-failure resulting from liquefaction to a less than significant level.

Because the project site is entirely within the INSP Planning Area considered under the 2018 EIR, the proposed project would not result in a larger development footprint than was considered in the INSP and 2018 EIR. Like the original project, the Isabel Crossing Project and future development on the No Net Loss Parcels would be subject to site-specific geotechnical studies. Therefore, the proposed project would not result in new or more severe impacts from risk of loss, injury, or death related to seismic ground failure or liquefaction risks beyond those identified in the 2018 EIR.

a.4 Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The 2018 EIR determined that compliance with CBC requirements or Caltrans standards and adherence to standard industry practices would ensure that adverse landslide impacts would be less than significant.

Because the project site is entirely within the INSP Planning Area considered under the 2018 EIR, the proposed project would not result in a larger development footprint than was considered in the INSP and 2018 EIR. Therefore, the proposed project would not result in new or more severe impacts from risk of loss, injury, or death associated with landslides beyond those identified in the 2018 EIR.

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

The 2018 EIR determined that compliance with applicable codes and regulations would reduce the potential for substantial soil erosion or topsoil loss resulting from implementation of the original project to be less than significant.

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Because the project site is entirely within the INSP Planning Area considered under the 2018 EIR, the proposed project would not result in a larger development footprint than was considered in the INSP and 2018 EIR. Therefore, the proposed project would not result in new or more severe impacts from risks related to soil erosion or topsoil loss beyond those identified in the 2018 EIR.

- 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?*

The 2018 EIR determined that potential hazards of unstable soil or geologic units would be addressed through the integration of geotechnical information into the planning and design process for future projects within the INSP Planning Area and that geotechnical investigations would be enforced through compliance with CBC requirements or Caltrans standards. Therefore, with compliance with standard industry practices and State requirements, impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapse resulting from implementation of the original project were determined to be less than significant.

Because the project site is entirely within the INSP Planning Area considered under the 2018 EIR, the proposed project would not result in a larger development footprint than was considered in the INSP and 2018 EIR. Therefore, the proposed project would not result in new or more severe impacts from unstable soils beyond those identified in the 2018 EIR.

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

The 2018 EIR determined that development in areas with expansive and corrosive soils would require compliance with State and local building codes (structures) or with Caltrans standards (roadways). Compliance with these codes or standards would require soil and geologic investigations, which would ensure that the impact resulting from the location of structures on expansive or corrosive soils would be less than significant.

Because the proposed project is entirely within the INSP Planning Area considered under the 2018 EIR, the proposed project would not result in a larger development footprint than was considered in the INSP and 2018 EIR. Therefore, the proposed project would not result in new or more severe impacts from risks related to expansive soils beyond those identified in the 2018 EIR.

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

The 2018 EIR determined that new development would tie into the City's existing wastewater collection system. Therefore, implementation of the INSP would have no impact related to the location of structures on soils incapable of supporting septic tanks or alternative wastewater disposal systems.

Because the proposed project is entirely within the INSP Planning Area considered under the 2018 EIR and would tie into the City's existing wastewater collection system, the proposed project would result in no new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR found that the INSP Planning Area is highly sensitive for paleontological resources. However, the 2018 EIR determined that implementation of Policies P-ENV-35 and P-ENV-36 would avoid potentially significant impacts to paleontological resources, and impacts would be reduced to a less than significant level.

Paleontological resources and unique geologic features are site-specific. The Isabel Crossing and No Net Loss Parcels are entirely within the Planning Area analyzed in the 2018 EIR. The project proposes changes to land use compared to the original project; however, the overall buildout would not exceed development planned for the original project, and excavation would occur within areas identified for grading under the original project and analyzed in the 2018 EIR. Furthermore, the project would be required to implement INSP Policies P-ENV-35 and P-ENV-36, consistent with the original project. Therefore, the proposed project would result in no new or more severe impacts on paleontological resources beyond those identified in the 2018 EIR.

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4.8 Greenhouse Gas Emissions

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Page 3.4-30 of the 2018 EIR Page 3.3-24 of the 2020 SEIR	No	No	Yes
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Page 3.4-37 of the 2018 EIR Page 3.3-40 of the 2020 SEIR	No	No	Yes

Analysis in Previous Environmental Documents

Impacts to GHG emissions were analyzed on pages 3.4-1 through 3.4-48 of the 2018 EIR and pages 3.3-1 through 3.3-52 of the 2020 SEIR. Greenhouse gas emission impacts related to the generation of construction and operational GHG emissions and conflicts with applicable plans related to GHG emission reductions were determined to be less than significant with implementation of Mitigation Measure AQ-1 (provided under Section 4.3, *Air Quality*), Policy P-LU-60, Policy P-ENV-15, and Mitigation Measure GHG-1 (provided below).

MM GHG-1: Operational GHG Emissions Reduction Measures. Implement the following GHG emissions reduction strategies to guide future development within the Planning Area:

1. Require that a minimum of 20 percent of housing allowed under the proposed Project be affordable (below market-rate) housing.
2. Incorporate street and intersection traffic calming measures to a minimum of 25 percent of streets and intersections in the Planning Area. Street traffic calming features may include, but are not limited to, on-street parking, planter strips with street trees, chicanes, horizontal shifts (lane centerline that curves or shifts), bollards, rumble strips, and woonerfs, Intersection traffic calming measures may include, but are not limited to, marked crosswalks, count-down signal timers, curb extensions, channelization islands, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, and traffic circles or mini-circles.
3. Expand the existing local bus network in the Planning Area by a minimum of 25 percent by adding or modifying bus routes to increase accessibility to the Valley Link station at Isabel Avenue
4. Require all new development to install indoor water efficient appliances and fixtures to achieve a minimum of 15 percent reduction in water usage and require applicants for new development to submit landscape and irrigation plans capable of achieving a minimum of 10 percent reduction in outdoor water usage. The percent reductions should be achieved over baseline water use conditions in the City at the time of development.

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5. Require a minimum solid waste diversion rate of 85 percent to be achieved by 2040.
6. Require employers with more than 50 employees to provide a suite of travel demand reduction measures (TDM) capable of reducing single-vehicle trips by at least 20 percent compared to normal trip generation rates.

The following describes the analysis included in the 2018 EIR and 2020 SEIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

The project would not involve construction equipment or material that was not accounted for in the original project, as the Isabel Crossing Project would require less structural construction activities on the Isabel Crossing Parcels because of the proposed reduction of 39 housing units and 92,823 commercial square footage compared to the 2020 SEIR. Future development facilitated by the No Net Loss Specific Plan Amendment Project would result in a net increase of residential units and net decrease in office/commercial space; however, overall development would not exceed the intensity of development planned in the INSP. Therefore, no new or more severe GHG emissions impacts beyond what was analyzed in the 2018 EIR and 2020 SEIR for the original project would result from construction of the Isabel Crossing and No Net Loss Specific Plan Amendment Project.

GHG emissions were modeled for the Isabel Crossing Project and No Net Loss Specific Plan Amendment Project separately, in order to show the net change with the currently proposed development on the Isabel Crossing Parcels as well as to show the net change associated with the overall land use modifications that would be applied under the No Net Loss Specific Plan Amendment Project. It should be noted that the net change associated with the No Net Loss Specific Plan Amendment Project takes into consideration the unit shortfall associated with the Isabel Crossing Project, in addition to the unit shortfall associated with other existing and planned development in the INSP area.

Isabel Crossing Project

Operational GHG emissions modeled for the Isabel Crossing Project include mobile source emissions, energy emissions, area emissions, refrigerant emissions, water and waste emissions. Mobile source emissions are based on Kittelson & Associates total daily VMT estimate for the Isabel Crossing Project and for development originally planned for the Isabel Crossing Parcels under the INSP, included under Section 4.17, *Transportation*, below (Kittelson & Associates 2024). The Isabel Crossing Project’s CalEEMod model uses default CalEEMod assumptions for area, energy, wastewater, solid waste, and refrigerant for the proposed land uses. As shown in Table 3, the Isabel Crossing Project would decrease operational GHG emissions compared with the original project. Operational GHG emissions would decrease because there would be fewer commercial retail spaces and no office land use. Therefore, the Isabel Crossing Project would result in less energy

consumption and a decrease in vehicle miles traveled, resulting in a reduction in mobile-and energy source GHG emissions.

In addition, the residential population would decrease with the incorporation of the Isabel Crossing Project, which would decrease area, water, and waste sources GHG emissions compared to the development originally planned for the Isabel Crossing Parcels. As shown in Table 3 below, the Isabel Crossing Project would generate less GHG emissions compared to the development planned under the INSP for the Isabel Crossing Parcels. However, similar to the original project, the Isabel Crossing Project without mitigation would exceed the 2020 SEIR 2040 “Substantial Progress” Efficiency Metric. Therefore, impacts would be potentially significant.

Table 3 Combined Annual Emissions for the Isabel Crossing Project – Unmitigated

Emission Source	2040 with Original Project	2040 with Proposed Project
Annual Emissions (MT CO₂e)		
Operational		
Mobile	23,949	20,377
Area	88	84
Energy	2,258	1,113
Water	142	103
Waste	372	327
Refrigerant	2	2
Total	26,810	22,005
Service Population		
Residents	3,956	3,703
Jobs	904	358
Service Population	4,860	4,061
Net Emissions		
Original Project Net Emissions Over Existing (for entire INSP)		52,230
Isabel Crossing Project Net Emissions (Original vs Project Emissions) (for the Isabel Crossing Parcels)		(4,805)
2020 SEIR Buildout Net Emissions With Isabel Crossing Project (for entire INSP)		45,795
Original Project Net Service Population (for entire INSP)		22,329
Net Service Population (Original Project vs Isabel Crossing Project Service Population) (for entire INSP)		21,530
Modified New 2020 SEIR Buildout Net Emissions per Net Service Population		2.1
2040 “Substantial Progress” Efficiency Metric		1.7
Exceed Threshold?		Yes

MT CO₂e = metric tons of carbon dioxide equivalent

Notes: Parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: See Appendix B for the CalEEMod worksheets

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Mitigation Measure GHG-1 (provided above) from the 2018 EIR and 2020 SEIR requires GHG reduction measures such as traffic calming, affordable housing, transit improvements, water conservation, and solid waste recycling and diversion. As shown in Table 4, the proposed Isabel Crossing Project, with mitigation incorporated, would be below the 2040 “Substantial Progress” efficiency metric in page 3.3-36 of the 2020 SEIR. Therefore, similar to the original project, the Isabel Crossing Project would result in GHG emissions that are less than the efficiency metric, and would result in less than significant GHG impact. The Isabel Crossing Project would result in no new or more severe impacts related to GHG emissions beyond those identified in the 2018 EIR or 2020 SEIR for the Isabel Crossing Parcels.

