



# FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

September 30, 2020

SCH #2016042039







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Prepared for  
City of Livermore

by

**DYETT & BHATIA**  
Urban and Regional Planners





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# 1 Introduction

This Program Final Supplemental Environmental Impact Report (SEIR or Final SEIR) has been prepared by the City of Livermore in accordance with the California Environmental Quality Act (CEQA). The City of Livermore is the lead agency responsible for ensuring that the proposed Isabel Neighborhood Specific Plan (proposed Project) complies with CEQA.

## 1.1 Purpose

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The SEIR is intended to disclose to City of Livermore decision makers, responsible agencies, organizations, and the general public the potential impacts of implementing the proposed Project. This program level analysis addresses potential impacts of activities associated with implementation of the proposed Project, which is described in Chapter 2: Project Description, of the Draft SEIR published June 23, 2020. The SEIR supplements the EIR for the 2018 Isabel Neighborhood Plan, which was certified on May 14, 2018.

The primary purpose of the Final SEIR is to revise and refine the environmental analysis in the Draft SEIR in response to comments received during the public review period. The review period for the Draft SEIR (State Clearinghouse No. 2016042039) ran for 45 days, from Tuesday, June 23, 2020 to Friday, August 7, 2020.

This document, combined with the Draft SEIR, constitutes the Final SEIR on the proposed Project. This Final SEIR amends and incorporates by reference the Draft SEIR, which is available at [cityoflivermore.net/insp](http://cityoflivermore.net/insp).

## 1.2 CEQA Process

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Upon publication of the Final SEIR, the City will hold public hearings to certify the SEIR and to consider adoption of the proposed Project. First, Planning Commission will make a recommendation, then the City Council, as the decision-making body of the Lead Agency, will take final action. Before the City Council may approve the various discretionary actions needed on the proposed Project, it must certify that the Final SEIR adequately evaluates and discloses the environmental effects of the proposed Project and that the Final SEIR has been completed in conformance with CEQA, based on its independent review and consideration of the information contained in the Final SEIR.

This SEIR does not find any new significant impacts; that is, impacts that were not already disclosed in the previously-certified EIR.

If the City decides to approve the proposed Project, it will file a Notice of Determination with the State and Alameda County.

The City of Livermore has prepared this document pursuant to CEQA Guidelines Section 15132, which specifies that the Final SEIR shall consist of:

- The Draft SEIR or a revision of the Draft;
- Comments and recommendations received on the Draft SEIR, either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft SEIR;
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final SEIR incorporates comments from public agencies, organizations, and the general public. **It also contains the Lead Agency's responses to those comments. Copies of the Final SEIR** have been provided to agencies and other parties that commented on the Draft SEIR or have requested the Final SEIR.

## 1.3 New Information in the Final SEIR

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If *significant new information* is added to an EIR after notice of public review has been given, but before final certification of the EIR, the Lead Agency must issue a new notice and recirculate the EIR for further comments and consultation. Pursuant to Section 15088.5 of the CEQA Guidelines, significant new information is that which discloses:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, **but the project's proponents decline to adopt it; or**
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Corrections or clarifications to the Draft SEIR identified in this document do not constitute *significant new information*; the new information in this Final SEIR merely clarifies and makes insignificant changes to an adequate SEIR. Information presented in the Draft SEIR and this document support this determination.

## 1.4 Organization

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This document contains the following components:

- Chapter 2: Comments on the Draft SEIR lists the agencies, organizations, and individuals that submitted written comments on the Draft SEIR; reproduces all comments; and provides a unique number for each comment in the page margin.
- Chapter 3: Responses to Comments provides responses to all submitted comments.
- Chapter 4: Revisions to the Draft SEIR lists revisions to the Draft SEIR by chapter and page, in the same order as the revisions would appear in the Draft SEIR.

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## 2 Comments on the Draft SEIR

This chapter contains copies of the comment letters received on the Draft SEIR during the public comment period, which began on June 23, 2020 and ended on August 7, 2020.

### 2.1 Comments Received

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A total of 28 comments, comment letters, and emails were received during the comment period. On July 7, 2020, a City of Livermore Planning Commission public meeting was held to receive oral comments on the Draft SEIR from members of the public. Two members of the public provided comments at this meeting.

Comments and responses to comments are organized by Public Agency and Organization comments and responses (section A) and Individual comments and responses (section B).

**Each comment letter is identified by a designator (e.g. “Letter A1” for agency letters).** Specific comments within each letter are denoted in the margin by a vertical line and number. For example, “A1-1” corresponds to the first comment in Letter A1.

Responses to comments are found in Chapter 3 of this Final SEIR. Responses focus on comments that raise important environmental issues or pertain to the adequacy of analysis in the Draft SEIR or to other aspects pertinent to identifying the potential effects of the proposed Project on the environment pursuant to CEQA. Comments that address policy issues, opinions, or other topics beyond the purview of the Draft SEIR or CEQA are noted as such for the public record. Comments on the merits of the proposed Project rather than on the Draft SEIR are also noted as such in the responses. Where appropriate, the information and/or revisions suggested in the comment letters have been incorporated into the Final SEIR. These revisions are included in Chapter 4, Revisions to the Draft SEIR, of this Final SEIR.

Comments received are summarized in Table 2-1.

Table 2-1 Comments Received on the Draft SEIR

<i>Comment #</i>	<i>Date</i>	<i>Commenter</i>	<i>Agency/Organization</i>
<i>Agencies and Organizations (A)</i>			
A1	July 7, 2020	Gordon Jacoby	Livermore Venture Partners
A2	August 7, 2020	David Best	Shea Homes, Northern California
A3	August 7, 2020	Dick Schneider	Sierra Club, Tri-Valley Group
A4	August 7, 2020	Elke Rank	Zone 7 Water Agency
<i>Individuals (B)</i>			
B1	June 29, 2020	Teddy Lee	
B2-A	July 2, 2020	Dennis Kolb	
B2-B	August 3, 2020	Dennis Kolb	
B2-C	August 6, 2020	Dennis Kolb	
B3	July 5, 2020	Steven Dunbar	
B4	July 5, 2020	Brad McDowell	
B5	July 5, 2020	Sue Carroll	
B6	July 5, 2020	John Stein	
B7-A	July 6, 2020	Chad Greer	
B7-B	July 10, 2020	Chad Greer	
B8	July 7, 2020	Kelsey Van Aken	
B9	July 7, 2020	Evan Branning	
B10	July 9, 2020	Maureen [No last name provided]	
B11	July 20, 2020	Mark Palajak	
B12	August 7, 2020	Tamara Reus	
B13	August 7, 2020	Carol Silva	
B14-A	August 7, 2020	Donna Cabanne	
B14-B	August 7, 2020	Donna Cabanne	
B14-C	August 7, 2020	Donna Cabanne	
B14-D	August 7, 2020	Donna Cabanne	
B14-E	August 7, 2020	Donna Cabanne	
B14-F	August 7, 2020	Donna Cabanne	
B14-G	August 7, 2020	Donna Cabanne	
B15	August 7, 2020	Jean King	



A1-1

**From:** [Gordon Jacoby](#)  
**To:** [Ashley Vera](#)  
**Subject:** July 7 Livermore Planning Commission - Supplemental DEIR Isabel Neighborhood Specific Plan  
**Date:** Tuesday, July 7, 2020 11:49:21 AM

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July 7, 2020

Dear Livermore Planning Commission and staff of the City of Livermore Community Development Department,

The following are background information and questions provided for your consideration tonight concerning the recently released Draft Supplemental Environmental Impact Report and the City of Livermore Isabel Neighborhood Specific Plan.

My name is Gordon Jacoby and I represent Livermore Venture Partners who owns 97 acres sandwiched between Las Positas College and the housing on the west side of Collier Canyon Road. LVP's ownership and participation in planning for the proposed Isabel Valley Link station area dates back more than 30 years.

It has not been a casual participation, particularly regarding the LVP assistance to Las Positas College. When in the 1990's the State refused to pay for College needed off-site utilities, LVP gave land and worked with our neighbors, Triad Business Park and Shea Properties, to resolve the State-created problem. The LVP land, which was subdivided for that purpose and annexed into the City, has been for 20 years the location of underground utilities in Collier Canyon Road and storm water improvements for the campus and adjoining properties. That LVP-gifted property was annexed into the City, the last annexation in the area and prior to the UGB (2003).

Annexation of the entire LVP property was considered at that time (mid-1990s – Council minutes provide in the earlier Isabel EIR) but LVP was asked to wait for annexation until the ill-fated North Livermore Plan was adopted. The LVP parcel was and is an isolated parcel surrounded by previously annexed property (Las Positas College/Triad Business Park) and adjacent to public services (which we enabled). The 2003 City Council initially adopted the UGB boundary to include the LVP parcel, at the request of the College. The following month the LVP parcel was removed from the UGB, despite our past history of help; it being isolated from the rest of North Livermore; its adjacency to utilities and the city limits and having no unique agriculture or habitat value.

In 2001/2002 prior to the adoption of the UGB, LVP and EAH Housing (non-profit) were meeting with Las Positas College to create an affordable housing project on LVP property to benefit College students/staff or faculty. EAH has built and manages over 10,000 low income rental homes/apartments in the Bay Area and rest of California/Hawaii. (The nearest EAH project is at the Dublin Plesanton BART station).

LVP and EAH, with important help from other Livermore entities, have discussed with Livermore leadership a new project proposal to provide greater than 30% affordable housing on LVP property. It would be specifically directed to benefit the Las Positas College community – students/staff/faculty. The housing would be located on only 21% of the LVP parcel with the remainder dedicated to open space or campus uses. The site is surrounded by land that is dedicated by easement to conservation purposes.

Importantly, the LVP proposal respects and complies with the UGB ordinance (Section 5). As such, the LVP proposal is located where its impacts are beneficial rather than negative to Livermore residents. Mostly importantly, the LVP proposal would be helpful to both the Livermore and Bay Area effort to extend environmentally-supportive light-rail transit service to San Joaquin County communities by placing housing with both walking/biking and existing transit service to the proposed Valley Link station.

A1-2

**Questions:**

1. **Question #1** - Very low and low-income rental housing is increasingly difficult to build/operate given increasing construction costs. The City of Livermore has made the same

A1-2

point in their recent Annual Housing Reports to HCD. Creating an Isabel Plan goal of 20-25% affordable, while commendable, is meaningless absent financial analysis on how it might be achieved. In June and later September 2019 the Livermore City Council authorized/directed Staff/consultants to prepare an Affordable Housing Finance Plan that would hopefully recommend the steps needed to reach the higher proportion of low-income housing as part of the Isabel Plan.

The Easy Bay Housing Organization, experts in affordable housing, made a similar recommendation in their August 15, 2016 letter to the City (copy in the earlier EIR materials).

MTC/ABAG PDA guidelines require the same. So do a number of the new State Housing laws, as explained in the May 2020 California Housing and Community Development (HCD) memo on how to prepare affordable housing inventories. The new Isabel Plan was prepared in a manner than does not seem to comply with some the new State laws if such financial feasibility analysis is not included.

The Isabel Plan provides an important opportunity to provide more affordable housing and reduce the social/energy/environmental problems caused of more in-commuting from San Joaquin County. Where is the 2019 Council-authorized Affordable Housing Finance Plan and why was it not included in the Plan or Supplemental EIR? CEQA requirements and general governmental transparency are reasons why such information should now be provided - if available as contemplated by the City Council. What are its recommendations?

A1-3

**Questions #2** - The Isabel Plan should be modified to comply more with recently adopted State housing laws – particularly those aimed at the provision of more low-income affordable housing.. The Specific Plan housing sites should be defined in a manner consistent with the HCD May 2020 Guideline on Housing Inventories, with attention to the following:

- a) The proposed housing areas should be defined using Assessor Parcel numbers and # of units by RHNA income category to help the reader understand if the proposals are feasible
- b) How to compensate for the **No Net Loss** provisions of State housing law due to under production of low income homes on Housing Element designated sites during the 2015-2022 RHNA period
- c) Analysis demonstrating the appropriateness of proposed zoned densities based on market demands; financial feasibility; development experience from earlier Livermore projects
- d) Since the Isabel Plan is a Specific Plan, the new State housing laws require specific sites be identified by parcel number; are they actually available; suitable; feasible
- e) Analysis of site size – as being too small or large per new State housing law; are they feasible given typical densities of previous Livermore approved affordable housing; the new laws seem to require a feasibility test.
- f) Feasibility of non-residential developed sites included in the Isabel plan such as the Gandolfo or Inter-State storage properties. Based on communication from the owners, is it possible that some of the proposed sites now being used for commercial or other uses may not be feasible as defined in the new State; at minimum requires further explanation.
- g) Discussion about consistency with Isabel Plan affordable housing proposals with 2015-2022 RHNA, Similarly, some discussion in the EIR about implications of anticipated/discussed region-wide preliminary housing needs provided by ABAG/MTC for the next RHNA period. Some Bay Area cities have been informed that their next RNHA goals will increase by as much as 50-100% over the previous RHNA period.
- h) Possible alternative housing sites if a determination is likely that, after excluding unfeasible sites, the current Housing Element Inventory provides sites for less than 100 low-income homes. That low estimate includes credit for current Livermore affordable projects

A1-3 | now under construction or in late stages of planning. Such alternative sites, under State law/guidelines, should include annexation.

A1-4 | Thank you for considering the above in your deliberations on the Supplemental EIR and the updated Isabel Area Specific Plan.

Sincerely

Gordon Jacoby

Livermore Venture Partners

A2-1

Ashley Vera, Associate Planner  
 City of Livermore; Planning Division  
 1052 South Livermore Avenue  
 Livermore, CA 94550

August 7, 2020

**RE: Comments to the Isabel Avenue Specific Plan**

Dear Ashley.

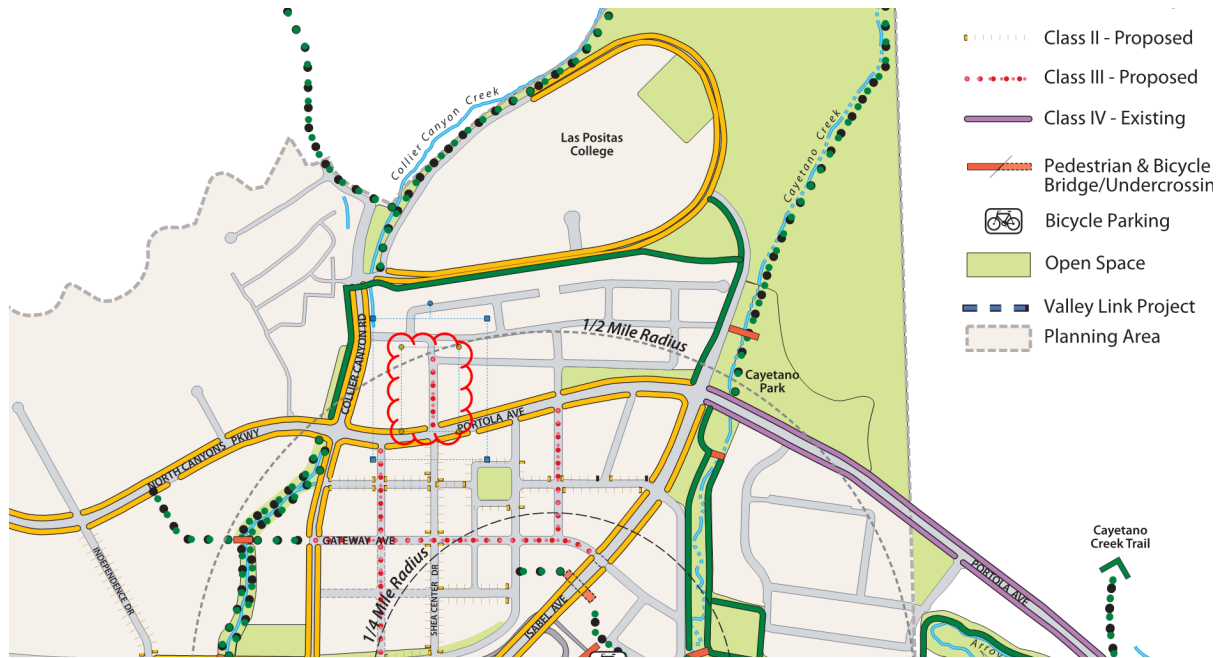
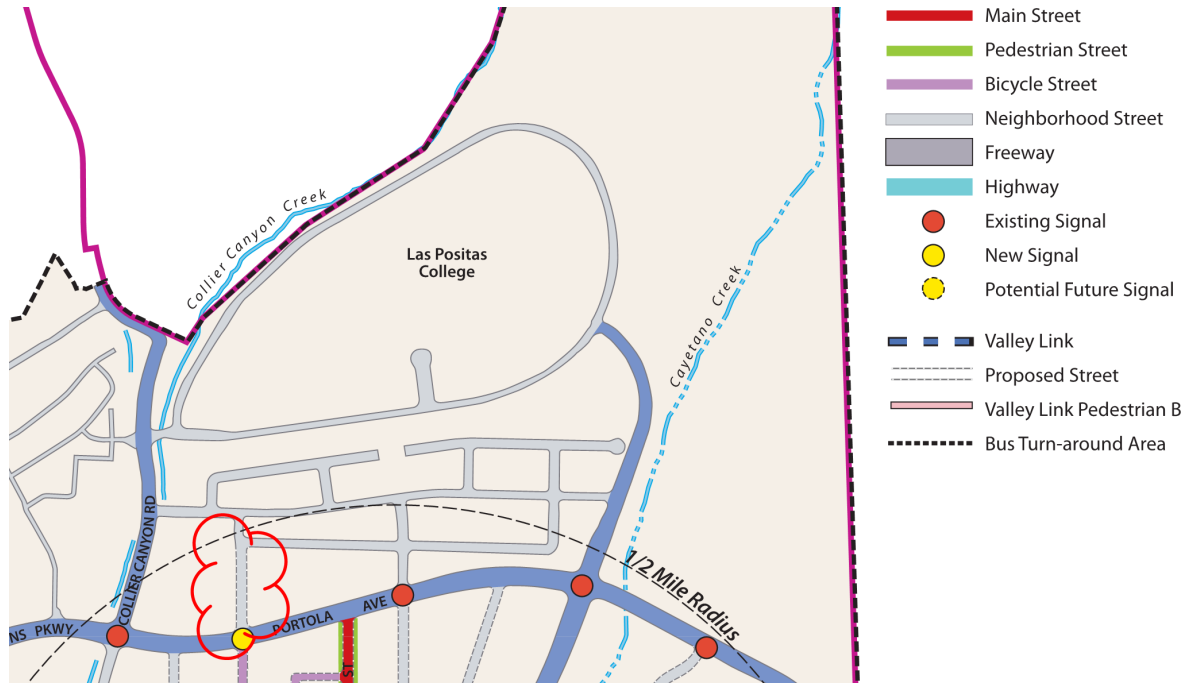
Thank you for the opportunity to comment on the City of Livermore's June 2020 Draft of the Isabel Avenue Specific Plan. Shea Homes is a major property owner within the plan's boundaries, and we greatly appreciate the opportunity to collaborate with the City on the contents. We hope you will consider these comments when drafting the final version of the plan. Our review focuses primarily on land use, development standards, and the planned transportation from the perspective of a local residential housing developer with years of experience planning, designing, executing and marketing residential housing projects in multiple market segments of the Bay Area. We also have extensive experience in the Livermore market place, having built over a thousand homes in Livermore over the past several decades.

We have organized our comments below with reference to the page, section, and specific tables and exhibits contained within the specific plan document with the hopes that it will be easy to follow.

A2-2

- Page 2-5, Figure 2-1, and page 3-4, figure 3-1. The land use plan and street network plans show a neighborhood public street (clouded on the screen shot below) on the Shea parcel later identified as subarea 2b north of Portola and south of the existing Montage project. This proposed street runs north from a new Portola intersection and connects to Dovecote Lane on the Montage development as a neighborhood street with a Class III bike route (figure 3-15). We have run several land planning scenarios that are attached to this letter as examples of typical rental and for sale residential layouts. This street connection if required to be in the location specified puts significant constraints on the developer's ability to layout a viable project that attempts to meet the density ranges called for in the plan. We agree with the location of the primary access to the 2b subarea off of Portola Avenue, but would ask that the plan eliminate this street connection to Dovecote Lane and allow the developer flexibility on secondary access to the site and if a connection to Dovecote Lane is even appropriate. The Montage project residents may not want this connection, and slope considerations will make it difficult to design as a full neighborhood street, nor do we feel that a Class III bike route street section is necessary through this subarea. **Note that there is an inconsistency with the current draft of the specific plan, and the supplemental EIR page 102, figure 3.2-1 which notes an additional roadway intersection #15 that was eliminated in this current draft of the INSP**

A2-2



A2-3

- Page 2-19, Table 2-1 Note #2 suggests that “Each unit has its own heating system”. This should be left up to the building code to rule on what is required for heating, cooling and ventilation of the structure. Including such a constraint in the specific plan that is not supported by building code is not necessary.
- Page 2-21, Table 2-2 limits the number of stories in certain density ranges, and note #2 on page 2-23 defines the term “story”. We question why it would be necessary to define limits to the number of stories when section 2.4 and table 2-6 of the plan put clear restrictions on building heights. Having limits on stories is redundant and may cause confusion if the developer wants to construct a product with elements such as roof top decks that may be considered a “story” but

the building does not exceed the max building height. We would suggest eliminating this development standard from the plan as redundant.

- Page 2-21 under Open Space, the 5<sup>th</sup> paragraph notes that bioswales for stormwater treatment may not be counted as open space unless people and pets can walk upon it. Water board policies prefer multiple small stormwater treatment bioswale areas sprinkled throughout the site when designing for water quality. These small areas can be designed to be an aesthetically pleasing small landscape pocket in and around pedestrian areas and activity areas. If they are excluded, it would result in a patchwork calculation of the total open space when considering paseo type features and will have an unintended negative effect on density.
- Page 2-27 – Table 2-6 provides for a range of total number of units per individual subareas. Attached to this letter are some site plan layouts of residential for sale and residential for rent product types placed on subareas 2a and 2b which are the properties owned by us. These site plans maximize the total number of units considering the maximum building heights, setbacks, open space requirements, street widths and all other development standards called for in the plan. It also considers constraints associated with the grade and location of existing roadways and other infrastructure to which the future project must conform. Additionally, it considers topographical constraints such as existing stream beds, slopes, and other geomorphologic features that have regulatory protections. While the apartment project with very small floor plans can achieve just a few units above the minimum on site 2b, a for sale product with what our experience tells us is the minimum interior spaces necessary to have a marketable for sale condominium will yield significantly less than the minimum number of housing units called for in the table for these two subareas. We would ask that the plan have provisions for the City to approve a development project with unit counts and densities below the minimum if the City and the land owner determine that a reasonable attempt has been made to maximize density considering the existing physical and regulatory constraints, constraints placed upon it by the plan's development standards and viability of the product type in the local marketplace.
- Page 2-27 – Table 2-6 calls for the maximum height for buildings in the 2b subarea that will be adjacent to the existing Montage project to be 45' above existing grade, and 50' above existing grade on the rest of the site. Since the 2b subarea is likely to have grades that are several feet below that of the southern edge of the Montage project, we would ask that you please define "existing grade" as that of the top of curb on the south side of Dovecote Lane, not of the existing undeveloped parcel.
- Page 2-29 – Figure 2-4 Scenic corridor amendment areas defines the maximum height of buildings for specific areas within the plan. The maximum heights defined for the 2a subarea limits the southern third of the site to two stories. This further restricts the developer's ability to even approach the minimum number of units called for in the plan. We ask that the City reconsider this height limitation such that three story product types can be built across the entire 2a subarea.
- Section 2.7 – Affordable Housing. The specific plan proposes to impose an inclusionary housing requirement on residential projects that is significantly more onerous than the City's existing ordinance. Not only does it increase the total percentage of units required to be sold at below market rate prices, it also imposes requirements on projects to provide amenities, on-site management, and support services which will be economically challenging in the least for apartment projects, and impossible on for sale condominium projects which would not

A2-3

otherwise have on-site management or the capability to provide support services. We would ask that the plan proposed that projects comply with the City's existing affordable housing ordinance.

- Page 2-48, PLU-30 – suggests specific requirements for universal design. The building code already defines the state mandated requirements for accessibility, exceptions to those requirements, and an entire section dedicated to how spaces are to be designed to comply with accessibility. The plan should not attempt to either re-state or alter those code requirements. This will only cause confusion in the future if building codes change. We suggest that P-LU-30 simply state that residential projects with more than 10 DUs shall adhere to the state building code with regards to accessibility.

A2-4

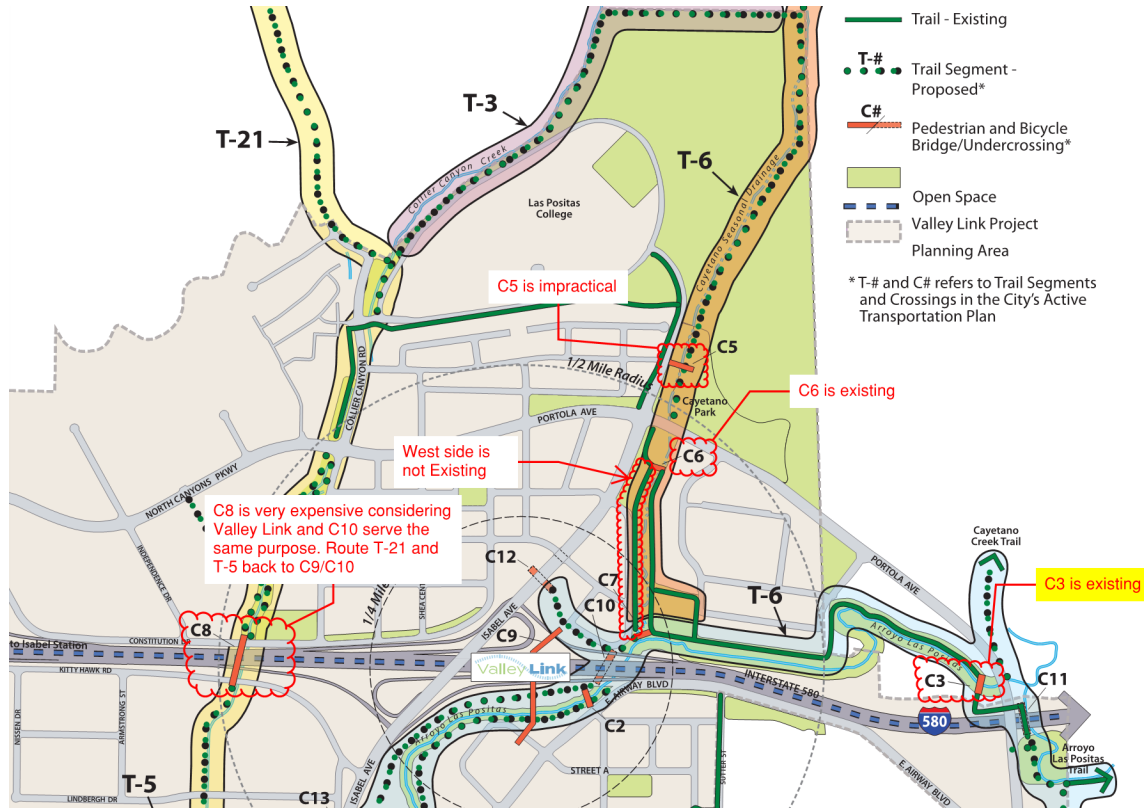
- Page 3-4 – Figure 3-1 indicates a new traffic signal at the intersection of Portola and the access road into the subarea 2b site. We don't believe this is practical considering the design speed and volume of traffic on Portola Avenue. See Figure 3-1 screen shot below. This signal will only be 650' away from the existing Collier Canyon signal and will result in 5 traffic signals over less than 3,500' of roadway. Eastbound traffic could stack into the Collier Canyon intersection during peak traffic times. We suggest eliminating this proposed new traffic signal from the plan.



A2-5

- Page 3-13 – Figure 3-12 should be updated to correctly reflect that the trail segment on the west side of the seasonal drainage at the Sage project is not existing, and pedestrian bridges C3 and C6 are existing (see notes below).
- Page 3-13 – Figure 3-12. The C5 ped bridge is not very practical considering the limited value for pedestrians, the expense associated with such a long span, and the nature of the grade differences between Campus Hill Drive and Cayetano Park which would require a long meandering path cut into the slope on the Cayetano Park side to get to the park grade on an accessible path. We suggest eliminating this improvement from the plan.

- Page 3-13 – Figure 3-12. The proposed C8 pedestrian bridge over I-580 is a very expensive improvement and it is not likely the plan can afford to build it. This connection is somewhat redundant considering the Valley Link station which will allow for non-rider pedestrian through traffic, and the planned C10 pedestrian underpass serve the same purpose.



- Page 3-15 – Figure 3-13 please correct “Existing Sidewalk” to Existing Crosswalk
- Page 3-26 – Table 3-2 Parking, The minimum parking requirements are fine, however the maximum guest parking of 1 per 4 units is too few. Guest parking is always in high demand in condo and apartment complexes, and the developer should have the flexibility to go as high as 1 guest stall per every 2 units.
- Page 7-3 and 7-4 – indicate an estimated finished “valuation” of \$3.0B (\$2.3B residential, \$0.7B commercial). This value assumes a 0 (zero) BMR requirement. If the current 15% BMR City ordinance is applied, the total value erodes to \$2.5B, a 25% BMR obligation erodes value further to \$1.7B. This would conclude that a 20% BMR obligation would yield a \$2.1B value, which under the 15% rule would support a fee/frontage improvement cost of \$315M. This section appears to erroneously state that \$375M of improvements could be supported. Please check the calculations, and/or clarify the methods used to calculate the amount of improvements that could be supported.
- Page 7-12 – P-IMP-5/6 suggests that the City will modify the Transfer Development Credit In-Lieu fee rates to facilitate development of high density. It has been our assumption that the TDC program would not apply to the INSP area since the original intent of the program was to charge landowners a fee for exceeding baseline zoning densities. Since the INSP resets the



A2-5

baseline zoning, the concept of charging TDC fees for projects that conform with the INSP zoning does not seem consistent with the intent of the original ordinance and imposes a significant financial burden to residential projects.

Thank you for your consideration of our comments. If you have any questions, or would like to discuss in further detail, please feel free to contact me at any time.