Table 4 Combined Annual Emissions for the Isabel Crossing Project - Mitigated

Emission Source	2040 with Original Project	2040 with Proposed Project
Annual Emissions (MT CO₂e)		
Operational		
Mobile	23,949	20,377
Area	88	84
Energy	2,258	1,113
Water	121	87
Waste	56	49
Refrigerant	2	2
Total	26,473	21,712
Net Emissions		
Original Project Net Mitigated Emissions Over Existing		3,722
Isabel Crossing Project Net Mitigated Emissions (Original vs Project Emissions)		(4,761)
2020 SEIR Buildout Mitigated Emissions Minus Isabel Crossing Project Net Mitigated Emissions		(1,039)
Net Service Population (2020 SEIR vs Net Isabel Crossing Project Service Population)		21,530
Modified 2020 SEIR Buildout Net Emissions per Net Service Population		(0.1)
2040 “Substantial Progress” Efficiency Metric		1.7
Exceed Threshold?		No

MT CO₂e = metric tons of carbon dioxide equivalent

Notes: Parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: See Appendix B for the CalEEMod worksheets

No Net Loss Specific Plan Amendment Project

The modeled operational GHG emissions for the No Net Loss Specific Plan Amendment Project include emissions from mobile sources, energy use, area emissions, refrigerants, water, and waste. The mobile source emissions are based on trip generation rates provided by Kittelson & Associates, Inc. for low-rise apartments near rail transit, low-rise apartments not close to rail transit, and commercial office land use (Kittelson & Associates, Inc. 2024). The modeling details described in Section 4.3, *Air Quality*, also apply to the GHG modeling. The CalEEMod model for the No Net Loss

Specific Plan Amendment Project uses default assumptions for area, energy, waste, solid waste, and refrigerant for the proposed land uses. Additionally, the GHG reduction measures outlined in Mitigation Measure GHG-1 from the 2018 EIR and 2020 SEIR, such as traffic calming, affordable housing, transit improvements, water conservation, and solid waste recycling and diversion, were applied in the modeling.

As shown in Table 5, the No Net Loss Specific Plan Amendment Project would reduce operational GHG emissions compared to development originally planned for the No Net Loss Parcels. The No Net Loss Specific Plan Amendment Project would lead to lower energy consumption and fewer total vehicle miles traveled, reducing mobile and energy source GHG emissions. Additionally, the increase in residential units under the No Net Loss Specific Plan Amendment Project would result in lower water and waste source GHG emissions and increased area source emissions due to apartment fireplaces, as compared to development planned for the No Net Loss Parcels under the INSP. The No Net Loss Specific Plan Amendment Project without mitigation would exceed the 2020 SEIR 2040 "Substantial Progress" Efficiency Metric.

Table 5 Combined Annual Emissions for the No Net Loss Specific Plan Amendment Project – Unmitigated

Emission Source	Original Project BART and Comcast Parcels: Commercial Use (Decrease of 1,531,486 sf of Office Space)	Proposed Project BART and Comcast Parcels: Residential Use (Increase of 1,431 Residential Units)
Annual Emissions (MT CO₂e)		
Operational		
Mobile	(14,986)	8,702
Area	(22)	91
Energy	(4,965)	2,021
Water	(535)	100
Waste	(445)	330
Refrigerant	(1)	2
Total	(20,953)	11,246
Service Population		
Residents	-	4,078 ²
Jobs	(5,304) ¹	-
Service Population	(5,304)	4,078
Net Emissions		
Original Project Net Emissions Over Existing (for entire INSP)		52,230
No Net Loss Specific Plan Amendment Project Net Mitigated Emissions (Commercial vs Residential Emissions)		(9,707)
2020 SEIR Buildout Mitigated Emissions Minus No Net Loss Specific Plan Amendment Project Net Mitigated Emissions		42,523
Original Project Net Service Population (for entire INSP)		22,329

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Emission Source	Original Project BART and Comcast Parcels: Commercial Use (Decrease of 1,531,486 sf of Office Space)	Proposed Project BART and Comcast Parcels: Residential Use (Increase of 1,431 Residential Units)
Net Service Population (Original Project vs No Net Loss Specific Plan Amendment Project) (for entire INSP) ³		21,103
No Net Loss Specific Plan Amendment Project Buildout Net Emissions per Net Service Population		2.0
2040 "Substantial Progress" Efficiency Metric		1.7
Exceed Threshold?		Yes

MT CO_{2e} = metric tons of carbon dioxide equivalent; sf = square feet

Notes: Parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

¹Based on the 2020 SEIR, 2,104,200 square feet of non-residential square feet would generate 9,200 jobs, or 288.7 square feet per job.

²Based on 2020 SEIR, stated that Livermore’s projected household size for development through 2040 would be 2.85 persons per household

³No Net Loss Specific Plan Amendment Project net service population = 4,078 – 5,304 = (1,226).

Source: Appendix B

As shown in Table 6, which includes implementation of the required Mitigation Measure GHG-1 from the 2018 EIR and 2020 SEIR, the No Net Loss Specific Plan Amendment Project would result in GHG emissions below the 2040 "Substantial Progress" efficiency target identified in the 2020 SEIR. Therefore, the No Net Loss Specific Plan Amendment Project would not lead to new or more severe impacts related to GHG emissions beyond those that were identified in the 2018 EIR or 2020 SEIR for the No Net Loss Parcels.

Table 6 Combined Annual Emissions for the No Net Loss Specific Plan Amendment Project – Mitigated

Emission Source	Original Project BART and Comcast Parcels: Commercial Use (Decrease of 1,531,486 sf of Office Space)	No Net Loss Specific Plan Amendment Project BART and Comcast Parcels: Residential Use (Increase of 1,431 Residential Units)
Annual Emissions (MT CO_{2e})		
Operational		
Mobile	(14,986)	8,204
Area	(22)	91
Energy	(4,965)	2,021
Water	(455)	85
Waste	(67)	50
Refrigerant	(1)	2
Total	(20,495)	10,453

Emission Source	Original Project BART and Comcast Parcels: Commercial Use (Decrease of 1,531,486 sf of Office Space)	No Net Loss Specific Plan Amendment Project BART and Comcast Parcels: Residential Use (Increase of 1,431 Residential Units)
Net Emissions		
Original Project Net Mitigated Emissions Over Existing		3,722
No Net Loss Specific Plan Amendment Project Net Mitigated Emissions (Commercial vs Residential Emissions)		(10,042)
2020 SEIR Buildout Mitigated Emissions Minus No Net Loss Specific Plan Amendment Project Net Mitigated Emissions		(6,320)
Net Service Population (2020 SEIR vs No Net Loss Specific Plan Amendment Project Service Population)		21,103
No Net Loss Specific Plan Amendment Project Buildout Net Emissions per Net Service Population		(0.3)
2040 "Substantial Progress" Efficiency Metric		1.7
Exceed Threshold?		No

MT CO₂e = metric tons of carbon dioxide equivalent; sf = square feet
Notes: Parenthetical values are negative numbers and are subtracted from the total emissions rather than added.
Source: Appendix B

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

Two plans have been adopted to reduce GHG emissions in Livermore and at the State level, including CARB’s Scoping Plan and the City of Livermore CAP. The 2017 Scoping Plan and City of Livermore CAP adopted in 2012 were the latest GHG reduction plans analyzed in the 2020 SEIR; therefore, the proposed project is also compared to those plans. Similar to the original project, the proposed project would be required to comply with applicable State and local energy efficiency, renewable energy, green building, water conservation, and solid waste diversion requirements for new development. The proposed project would be required to comply with the policies in the INSP that encourage increased water conservation, solid waste diversion, renewable energy production, bicycle and pedestrian trips, and carpooling. In addition, development facilitated by the proposed project would include mixed-use land uses and development on the Isabel Crossing Parcels and BART Parcel would be located near transit. As shown in Table 3 and Table 6, the proposed project would emit less GHG emissions compared to the original project. Therefore, the proposed project would have no new or more severe impacts related to GHG emissions beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

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4.9 Hazards and Hazardous Materials

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Pages 3.8-17 through 3.8-18 in the 2018 EIR	No	No	N/A
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?	Page 3.8-18 in the 2018 EIR	No	No	N/A
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Page 3.8-18 through 3.8-19 in the 2018 EIR	No	No	N/A
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Pages 3.8-19 in the 2018 EIR	No	No	N/A
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Pages 3.8-20 through 3.8-21 in the 2018 EIR Page 3.2-73 in the 2020 SEIR	No	No	N/A

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Page 3.8-22 in the 2018 EIR	No	No	N/A
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Page 3.8-23 in the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to hazards and hazardous materials were analyzed on pages 3.8-17 through 3.8-23 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to hazards and hazardous materials from the 2018 EIR. Impacts related to hazards and hazardous materials were determined to be less than significant and the 2018 EIR and 2020 SEIR determined there would be no impact regarding safety of people residing or working within the vicinity of an airstrip.

The following describes the analysis included in the 2018 EIR and 2020 SEIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The 2018 EIR found that the INSP would result in new housing units, mixed-use facilities, commercial uses, and industrial space. The 2018 EIR determined that with implementation of existing federal, State, and local programs and regulations, impacts regarding the routine transport, use, or disposal of hazardous materials would be less than significant. The 2018 EIR found that while risks of upset and accident conditions involving the release of hazardous materials into the environment cannot be completely eliminated, they can be reduced to a manageable level. The 2018 EIR determined that with implementation of existing federal, State, and local programs and regulations, impacts regarding upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

The Isabel Crossing and No Net Loss Parcels are entirely within the INSP Planning Area evaluated under the 2018 EIR and would consist of operational uses similar to those planned for the original project. Compliance with regulations pertaining to the routine transport, handling, and disposal of hazardous materials would be mandatory and would minimize impacts of upset or hazards. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR found that there are no active, existing schools within one-quarter mile of the INSP planning area. However, there is an overlay in the INSP Planning Area designating zones for K-12 school uses. The INSP includes goals and policies G-PF-3, P-PF-25, P-PF-26, and P-PF-27 to minimize the exposure of new development in the INSP Planning Area to hazardous materials which would reduce potential impacts to schools to a less than significant level.