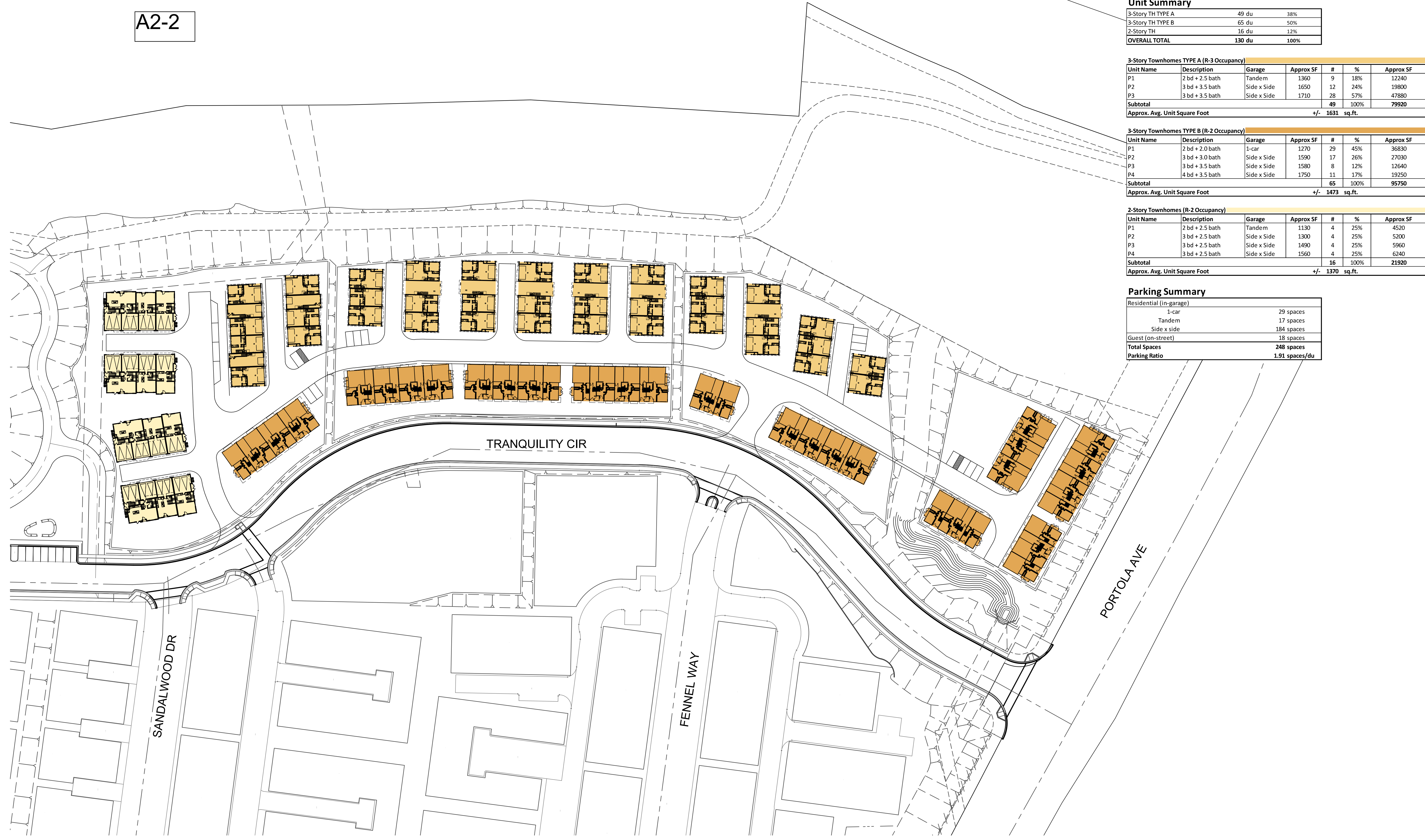
Sincerely,

*David Best*

David Best – Community Development Manager  
Shea Home, Northern California  
2630 Shea Center Drive  
Livermore, CA 94551  
925-245-3631 (o)  
925-525-0162 (m)

# SUBAREA 2a RESIDENTIAL FOR SALE YIELD STUDY

A2-2



## SAGE SITE STUDY SUMMARY

### Unit Summary

3-Story TH TYPE A	49 du	38%
3-Story TH TYPE B	65 du	50%
2-Story TH	16 du	12%
<b>OVERALL TOTAL</b>	<b>130 du</b>	<b>100%</b>

### 3-Story Townhomes TYPE A (R-3 Occupancy)

Unit Name	Description	Garage	Approx SF	#	%	Approx SF
P1	2 bd + 2.5 bath	Tandem	1360	9	18%	12240
P2	3 bd + 3.5 bath	Side x Side	1650	12	24%	19800
P3	3 bd + 3.5 bath	Side x Side	1710	28	57%	47880
<b>Subtotal</b>				<b>49</b>	<b>100%</b>	<b>79920</b>
<b>Approx. Avg. Unit Square Foot</b>				<b>+/- 1631 sq.ft.</b>		

### 3-Story Townhomes TYPE B (R-2 Occupancy)

Unit Name	Description	Garage	Approx SF	#	%	Approx SF
P1	2 bd + 2.0 bath	1-car	1270	29	45%	36830
P2	3 bd + 3.0 bath	Side x Side	1590	17	26%	27030
P3	3 bd + 3.5 bath	Side x Side	1580	8	12%	12640
P4	4 bd + 3.5 bath	Side x Side	1750	11	17%	19250
<b>Subtotal</b>				<b>65</b>	<b>100%</b>	<b>95750</b>
<b>Approx. Avg. Unit Square Foot</b>				<b>+/- 1473 sq.ft.</b>		

### 2-Story Townhomes (R-2 Occupancy)

Unit Name	Description	Garage	Approx SF	#	%	Approx SF
P1	2 bd + 2.5 bath	Tandem	1130	4	25%	4520
P2	3 bd + 2.5 bath	Side x Side	1300	4	25%	5200
P3	3 bd + 2.5 bath	Side x Side	1490	4	25%	5960
P4	3 bd + 2.5 bath	Side x Side	1560	4	25%	6240
<b>Subtotal</b>				<b>16</b>	<b>100%</b>	<b>21920</b>
<b>Approx. Avg. Unit Square Foot</b>				<b>+/- 1370 sq.ft.</b>		

### Parking Summary

<b>Residential (in-garage)</b>	
1-car	29 spaces
Tandem	17 spaces
Side x side	184 spaces
<b>Guest (on-street)</b>	<b>18 spaces</b>
<b>Total Spaces</b>	<b>248 spaces</b>
<b>Parking Ratio</b>	<b>1.91 spaces/du</b>



Architecture + Planning  
888.456.5849  
ktgy.com

SHEA HOMES  
2630 SHEA CENTER DRIVE  
LIVERMORE, CA 94551

**SHEA - SAGE & MONTAGE**  
LIVERMORE, CA # 2019-0991

CONCEPTUAL PLANNING  
NOVEMBER 7, 2019



SAGE SITE STUDY 2  
(FOR INTERNAL USE ONLY)

SP 1.2



# SUBAREA 2b RESIDENTIAL APARTMENT YIELD STUDY

## DEVELOPMENT CONCEPT



### LEGEND

- Clubhouse
- Pool
- Open Space
- Garden Apartment
- Trash Enclosure / Bike Storage
- Maintenance Bldg / Pool Equip.
- Gazebo / BBQ
- Main Entry
- Secondary Entry
- Setback
- Property Line

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# SUBAREA 2b RESIDENTIAL APARTMENT YIELD STUDY

## PARKING SUMMARY

## PRELIMINARY BUILDING SCHEDULE

PARKING PROVIDED		
VEHICULAR	# OF SPACES	TOTAL SPACES
SURFACE	318	352
SURFACE (TANDEM)	34	
COVERED (CARPORTS)	152	206
COVERED (PRIVATE GARAGES)	54	
<b>TOTAL PARKING PROVIDED</b>		<b>558</b>
PERCENTAGE OF COVERED PARKING		37%
TOTAL PARKING RATIO		1.68 / UNIT

K3 GARDEN APARTMENTS			
BUILDING TYPE	CHASSIS CONFIG	# OF BLDGS.	# UNITS/BLDG
GARDEN	A-F	2	24
GARDEN TUCK	A-F	1	20
GARDEN TUCK	A-C	4	20
GARDEN	B-C	2	24
GARDEN	B-E	4	24
GARDEN TUCK	B-E	2	20
<b>TOTAL</b>		<b>15</b>	<b>332</b>

REFER TO VEHICLE & ALTERNATIVE TRANSPORTATION PARKING OVERVIEW (PAGE 12/16) FOR MORE DETAILED OUTLINE OF PROJECT PARKING REQUIREMENTS.

## PRELIMINARY UNIT SCHEDULE

TOTAL UNIT MATRIX							
UNIT TYPE	# OF UNITS	TOTAL UNITS	% UNITS	TOTAL BEDS	TOTAL BATHS	NRSF / UNIT*	TOTAL NRSF.
S01B Studio	16	190	4.82%	15	15	526	8416
A01B 1BD/ 1BA	22			20	20	738	16,236
A02B 1BD/ 1BA	46			38	38	713	32,798
A03B 1BD/1BA	24			27	27	712	17,088
A04B 1BD/1BA	14			14	14	764	10,696
A05B 1BD/1BA	84	109	32.83%	90	90	734	61,656
B01B 2BD/ 2BA	30			64	56	997	29,910
B02B 2BD/ 2BA	45			96	84	1026	46,170
B03B 2BD/ 2BA	16			28	24.5	1049	16,784
B04B 2BD/ 2BA	18	36	31.5	1056	19,008		
C01B 3BD/ 2BA	8	17	5.12%	21	12.25	1224	9,792
C02B 3BD/ 2BA	9			27	15.75	1201	10,809
<b>TOTAL</b>		<b>332</b>		476	428	-	279947
<b>TOTAL NET RENTABLE SQUARE FOOTAGE (NRSF)</b>							<b>279,363 SF</b>
<b>AVERAGE UNIT SF</b>							<b>841 SF / UNIT</b>

\* UNIT NRSF BASED ON USE OF KATERRA KTAC SYSTEM.

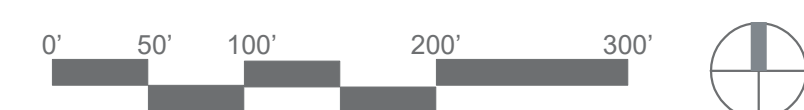
NOTE:

GROSS LEASABLE AREA, OR GROSS SQUARE FOOTAGE, OF A BUILDING INCLUDES COMMON AREAS (SUCH AS CLUBHOUSE), ELEVATORS, COMMON BATHROOMS, STAIRWELLS AND OTHER PORTIONS OF THE BUILDING(S) THAT THE TENANT DOESN'T OCCUPY. THE ACTUAL SQUARE FOOTAGE OF THE TENANTS SPACE IS CALLED THE NET RENTABLE SQUARE FOOTAGE (NRSF) OF THE SPACE



### LEGEND

- Studio
- One Bedroom
- Two Bedroom
- Three Bedroom
- Mechanical Room
- Tuck Under Garage
- Breezeway Entry
- Main Entry
- Secondary Entry
- Setback
- Property Line



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ASSUMPTIONS / ISSUES

- 22' CURB TO CURB ON PRIVATE STREETS
- 23' RIGHT OF WAY ON PRIVATE STREETS
- 20' RADIUS ON ALL PRIVATE RETURNS, 30' RADIUS FOR ALL PUBLIC RETURNS
- SOME GRADE TO DEAL WITH ON SITE
- ONE PUBLIC ROAD IN THE MIDDLE WITH PRIVATE EVERYWHERE ELSE
- 3' ANGLE AT CONNECTION TO PORTOLLA AVE.
- 15' MINIMUM BETWEEN SIDE OF BUILDINGS
- 30' MINIMUM BETWEEN BACK OF BUILDINGS

LEGEND

- WATER QUALITY
- OPEN SPACE
- PRIVATE ROADS
- PUBLIC ROADS
- HALF TUCK BUILDING (4 FOOT SPLIT)

PRODUCT MIX			
PRODUCT TYPE	WEST	EAST	TOTAL
4- PLEX	1	3	4
6- PLEX	15	17	32
TOTAL	16	20	36

PLAN MIX			
PLAN TYPE	WEST	EAST	TOTAL
PLAN 1	31	37	68
PLAN 2	31	37	68
PLAN 3	32	40	72
TOTAL	94	114	208

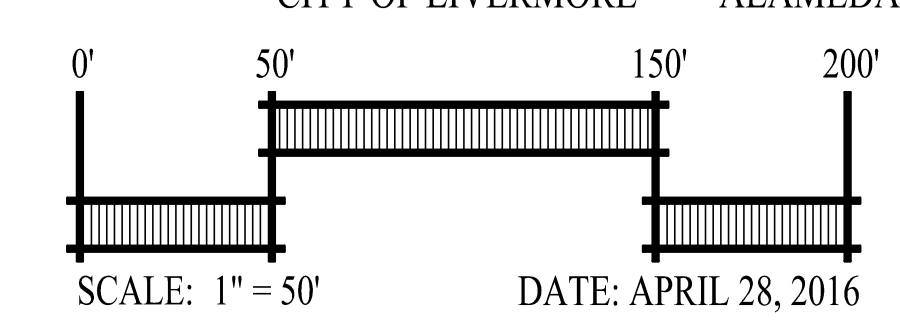
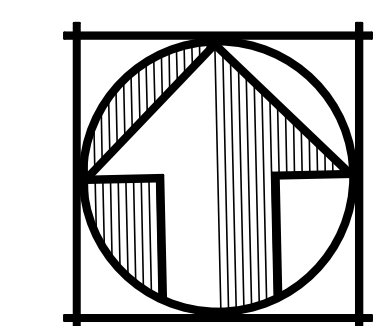
PARKING			
# STALLS	WEST	EAST	TOTAL
	36	70	106

AREA SUMMARY	
DESCRIPTION	AREA (AC)
INTERNAL STREETS (TOTAL)	2.54
PUBLIC STREETS	0.46
PRIVATE STREETS	2.08
FRONTAGE STREETS (TOTAL)	1.55
COLLIER CANYON ROAD	0.35
PORTOLA AVENUE	1.06
MONTAGE DRIVE	0.05
DOVECOTE LANE	0.09
PARK	0.31
TOT LOT	0.06
TOTAL	4.46
GROSS AREA	12.93
NET AREA	8.47
DENSITY	24.5± DU/AC

# YIELD STUDY

## MONTAGE

CITY OF LIVERMORE ALAMEDA COUNTY CALIFORNIA



Civil Engineers • Surveyors • Planners  
 2633 CAMINO RAMON, SUITE 350  
 SAN RAMON, CALIFORNIA 94583  
 (925) 866-0322  
 www.cbg.com



A3-1



August 7, 2020

Submitted electronically

Ashley Vera  
 City of Livermore, Planning Division  
 1052 S. Livermore Ave.  
 Livermore, CA 94550

Comments on Isabel Neighborhood Plan Draft Supplemental Environmental Impact Report

Dear Ms. Vera:

The Sierra Club has reviewed the Isabel Neighborhood Plan Public Review Draft Supplemental Environmental Impact Report (DSEIR), dated June 23, 2020, and submits the following comments. (Unless otherwise indicated, all page numbers are to the DSEIR.)

A3-2

1. The current Isabel Neighborhood Plan is an update to the 2018 Isabel Neighborhood Specific Plan (2018 INSP), which assumed a BART to Livermore Extension. That Extension was never approved. The current Isabel Neighborhood Plan assumes completion of the Valley Link rail system, and a Valley Link rail station is part of the Isabel Neighborhood Plan. Nevertheless, a Valley Link EIR is not available for review (“[T]hat project is now undergoing further design and environmental review by the [Rail] Authority.” P. 2-1) It is impossible to evaluate the combined impacts of Valley Link and the revised Isabel Neighborhood Plan without the Valley Link EIR. The two projects are intertwined and their environmental impacts must be examined together to understand the cumulative impact of the two projects. This DSEIR process should be suspended until the Valley Link EIR is available and the public has had adequate time to review both projects’ environmental impacts together.

2. When adopting the 2018 Isabel Neighborhood Specific Plan, the City made it contingent on BART to Livermore being approved. When that did not occur, the City withdrew the 2018 INSP. Similarly, the City should make the 2020 Isabel Neighborhood Plan contingent on Valley Link being approved and full funding commitments made in both counties. “The INSP is both a policy document and an implementation tool for the General Plan.” (P. 2-1) There is no valid reason for a large new city area to be developed next to I-580 unless there is a freeway-median transit station as its hub.

A3-3

3. The projected population in the proposed Isabel Neighborhood Plan is significantly underestimated. All environmental impacts based on population size are therefore similarly underestimated. The DSEIR projects a population of “approximately 9,800 new residents” in the Plan area. (P. 2-17) But the DSEIR uses the same assumptions for its calculation as in the 2018 Isabel Neighborhood Specific Plan (4,095 new housing units at buildout, 5% vacancy rate, and 2.52 average household size). (P. 2-17) However, the average household size assumption of 2.52 is based on ABAG Projections, 2013. (2018 INSP, P. 3.1-25, footnote 4) The more recent ABAG Projections, 2017, show an average household size of 2.85 through 2040. (P. 2-17) Using the newer ABAG figure increases the number of new residents to 11,097. This is 13% greater than the 9,800 figure used in the DSEIR. Recalculation of all impacts based on increased population size is required and their levels of significance reevaluated.

- A3-4 | 4. Air quality in the Livermore Valley is often the worst in the Bay Area and has significant impacts on human health. The DSEIR needs to include the most recent air quality data available, which is from 2019. The public cannot assess the air impacts of the Isabel Neighborhood Plan without the most current and complete data. The DSEIR should be revised to include the 2019 data and recirculated for 45 days.
- A3-5 | 5. The DSEIR states that it was determined that only particulate matter (PM10) emissions associated with this project would exceed BAAQMD's project level thresholds. The DSEIR goes on to state, "Because the proposed Project's mobile source emissions are generated from passenger vehicles that are not regulated at the City level, there are no additional feasible mitigation measures available that can be implemented by the City to reduce these PM10 emissions." (P. 3.1-42)
- These statements directly conflict with information collected by the non-profit Tri-Valley Air Quality Community Alliance (TVAQCA). Their data show that Small Off Road Engines (SORE) used for landscaping businesses that service residential and commercial areas will add more air pollutants than cars. Car emissions are strictly regulated where Small Off Road Engines are not. This information was presented to the Livermore City Council. Why is this critical information missing from the DSEIR? The city could in fact require all SORE engines used in residential and commercial businesses operating within city limits to switch to electrification, which would reduce air emission impacts. Dublin has incorporated electrification of SOREs into their climate action plan. Why was this not included as a possible mitigation strategy to reduce particulates?
- A3-6 | 6. Livermore exceeds federal ozone standards every year in the summer (TVAQCA). Adding an increase of at least 11,000 more residents and their cars along I-580 will only exacerbate this problem for decades to come. Why is this critical air quality data missing from the DSEIR?
- A3-7 | 7. Livermore exceeds federal and state respirable particulate matter (PM 2.5) some years, with a record number of 14.8 days exceeding thresholds in 2018. (TVAQCA) Why is this critical air data missing from the DSEIR? Again, this information must be added and released to the public for comment for 45 days.
- A3-8 | 8. The DSEIR suggests implementing some best construction practices during construction of housing units in the Isabel Neighborhood Plan area for the next 20 years. These mitigations are wholly inadequate and are mainly used in attainment air basins; these mitigations will not be adequate for a non-attainment air basin like Livermore. Also, mitigations do not cover impacts generated by this project after construction is completed.
- A3-9 | 9. The Altamont Landfill is the third highest Greenhouse Gas Emitting landfill in the state after Puente Hills Landfill in Los Angeles County and Kiefer Landfill in Sacramento County (City Community Monitor Report, January 2020) The Altamont Landfill is currently applying for an extension of operations from 2025 to 2075. It generates high methane emissions even with the operation of its LNG plant. This will continue to pose health risks that cannot be sufficiently reduced for the next 50 years. Why is this critical GHG information missing from the DSEIR? City staff certainly has had access to the Community Monitor Report for months.
- A3-10 | 10. What does "fostering" bicycle and pedestrian infrastructure mean? Who will pay for this infrastructure – current residents as well as new residents? How – by increasing taxes on all city residents? When – at the beginning of the project; at the end? Will Isabel Neighborhood residents be forced to use bicycles? Or will these bicycle additions be mainly recreational trails? Please clarify with

- A3-10 | details relating to timing, costs, enforcement of usage, and who pays for additional bicycle and pedestrian infrastructure?
  
- A3-11 | 11. It is well known that air pollutants cause increased hospitalizations, increased lung and heart disease, increased asthma especially in children, and interferes with oxygen transport to the brain and other sensitive and essential organs. Air pollutants specifically affect pregnant women, infants, children, the elderly and individuals with compromised immune systems. Explain the rationale of exposing 11,000 new residents – which would include many of these more susceptible populations – to higher air pollutants by placing 4,095 housing units adjacent to I-580 when housing needs can be met in other areas of Livermore with lower air pollutant concentrations?
  
- A3-12 | 12. Why are data about Toxic Air Contaminants (TACs) in Livermore not included in the DSEIR?
  
- A3-13 | 13. The Isabel Neighborhood Plan will be growth-inducing, but this impact is inadequately analyzed. The DSEIR states that the Isabel Neighborhood Plan would simply shift growth that would have occurred at the proposed Greenville BART station Transit-Oriented Development to Isabel. Since the BART extension will no longer occur, moving those housing units would not produce a net increase in Livermore’s overall development. “Shifting the capacity associated with a BART station from the Greenville TOD to the Isabel Neighborhood reflects the current status of the Valley Link project. With this shift, there is sufficient capacity under the current General Plan to accommodate the envisioned level of development for the Isabel Neighborhood.” (P. 4-2) The Draft Valley Link Project Feasibility Report, June 2019, which is already mentioned in the DSEIR and therefore known to its preparers, clearly shows a Greenville Valley Link station. (See Cover as well as Alignment diagram, p. 15 of 840-page PDF.) Given both City and Regional policy to support Transit-Oriented Development, it is reasonably foreseeable that a Greenville TOD project will be proposed if Valley Link is built. To suggest that shifting BART Greenville TOD units to Isabel will not be backfilled by Valley Link TOD at Greenville is disingenuous. This growth-inducing impact must be acknowledged.

Additional comments from individual Sierra Club members may be submitted.

Respectfully yours,

*/s/ Dick Schneider*

Dick Schneider, Chair  
 Sierra Club Tri-Valley Group  
[Richs59354@aol.com](mailto:Richs59354@aol.com)  
 510-926-0010





ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY • LIVERMORE, CA 94551 • PHONE (925) 454-5000 • FAX (925) 454-5727

August 7, 2020

- A4-1 Ashley Vera, Associate Planner  
City of Livermore; Planning Division  
1052 South Livermore Avenue  
Livermore, CA 94550
- Sent by e-mail to: [asvera@cityoflivermore.net](mailto:asvera@cityoflivermore.net)
- Re: Draft Supplemental Environmental Impact Report for Isabel Neighborhood Specific Plan
- Zone 7 Water Agency (Zone 7, or Zone 7 of the Alameda County Flood Control and Water Conservation District) has reviewed the referenced document in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley. Following are our comments for your consideration:
- A4-2 1. Page 1-5, Zone 7 Water Agency. Please correct the description of Zone to reflect that the agency manages certain (but not all) channels through the Planning Area.
- A4-3 2. Development Impact Fee. New development and the expansion of existing development may impose a burden on the existing flood protection and storm drainage infrastructure within the Zone 7 service area. Developments creating new impervious areas within the Livermore-Amador Valley are subject to the assessment of the Development Impact Fee for Flood Protection and Storm Water Drainage. These fees are collected for Zone 7 by the local governing agency: 1) upon approval of final map for public improvements creating new impervious areas; and/or 2) upon issuance of a building or use permit required for site improvements creating new impervious areas. Fees are dependent on whether post-project impervious area conditions are greater than pre-project conditions and/or whether fees have previously been paid. Please refer to Zone 7's Flood Protection & Storm Water Drainage Development Impact Fee Ordinance and additional information at: <http://www.zone7water.com/permits-a-fees>.
- A4-4 3. Livermore Valley Groundwater Basin - Groundwater Quality. The project area lies over a portion of the Livermore Valley Groundwater Basin; as such, the underlying groundwater is subject to the management provisions of the basin's Alternative Groundwater Sustainability Plan (GSP), which was prepared by Zone 7 Water Agency and approved by the State Department of Water Resources. As the designated Groundwater Sustainability Agency (GSA), Zone 7 Water Agency strives to maintain sufficient groundwater supplies and good groundwater quality within the groundwater basin. To support these goals, the project should be consistent with the GSP

A4-4 | and Zone 7's Sustainable Groundwater Management Ordinance, as well as the State's Water Recycling Policy (and associated orders), the State's storm water protection measures, and the County's Water Wells Ordinance. Many of these documents can be found on Zone 7's website; <https://www.zone7water.com>.

A4-5 | 4. Groundwater Wells. Our records indicate that there are many wells within the project area. The approximate locations are shown on the enclosed well map (see Attachment 1). Please immediately notify Zone 7 Water Agency if any other wells exist in the project area. All well locations should be field verified and noted on the plans. If any of the wells are to be decommissioned, a well destruction permit must be obtained from Zone 7 before the work begins. A Zone 7 drilling permit is also needed for any other water well or soil boring work that may be planned for this project. The drilling permit application and fee schedule can be downloaded from our website: <http://www.zone7water.com/permits-a-fees/64-well-drilling-and-destruction-permits>.

A4-6 | 5. Water-wise Landscaping. Zone 7 encourages the use of sustainable, climate-appropriate, and drought tolerant plants, trees and grasses that thrive in the Tri-Valley area. Find more information at: <http://www.trivalleywaterwise.com>.

A4-7 | 6. Please see Attachment 1 for comments previously submitted in relation to both the INSP EIR and the BART to Livermore EIR (December 2019, February 2018, November 2017, October 2017, June 2017).

A4-8 | In an effort to ensure that mailed notices and referrals from your agency make their way to the appropriate staff at Zone 7 in a timely manner, we are requesting that your databases / mailing lists are updated to reflect the following points of contact, specifically for routine development referrals and for CEQA / environmental reviews.

<b>For CEQA / environmental review:</b>	<b>For development review / referral:</b>
Zone 7 Water Agency <b>Attn: CEQA Review / Elke Rank</b> 100 North Canyons Parkway Livermore, CA 94551 <a href="mailto:ceqa@zone7water.com">ceqa@zone7water.com</a>	Zone 7 Water Agency <b>Attn: Dev Referral / Steven Ellis</b> 100 North Canyons Parkway Livermore, CA 94551 <a href="mailto:reviewers@zone7water.com">reviewers@zone7water.com</a>
Staff contact: Elke Rank, <a href="mailto:erank@zone7water.com">erank@zone7water.com</a>	Staff contact: Steven Ellis, <a href="mailto:sellis@zone7water.com">sellis@zone7water.com</a>

A4-9 | We appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at [erank@zone7water.com](mailto:erank@zone7water.com).

Sincerely,



Elke Rank

cc: Carol Mahoney, Amparo Flores, file

A4-10



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY • LIVERMORE, CA 94551 • PHONE (925) 454-5000 • FAX (925) 454-5727

December 20, 2019

Ashley McBride, Assistant Planner  
 City of Livermore, Planning Division  
 1052 South Livermore Avenue  
 Livermore, CA 94550  
 Sent by e-mail to: [asmcbride@cityoflivermore.net](mailto:asmcbride@cityoflivermore.net)

**Re: Comments on Draft SEIR for the Isabel Neighborhood Plan Draft**

Dear Ms. McBride,

Zone 7 Water Agency (Zone 7, or Zone 7 of the Alameda County Flood Control and Water Conservation District) has reviewed the referenced document in the context of Zone 7’s mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley. Following are our comments for your consideration:

- 1). See Zone 7’s comment letter on the 2018 Draft EIR, attached.

We appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at [erank@zone7water.com](mailto:erank@zone7water.com) .

Sincerely,

Elke Rank

cc: Carol Mahoney, Amparo Flores, file

attachment



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

A4-10

February 26, 2018

Ashley McBride, Assistant Planner  
City of Livermore, Planning Division  
1052 South Livermore Avenue  
Livermore, CA 94550  
Sent by e-mail to: [asmcbride@cityoflivermore.net](mailto:asmcbride@cityoflivermore.net)

Re: *Comments on Isabel Neighborhood Plan Draft EIR*

Dear Ms. McBride,

Zone 7 Water Agency (Zone 7, or Zone 7 of the Alameda County Flood Control and Water Conservation District) has reviewed the referenced document in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley. Following are our comments for your consideration:

**1. Page 3.9-1, last paragraph**

There is a reference to LLNL draining wastewater to the Arroyo Seco. Zone 7's line facility designation is "Line P" (along southwestern side of LLNL), not Line P-1, unless it was meant to say it drains to the relocated Arroyo las Positas, Line P-1, located along the northern portion of LLNL. Please confirm and correct accordingly.

**2. Page 3.9-2, first paragraph**

The Draft EIR states that the Alameda County Flood Control and Water Conservation District is responsible for sections of Arroyo las Positas; please update to read Zone 7 Water Agency. Further, Zone 7 does have some capital improvement plans to modify drainage within the Arroyo las Positas in the Planning Area, which were originally identified in the 2006 Stream Management Master Plan (SMMP). An amendment to the SMMP is nearly complete, which will propose improvements to the reach of Arroyo las Positas north of I-580 and west of the Portola Ave overcrossing, as well as the reach of Arroyo las Positas between Isabel Ave and Airway Blvd. For additional information, contact Jeff Tang at (925) 454-5075.

**3. Page 3.9-14, Local Regulations**

Several Zone 7 programs and ordinances should be included here:

- **Development Impact Fee.** New development and the expansion of existing development may impose a burden on the existing flood protection and storm drainage infrastructure within the Zone 7 service area. Developments creating new impervious areas within the Livermore-Amador Valley are subject to the assessment of the Development Impact Fee for Flood Protection and Storm Water Drainage. These fees are



collected for Zone 7 by the local governing agency: 1) upon approval of final map for public improvements creating new impervious areas; and/or 2) upon issuance of a building or use permit required for site improvements creating new impervious areas. Fees are dependent on whether post-project impervious area conditions are greater than pre-project conditions and/or whether fees have previously been paid. Please refer to Zone 7's Flood Protection & Storm Water Drainage Development Impact Fee Ordinance and additional information at: <http://www.zone7water.com/permits-a-fees> .

- **Stream Management Master Plan (SMMP).** Zone 7's SMMP was first completed in 2006, and it identified projects in the Planning Area. These projects are currently planned to be superseded with a new project in the SMMP Amendment to be released in the near term, which will address regional flooding issues. For additional information, contact Jeff Tang at (925) 454-5075.
- **Groundwater Management.** The project area lies over a groundwater basin (Livermore Valley Groundwater Basin) that is used for municipal, industrial, and domestic and irrigation water supply. To support protection of groundwater quality, the project should be consistent with or comply with appropriate plans and regulations such as Zone 7's Salt and Nutrient Management Plan and the Sustainable Groundwater Management Ordinance, the State's Water Recycling Policy (and associated orders), the State's storm water protection measures, and the County's Water Wells Ordinance.

Our records indicate that there are 30 water wells in the project area (see attached table and maps). Five wells (3S1E1F2, 3S1E1H3, 3S1E1L1, 3S1E1P2, 3S1E2J3) are Zone 7 monitoring program wells owned by Zone 7 Water Agency and will need to be protected. Well 3S1E1P3 is not owned by Zone 7 but is part of Zone 7's monitoring program. This well and the remaining wells need to be protected or decommissioned. The approximate locations are shown on the enclosed Well Location maps. Please immediately notify Zone 7 if any other wells exist in the project area. All well locations should be field verified and noted on the plans.

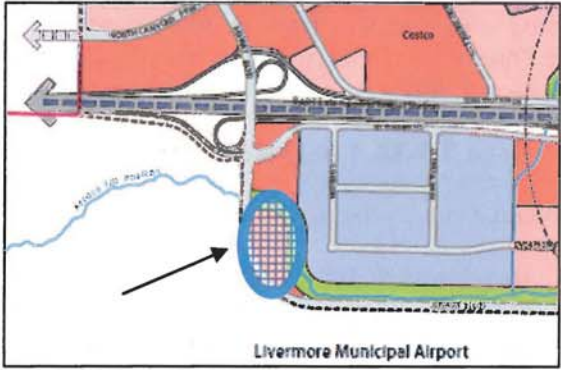
Any planned new well, well repair or modification, well decommissioning or destruction, or exploratory soil boring that may intersect groundwater within Zone 7's jurisdiction must be permitted by Zone 7 before starting the work. In addition, a Zone 7 drilling permit is required to dig, drill, bore, drive, advance by direct push any exploratory soil boring 10 feet or greater in depth within the groundwater basins of Zone 7 regardless of groundwater depth. Find more information at: <http://www.zone7water.com/permits-a-fees/36-public/content/64-well-drilling-and-destruction-permits>, or contact Michelle Parent at (925) 454-5077.