The Isabel Crossing and No Net Loss Parcels are not located within 0.25 miles of the K-12 school overlays described in the 2018 EIR. As shown in Figure 2, land uses planned for the area south of the Isabel Crossing and BART Parcels immediately across the I-580 include education/institutional uses. This designation allows a range of uses including schools, transit facilities, public and private meeting facilities, park and recreation areas, administrative and professional offices, and research laboratories (City of Livermore 2020a). While this area is less than 0.25 miles from the Isabel Crossing Parcels and the BART Parcel, INSP goals and policies to minimize the exposure of new development in the INSP Planning Area to hazardous materials would apply to the project. The Comcast Parcels are located approximately 0.15 mile east of school overlay parcels, across Independence Drive. Similar to the Isabel Crossing and BART Parcels, while this area is less than 0.25 mile from the Comcast Parcels, INSP goals and policies to minimize the exposure of new development in the INSP Planning Area to hazardous materials would apply to the project. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR found that there are three sites in the INSP Planning Area that are included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and five permitted underground storage tanks. However, all three of the hazardous materials sites cases are closed, representing a low to moderate risk of encountering impact during potential future redevelopment. The 2018 EIR found that future construction activities associated with implementation of the plan may also generate hazardous materials and waste, such as fuels and oils from construction equipment and vehicles; however, compliance with applicable policies, regulations, and programs would reduce the impact to less than significant.

The Isabel Crossing and No Net Loss Parcels are not located on or adjacent to any of the three sites identified in the 2018 EIR or the permitted underground storage tank sites. No new open hazardous materials sites have been identified on the Isabel Crossing or No Net Loss Parcels since the 2018 EIR (State Water Resources Control Board 2023; California Department of Toxic Substances Control 2023). The proposed project would be required to comply with applicable policies, regulations, and

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programs to reduce impacts. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR found that the INSP exempts development in the INSP Planning Area from a City Development Code policy limiting building height to 40 feet within 5,000 feet of an airport runway; however, new development under the INSP would be subject to ALUCP height limits and regulations on airspace protection, in addition to scenic view and land use compatibility factors. Therefore, environmental impacts from this amendment would not be significant. The 2018 EIR also determined that INSP would be consistent with the ALUCP to prevent safety hazards for people residing and working in the Planning Area near the Livermore Municipal Airport. The 2020 SEIR determined that the INSP does not propose any elements that would affect the established flight patterns for the Livermore Airport as the Plan is consistent with the ALUCP and federal aviation regulations on height and safety, therefore, the impact on flight patterns would be less than significant.

As discussed in Section 4.1, *Aesthetics*, some of the proposed buildings on the Isabel Crossing Parcels would exceed heights under the INSP scenic view requirements; however, several of the proposed building heights would be reduced compared to the original project, and these changes would be consistent with the INSP land uses with concessions and waivers approved under the State Density Bonus. Future development on the No Net Loss Parcels would be required to comply with the height requirements set forth in the INSP. The proposed project would continue to be subject to ALUCP height limits and regulations on airspace protection. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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

The 2018 EIR determined that development facilitated by the INSP would result in new development and population growth, resulting in an increase in demand for emergency services, which could affect implementation of the Alameda Local Hazard Mitigation Plan and the Tri-Valley Hazard Mitigation Plan; however, with implementation of existing local programs and regulations, impacts would be less than significant.

The project site is located within the INSP Planning Area and would not exceed the overall buildout potential of the original project. As discussed in Section 4.17, *Transportation*, a Technical Memorandum prepared by Kittelson and Associates in May 2024 (Appendix E) conducted VMT analysis for the Isabel Crossing Project and determined overall VMT would be lower compared with the original project proposed at the Isabel Crossing Parcels. A subsequent analysis prepared by Kittelson and Associates in June 2024 (Appendix E) determined that fewer daily trips and less total VMT would be generated by anticipated future development of the No Net Loss Parcels compared to development planned under the INSP. Therefore, traffic impacts during an emergency or evacuation event would not exceed those considered for the original project and no revisions to the 2018 EIR or 2020 SEIR would be required. Similar to the original project, the proposed project would be required to comply with existing regulations, and policies in the Livermore General Plan including Policy P3 which requires residential, commercial, and industrial

areas to provide efficient and safe access for emergency vehicles, to reduce the potential to interference with adopted emergency response or emergency evacuation plans. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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 2018 EIR found that while the City of Livermore has identified high wildfire severity zones in the INSP Planning Area, none of the INSP Planning Area constitutes a very high fire hazard severity zone and development would be consistent with Livermore's Fire Code and Chapter 9, Fire Protection Systems, of the California Building Code, which requires improvements such as fire sprinkler systems and fire alarms. The 2018 EIR determined that with implementation of existing State and local programs and regulations as well as the policies of the INSP, impacts would be less than significant.

The Isabel Crossing and No Net Loss Parcels are entirely within the Planning Area studied in the 2018 EIR for the INSP and is not located in a fire hazard severity zone. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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4.10 Hydrology and Water Quality

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Pages 3.9-19 through 3.9-23 in the 2018 EIR	No	No	N/A
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Pages 3.9-23 through 3.9-24 in the 2018 EIR	No	No	N/A
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	Pages 3.9-25 through 3.9-26 in the 2018 EIR	No	No	N/A
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site	Page 3.9-26 in the 2018 EIR	No	No	N/A
(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	Pages 3.9-26 through 3.9-28 in the 2018 EIR	No	No	Yes
(iv) Impede or redirect flood flows?	Page 3.9-29 in the 2018 EIR	No	No	N/A

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Pages 3.9-29 through 3.9-30 in the 2018 EIR	No	No	N/A
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Pages 3.9-23 through 3.9-24 in the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to hydrology and water quality were analyzed on pages 3.9-19 through 3.9-30 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to hydrology and water quality from the 2018 EIR. Hydrology and water quality impacts regarding water quality and groundwater recharge were determined to be less than significant, while impacts related to stormwater runoff capacity were determined to be less than significant with mitigation and adherence to INSP policies P-PF-39 and P-PF-42, and it was determined that there would be no impact regarding exposing people to flood hazards or the project resulting in seiche, tsunami, or mudflow.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- 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?*
- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The 2018 EIR determined that future specific projects would be required to comply with, at a minimum, the Clean Water Act, the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act), the San Francisco Bay Basin (Region 2) Water Quality Control Plan, and all INSP policies intended to avoid or minimize increases in stormwater flows and the associated degradation of water quality. Projects that disturb one or more acre of ground surface require a Construction General Permit which requires development and implementation of a SWPPP, which includes BMPs to eliminate or reduce stormwater and other discharge from construction sites and

ensure that water quality is not degraded. Projects would be required to comply with NPDES requirements during construction and would be designed in accordance with the Phase I MS4 Permit, Provision C.3.c, for post-construction stormwater management. Compliance with waste discharge requirements and dewatering regulations would ensure that dewatering activities are monitored and treated as required and that no violations of any water quality standards or waste discharge requirements occur. The 2018 EIR determined that compliance with all construction and design related stormwater regulatory requirements, the projects implemented under the INSP would not violate water quality standards or waste discharge requirements or provide substantial additional sources of polluted runoff and impacts would be less than significant.

The 2018 EIR determined that individual projects implemented under the INSP would be required to implement hydromodification BMPs to reduce the volume of runoff, include stormwater management measures as part of the design, and conform to INSP guidelines including stormwater runoff reduction and capture measures. The 2018 EIR found that with adherence to these requirements, development under the INSP would not change impervious surface area such that infiltration of groundwater would be affected. The 2018 EIR also found that water demand from the INSP would be accommodated by current water sources and impacts related to groundwater recharge would be less than significant.

The project site is located within the INSP Planning Area studied in the 2018 EIR for the INSP and would not exceed the buildout planned for the INSP. As discussed in Section 4.19, *Utilities and Service Systems*, water demand for the proposed Isabel Crossing and No Net Loss Specific Plan Amendment Project would be greater than the original project (Appendix F). The project would result an increase in water demand of approximately 134,514 gallons per day (GPD) and the reduction in office space would result in a decrease in approximately 32,030 GPD for a net water demand increase of approximately 102,484 GPD, or 115 acre-feet per year (AFY) compared with planned development under the INSP. The net water demand would comprise approximately 5.7 percent of the 2020 remaining water supply (Cal Water 2021). This additional demand would not be substantial and could be accommodated by the districts' existing water supply sources (Appendix F). Thus, no new or additional water infrastructure or water supply resources would be required.

The level of ground disturbance for the proposed Isabel Crossing Project and potential future development on the No Net Loss Parcels would be similar to that of the original project; therefore, impacts on groundwater supplies and groundwater recharge would be similar to the impacts determined for the original project. The proposed Isabel Crossing Project and future development on the No Net Loss Parcels would introduce new impervious surfaces such as roads and driveways which would increase surface runoff; however, new impervious surfaces from proposed development on the project site would not exceed those of development accounted for under the original project in the 2018 EIR. The proposed project would not introduce land uses that would increase the sources of polluted runoff compared to the original project. While the proposed project changes the land use compared with the original project, it would not introduce entirely new types of land use that are not already considered in the 2018 EIR for the original project and would not introduce new types of pollutants compared with the original project. Like the original project, construction and design related stormwater regulatory requirements, hydromodification BMPs, INSP policies and guidelines, and other federal, state and local regulations would apply to the proposed project, which would ensure compliance with the applicable Water Quality Control Plan (San Francisco Bay Regional Water Quality Control Board Basin Plan) and Zone 7 Alternative Groundwater Sustainability Plan. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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- 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 situation 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?*
 - 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?*

The 2018 EIR determined that with adherence to regulatory requirements and implementation of the policies and associated design guidelines contained in the INSP, future development within the INSP Planning Area would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site. The 2018 EIR determined that with the application of the Phase I MS4 Permit, projects implemented within the INSP Planning Area would not substantially alter the existing drainage pattern of a site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site. Therefore, the 2018 EIR determined impacts would be less than significant related to erosion and siltation and on or off-site flooding. The 2018 EIR determined that projects that would create one acre or more of new impervious surface would be required to analyze the project runoff and provide on-site or regional BMPs to reduce the runoff rate. The 2018 EIR determined that with compliance with INSP Policies, P-PF-39, P- PF-42, P-ENV-33, and NPDES requirements, Phase I MS4 Permit, Provision C.3.c, for post-construction stormwater management including Low Impact Development (LID) impacts related to the potential to exceed stormwater drainage systems would be less than significant.

The proposed project would not involve work within surface waters, including streams or rivers. Total construction area and depth of excavation would not be substantially increased compared with that considered for the original project. The Isabel Crossing Project and future development on the No Net Loss Parcels would introduce new impervious surfaces such as roads and driveways which would increase surface runoff; however, new impervious surfaces from proposed development on the project site would not exceed those of development accounted for under the original project in the 2018 EIR. As described in the 2018 EIR, the proposed project would be required to implement BMPs to reduce the runoff rate, since it would create more than one acre of new impervious surfaces. The proposed Isabel Crossing Project would use biotreatment areas, on-site pervious pavers, on-site biotreatment and flowthrough planers, and a detention vault. Future development on the No Net Loss Parcels would be expected to install similar stormwater features. Therefore, construction and operation of the proposed project would not increase potential for substantial erosion compared to the original project.

The proposed project would not introduce land uses that would increase the sources of polluted runoff compared to the original project. While the proposed project changes the land use compared with the original project, it would not introduce entirely new types of land use that are not already considered in the 2018 EIR for the original project and would not introduce new types of pollutants compared with the original project.

- 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:
 - iv. *Impede or redirect flood flows?**
- d. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The 2018 EIR found that while some portions of the INSP Planning Area are in 100-year flood hazard areas, impacts related to development within flood zones would be less than significant. The 2018 EIR found that the INSP Planning Area is not in a dam inundation area, and that there would be no impacts related to the risk of the failure of levees or dams; seiche; tsunami; or mudflow.

While the proposed project changes the land use compared with the original project, the proposed project would not introduce land uses or features that would alter the drainage pattern of the site or area more than under the original project. Similarly, the proposed project would not increase the amount of impervious surfaces beyond that of the original project. The proposed Isabel Crossing Project would include biotreatment areas, on-site pervious pavers, on-site biotreatment and flowthrough planters, and a detention vault. Similar to the original project, the proposed Isabel Crossing Project and future development on the No Net Loss Parcels would be subject to Plan Policy P-ENV-33, which requires preparation of a drainage study.

The project site is located within the INSP Planning Area studied in the 2018 EIR for the INSP. The Federal Emergency Management Agency National Flood Hazard Layer Map shows that the Isabel Crossing and No Net Loss Parcels are located in Flood Zone X, which is an area of minimal flood hazard (Federal Emergency Management Agency 2009). Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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4.11 Land Use and Planning

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Physically divide an established community?	Page 3.1-16 of the 2018 EIR	No	No	N/A
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?	Page 3.1-17 through 3.1-25 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to land use and planning were analyzed on pages 3.1-16 through 3.1-25 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to land use and planning. Impacts regarding the potential to divide an established community were determined to be less than significant and impacts regarding the potential to conflict with land use plans, policies, and regulations for avoiding or mitigating an environmental impact would be less than significant with the implementation of INSP goals and policies.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

a. Would the project physically divide an established community?

The 2018 EIR determined that the INSP would not divide an established community, and impacts would be less than significant. The project site would be entirely within the INSP Planning Area analyzed in the 2018 EIR and would not exceed development considered in the 2018 EIR or introduce new features that would divide an established community. The proposed project would result in no new or more severe impacts related to dividing established communities beyond those identified in the 2018 EIR.

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- 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 2018 EIR found that since the INSP would replace existing General Plan and zoning standards in the planning area, the General Plan and Development Code would be amended to accommodate development resulting from implementing the INSP, the INSP helps fulfill existing General Plan goals, and the INSP does not conflict with other applicable agencies' plans, policies, or regulations, impacts would be less than significant.

The project site would be entirely within the INSP Planning Area analyzed in the 2018 EIR and would not exceed development considered in the 2018 EIR. The Isabel Crossing Project proponent's use of the State density bonus law would not conflict with the INSP, as this provision allows for the slight modification of land uses from established land use plans to increase the availability of affordable housing throughout the state. Although the general mix of uses would shift and office and commercial uses would be reduced, land uses would remain generally similar to those envisioned in the adopted INSP. The Isabel Crossing Project's proposed Specific Plan Amendment would revise INSP Policies P-LU-8 and P-L-34 in a manner that allows the project to engage in master planning, which, under the amended INSP, would allow the averaging of densities and uses across the site, the assessment of INSP zoning and development standards based on proposed housing density and uses, the reconfiguration of site blocks, roads, and infrastructure elements, and alternative compliance with affordable housing requirements. In addition, the Isabel Crossing Project's Density Bonus "waiver or reduction" requests enable relief from certain INSP development standards, including, among others, for height in four different areas. The proposed master site plan includes a concentration of tall buildings near Gateway Avenue, transitioning downward in scale along Portola Avenue. The combined target unit count for Subareas 3b and 3c in the INSP was 1,477 housing units and a minimum unit count of 1,236 units. The Isabel Crossing project would involve construction of 1,299 housing units, with taller buildings located near Gateway Avenue, and modification of the street network as shown in the INSP. These project features are consistent with INSP Policies P-LU-8 and P-LU-37, as proposed for amendment.

The proposed land use designation change for the BART parcel would allow for the construction of 913 units, which is greater than is currently allowed in Subarea 3a. Subarea 1d is designated as Business Park which allows commercial and light industrial uses. Residential uses are not currently permitted on the Comcast Parcels. The No Net Loss Specific Plan Amendment Project would amend the INSP to change the land use designation of the BART Parcel to Residential Core, and the Comcast Parcels to Village and Transition, to ensure that there is adequate opportunity for the development of housing within the INSP area. The project would also be required to comply with INSP goals, policies, and actions described in the 2018 EIR for the original project related to environmental mitigation. The proposed project would result in no new or more severe impacts related to conflicts with any land use plan, policy, or regulation beyond those identified in the 2018 EIR.

4.12 Mineral Resources

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
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?	Page 3.15-1 through 3.15-2 of the 2018 EIR	No	No	N/A
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?	Page 3.15-1 through 3.15-2 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to mineral resources were analyzed on pages 3.15-1 through 3.15-2 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to mineral resources from the 2018 EIR. The 2018 EIR determined there would be no impact to mineral resources.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

The 2018 EIR determined that the INSP Planning Area does not have known mineral resources of regional or statewide value, or locally-important mineral resource recovery sites that are delineated on a land use plan, therefore, the INSP would have no impact on mineral resources. The project site is entirely within the INSP Planning Area analyzed in the 2018 EIR and would result in no new or more severe impacts beyond those identified in the 2018 EIR.

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4.13 Noise

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Generate 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?	Pages 3.6-20 through 3.6-34 and 3.6-38 through 3.6-39 of the 2018 EIR Pages 3.4-18 through 3.4-34 and 3.4-38 through 3.4-40 of the 2020 SEIR	No	No	No
b. Generate excessive groundborne vibration or groundborne noise levels?	Pages 3.6-34 through 3.4-38 of the 2018 EIR Pages 3.4-34 through 3.4.38 of the 2020 SEIR	No	No	No
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, expose people residing or working in the project area to excessive noise levels?	Pages 3.6-40 through 3.6-44 of the 2018 EIR Pages 3.4-40 through 3.4-44 of the 2020 SEIR	No	No	No

Analysis in Previous Environmental Documents

Impacts to noise were analyzed on pages 3.6-17 through 3.6-44 of the 2018 EIR and pages 3.4-16 through 3.4-44 of the 2020 SEIR. Noise impacts related to construction activities, stationary equipment, and airport noise were determined to be less than significant. Impacts related to traffic noise were determined to be significant and unavoidable despite implementation of Mitigation Measure NOI-1 (included below). Impacts related to groundborne vibration from construction activities were determined to be significant and unavoidable, despite implementation of Policy P-ENV-6 of the INSP.

MM NOI-1 Implement Traffic Noise Reduction Measures at Existing Sensitive Receptors.

The City shall implement off-site traffic noise reduction measures along the following three roadway segments such that the Plan-related increase in traffic noise for sensitive receptors is 3 dB or less:

- Portola, east of Tranquility Circle
- East Airway Boulevard east of Sutter Street and west of Via Mateo (around the mobile home development)
- East Airway Boulevard east of Via Mateo and West/North of Portola Avenue (around the mobile home development)

Measures that can be implemented include, but are not limited to:

- Construction of solid barriers between the roadway and adjacent residential use; and
- Installation of “quiet” pavement, such as open-graded asphalt, along the area of the roadway adjacent to residences.

The City shall prepare a noise control plan for impacted existing land uses that identifies the location, design, and effectiveness of the specific treatments to be implemented.

The following describes the analysis included in the 2018 EIR and 2020 SEIR, and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- 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?*

Noise-sensitive receptors closest to the Isabel Crossing Parcels include future residences currently under construction approximately 150 feet to the north across Portola Avenue and existing multi-family residences in the Montage multi-family residential neighborhood, located approximately 250 feet north of the project site on Dovecote Lane. Additional multi-family residences are located approximately 700 feet east on Tranquility Circle, and Cayetano Park approximately 540 feet northeast of the project site across Portola Avenue and Isabel Avenue.

Noise-sensitive receptors closest to the BART Parcel include residences located approximately 750 feet to the east on Tranquility Circle. Noise-sensitive receptors closest to the Comcast Parcels include residences located approximately 70 feet to the northeast on Copper Crest Common.

Construction

As described in the 2018 EIR and 2020 SEIR, construction activities associated with future projects and related construction noise impacts would be temporary. Each individual construction activity would have the potential to generate noise levels that could be in excess of applicable local

thresholds, or that could cause a disturbance to nearby noise-sensitive receptors. As stated in the 2020 SEIR, at 50 feet from the source, construction noise levels could potentially be above 80 dBA.

The City noise ordinance allows construction during daytime hours of Monday through Friday from 7:00 a.m. to 8:00 p.m., Saturday from 9:00 a.m. to 6:00 p.m., and prohibits construction on Sundays and City-observed holidays. Development under the proposed project would be required to comply with these restrictions. As stated in the 2018 EIR and 2020 SEIR, construction that complies with the time-of-day restrictions for construction activities would result in less than significant noise impacts with regard to the generation of noise in excess of thresholds. Therefore, as the Isabel Crossing Project and future development of the No Net Loss Parcels would be required to comply with the hourly restrictions for construction activities, this impact would not be more severe than identified in the 2018 EIR and 2020 SEIR.