**4. Page 3.10-2, Potable and Non-Potable Water, second paragraph**

Please add the word "planned" to the sentence as follows: Based on the adopted UWMPs and updated projections, Zone 7 has indicated that there is sufficient **planned** water supply at this time to serve the City's General Plan anticipated growth, which accounts for development under the Isabel Neighborhood Plan. This should also be reflected in the Isabel Neighborhood Plan on page 4-21.

**5. Land Use Plan Needs Addition of Zone 7 Flood Easement**

Per the 2011 El Charro Specific Plan Agreement between the City and Zone 7, the parcel shown circled in blue in the image at right is an easement from the City of Livermore to Zone 7 for flood protection purposes, and therefore should not be zoned for commercial development in the Plan.



## 6. Relation to BART

BART was proposing to extend their system to a corporation yard north of Portola Ave, yet the Draft EIR only shows where the proposed station ends and does not indicate any additional track extension to the northeast that may be required.

## 7. Zone 7 Pipeline and Other Infrastructure

Zone 7 has two pipelines/easements within the Plan area. The Altamont Pipeline runs easterly along E. Airway Blvd., from Isabel Ave. to beyond Portola Ave. The Cross-Valley Pipeline runs easterly along Kittyhawk Rd. to a pump station located at the corner of E. Airway & Isabel Ave., then southerly along Isabel Ave. Other water supply facilities are also located within the Planning Area, and need to be protected. Any work within Zone 7's easements will require an encroachment permit. Contact John Koltz, 925-454-5067.

## 8. Water Supply Assessment

Incorporated here by reference is Zone 7's comment letter to the City of Livermore regarding the Water Supply Assessment for the Isabel Neighborhood Plan. Please review and incorporate as appropriate.

## 9. Additional Information

Included here for additional information is Zone 7's October 2017 comment letter on the Notice of Availability of Draft Environmental Impact Report for the BART to Livermore Extension, as well as letters to the City of Livermore dated June 2017 and November 2017 regarding the Isabel Plan.

We appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at [erank@zone7water.com](mailto:erank@zone7water.com).

Sincerely,



Elke Rank

cc: Carol Mahoney, Amparo Flores, file

Attachment 1. Zone 7 comment letter on BART to Livermore Extension Draft EIR, October 2017

Attachment 2a/b. List and maps of known wells in the plan area

Attachment 3. Zone 7 comment letter to Livermore regarding water supply for Isabel Plan, June 2017

Attachment 4. Zone 7 comment letter to Livermore regarding Isabel Plan, November 2017







A4-10

October 16, 2017

BART to Livermore Extension Project  
21st Floor, 300 Lakeside Drive  
Oakland, CA 94612.

Sent via e-mail to [barttolivermore@bart.gov](mailto:barttolivermore@bart.gov)

Re: Notice of Availability of Draft Environmental Impact Report for the BART to Livermore Extension Project and Public Meetings

Zone 7 Water Agency (Zone 7, or Zone 7 of the Alameda County Flood Control and Water Conservation District) has reviewed the referenced Draft EIR in the context of Zone 7's mission to provide water supply, flood protection, and groundwater and stream management within the Livermore-Amador Valley. We have the following comments for your consideration:

- 1. New Development / Impervious Surfaces.** New development and the expansion of existing development may impose a burden on the existing flood protection and storm drainage infrastructure within the Zone 7 service area. Developments creating new impervious areas within the Livermore-Amador Valley are subject to the assessment of the Development Impact Fee for Flood Protection and Storm Water Drainage. These fees are collected for Zone 7 by the local governing agency: 1) upon approval of final map for public improvements creating new impervious areas; and/or 2) upon issuance of a building or use permit required for site improvements creating new impervious areas. Fees are dependent on whether post-project impervious area conditions are greater than pre-project conditions and/or whether fees have previously been paid. Please refer to Zone 7's Flood Protection & Storm Water Drainage Development Impact Fee Ordinance and additional information at: <http://www.zone7water.com/permits-a-fees> .
- 2. Section HYD-9 / Mitigation Measure HYD-5, Impacts to Hydrology.** As noted in the Draft EIR, we expect BART to continue to consult with Zone 7 staff on plans for maintaining the existing hydraulic capacity and velocities for storm flows at channel crossing locations.
- 3. Zone 7 Stream Management Master Plan (SMMP) Project R5-2.** Sediment management is a key component for overall regional flood protection. In the 2006 SMMP (which is currently being updated), Zone 7 identified a potential location for a new sedimentation basin along Arroyo Las Positas near Portola Avenue and Interstate 580 (see the Project R5-2 description, attached). The BART project includes facilities near that proposed location. Please contact Jeff Tang, 925-454-5075 or [jtang@zone7water.com](mailto:jtang@zone7water.com) to discuss potential compatibility of these facilities.
- 4. Table 1-1, and page 782:** Zone 7 is the permitting agency for drilling and well permits. Any drilling (well destruction, well construction, geotechnical borings, etc.) must be permitted by Zone 7 before starting work. Find more information at: <http://www.zone7water.com/permits-a-fees/36-public/content/64-well-drilling-and-destruction-permits>



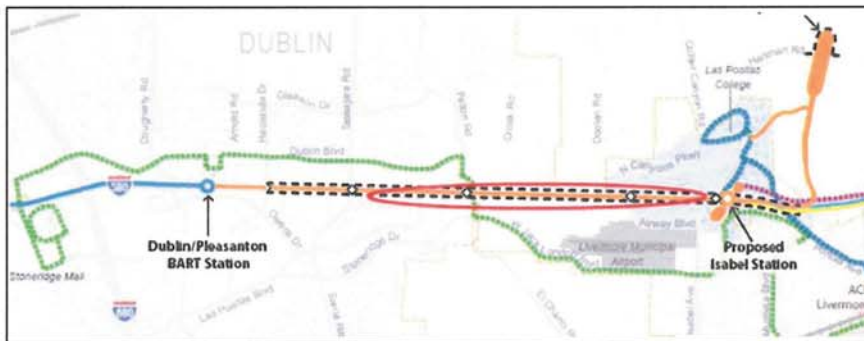
5. **Existing wells.** Several wells within Zone 7's groundwater monitoring network are within the project limits and have the potential to be impacted. Wells may need to be properly destroyed and a replacement well constructed. BART should consult with Zone 7 for specific rules and practices; contact Matt Katen, 925-454-5071 or [mkaten@zone7water.com](mailto:mkaten@zone7water.com).
6. **Page 748, last paragraph:** The EIR states that Arroyo Mocho is perennial due to mining discharges. This information is out of date, as the mining companies have not discharged to the Mocho since December 2013. Note also that Zone 7 releases water, when available from the State Water Project, to Arroyo Mocho for groundwater recharge.
7. **Figure 3.H-2:** The depiction of the lakes within the mining area is inaccurate. Lakes F, G, H, and I are not shown but a lake is shown south of where Lake I is. In addition to the image below for reference, included here as an attachment is a pdf with the current pond outlines. Note that due to active mining at some of these lakes, the outline of the lakes can change somewhat from year to year.



*This figure depicts the future Chain of Lakes.*

*Source: Groundwater Management Program Annual Report 2016 (available at <http://www.zone7water.com/36-public/content/76-groundwater-management-program-annual-report>)*

8. **Zone 7 Existing Facilities.** Water transmission and pumping facilities are located in the Southwest corner of the proposed development at Isabel & East Airway. See Figures 1 and 2, below. We would request that our facility not be within the confines of the BART facilities (including parking areas) to ensure our ability for access during maintenance or emergency activities. Additionally, the Zone 7 facilities could be impacted by construction as it runs along the frontage road of East Airway Ave. Any work with Zone 7's easements will require an encroachment permit; Contact John Koltz, 925-454-5067.



**Figure 1.** The red oval indicates the location of a Zone 7 pipeline along the south side of 580 between Santa Rita and Isabel Ave.; this could be impacted by the BART project dependent on how far to the south 580 would be widened to accommodate the BART tracks.

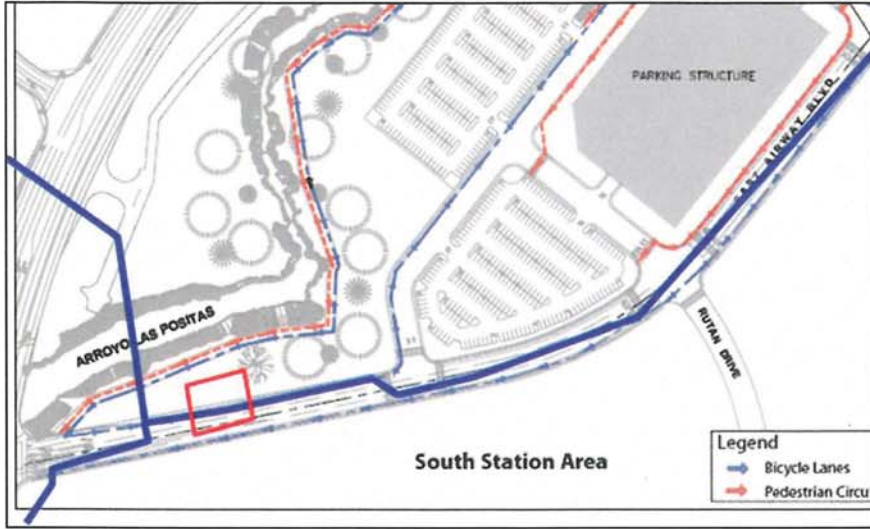


Figure 2. The blue line denotes a Zone 7 pipeline and the red rectangle denotes a pumping facility.

- 9. **Water Supply Evaluation.** Note that Zone 7 provided comments to the City of Livermore on their Draft Water Supply Assessment for the Isabel Neighborhood Plan, which may be relevant to BART’s analysis.

On behalf of Zone 7, I appreciate the opportunity to comment on this project. If you have any questions on this letter, please feel free to contact me at (925) 454-5005 or via email at [erank@zone7water.com](mailto:erank@zone7water.com).

Sincerely,

*Elke Rank*

Elke Rank

cc: Carol Mahoney, Amparo Flores, Matt Katen, Rhett Alzona, Jeff Tang, Joe Seto, file

Attachments (2)