Operation

The primary on-site operational noise source from the project would be HVAC units on each of the proposed buildings within the Isabel Crossing Parcels. According to the site plans provided by William Hezmalhalch Architects for the Isabel Crossing Project (WHA 2023; Appendix A), the closest sensitive receptor to a potential HVAC unit would be approximately 150 feet north across Portola Avenue. Specific planning data for the future HVAC systems, including any that may be proposed with development on the No Net Loss Parcels, are not available at this stage of project design. The development of new residences could result in the exposure of existing residential land uses to noise that exceeds the City's noise standards.

Future development under the project would be required to comply with policies included in the City's General Plan that would help reduce noise effects to surrounding sensitive receptors. Pursuant to the City's General Plan Objective N-1.5, Policy P1, project impacts would be significant if exterior noise levels exceed 55 dBA L50 at a residential property during the hours of 7:00 a.m. – 10:00 p.m. and 45 dBA L50 during the hours of 10:00 p.m. to 7:00 a.m. Conservatively assuming that HVAC units would be running 24 hours each day, the project would be required to comply with the City of Livermore's nighttime exterior noise policy of 45 dBA L50.

However, even with General Plan Objective N-1.5, Policy P1, it is possible that noise levels from HVAC could result in potentially significant noise at adjacent noise-sensitive residential receptors. Implementation of Policy P-ENV-7 would reduce noise impacts from HVAC to less than significant levels. Therefore, this impact would not be more severe than those identified in the 2018 EIR and 2020 SEIR.

Special Events

As discussed in the 2020 SEIR, the project would include the development of parks and plazas which could be used for gatherings or events. The types of potential events that could occur at proposed or future parks and plazas within the project site are not known at this time, so it is not possible to estimate potential temporary or periodic noise generated by gatherings in these areas. However, all special events would be required to obtain a special event permit in accordance with the City of Livermore rules. To obtain a permit, event organizers must be certain that all event activities comply with the local laws applicable to noise abatement (City of Livermore 2017). Any special event in the City would need to obtain a special event permit in accordance with the City of Livermore rules. Therefore, noise impacts related to special events occurring at the project site would not be more severe than those identified in the 2018 EIR and 2020 SEIR.

Traffic

The proposed project would involve construction of 1,431 greater residential units than the original project. This increase in residential units would balance out with the decrease in commercial and office space, resulting in a corresponding net reduction in total daily vehicle trips to and from the Isabel Crossing and No Net Loss Parcels (Appendix E). Because the project would result in a net decrease in daily vehicle trips, the project would not result in a significant traffic noise increase and this impact would not be more severe than those identified in the 2018 EIR and 2020 SEIR.

b. Would the project generate excessive groundborne vibration or groundborne noise levels?

The 2018 EIR and 2020 SEIR determined that construction groundborne vibration would be significant. Operation of the proposed and future residential development projects would not include substantial vibration sources. Thus, construction activities have the greatest potential to generate groundborne vibration affecting nearby sensitive receptors. Construction equipment would be consistent with that analyzed in the 2020 SEIR. Therefore, construction activities known to generate excessive groundborne vibration, such as pile driving, may be required for project construction. INSP Policy P-ENV-6 would help reduce construction vibration effects at sensitive land uses by requiring the project developer to implement measures to reduce vibration. Such measures could include: operating heavy equipment as far as practical from residential uses; using smaller bulldozers (operating weight less than 20,000 pounds) when grading must occur within approximately 50 feet of residential uses or other vibration sensitive uses; and using quiet pile driving technology when feasible.

For purposes of this analysis, the greatest anticipated source of vibration during general project construction activities would be from an impact pile driver, which could be used within 70 feet from the nearest residential building, located northeast of the Comcast Parcels, and 40 feet from the nearest industrial/commercial building, located west of the Comcast Parcels. As stated in the 2020 SEIR, vibration impacts would be significant if they would exceed 0.5 in/sec PPV (Caltrans 2013) at the new residential buildings and the modern industrial/commercial buildings which is the level at which structural damage may occur. At a distance of 40 feet, an impact pile driver would typically create approximately 0.384 PPV (in/sec) at the existing commercial buildings, and at a distance of 70 feet, an impact pile driver would create approximately 0.208 PPV (in/sec) at the existing residential buildings (Federal Transportation Administration 2018). This would not exceed the architectural damage criterion for new residential buildings and modern industrial/commercial buildings of 0.5 PPV (in/sec) and impacts would be less than significant. Therefore, construction vibration impacts resulting from use of an impact pile driver within 40 feet of the nearest industrial/commercial building and within 70 feet of the nearest residential building would be less severe than those identified in the 2018 EIR and 2020 SEIR.

c. Would the project be 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, and expose people residing or working in the project area to excessive noise levels?

The project site is located approximately 0.5 mile northeast of the closest public airport, the Livermore Municipal Airport. As stated in the Livermore Executive Airport, Airport Land Use Compatibility Plan (City of Livermore 2012), all project parcels are located inside the Airport Protection Area and Influence Area, and outside the limit of any noise contour. Therefore, no substantial noise exposure from airport noise would occur to people residing or working in the

project area, and impacts would not be more severe than those identified in the 2018 EIR and 2020 SEIR.

Additionally, the project site is located approximately 6.3 miles northwest of the closest private airport, Meadowlark Field Airport. As stated in the 2020 SEIR, this small private airport has only six aircraft based at the field. At this distance, and based on the size of this airstrip, no substantial noise exposure from airport noise would occur to people residing or working in the project area, and impacts would not be more severe than those identified in the 2018 EIR and 2020 SEIR.

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4.14 Population and Housing

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	Page 3.1-25 through Page 3.1-29 of the 2018 EIR	No	No	N/A
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Page 3.1-29 through Page 3.1-32 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to population and housing were analyzed on pages 3.1-25 through 3.1-32 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to population and housing from the 2018 EIR. Population and housing impacts regarding unplanned population growth were determined to be less than significant and impacts related to the displacement of people or housing would be less than significant with implementation of INSP goals and policies.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?*
- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The 2018 EIR determined that direct inducement of population growth through new housing and businesses would not be considered a significant impact because development facilitated by the INSP would be within the overall General Plan capacity and would be paced as part of the City's growth management program and the INSP phasing program. The 2018 EIR found that buildout of

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the INSP would generate at least 20 percent subsidized housing units, which may serve people displaced from existing housing due to rising rents. The 2018 EIR determined that the INSP includes policies to reduce potential displacement and maximize affordable housing options that build upon existing City programs and policies, therefore, impacts would be less than significant.

As described in Section 1.5, *Project Description*, the Isabel Crossing and No Net Loss Specific Plan Amendment Project would result in a net increase of 1,431 residential units beyond the total residential buildout in the adopted INSP. The project would also result in a net decrease of 1,531,486 square feet of office and commercial space compared to the adopted INSP. Livermore's average household size for development is 2.6 persons per household (California Department of Finance [DOF] 2024). Using this estimate, the population increase facilitated by the proposed project would be approximately 3,720 residents beyond the original project. INSP goals and policies described for the original project in the 2018 EIR would continue to apply for the modified project. As described in the 2018 EIR, the City's General Plan establishes an overall development capacity for the city of 41,000 residential units and 9,100 new jobs. Of the total 41,000 residential units anticipated by the General Plan, 4,500 units were associated with an anticipated new BART station. The proposed project would result in 1,431 residential units beyond those considered in the INSP EIR, which would exceed the anticipated growth for the BART station area. However, at this time, only the Isabel Crossing Parcels are proposed for project-specific development. The No Net Loss Specific Plan Amendment Project would allow the BART and Comcast Parcels to be developed with residential uses at a later date. As described in the INSP EIR, the INSP includes growth management strategies to ensure there is adequate public infrastructure and services through the allocation of residential units to development projects at the entitlement phase. Additionally, it should be noted that the City has observed a shortfall in housing unit production in the INSP area from existing and proposed development projects, resulting in a unit shortfall which the No Net Loss Specific Plan Amendment Project is intended to address. Because the population increase facilitated by the proposed project would be subject to the INSP growth management strategies and is intended to address housing unit shortfalls currently experienced in the INSP area, the project would result in no new or more severe impacts related to population growth beyond those identified in the 2018 EIR. Because there are no existing residences on the project site, the project would not displace housing or people. Therefore, the proposed project would result in no new or more severe impacts to population and housing beyond those identified in the 2018 EIR.

4.15 Public Services

		Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a.	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1	Fire protection?	Page 3.11-13 of the 2018 EIR	No	No	N/A
2	Police protection?	Page 3.11-13 through 3.11-15 of the 2018 EIR	No	No	N/A
3	Schools?	Page 3.11-12 through 3.11-13 of the 2018 EIR	No	No	N/A
4	Parks?	Page 3.11-8 through 3.11-12 of the 2018 EIR	No	No	N/A
5	Other public facilities?	Page 3.11-15 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to public services were analyzed on pages 3.11-13 through 3.11-15 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to public services from the 2018 EIR. Impacts regarding the expansion of public services were determined to be less than significant with implementation of INSP policies.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative

impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

1. *Fire protection?*
2. *Police protection?*
3. *Schools?*
4. *Parks?*
5. *Other public facilities?*

Fire Protection Services

According to the LPPD 2020 year-end report, the department had 121 full-time employees serving a population of 171,385 (LPPD 2021). This would yield a ratio of 0.71 firefighters per 1,000 residents. The additional residential units proposed for the Isabel Crossing Project and future development facilitated by the No Net Loss Specific Plan Amendment Project would result in an increase in population of approximately 3,720 persons beyond the 2018 EIR and 2020 SEIR. This increase in population would result in a ratio of 0.69 firefighters per 1,000 residents. The change in ratio for fire protection services would not be considered substantial as the number of staff needed to offset this increase would be limited to approximately three firefighters. Although three new firefighters may be required to serve the project, the incremental increase in staff alone would not warrant construction of new or expanded fire facilities.

The Isabel Crossing Project, as well as future development facilitated by the No Net Loss Specific Plan Amendment Project, would be subject to INSP Policies P-PF-26 and P-PF-27, which require ongoing coordination between the City and the LPPD to ensure the adequate provision of fire protection services in the INSP area, as development occurs. As part of the ongoing coordination efforts, the Livermore-Pleasanton Fire Department (LPPD) has indicated there are increasing demands for fire protection services citywide, including within the INSP area. Separate from this project, the LPPD is preparing a comprehensive Community Risk Assessment report, anticipated to be completed mid-summer of 2024, that will further identify operational needs and provide recommendations to address future fire protection services citywide, including those in the INSP area. Consistent with the INSP policies cited above, the project would be subject to the recommendations of the Community Risk Assessment when completed.

Furthermore, the Isabel Crossing Project proponent would be required to pay fair share fees into the City's Community Benefit Fund, which is intended to fund infrastructure improvements, such as necessary community service facility expansions or renovations. Future development of the No Net Loss Parcels would be required to make similar fair share payments. Additionally, the Isabel Crossing Project and future development facilitated by the No Net Loss Specific Plan Amendment Project would generate tax revenue during project operation, which includes contribution to the City's

General Fund. Collectively, the project's contributions to the General Fund, in addition to the Community Benefit Fund, would be used to ensure adequate services, facilities, and infrastructure are provided within the INSP area, including fire protection services. No new impacts or substantially increased impacts related to fire protection services would occur.

Police Services

According to the Livermore Police Department (LPD) 2022 annual report, there were a total of 97 police officers employed by LPD (LPD 2023). The DOF estimates that the 2022 population was 85,769. This yields a ratio of 1.13 officers per 1,000 people.

The additional residential units proposed for the Isabel Crossing Project and future development facilitated by the No Net Loss Specific Plan Amendment Project would result in an increase in population of approximately 3,720 persons beyond the 2018 EIR and 2020 SEIR. This increase in population would result in a new ratio of 1.08 officers per 1,000 people. The decrease in office space would result in a reduced demand for police services, which would offset some of the increase in demand for police protection services from the increase in residential uses. The increase in demand for police services would not be substantial; the number of staff needed to offset this increase would be approximately four police officers. Although four new police officers may be required to serve the project, the increase in staff would not warrant construction of new or expanded police facilities. Furthermore, the Isabel Crossing Project proponent would be required to pay fair share fees into the City's Community Benefit Fund, which is intended to fund infrastructure improvements, such as necessary community service facility expansions or renovations. Future development of the No Net Loss Parcels would be required to make similar fair share payments. No new impacts or substantially increased impacts related to police services would occur.

Schools

According to the 2019 Livermore Community Services and Infrastructure Report, the Livermore Valley Joint Unified School District (LVJUSD) has a total school capacity of 16,150 students (City of Livermore 2020b). Census data shows that the 2022-23 enrollment total for LVJUSD was 12,956 students.

The additional residential units proposed for the Isabel Crossing Project and future development facilitated by the No Net Loss Specific Plan Amendment Project would result in approximately 600 new students in the LVJUSD beyond the 2018 EIR and 2020 SEIR, for a total enrollment in LVJUSD of 13,556 students, or approximately 84 percent of the total school capacity of the LVJUSD. This would remain below LVJUSD's total school capacity. No new impacts or substantially increased impacts related to schools would occur.

Parks

According to the Livermore General Plan, the Livermore Area Recreation and Park District's (LARPD) standard for neighborhood parks is 2 acres per 1,000 residents or 1 park per 3,000 to 5,000 residents, for community parks is 2 acres per 1,000 residents, for regional parks is 15 acres per 1,000 residents, and for special use parks is 3 acres per 1,000 residents (City of Livermore 2004). The INSP includes 236.1 acres of combined parkland, including three new neighborhood parks, and a buildout population in the INSP Planning Area of 13,720 residents (City of Livermore 2018).

The additional residential units proposed for the Isabel Crossing Project and future development facilitated by the No Net Loss Specific Plan Amendment Project would generate a population of

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approximately 3,720 people beyond the 2018 EIR and 2020 SEIR, for a new INSP buildout population of 17,440 people. While this would exceed the 1 neighborhood park per 3,000 to 5,000 resident ratio, Policy P-PF-4 of the INSP requires individual developers to provide land and/or in lieu fees for the development of parks to maintain acceptable parks to resident ratios. Future development on the No Net Loss Parcels would be required to satisfy this INSP requirement. No new impacts or substantially increased impacts related to parks would occur.

4.16 Recreation

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. 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?	Page 3.11-15 of the 2018 EIR	No	No	N/A
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Page 3.11-15 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to recreation were analyzed on page 3.11-15 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to recreation from the 2018 EIR. Recreation impacts were determined to be less than significant.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b. *Would 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 2018 EIR determined that because new development is required to dedicate park and recreational facilities or pay in-lieu fees that are used to build and maintain parks and recreational facilities and INSP policies would reduce impacts, impacts related to the use and deterioration of neighborhood and regional parks would be less than significant.

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The proposed Isabel Crossing project includes 2.56 acres of common open space, which is greater than the original project planned for the Isabel Crossing project site by 0.39 acres. This exceeds the Livermore Area Recreation and Parks District (LARPD) standard of 2 acres per 1,000 residents or 1 park per 3,000-5,000 residents which was considered in the 2018 EIR for the original project.

The additional residential units facilitated by the land use change proposed on the No Net Loss Parcels would generate a population of approximately 3,720 people beyond the 2018 EIR and 2020 SEIR, for a new INSP buildout population of 17,440 people. While this would exceed the 1 neighborhood park per 3,000 to 5,000 resident ratio, Policy P-PF-4 of the INSP requires individual developers to provide land and/or in lieu fees for the development of parks to maintain acceptable parks to resident ratios. Future development on the No Net Loss Parcels would be required to satisfy this INSP requirement. No new impacts or substantially increased impacts related to parks would occur beyond those identified in the 2018 EIR.

4.17 Transportation

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Page 3.2-32 through 3.2- 46 of the 2018 EIR Pages 3.2-31 through 3.2-51 of the 2020 SEIR	No	No	Yes
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	N/A	No	No	N/A
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	Page 3.2-64 of the 2018 EIR Page 3.2-73 of the 2020 SEIR	No	No	N/A
d. Result in inadequate emergency access?	Page 3.2-64 of the 2018 EIR Page 3.2-74 of the 2020 SEIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to transportation were analyzed on pages 3.2-32 through 3.2-36 of the 2018 EIR and pages 3.2-31 through 3.2-74 of the 2020 SEIR. Impacts related to the potential for the INSP to conflict with a program, plan or ordinance addressing the circulation system were determined to be significant and unavoidable in the 2018 EIR and 2020 SEIR. Impacts related to hazards due to a geometric design feature or emergency access were determined to be less than significant in the 2018 EIR and 2020 SEIR.

The following describes the analysis included in the 2018 EIR and 2020 SEIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

The 2020 SEIR found that the INSP would result in unacceptable operations at the intersection of North Livermore Avenue & Portola Avenue (#3) during the weekday PM peak hour under Cumulative 2040 Conditions and cause vehicular delay during the PM peak hour, which is operating below the LOS D standard, to increase by more than five seconds compared the no-project (15 seconds). The 2020 SEIR included a mitigation measure which consists of adding additional left turn lanes to the impacted intersection under 2040 conditions, which would require the widening of North Livermore Avenue and Portola Avenue. However, the 2020 SEIR determined that due to right-of-way constraints on both roads, the addition of new lanes would not be feasible, and impacts would remain significant and unavoidable.

The Isabel Crossing Project would alter some aspects of the roadway system analyzed in the 2020 SEIR for the original project, including street locations and internal circulation within the Isabel Crossing Parcels. However, roadways for the Isabel Crossing Project and future roadways associated with development of the No Net Loss Parcels would be required to comply with City standards and would result in no new or substantially more severe impacts than those identified in the 2018 EIR or 2020 SEIR for the original project. The proposed project would be entirely within the Planning Area considered for the INSP in the 2018 EIR and 2020 SEIR. While the development pattern would be modified by the Isabel Crossing and No Net Loss Specific Plan Amendment Project, intersection operations would not be substantially degraded with the proposed project, and no new or more severe impacts on roadway facilities would occur (Appendix E).

The Isabel Crossing Project would include pedestrian sidewalks and a multi-use trail for bicycles and pedestrians on the Isabel Crossing Parcels. Development facilitated by the No Net Loss Specific Plan Amendment Project would similarly include bicycle and pedestrian facilities, as required by INSP policies P-TRA-1, P-TRA-3 through P-TRA-6, P-TRA-8, P-TRA-9, and P-TRA-11 through P-TRA-13, which require the provision of adequate pedestrian and bicycle facilities throughout the INSP area and as part of individual development projects. Therefore, the proposed project would result in no new or more severe impacts on bicycle and pedestrian facilities beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

The proposed project would be on the same project site as the original project. Therefore, the proposed project would be in proximity to the same transit stops as the original project. As described under Section 4.14, *Population and Housing*, the proposed project would result in more residents on the project site than the original project. Accordingly, there would be a corresponding increase in demand for transit. Development facilitated by the No Net Loss Specific Plan Amendment Project would be required to satisfy INSP policies P-TRA-14 through P-TRA-19, P-TRA-21, and P-TRA-22, which require improvements to existing and planned transit facilities throughout the INSP area and as part of individual development projects. The proposed project would result in no new or more severe impacts on transit facilities beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

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

CEQA Guidelines Section 15064.3(b), which was added to the *CEQA Guidelines* in November 2018, defines acceptable criteria for analyzing transportation impacts under CEQA. It states that land use

projects with vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact, and that projects that decrease VMT compared to existing conditions should be presumed to have a less than significant transportation impact.

While the 2018 EIR and 2020 SEIR did not address VMT as an impact metric pursuant to Senate Bill 743, analysis conducted by Kittelson & Associates Inc. directly compares the INSP VMT to proposed project VMT to disclose whether there would be additional total VMT or increased VMT metrics generated by the changes in the proposed project (Appendix E). VMT was modeled for the Isabel Crossing Project and No Net Loss Specific Plan Amendment Project separately, in order to show the net change with the currently proposed development on the Isabel Crossing Parcels as well as to show the net change associated with the overall land use modifications that would be applied under the No Net Loss Specific Plan Amendment Project. It should be noted that the net change associated with the No Net Loss Specific Plan Amendment Project takes into consideration the unit shortfall associated with the Isabel Crossing Project, in addition to the unit shortfall associated with other existing and planned development in the INSP area.

Isabel Crossing Project

Table 7 shows daily VMT calculations for the original project compared with the Isabel Crossing Project for residential, employment, and retail uses. Table 8 shows VMT per capita for the original project compared with the Isabel Crossing Project for residential and employment uses.