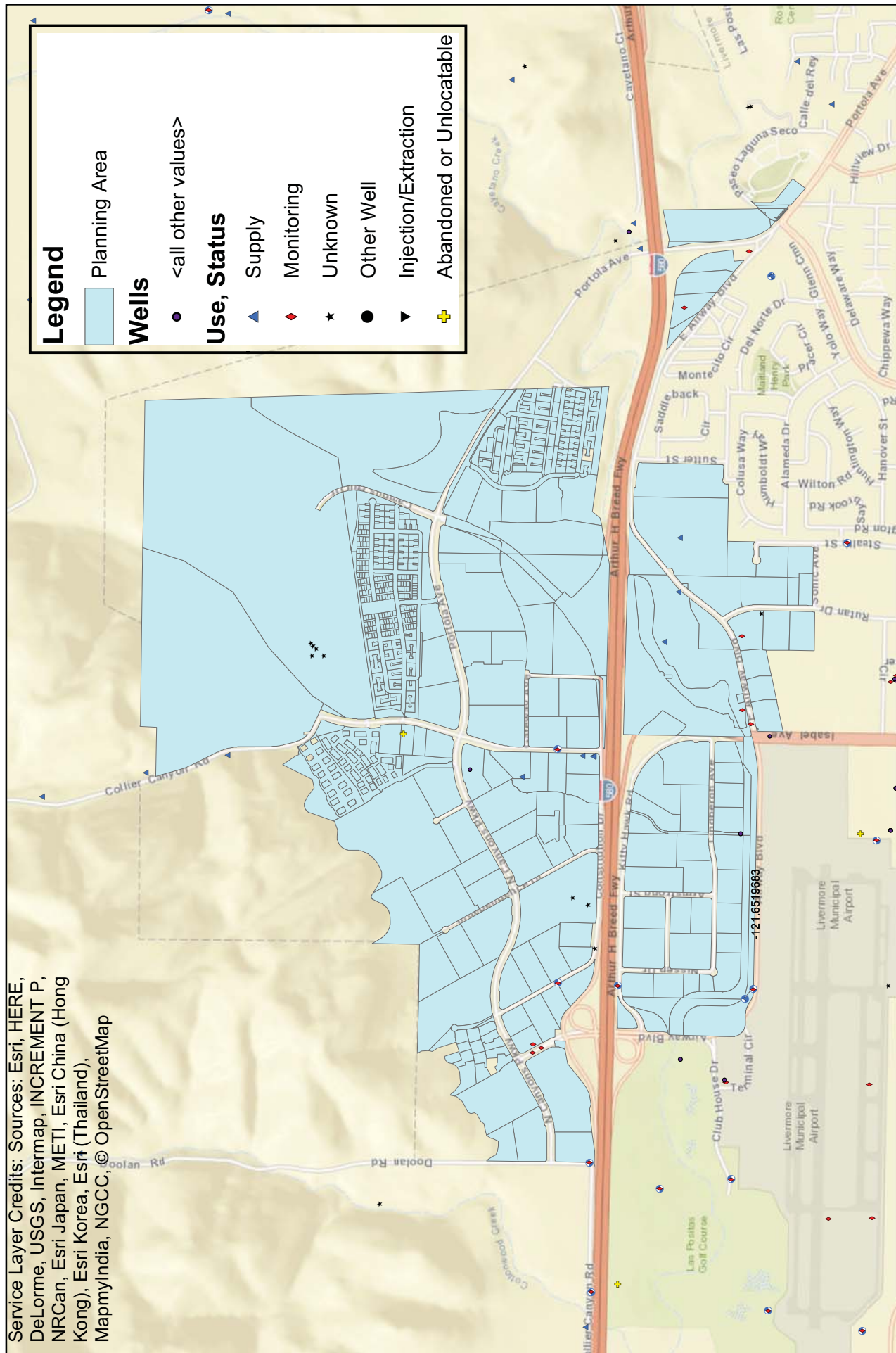
Isabel Neighborhood Plan Well List

Well Number	Use	Address	City	Location	Basin	Status	ComplDate	PermitNum	Driller	Category	SubCategory	GS_Elev	GElevFromDem
25/ZE 31N 1	unknown	<Null>	<Null>	<Null>	<Null>	unknown	<Null>	0	<Null>	well-static	unknown	473.4	473.3633
25/ZE 31N 2	unknown	<Null>	<Null>	<Null>	<Null>	unknown	<Null>	0	<Null>	well-static	unknown	474.5	474.4546
25/ZE 31N 3	unknown	<Null>	<Null>	<Null>	<Null>	unknown	<Null>	0	<Null>	well-static	unknown	474.4	474.4123
25/ZE 31N 4	unknown	<Null>	<Null>	<Null>	<Null>	unknown	<Null>	0	<Null>	well-static	unknown	474.3	474.2333
25/ZE 31N 5	unknown	<Null>	<Null>	<Null>	<Null>	unknown	<Null>	0	<Null>	well-static	unknown	471.4	471.3096
35/1E 1F 2	monitor	CONSTITUTION DR & N. CANYONS PKWY	Livermore	<Null>	Mocho II	active	12/18/2000	20231	WOODWARD	well-static	monitor	431.3	431.3042
35/1E 1F 8	monitor	1051 AIRWAY BLVD	Livermore	<Null>	Camp	unknown	<Null>	27027	APEX	well-static	monitor	443.8	443.9955
35/1E 1F 9	monitor	1051 AIRWAY BLVD	Livermore	<Null>	Camp	unknown	<Null>	27027	CLOSURE SOLUTIONS	well-static	monitor	443.8	443.6602
35/1E 1F 10	monitor	1051 AIRWAY BLVD	Livermore	<Null>	Camp	unknown	<Null>	27027	CLOSURE SOLUTIONS	well-static	monitor	441.9	441.9184
35/1E 1G 1	unknown	465 COLLIER CANYON RD	Livermore	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-static	unknown	423.3	423.2601
35/1E 1H 1	supply	2620 COLLIER CANYON RD.	Livermore	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-supply	supply	422.3	422.4379
35/1E 1H 3	monitor	COLLIER CANYON CT.	Livermore	<Null>	Mocho II	active	10/19/1977	0	USGS HEW	well-static	monitor	424.2	424.1928
35/1E 1H 4	supply	2740 COLLIER CANYON RD	Livermore	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-supply	supply	425	425.0229
35/1E 1J 3	irrigation	Collier Canyon Rd & Constitution Dr	Livermore	<Null>	Mocho II	unknown	4/14/2000	20028	GLENN MARTELL	well-supply	irrigation	420.9	420.8683
35/1E 1J 4	supply	Collier Canyon Road	Livermore	At corner of	<Null>	active	<Null>	2017083	Hennings Brothers	well-supply	irrigation	<Null>	<Null>
35/1E 1K 1	unknown	<Null>	<Null>	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-static	unknown	430	430.0116
35/1E 1K 2	unknown	<Null>	<Null>	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-static	unknown	427.4	427.5027
35/1E 1L 1	monitor	KITTY HAWK RD & NISSEN DR	Livermore	<Null>	Camp	active	12/19/2000	20230	WOODWARD	well-static	monitor	402.9	402.8736
35/1E 1P 2	monitor	AIRWAY BLVD ACROSS FROM TOWER	Livermore	<Null>	Amador	active	<Null>	0	USGS HEW	well-static	monitor	390.6	390.5753
35/1E 1P 3	supply	AIRWAY BLVD	Livermore	<Null>	Amador	inactive	7/28/1988	88288	MAGGIORA BROS.	well-supply	supply	391.2	391.302
35/1E 2I 3	monitor	COLLIER CYN RD & DOOLAN RD	Livermore	<Null>	Camp	active	7/16/2003	23087	WOODWARD	well-static	monitor	406.9	406.842
35/ZE 5N 6	monitor	800 EAST AIRWAY BLVD	Livermore	<Null>	Mocho II	unknown	4/8/1991	91167	BLYMWER ENGINEERS	well-static	monitor	442.1	441.9813
35/ZE 5N 11	monitor	AIRWAY BLVD & PORTOLA AVE	Livermore	<Null>	Mocho II	unknown	8/18/2005	25106	GEOMATRIX	well-static	monitor	445.1	445.119
35/ZE 6L 1	supply	200 EAST AIRWAY BLVD	Livermore	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-supply	supply	405.3	405.324
35/ZE 6L 3	supply	<Null>	<Null>	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-supply	supply	417.1	417.0959
35/ZE 6N 1	monitor	AIRWAY BLVD & RUTAN DR	Livermore	<Null>	Mocho II	unknown	2/2/1989	0	WAHLER ASSOCIATES	well-supply	monitor	413.2	413.1471
35/ZE 6N 3	monitor	AIRWAY BLVD & KITTY HAWK RD	Livermore	<Null>	Mocho II	unknown	8/23/2005	25106	GEOMATRIX	well-static	monitor	402.9	402.9144
35/ZE 6N 4	monitor	E. AIRWAY BLVD & KITTY HAWK RD	Livermore	<Null>	Mocho II	unknown	<Null>	28169	GREGG DRILLING	well-static	monitor	404.9	404.9679
35/ZE 6P 1	supply	1487 PORTOLA AVE	Livermore	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-supply	supply	421.4	421.2807
35/ZE 6P 5	unknown	<Null>	<Null>	<Null>	Mocho II	unknown	<Null>	0	<Null>	well-static	unknown	413.3	413.1217

\* Zone 7 Program wells are highlighted in red



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap



### Isabel Neighborhood Plan Planning Area

**ZONE 7 WATER AGENCY**  
100 North Canyons Parkway, Livermore, CA

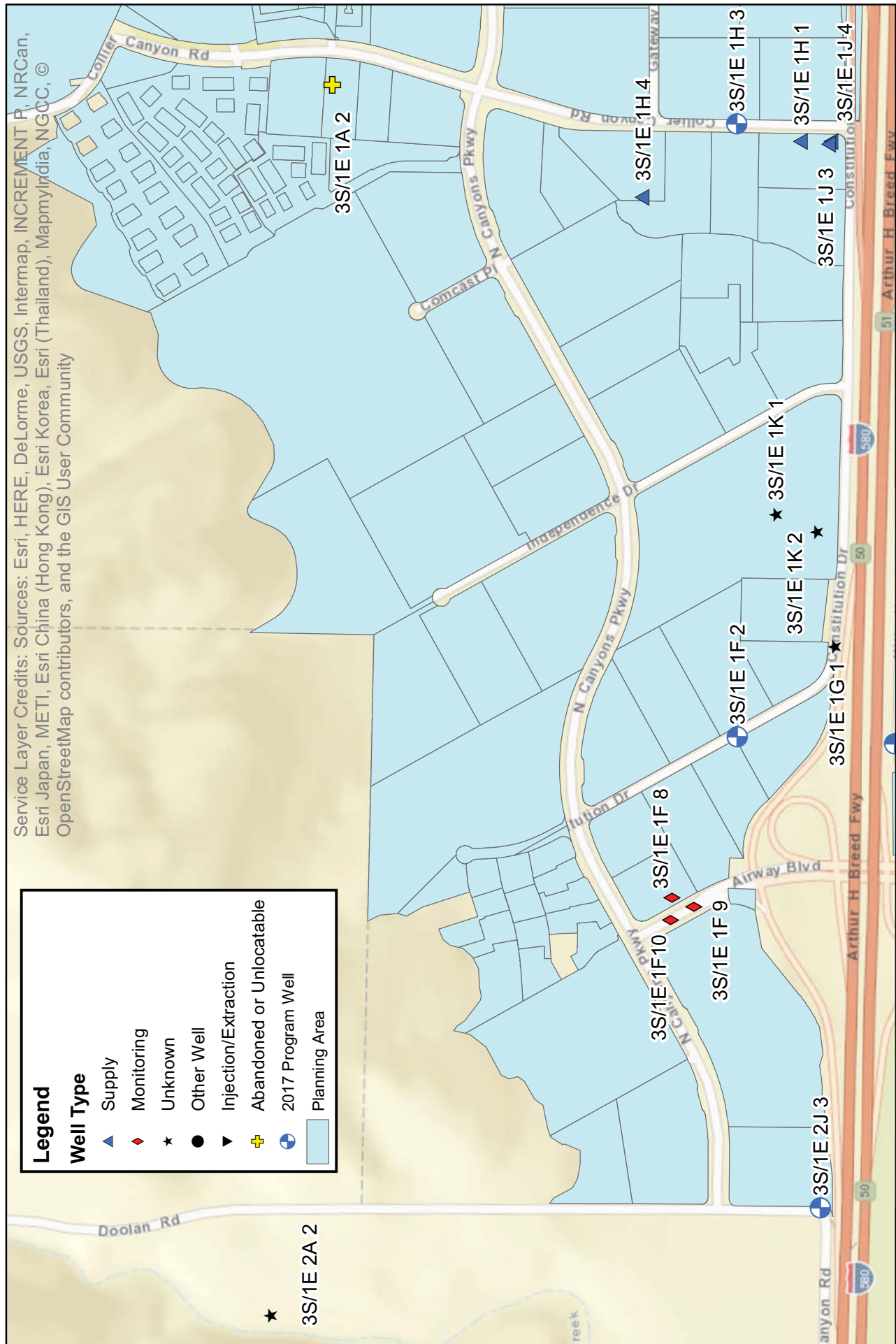


Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community

**Legend**

**Well Type**

- ▲ Supply
- ◆ Monitoring
- ★ Unknown
- Other Well
- ▼ Injection/Extraction
- ✚ Abandoned or Unlocatable
- ⊕ 2017 Program Well
- Planning Area



**Isabel Neighborhood Plan  
Well Location Map 1**

**ZONE 7 WATER AGENCY**  
100 North Canyons Parkway, Livermore, CA



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community



**Legend**

**Well Type**

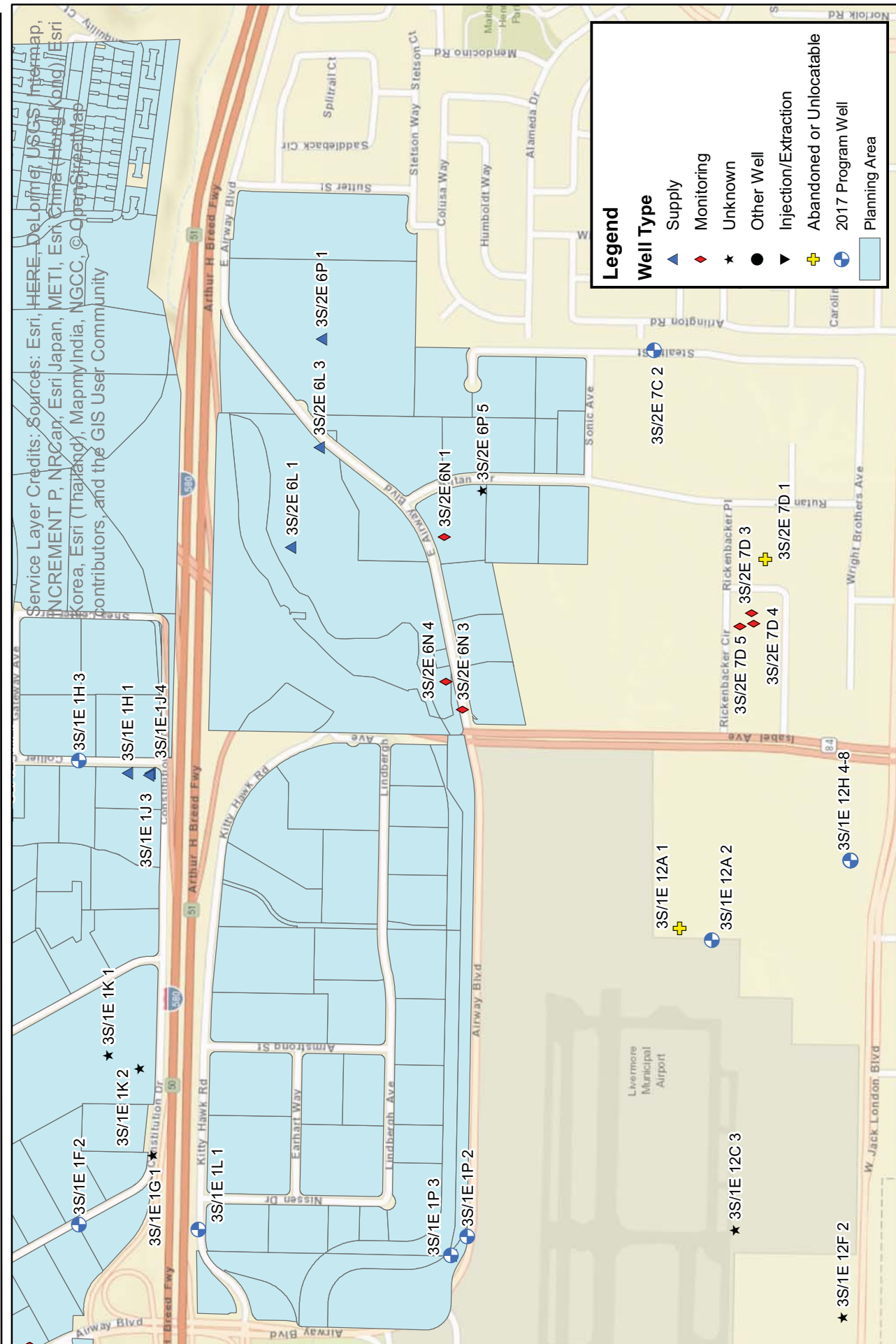
- ▲ Supply
- ◆ Monitoring
- ★ Unknown
- Other Well
- ▼ Injection/Extraction
- ⊕ Abandoned or Unlocatable
- 2017 Program Well
- Planning Area

**Isabel Neighborhood Plan  
Well Location Map 2**

**ZONE 7 WATER AGENCY**  
100 North Canyons Parkway, Livermore, CA



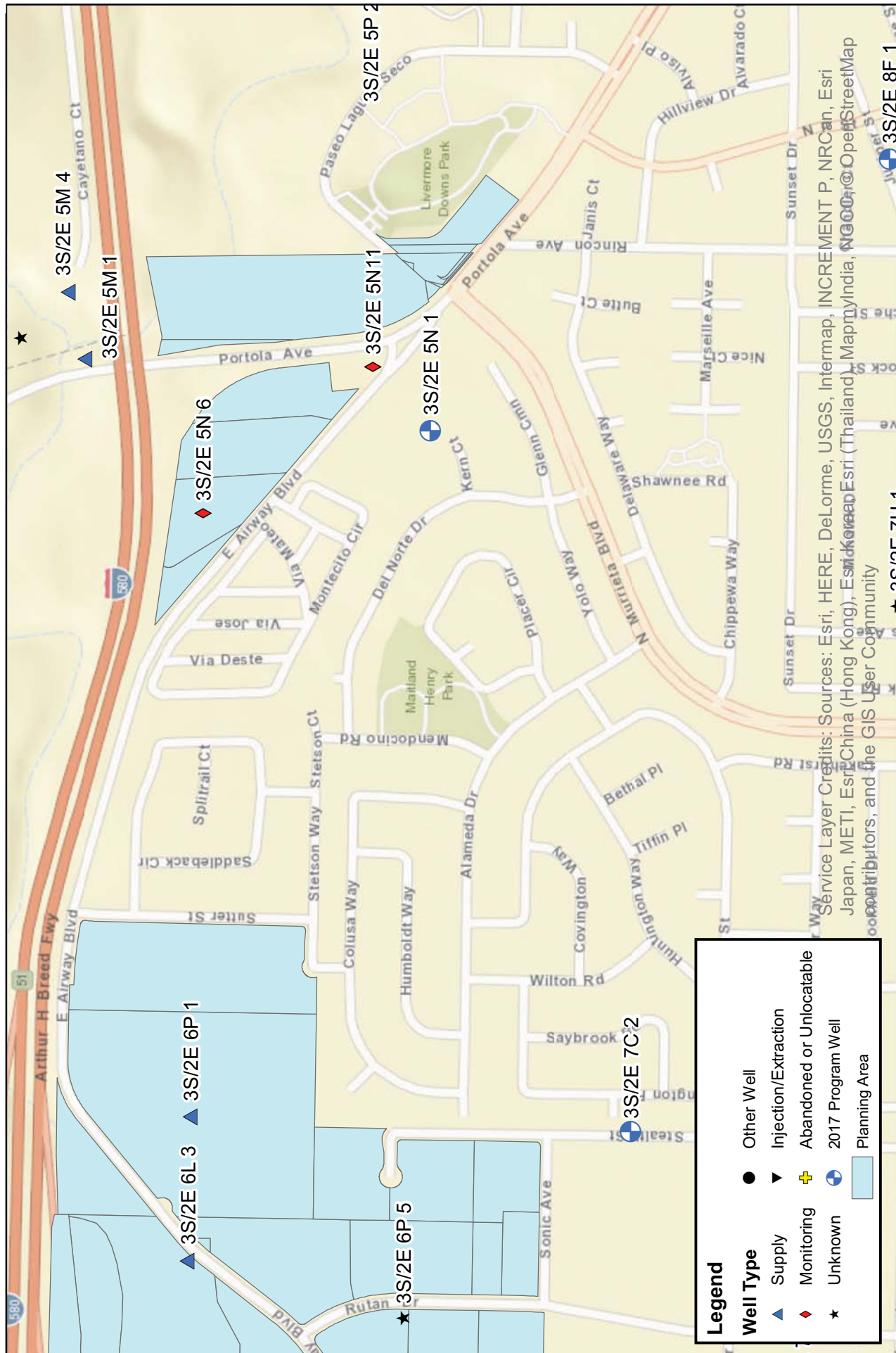




## Isabel Neighborhood Plan Well Location Map 3

**ZONE 7 WATER AGENCY**  
100 North Canyons Parkway, Livermore, CA





**Legend**

Well Type	Symbol
Supply	▲
Monitoring	◆
Unknown	★
Other Well	●
Injection/Extraction	▼
Abandoned or Unlocatable	⊕
2017 Program Well	⊕
Planning Area	■

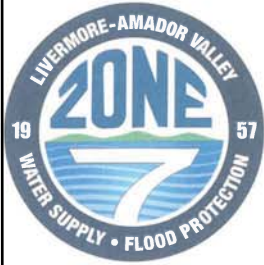
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Swire Hong Kong, Swire, Esri Korea, Esri (Thailand), MapmyIndia, ©OpenStreetMap contributors, and the GIS User Community



**ZONE 7 WATER AGENCY**  
 100 North Canyons Parkway, Livermore, CA

**Isabel Neighborhood Plan**  
**Well Location Map 4**





ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

June 15, 2017

Helen Ling  
 Water Resources Division Manager  
 Livermore Water Resources/Public Works Division  
 101 West Jack London Boulevard.  
 Livermore, CA 94551

Subject: *Response to Request for Input on WSA – Isabel Neighborhood Plan*

Dear Ms. ~~Ling~~ *Helen*:

This letter responds to your letter dated May 15, 2017 regarding “*Request for Input on Water Supply Assessment for Isabel Neighborhood Plan.*”

We would like to respond to two separate issues raised in your letter:

1. ***Updated Demand Projections*** - The City of Livermore is currently completing a Draft Water Master Plan that includes updated demand projections based on Livermore’s current General Plan. Based on Zone 7’s understanding, the analysis indicates that the projected buildout demand will increase from the 6,966 acre-feet annually (AFA) of demand presented in Livermore’s 2015 Urban Water Management Plan (UWMP) (Livermore, 2016) to 8,225 AFA, or an increase of 1,259 AFA.