Table 7 VMT Analysis for Original Project Compared with Isabel Crossing Project (Total VMT)

Land Use	Original Project	Isabel Crossing Project	Net Change in VMT
Residential	126,704	87,620	-39,084
Employment	50,474	44,260	-6,214
Retail	235,940	193,155	-42,785

Source: Appendix E

Table 8 VMT Analysis for Original Project Compared with Isabel Crossing Project (VMT per Capita)

Land Use	Original Project	Isabel Crossing Project	Net Change
Residential	24.5	20.8	-3.7
Employment	12.7	13.4	+0.6

Source: Appendix E

Analysis by Kittelson & Associates Inc. concluded that the Isabel Crossing Project would result in a slight increase in VMT per employee compared with the original project due to the reduction in office land use by the Isabel Crossing Project; however, the total VMT for all land uses would be lower under the Isabel Crossing Project. The Isabel Crossing Project also would be within 0.5 miles of quality transit, like the original project, and would be required to adhere to transportation demand management measures associated with INSP Policies P-TRA-19 and P-TRA-24 described in the 2020 SEIR. Therefore, the Isabel Crossing Project would not increase VMT impacts compared to impacts analyzed in the 2020 SEIR. The Isabel Crossing Project would result in no new or more severe impacts to VMT beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

No Net Loss Specific Plan Amendment Project

Table 9 shows the total daily VMT calculations for the original project compared with the No Net Loss Specific Plan Amendment Project for the entire INSP area.

Table 9 Daily VMT Analysis for Original Project Compared with No Net Loss Specific Plan Amendment Project

	No Project (2013)	Original Project (2040)	No Net Loss Specific Plan Amendment Project (2040)
Daily Vehicle Trips	57,730	112,183	104,657
Daily VMT	599,393	1,168,901	1,157,280
Service Population	14,671	36,273	35,328
VMT/Service Population	40.9	32.2	32.8

Source: Appendix E

Analysis by Kittelson & Associates Inc. concluded that the No Net Loss Specific Plan Amendment Project would result in a slight increase in VMT per service population compared with the original project due updated VMT analysis methodology; however, the daily vehicle trips and total daily VMT would be lower under the No Net Loss Specific Plan Amendment Project. The BART Parcel also would be within 0.5 miles of quality transit, and future development facilitated by the No Net Loss Specific Plan Amendment Project would be required to adhere to transportation demand management measures associated with INSP Policies P-TRA-19 and P-TRA-24, described in the 2020 SEIR. Therefore, the No Net Loss Specific Plan Amendment Project would not increase VMT impacts compared to impacts analyzed in the 2020 SEIR. The No Net Loss Specific Plan Amendment Project would result in no new or more severe impacts to VMT beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

Because the Isabel Crossing Project and No Net Loss Specific Plan Amendment Project would both result in less total VMT than the INSP as described in the 2018 EIR and 2020 SEIR, the proposed project as a whole would not result in a new or more severe impact to VMT beyond those identified in the 2018 EIR or 2020 SEIR for the original project.

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

The 2020 SEIR determined that implementation of the INSP would increase traffic levels in the study area and introduce new intersections and traffic signals to the existing street system. However, these new roadways and traffic signals would be designed to City Design standards and therefore should not substantially increase hazards due to a design feature or incompatible use and impacts would be less than significant.

The Isabel Crossing Project would include internal circulation within the Isabel Crossing Parcels that is different from the original project. However, like the original project, roadways and traffic signals would be designed to City Design standards and therefore should not substantially increase hazards due to a design feature or incompatible use. Similarly, future development facilitated by the No Net Loss Specific Plan Amendment Project that includes new roadways or traffic signals would similarly be required to meet City Design standards. Therefore, impacts related to design hazards and

incompatible use would not exceed those considered for the original project and no revisions to the 2018 EIR or 2020 SEIR would be required.

d. Would the project result in inadequate emergency access?

The 2020 SEIR determined that implementation of the INSP would increase traffic levels in the study area and introduce new intersections and traffic signals to the existing street system. However, these new roadways and traffic signals would be designed to City Design standards and therefore should not result in inadequate emergency access and impacts would be less than significant. The 2020 SEIR determined that new land uses would require additional emergency access to respond to emergencies, however, new roadways and intersections would be designed to City design standards that account for emergency access and impacts would be less than significant.

The Isabel Crossing Project would include internal circulation within the Isabel Crossing Parcels that is different from the original project. However, like the original project, roadways and traffic signals would be designed to City Design standards and therefore should not result in inadequate emergency access. Similarly, future development facilitated by the No Net Loss Specific Plan Amendment Project that includes new roadways or traffic signals would similarly be required to meet City Design standards. The transportation analysis conducted by TJKM in May 2024 (Appendix E) for the Isabel Crossing Project determined that fewer trips would be produced by the Isabel Crossing Project compared to the original project on the Isabel Crossing Parcels. Similarly, the transportation analysis conducted by Kittelson in June 2024 (Appendix E) for the No Net Loss Specific Plan Amendment Project determined that fewer trips would be produced by future development facilitated by the No Net Loss Specific Plan Amendment Project compared to the original project on the No Net Loss Parcels. Therefore, traffic impacts during an emergency or evacuation event would not exceed those considered for the original project and no revisions to the 2018 EIR or 2020 SEIR would be required.

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4.18 Tribal Cultural Resources

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?	
<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>					
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)?	Page 3.13-19 of the 2018 EIR	No	No	N/A
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Page 3.13-19 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to tribal cultural resources were analyzed on page 3.13-19 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to tribal cultural resources from the 2018 EIR. Tribal cultural resources were determined to be less than significant.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

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

- 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)?*
- 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

During preparation of the 2018 EIR, NAHC and seven Native American tribes were contacted, pursuant to AB 52 and SB 18. At the time the 2018 EIR was completed, no response had been received from the tribes. An updated sacred lands file search conducted for this project by the NAHC did not indicate the presence of additional Native American cultural resources within the planning area. The 2018 EIR determined that there would be no impact to tribal cultural resources within the planning area.

Pursuant to SB 18, the City reached out to tribes listed on the NAHC contact list. The Confederated Villages of Lisjan Nation requested information about the project and environmental documents which the City provided via email, and the North Valley Yokuts Tribe requested information regarding the Sacred Lands File Search which the City provided via email. No tribes requested further consultation at the time of this report.

The proposed project would be located at the same project site as the original project, and would not exceed the level of ground disturbance or intensity of development considered in the INSP. Therefore, the proposed project would result in no new or more severe impacts regarding tribal cultural resources beyond those identified in the 2018 EIR for the original project.

4.19 Utilities and Service Systems

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
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?	Page 3.10-11 through 3.10-13 of the 2018 EIR	No	No	N/A
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Page 3.10-13 of the 2018 EIR	No	No	N/A
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?	Page 3.10-11 of the 2018 EIR	No	No	N/A
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?	Page 3.10-13 through 3.10-15 of the 2018 EIR	No	No	N/A
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Page 3.10-15 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to utilities and service systems were analyzed on pages 3.10-11 through 3.10-15 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to utilities and service systems from the 2018 EIR. Utilities and service systems impacts were determined to be less than significant.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- 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?*
- 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?*
- 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?*
- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The 2018 EIR determined that the INSP would not require or result in the construction of new stormwater drainage, solid waste, wastewater, or water facilities. The 2018 EIR determined that implementation of the INSP would not result in insufficient water supplies available to serve the project from existing entitlements and resources or require expanded entitlements. The 2018 EIR determined that implementation of the INSP would not exceed wastewater treatment requirements of the San Francisco Regional Water Quality Board. The 2018 EIR determined that implementation of the INSP would not result in solid waste disposal needs that exceed the permitted landfill capacity serving the INSP planning area. The 2018 EIR determined that the INSP would be required to comply with federal, State, and local statutes and regulations related to solid waste, therefore, the impacts would be less than significant.

The proposed project would be on the same project site as the original project and entirely within the INSP Planning Area analyzed in the 2018 EIR. As described under Section 4.14, *Population and Housing*, the Isabel Crossing and No Net Loss Specific Plan Amendment Project would result in a net increase of 1,431 residential units beyond the total residential buildout in the adopted INSP. The project would also result in a net decrease of 1,531,486 square feet of office and commercial space as compared to the adopted INSP.

Water

The 2020 Livermore Urban Water Management Plan (UWMP) indicates adequate available water supply during all future year scenarios to meet anticipated water demands up to 10,128 AFY, with additional unused water supply available. The 2020 total water demand in the district was 9,571 AFY, with 2,003 AFY unused.

The project would result an increase in water demand of approximately 134,514 gallons per day (GPD) and the reduction in office space would result in a decrease in approximately 32,030 GPD for a net water demand of approximately 102,484 GPD, or 115 acre-feet per year (AFY) compared with planned development under the INSP. The net water demand would comprise approximately 5.7 percent of the 2020 remaining water supply (Cal Water 2021). This additional demand would not be substantial and could be accommodated by the districts' existing water supply sources (Appendix F). Thus, no new or additional water infrastructure or water supply resources would be required. The proposed project would result in no new or more severe impacts or the need for new or expanded water facilities beyond those identified in the 2018 EIR for the original project.

Wastewater

The Livermore Water Reclamation Plant has a capacity of 8.5 million GPD and as of 2020, treats 4 to 7 million GPD according to the 2020 Livermore UWMP (Cal Water 2021). The remaining capacity would be 1.5 million GPD.

Assuming that wastewater generation is approximately 80 percent of water demand due to system losses, the wastewater generation for development facilitated by the proposed project would be 82,987 GPD. The additional wastewater generated by development facilitated by the proposed project would represent approximately 5.5 percent of the remaining capacity, which would not be a substantial increase. Thus, no new or additional wastewater infrastructure would be required. The proposed project would result in no new or more severe impacts or the need for new or expanded wastewater facilities beyond those identified in the 2018 EIR for the original project.

Stormwater

As discussed in Section 4.10, *Hydrology and Water Quality*, the proposed project would introduce new impervious surfaces, and would change the land use compared with the original project; however, the proposed project would not introduce new impervious surfaces that would exceed those considered in the 2018 EIR for the original project and would not introduce land uses or features that would substantially alter the drainage pattern of the site or area compared with the original project. The Isabel Crossing Project would include biotreatment areas, on-site pervious pavers, on-site biotreatment and flowthrough planters, and a detention vault. Future development facilitated by the No Net Loss Specific Plan Amendment Project would include similar features, as required by local and state stormwater regulations. Similar to the original project, the proposed project would be subject to regulations regarding stormwater including INSP Policy P-ENV-33, which requires preparation of a drainage study. The proposed project would result in no new or more severe impacts or the need for new or expanded stormwater facilities beyond those identified in the 2018 EIR for the original project.

Solid Waste

According to the California Department of Resources Recycling and Recovery (CalRecycle) waste characterization rates, the residential solid waste rate is 8.6 pounds per unit per day, and the office rate is 6 pounds per 1,000 square feet per day (CalRecycle 2024a).

The City of Livermore sends its waste to the Vasco Road Landfill and the Altamont Landfill. The Vasco Road Landfill has a maximum permitted throughput of 2,518 tons per day and a total remaining capacity of 11.6 million cubic yards, and the Altamont Landfill has a maximum permitted throughput of 11,150 tons per day and a total remaining capacity of 65.4 million cubic yards (CalRecycle 2024b, 2024c). This amounts to a total maximum daily throughput of 13,668 tons per day and a total remaining capacity of 77.0 million cubic yards across both landfills.

The Isabel Crossing Project would decrease residential units and commercial and office space compared to development originally planned for those parcels under the INSP, therefore, the Isabel Crossing Project would not result in new or more severe impacts or the need for new or expanded solid waste facilities beyond those identified in the 2018 EIR for the original project.

The increase in solid waste generated by new residential uses facilitated by the No Net Loss Specific Plan Amendment Project would be approximately 12,307 pounds per day¹ and the decrease in solid waste generation by the removal of office space from the No Net Loss Parcels would be approximately 9,188 pounds per day² for a net increase in solid waste generation from the No Net Loss Specific Plan Amendment Project of approximately 3,119 pounds per day (1.6 tons per day). This equates to approximately 33 annual cubic yards of solid waste.

This increase in solid waste generation would be less than 0.02 percent of the maximum daily throughput and less than 0.001 percent of the total remaining capacity of the Vasco Road and Altamont Landfills. Thus, the current solid waste infrastructure would be adequate to accommodate the increased solid waste generation from the No Net Loss Specific Plan Amendment Project and no new or additional solid waste infrastructure would be required.

The proposed project would continue to be subject to applicable federal, State, and local statutes and regulations related to solid waste, including Chapter 8.08 of the LMC, like the original project. The proposed project would result in no new or more severe impacts or the need for new or expanded solid waste facilities beyond those identified in the 2018 EIR for the original project.

¹ 1,431 residential units multiplied by 8.6 pounds per day.

² 1,531,486 square feet multiplied by 6 pounds per 1000 square feet per day.

4.20 Wildfire

	Where was Impact Analyzed in the EIR?	Are Major Revisions to the EIR Required?	Are There New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Page 3.8-22 of the 2018 EIR	No	No	N/A
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?	N/A	N/A	N/A	N/A
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?	N/A	N/A	N/A	N/A
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Page 3.8 - 23 of the 2018 EIR	No	No	N/A

Analysis in Previous Environmental Documents

Impacts to wildfire were analyzed on pages 3.8-22 through 3.8 -23 of the 2018 EIR. The 2020 SEIR did not update or modify the analysis of impacts to wildfire from the 2018 EIR. Impacts regarding wildfire were determined to be less than significant.

The following describes the analysis included in the 2018 EIR and provides a review to determine whether there would be project-specific impacts that are either 1) peculiar to the project or the parcels on which the project is located; 2) were not previously analyzed in a previous environmental documents as significant effects; 3) are potentially significant off-site impacts and cumulative impacts that were not previously discussed in the previous environmental documents; and 4) are now determined to have a more severe impact than discussed in the previous environmental documents due to substantial new information.

Project-Specific Impacts

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The 2018 EIR determined that development facilitated by the INSP would result in new development and population growth, resulting in an increase in demand for emergency services, which could affect implementation of the Alameda Local Hazard Mitigation Plan and the Tri-Valley Hazard Mitigation Plan; however, with implementation of existing local programs and regulations, including the City's existing General Plan's Public Safety Element and Circulation Element, impacts would be less than significant.

The California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones Map for Alameda County shows that none of the project parcels are not located in a State Responsibility Area or lands classified as Very High Fire Severity Zones (CAL FIRE 2022). The nearest State Responsibility Area is located approximately 0.11 mile west of the Comcast Parcels, 0.33 mile north of the Isabel Crossing Parcels, and 0.35 mile east of the BART Parcel and is classified as moderate. The proposed project would be located within the INSP Planning Area and would not exceed the buildout anticipated by the original project. Similar to the original project, the proposed project would be subject to existing local programs and regulations including the Livermore General Plan's Circulation Element which requires all residential, commercial, and industrial areas to provide efficient and safe access for emergency vehicles. In addition, the proposed project would be reviewed by the Livermore Fire Department which reviews and approves projects to ensure that emergency access standards are met, and therefore development facilitated by the project would be reviewed to ensure that it does not hinder emergency access or evacuation plans. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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

The California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones Map for Alameda County shows that none of the project parcels are not located in a State Responsibility Area or lands classified as Very High Fire Severity Zones (CAL FIRE 2022). The nearest State Responsibility Area is located approximately 0.11 mile west of the Comcast Parcels, 0.33 mile north of the Isabel Crossing Parcels, and 0.35 mile east of the BART Parcel and is classified as moderate. The 2018 EIR determined that with implementation of existing State and local programs and regulations as well as the policies of the INSP, impacts would be less than significant.

While pollutant concentrations from wildfire and the installation or maintenance of associated infrastructure were not specifically addressed in the 2018 EIR, the proposed project would be on the same project site as the original project and entirely within the INSP planning area analyzed in the 2018 EIR, and would not substantially change existing conditions or require the installation or maintenance of associated infrastructure beyond what was planned for the INSP and considered in the 2018 EIR. Therefore, the proposed project would not result in new or more severe impacts beyond those identified in the 2018 EIR for the original project.

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5 Cumulative Impacts

In addition to the specific impacts of individual projects, CEQA requires consideration of potential cumulative impacts of the proposed project. CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other past, present, and probable future projects producing related or cumulative impacts. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. The cumulative impact analysis provides a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA Guidelines Section 15130 requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a summary of projections contained in an adopted planning document such as a general plan.

Impacts Identified in the 2018 EIR and 2020 SEIR

The cumulative setting for the analysis in the 2020 EIR is explained in Section 4.2, *Cumulative Impacts*, of the 2020 SEIR. As stated in that section, cumulative impacts of the INSP were considered in conjunction with the Valley Link Project, which would construct new rail stations at Greenville Road and Isabel Avenue in Livermore, traversing the INSP area. The 2020 SEIR indicates that some sections of the EIR are cumulative in nature, including air quality, energy, greenhouse gas emissions, noise, and transportation. The 2018 EIR provides an additional cumulative analysis for the following topics: aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, recreation, tribal cultural resources, and utilities and service systems.

The 2018 EIR and 2020 SEIR determined that the following resource areas would have a considerable contribution to a cumulative impact: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, greenhouse gas emissions, population and housing, noise, transportation, and tribal cultural resources.

The 2018 EIR and 2020 SEIR determined that the following resource areas would not have a considerable contribution to a cumulative impact: geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, public services, recreation, and utilities and service systems.

Impacts of the Proposed Project

Since certification of the 2018 EIR and 2020 SEIR, there has been no new development proposed within the INSP area that was not considered as part of the INSP. Similarly, the Valley Link Project has not changed substantially since the 2018 EIR and 2020 SEIR. There are no new cumulative projects in the INSP area that were not previously considered in the 2018 EIR and 2020 SEIR. The cumulative conditions in the 2018 EIR and 2020 SEIR have not substantially changed; therefore, the cumulative setting in the 2018 EIR and 2020 SEIR remains the same for the purposes of this analysis.

The proposed project would not result in new impacts compared to the INSP as analyzed in this Addendum. While the project would result in the potential future development of a greater number of housing units and less commercial and office space in the INSP area than analyzed in the 2018 EIR and 2020 SEIR, the physical development area of the INSP would not be modified. Therefore, no new or additional cumulatively considerable contributions to a significant cumulative impact would occur as a result of the project.

Conclusion

The proposed project would not result in new or more severe cumulatively considerable impacts than were identified in the 2018 EIR and 2020 SEIR. No new or substantially more severe significant effects would occur to cumulative impacts, and no new mitigation measures are required. No substantial changes have occurred that require major revisions to the 2018 EIR and 2020 SEIR. There is no new information indicating that the proposed project would have new significant impacts or substantially more severe significant impacts with respect to cumulative impacts than were identified in the 2018 EIR and 2020 SEIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR have been met.

6 Conclusion

Analysis in Section 2, *Overview of CEQA Guidelines Section 15162 and Section 15164*, and Section 4, *Impact Analysis*, there are no project-specific significant effects which are peculiar to the proposed project or its site; potentially significant off-site impacts and cumulative impacts which were not discussed in the 2018 EIR or 2020 SEIR; or previously identified significant effects which, as a result of substantial new information, which was not known at the time the 2018 EIR or 2020 SEIR were certified, are determined to have a more severe adverse impact.

Analysis in Section 4, *Impact Analysis*, determined that substantial changes are not proposed to the original project nor have substantial changes occurred that would require major revisions to the 2018 EIR or 2020 SEIR prepared for the original project. Substantially more severe impacts beyond those identified and analyzed in the 2018 EIR and 2020 SEIR would not occur as a result of the proposed project. Overall, the proposed project would result in no new impact or mitigation information of substantial importance that would generate new, more severe impacts or require new mitigation measures compared to those identified for the original project in the 2018 EIR and 2020 SEIR. As such, the proposed project would not result in conditions identified in *CEQA Guidelines* Section 15162 requiring supplemental environmental review or a Subsequent EIR, and these are therefore not required for the proposed project.

Therefore, the City concludes that the analyses conducted, the conclusions reached, and the mitigation measures adopted in the 2018 EIR and 2020 SEIR would not be substantially changed for the proposed project. The proposed project would remain subject to all previously adopted mitigation measures and uniformly applicable development policies included in the 2018 EIR and 2020 SEIR for the original project. Based on the above analysis, no subsequent action under *CEQA Guidelines* Sections 15162 or 15164 is required.

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