The UWMP, which is prepared every five years, documents analyses conducted to determine available water supplies for the following twenty years and is the formal document used by Zone 7 and other water agencies to communicate water supply conditions to the public; any updated demand projections provided by Livermore, and other retailers, will therefore be formally analyzed and incorporated, as appropriate, into the 2020 UWMP. Note, however, that Zone 7’s projected water supplies as shown in Tables 7-12, 7-13, and 7-14 of Zone 7’s 2015 UWMP show excess supplies available under normal and dry conditions. This is intended to include some conservatism for planning purposes, including accounting for extreme conditions and uncertainty in the demand projections. The additional demand estimated by Livermore could likely be served by these planned excess supplies. The requested increase in demand amounts to about 20% of the projected excess supply in 2035, the latest projection in Zone 7’s 2015 UWMP (buildout is expected to be nearly complete at this time).

2. ***Isabel Neighborhood Plan*** – According to Livermore’s analysis, incorporating the Isabel Neighborhood Plan (INP), a proposed development, into Livermore’s General Plan would increase Livermore’s total demand by 140 acre feet annually/AFA (67 AFA in the area served by Livermore and 73 AFA in the area served by Cal Water). For the area

served by Livermore, potable water will only be used to meet indoor demands and recycled water will be used provide landscape irrigation. Should the Livermore City Council approve this development, this demand increase is less than 1% of demands for Livermore and Cal Water combined and is therefore not considered a significant increase requiring any interim analysis since it is well within the margin of error for Zone 7's projected water demands and planned future water supplies.

As you know, Zone 7 strongly supports the use of recycled water for landscaping and encourages incorporation of water use efficiency in any future developments such as this one. If you have any questions, please contact either Amparo Flores or me.

Sincerely,

  
G.F. Duerig  
General Manager

cc: Dan McIntyre, DSRSD  
Kathleen Yurchak, Pleasanton  
Frank Vallejo, Cal Water  
Carol Mahoney  
Amparo Flores



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

A4-10

November 6, 2017

Ashley McBride, Assistant Planner  
Livermore Community Development Department  
1052 South Livermore Avenue  
Livermore, CA 94550

Subject: *Comments on Draft Sections for Isabel Neighborhood Plan*

Dear Ms. McBride:

Thank you for the opportunity to comment on the preliminary draft sections that are in preparation (introduction and utilities) for the Draft Isabel Neighborhood Plan. In addition to comments previously provided on the draft Water Supply Assessment (attached), Zone 7 has the following comments for your consideration:

**INTRODUCTION**

- Zone 7's 2006 Stream Management Master Plan should be referenced: "In August 2006, the Zone 7 Board adopted a new flood control master plan, the Stream Management Master Plan (SMMP). The SMMP included 45 individual multi-benefit projects throughout the Livermore-Amador Valley while focusing mainly on regional storage of flood and storm waters within the Chain of Lakes to limit peak flows downstream. The SMMP also focuses on achieving project goals by incorporating multi-benefit and environmentally-friendly objectives, while forming partnerships with related agencies." For more details about flood control project(s) that may be implemented in the area, see Zone 7's comment letter to BART dated October 16, 2017, attached.

**SECTION 4.1 UTILITIES**

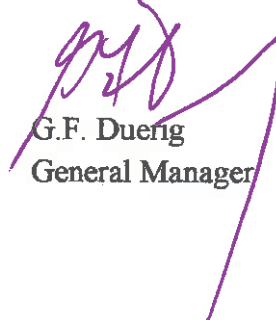
- Under 'Water Supply and Infrastructure,' third paragraph, last sentence, please add the word "planned" to the sentence as follows: *Based on the adopted UWMPs and updated projections, Zone 7 has indicated that there is sufficient planned water supply at this time to serve the City's General Plan anticipated growth, which accounts for development under the Isabel Neighborhood Plan.* Please also see (attached) Zone 7's letter to Helen Ling, City of Livermore's Water Resources Division Manager, dated June 15, 2017, regarding the Water Supply Assessment for the Isabel Neighborhood Plan.
- Water Supply and Infrastructure: Also note that there are Zone 7 facilities (pump stations, turnouts, and pipelines) in the area as follows:

- a. The Zone 7 Kittyhawk Pump Station and related facilities (including underground electrical facilities and a discharge structure) as well as a portion of the Altamont Pipeline are in the area of the Southwest corner of Isabel & East Airway.
- b. The Zone 7 Liv. #5 Turnout is north of Arroyo Las Positas along Kittyhawk Ave, within the City's Wastewater Pump Station fence line.
- c. The Cross Valley Pipeline runs East/West on the south side of I-580 between Santa Rita and Isabel.
- d. South of East Airway, the Cross Valley Pipeline runs North/South, on the east side of Isabel (Hwy 84).
- e. North of East Airway, the Cross Valley Pipeline runs along Kittyhawk Ave., typically along the south edge.
- f. All of the above facilities could be impacted by the Plan. An encroachment permit will be required for any modifications or crossings of the facilities. Please also see attached Zone 7's comment letter to BART dated October 16, 2017.

- Under 'Stormwater,' first paragraph, fifth sentence, please add "and maintains" to the sentence as follows: *Zone 7 only owns and maintains the north side of Arroyo Las Positas (Line H) from Isabel to the crossing under Airway Boulevard.*
- Stormwater facilities: Zone 7 owns the portion of Collier Canyon Creek (aka Line M) that runs through Zone 7's North Canyons Office parcel, since Zone 7 purchased the property at 100 North Canyons Parkway earlier this year.

If you have any questions, please contact either Elke Rank or me at (925) 454-5000.

Sincerely,



G.F. Duerig  
General Manager

cc: Amparo Flores  
Carol Mahoney  
Elke Rank

Attachment

B1-1 | **Ashley Vera**

**Subject:** RE: Draft Supplemental Environmental Impact Report for the Isabel Specific Neighborhood Plan - Comments

-----Original Message-----

From: Teddy Lee <teddylee84@gmail.com>

Sent: Monday, June 29, 2020 11:27 PM

To: Planning Web email <planning@cityoflivermore.net>

Subject: Draft Supplemental Environmental Impact Report for the Isabel Specific Neighborhood Plan - Comments

To whom it may concern,

I am a homeowner in the Sage community between Isabel and Portola Avenues directly adjacent to Interstate 580 and near the proposed Isabel train station. My concern with the building of a new rail line and train station is the additional noise that will be generated as a result of this project.

Currently, the sound level that is generated from the freeway is a daily nuisance, especially at night. Assuming the highway will have to be widened to make room for the rail service, it would mean the source of the current highway and additional rail noise will get closer to my property, my fellow homeowner's property, as well as increase in decibels. Based on a review of the Isabel Neighborhood Specific Plan, I live in an area where the plan's projections state the decibel levels will be in the 70-75 range which is higher than the decibel limit of 60-65. I can also assure you when large semi trucks and Harley motorcycles pass by and they do very frequently, the noise they generate surpasses those limits as well. I would like for your commission to seriously consider the addition of a sound wall/barrier to be built along the northern side of Interstate 580 near the Sage community between Isabel and Portola Avenues to reduce the additional noise that will be generated as a result of the rail project and possible highway widening. If you have any questions, please feel free to reply back to me.

Teddy Lee

817 Tranquility Circle #13

Sent from my iPhone

B2-A-1

**From:** [Dennis Kolb](#)  
**To:** [Planning Web email](#)  
**Subject:** Planning Zoom Meeting  
**Date:** Thursday, July 2, 2020 3:52:45 PM

---

I would like to attend the meeting on July 7 at 7:00pm. Please provide me with Zoom link & call-in information?

Questions

1. I would also like to question whether the City will assist with HOA costs to protect non Montage residents from parking in our multiple private parking lots?
2. Parking on our City streets is a challenge and I have concerns that commuters may come into Montage City community streets much like what occurred in Dublin. How can the City assist?

Thank you,  
Dennis Kolb  
545 Heligan Ln #4, Livermore, CA 94551

B2-  
B-1 **Ashley Vera**

---

**Subject:** RE: Planning SEIR Zoom Meeting

**From:** Dennis Kolb <constantcomm1@gmail.com>

**Sent:** Monday, August 3, 2020 8:05 PM

**To:** Ashley Vera <ASVera@cityoflivermore.net>

**Cc:** Ludwig, Fanny <foludwig@cityoflivermore.net>; Dennis Kolb <constantcomm1@gmail.com>

**Subject:** Re: Planning SEIR Zoom Meeting

Ashley,

The Isabel Neighborhood Plan is a lot for any one homeowner to totally absorb. There is some thought of community members getting together to represent our community concerns in an official committee. In the meantime I have a few questions that I would like to address.

Questions, clarifications or information:

- B2-  
B-2 1. It should be noted the intersection at Heligan & Collier Canyon is a "one way into the neighborhood" street and it may cause traffic issues when the new adjoining neighborhood is built. Traffic flow or studies should be considered as requested below. Figure 3-1.
- B2-  
B-3 2. I am not a traffic engineer but the extension of Alnwick to Portola will not be sufficient to handle the traffic of this new Shea Center residential development. This Shea Center land as I understand was originally zoned to be retail; hence one exit & entrance to the businesses. Using one entrance/exit for a residential area, in my opinion, is different than retail. If the planning as shown is for residential, it should only be for Transitional not Village to have some control on the number of cars. Figure 2-2 & 2-3 I can also view western residents of Montage will also use the extension to exit Montage. Traffic review needs to be reviewed and another exit planned.
- B2-  
B-4 3. With today's high cost housing we are finding more extended families living in one residence hence making the Table 3-2 for Transition & Village land use for parking no longer valid considering occupancy of homes. We have some residents with 4 cars per household. You can place all the rules about parking in garages you want, but it is not enforceable. Today neighborhoods of cluster housing are jammed with on street parking. I know parking doesn't bring revenue to developers, but it is a fact of life that business and residential designs minimize parking allocation. I invite you and the regional planners to see Montage on any given day to witness the parking problem cluster housing brings. I would be happy to provide a tour for you and/or the regional planners.

B2-  
B-5 Discrepancies:

1. Maps having trail markings (Figure 3-14 for example) show the trail system behind Montage incorrectly. This multi-use trail ends before it intersects with the college property or

B2- roadway. Although the city promised several years ago there would be a trail here, there is no  
B-5 trail through or along the drainage area until you hit the Collier Canyon sidewalk. At a HOA  
meeting recently we were advised the trail would not be completed until 2022. Instead, other  
trails in a nearby community have been completed including multiple bridges. These maps should  
all be updated with accurate information.

B2- Answers still pending from previous questions:  
B-6

1. I would like to question whether the City will assist the HOA for costs to protect non Montage residents from parking in our multiple private parking lots?
2. Parking on our city streets is a challenge normally (as mentioned above), and I have concerns that commuters may come into our community streets much like what occurs in Dublin. How can the City assist in controlling parking just beyond the 10 minute walk area? Figure 3-14

Thank you,  
Dennis Kolb  
545 Heligan Lane Unit 4  
516-318-5663 cell



B2-  
C-1

**Ashley Vera**

---

**Subject:** RE: Planning SEIR Zoom Meeting

---

**From:** Dennis Kolb <constantcomm1@gmail.com>

**Sent:** Thursday, August 6, 2020 3:45 PM

**To:** Ashley Vera <ASVera@cityoflivermore.net>

**Cc:** Ludwig, Fanny <foludwig@cityoflivermore.net>

**Subject:** Re: Planning SEIR Zoom Meeting

Ashley,

Thanks for your confirmation reply.

B2-  
C-2

I forgot to add the additional traffic on the Alnwick extension which will come from the western extension of Montage who will be avoiding the drive down Heligan. I understand the need to meet the guidelines of the number of units/homes to support the new extension but please do not make traffic jams a neighborhood issue that is a serious consideration.

B2-  
C-3

Thank you. Would I(we) expect feedback sine feedback on the issues?

Thank you,  
Dennis Kolb

B3-1 | **From:** [Steven Dunbar](#)  
**To:** [Planning Web email](#)  
**Cc:** [Susie Hufstader](#); [Dave Campbell](#); [Jacob Anderson](#); [rebonanno1@gmail.com](#)  
**Subject:** June 7th Isabel Plan Comments (Past and Present)  
**Date:** Sunday, July 5, 2020 2:13:49 PM  
**Attachments:** [image.png](#)

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Planning Commissioners and Staff,

Regarding the Isabel Neighborhood Plan:

I am sad to see the open park space decreasing and ground floor retail being removed (even on Main Street). I hope to hear more about why these changes were proposed.

B3-2 | To the environmental report in general: I continue to believe that the VMT mitigation measures are too soft and will be ineffective. Too many goals and guidelines are suggestions instead of requirements. Please see the attached comments from 2018.

B3-3 |

- The so-called "Pedestrian Street" has more space for car parking alone than for pedestrians.
- The bicycle circulation diagram is wildly insufficient for 2020, and includes numerous errors.
  - Class IIB "buffered" bike lanes are appropriate for a repave project. They are entirely unacceptable for a long-term planning document and for any new construction in an urban area.
  - There is no mention of protected intersections whatsoever.
  - I do not believe this plan meets the vision statement of the ATP.
  - The INP points to the Active Transportation Plan, but the ATP does not consider the streets to be added in the INP whatsoever. In fact, an earlier draft of the ATP referred to the INP for specific planning, but it was removed in the final ATP. It seems that the coordination between the plans no longer exists.
- The transit integration is still an incomplete thought.

It is okay to have a higher degree of car access for a Livermore train station - I'm not an absolutist - but I need more from this plan to advocate for county funds to be transferred to Valley Link. Please direct staff to fix the ATP coordination, improve bike/ped/transit access and safety, and lower VMT estimates further.

B3-3



Thank you,  
Steven Dunbar

B3-4

----- Forwarded message -----

From: **Steven Dunbar** <[steven.james.dunbar@gmail.com](mailto:steven.james.dunbar@gmail.com)>

Date: Mon, Feb 26, 2018 at 1:08 PM

Subject: Isabel Neighborhood Plan Comments

To: [asmcbride@cityoflivermore.net](mailto:asmcbride@cityoflivermore.net) <[asmcbride@cityoflivermore.net](mailto:asmcbride@cityoflivermore.net)>

Cc: <[BoardofDirectors@bart.gov](mailto:BoardofDirectors@bart.gov)>, Susie Hufstader <[susie@bikeeastbay.org](mailto:susie@bikeeastbay.org)>, Dave Campbell <[dave.campbell62@gmail.com](mailto:dave.campbell62@gmail.com)>, [rene@bikeeastbay.org](mailto:rene@bikeeastbay.org) <[rene@bikeeastbay.org](mailto:rene@bikeeastbay.org)>, Steven Spedowfski <[SSpedowfski@cityoflivermore.net](mailto:SSpedowfski@cityoflivermore.net)>

To the City of Livermore Isabel Neighborhood Planning Group:

Please consider the following comments regarding the draft plan.

1) Regarding development potential, I am disappointed that the plan phasing calls for all the office to be built before the residential. We cannot continue to add to the housing crisis throughout the bay, and planning for double the amount of jobs relative to housing will continue this trend.

2) Requiring a 25% affordability requirement in the plan seems unsustainable without significant building cost analysis. I find the analysis around section 7 for affordability to be lacking in the context of the changes to HUD at the national level. Please provide a stronger

B3-4

analysis to ensure the development is actually built. Please consider how the city will enforce this value capture on current landowners, without delaying housing until market-rate housing is obscenely expensive.

3) The TDM is lacking

- a. The TDM requirements should require more from new development to be of the highest quality: carpool/vanpool matching and guaranteed ride home systems are far too easy to avoid the bigger systems such as parking cash out and transit passes.
- b. Forget “considering” charging for parking along main street – actually charge for parking.
- c. Put teeth into policy P-TRA-37. Require the payment of parking cash-out to be based on the actual amortized cost of the parking structure provided over the life of the project. All too often this is left up to developers who then charge only \$10 or similar because they are overparked. Force developers to truly think about their estimate (yes, this involves risk cost to those developers).
- d. Parking minimums and maximums are set far too high. Bullet point c should address this issue provided adequate cost of on-street parking and/or parking permits.

4) The bike environment is lacking.

- a. There needs to be a clear and defined path for cyclists using the underpass from Isabel into the main residential area. Shooting out into a plaza is insufficient, and will cause disruption with pedestrians. Provide a clearly labeled and appropriately paved path from the undercrossing through the immediate development to the street.
- b. Bikeway design guidelines that do not follow the “All Ages and Abilities” NACTO guidelines are unacceptable on all streets, but particularly any newly built street in 2018.
- c. “Bike streets” should have protected bike lanes, bar none. The idea that the bike buffer is what is left undefined in a bike street guideline is unacceptable – the number of car lanes and the width of those lanes should be what changes first.
- d. The bicycle streets are scattered and inconsistent. “Bicycle streets” just end.
- e. Improvements to existing bike lanes are left too undefined – Constitution Drive, for example, is not an “all ages and abilities” bike lane. All large major streets should be improved to contain class IV lanes, not class II. Class II is unacceptable on almost every street in the plan area. This is important because most destinations in the plan are bikeable from the BART station – even my current office is almost a mile outside of the BART station area and would still be easily bikeable – IF the bikeways on existing streets are improved to make it safe.

- f. In general, the lack of Class IV on-street bikeways throughout the project is extremely disappointing.
- g. “Painted or raised bike lane buffer” on Isabel Avenue is another example of bad design. In no case whatsoever should that buffer be paint-only. Even with new design, the speed of Isabel will be far too high.
- h. East Airway Boulevard should not have 13’ travel lanes if it has 5’ unprotected bike lanes. 11.5’ travel lanes should be the norm and all other space should be dedicated to pedestrians and cyclists.
- i. In general, trails are no substitute for on-street bikeways, as almost every destination will require street riding at some point.
- j. Traffic lanes should not increase to 11ft when they are Class III bike routes. Traffic calming should eliminate all need for cars to pass cyclists on Class III in the context of this plan.

5) Pedestrian design is lacking.

- a. I do not see mention of better pedestrian signaling. Automatic pedestrian phases, pedestrian recall, pedestrian scale lighting at crosswalks and throughout the plan, and multi-modal LOS should be included as metrics with defined goals.
- b. 6’ sidewalks are insufficient even with a flexible buffer space.

6) Transit design is lacking.

- a. There are too few policies regarding improvement of bus service with the plan. Define improvements to Wheels routes to coordinate with the city, such as bus lanes, bus priority signals on the routes and at the entry to the bus loop, bus spacing requirements to keep buses moving, etc.
- b. There seems to be a DropOff/Pickup area close to the plaza on the north side. This should be specifically designated to be bus or handicapped only. Very long walks to bus stop stations increase transfer time and decrease ridership. Bus pickups should be as close and as convenient as possible for riders. Consider reconfiguring the large plaza to bring the buses closer to the station exit.
- c. Consider the best possible routing to speed buses entering the waiting area. Long entry and exit routes like at Dublin/Pleasanton station add far too much delay to the bus system. The Gateway/Isabel intersection should absolutely have a bus priority treatment for all directional movements (left, right, and straight).
- d. The fact that the “Transit” section of the plan is only 3 pages is essentially laughable. Everything is ill-defined and just talks about partnerships. Take concrete steps in the plan now, please.

B3-4

I hope the city will consider improving on all of the above design elements to incentivize a truly transit-oriented development, not merely a transit-adjacent one. I also suspect it will increase the chance of the BART board approving the development.

Thank you for your consideration.

Best,

Steven Dunbar

Livermore Resident, Transit Industry Professional, and BikeEastBay Local Leader

Cc'd: BART Board of Directors, BikeEastBay

B4-1

**From:** [Brad McDowell](#)  
**To:** [Planning Web email](#)  
**Cc:** ["ggu1988@yahoo.com"](mailto:ggu1988@yahoo.com)  
**Subject:** RE: Draft Supplemental EIR - Isabel Neighborhood Specific Plan?  
**Date:** Sunday, July 5, 2020 5:48:33 PM

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From a recent public hearing notice mailed to residents, quoting from notice:

*“The Plan would allow up to 4,095 new multi-family housing units and approximately 2.1 million square feet of net new non-residential uses. The Plan also includes **three new neighborhood parks**, multi-use trails, and pedestrian and bike facilities.”*

**Questions:** Without seeing The Plan nor knowing how many square feet of space are planned to be

new  
Devoted to each park, will there be adequate park space to accommodate ~15,000

Residents beyond creating (essentially) small “dog parks” that aren’t truly geared for human  
enjoyment?

Park space sufficient to allow activities like Frisbee, kite flying, ball throwing?

And, will the park spaces include any play structures for smaller children?

Thank you,

John McDowell  
 764 Tranquility Circle (Unit #1)  
 Livermore, CA 94551

B5-1

**From:** [Sue Carroll](#)  
**To:** [Planning Web email](#)  
**Subject:** Public Hearing: Planning Area for the Isabel Neighborhood Specific Plan.  
**Date:** Sunday, July 5, 2020 7:22:32 PM

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Hello,

I was wondering if someone could investigate the amount of parking that will be available for the new development? I currently live in the Montage community, and there is an ongoing daily challenge with street parking and guest parking in the development. I am concerned that the number of new homes might impact the already challenging parking in our neighborhood.

I also have a question about the height of the proposed units. I was told when I moved in that any construction in the adjacent field would be limited to a two-story building. Having a three-story building will significantly impact the view from our homes. Is it possible to create a two story model?

Thank you for your consideration.

Sue Carroll



B6-1 | **From:** John Stein <[stein53@aol.com](mailto:stein53@aol.com)>  
**Sent:** Sunday, July 5, 2020 12:54 PM  
**To:** Cityclerk - Livermore <[cityclerk@cityoflivermore.net](mailto:cityclerk@cityoflivermore.net)>  
**Subject:** Gandolfo Ranch

***John Stein, 1334 Kathy Court, Livermore, California 94550***

Members of the Historical Preservation Commission, July 4, 2020

The Gandolfo ranch is a unique and irreplaceable part of Livermore's history and deserves protection. It is an intact 1880's farmstead with a beautiful Victorian house and surrounding out buildings that have remained in the same ranching, farming and construction family for over 100 years. In the past it has been considered for historical designation.

Over the past 40 years this site has been looked at a number of times. Some of the times include: the acquisition of the BART station site, the widening of Airway Blvd, the zoning of the Interstate Storage site and the establishment of the Airport Protection Area. It was repeatedly determined that the site was unsuited for residential development because of high noise levels from local aircraft. Nearby residents stated that peak noise levels exceeded 100 decibels and made conversation inside their homes impossible and their back yards unusable. There were also questions about lead particulates from the using of avgas. It would be a shame to see this site replaced by tilt up industrial buildings. In the long term the highest and best use of this site would be as a park operated by LARPD or East Bay Regional Parks.

It would be worthwhile if the entire site could be preserved and operated like Hageman Ranch, Ravenswood or Ardenwood Farm to show some of the agricultural operations that once thrived in Livermore. There was also the idea that this site could be used to relocate historical buildings that could not otherwise be preserved. An example of this is the successful San Diego Heritage Park Victorian Village.

I urge you to see if you can get a tour of the site from the family and talk to Anita Gandolfo if she is still around. She was a veritable encyclopedia of information on the family's history in Livermore and the site history.

My generation and its memories are rapidly (more rapidly since Covid-19) disappearing. I urge that this valuable piece of Livermore's heritage be saved for future generations.

Thank for all of your efforts to preserve Livermore's history,  
 John Stein (925)360-6644

B7-A-1

**From:** [Chad Greer](#)  
**To:** [Planning Web email](#)  
**Subject:** Public Comments for Agenda 7/7  
**Date:** Monday, July 6, 2020 7:14:38 PM

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Per the Isabel Neighborhood Plan, infrastructure expenditures will be required. What source(s) of funding will these expenditures be funded from? What amount of capital expenditure will need to be allocated over the next 3 years to this project from the City of Livermore? Lastly, what is the estimated timeframe that G&M farms would be purchased and no longer operational?

B7-A-2

I ask that the planning commission designate G&M farms as a historical site in order to preserve the cultural heritage of Livermore. Many families have enjoyed the fall festivities while at that farm and have fond memories including my own.

Thanks to the Planning Commission for their attention to these matters.

--

Chad Greer  
[greer.w.chad@gmail.com](mailto:greer.w.chad@gmail.com)  
Mobile - (408) 332-7625

B7-B-1 | **From:** Chad Greer <[greer.w.chad@gmail.com](mailto:greer.w.chad@gmail.com)>  
**Sent:** Friday, July 10, 2020 7:36 AM  
**To:** Planning Web email <[planning@cityoflivermore.net](mailto:planning@cityoflivermore.net)>  
**Subject:** Public Comments for Agenda 7/21

Per the Isabel Neighborhood Plan, infrastructure expenditures will be required. What source(s) of funding will these expenditures be funded from? What amount of capital expenditure will need to be allocated over the next 3 years to this project from the City of Livermore? Lastly, what is the estimated timeframe that G&M farms would be purchased and no longer operational?

B7-B-2 | Many of the residents in the adjacent neighborhoods such as Sage are concerned over the potential crime that mass transit brings. What assurances can be made within the ISNP to protect the neighboring communities from property crime as these neighborhoods are within the half mile radius of Valley Rail?

Thanks to the Planning Commission for their attention to these matters.

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Chad Greer  
[greer.w.chad@gmail.com](mailto:greer.w.chad@gmail.com)  
Mobile - (408) 332-7625

B8-1

**From:** [Kelsey Van Aken](#)  
**To:** [Planning Web email](#)  
**Subject:** Comments: Public Hearing July 9, 2020 | Isabel development plan  
**Date:** Tuesday, July 7, 2020 12:00:23 PM

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Hello,

My name is Kelsey Van Aken, I live at 2890 Kew Ave, adjacent to the planned Isabel development. **I oppose** the development plan. This development plan would increase density to the Livermore area and reduce the quaint small town feel which I moved to Livermore for. Additionally, this development would strain our public school system as there are no plans to develop new schools or expand Livermore public schools.

Dublin, CA is an example of where housing grew continuously for the last 25 years. That growth has now created crowded schools, congested roads, and a lack of community. I urge the Livermore City Council to not proceed with the Isabel Development Plan.

If the development plan is approved I urge the committee to consider the following:

- Adding a new school or expanding Livermore Public Schools to account for the influx of people
- Restrict building height to 2 stories to not obfuscate views of existing homes
- Expand the I-580 westbound freeway on-ramp to reduce future congestion
- Ensure that public parks and greenspace are created between the new development and existing housing in the area.

A concerned citizen,

Kelsey Van Aken

Original comment from Evan Branning (7/7/20 PC hearing):

- B9-1** | I want to support and echo all of the comments and concerns raised by Mr. Dunbar. I also want to say this project has been in the works for many years and is one of the most impressive projects in Livermore. We will not have another chance to do this correctly.
- B9-2** | I am very concerned about the lack of Class 4 bikeways and bike access/mobility to and through the plan.

Maureen [No last name provided] (7/9/20 HPC hearing):

B10-1 | I also believe it will be tragic to lose such a large piece of Livermore's history by replacing the Gandolfo Ranch with modern housing. Can the ranch remain as a park feature?

Mark Palajak (7/20/20 Airport Commission hearing):

B11-1 | I would add a notification to buyers that the protection area was modified to allow construction of housing, while it may not indicate risk, air traffic should be expected on a regular basis.

B12-1 | From: [Tamara Reus](#)  
To: [Ashley Vera](#)  
Subject: Comment on Draft SEIR for the Isabel Neighborhood Specific Plan  
Date: Friday, August 7, 2020 11:47:56 AM

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Dear Ms. Vera,

I am a resident of Livermore. I have the following comments on the Draft Supplemental Environmental Impact Report (SEIR) for the Isabel Neighborhood Specific Plan.

- B12-2 | The SEIR is premature. The Valley Link DEIR is not expected to be released until Fall 2020. The information in that DEIR could significantly affect assumptions made in the current EIR and may reveal issues that have not been considered in this EIR. The City should wait until a final EIR is available for Valley Link and then conduct a full EIR review for the Isabel Neighborhood Specific Plan.
- B12-3 | The SEIR indicates on page 2-17 that ABAG has projected the average household size by 2040 to be 2.85. Yet, the report uses the more conservative figure of 2.52 plus an assumed 5% vacancy rate to come up with a total increase in population of 9800 people at build-out. There is no justification given for the lower number used. The analysis should be revised to use the higher number which reflects the scientific analysis of the data prepared by ABAG. The adjusted number comes to more than 11,000 additional residents in the Isabel Plan area. This represents 1200 more individuals than assumed in the SEIR. An analysis based on this number would more accurately reflect the impacts on traffic, water, air quality and other infrastructure. The final EIR should be revised based on the higher number of anticipated residents.
- B12-4 | In addition, the cumulative impacts analysis does not address the impact of infill development planned for Livermore over the next 20 years. This additional housing will affect the environment as well, especially in the area of traffic and air quality in the community and should be factored into the analysis so people get a true picture of what the city will be like when the Isabel neighborhood plan is complete.
- B12-5 | The project as envisioned in the Supplemental EIR acknowledges significant cumulative and irreversible environmental impacts that cannot be mitigated in a number of areas, including, air quality, noise, water, traffic, and loss of important farmland. Livermore and the Bay Area cannot afford further degradation to the environment in these areas.

Thank you for the opportunity to comment.

Tamara Reus

5870 Felicia Ave.

Livermore, CA 94550



**B13-1** | **From:** [Carol Silva](#)  
**To:** [Ashley Vera](#)  
**Subject:** Submission of Comments to the Draft Isabel Neighborhood SEIR  
**Date:** Friday, August 7, 2020 12:12:19 PM

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Ms. Vera,

Below are my comments to the Draft Isabel Neighborhood Specific Plan's SEIR:

- B13-2** | 1. How can this Isabel Neighborhood Draft SEIR be reviewed at this time when completion of Valley Link's Draft EIR is currently planned for the Fall of 2020, according to Valley Link Project's Environmental/CEQA website? The period for public comment on this Draft SEIR should be extended based upon the unavailability of Valley Link's Draft EIR and due to the volume of Isabel Neighborhood documentation for review. I think that the period for public comments should be extended by 45 days after the release of the Valley Link's Draft EIR.
- B13-3** | 2. Does the City of Livermore still intend to pursue this significant growth even if Valley Link is not constructed? How many housing units has the City of Livermore already approved but not built, excluding the Isabel Neighborhood project? How many housing units in Livermore have been completed during the past 12 months?
- B13-4** | 3. A significant difference between BART ending in Livermore versus Valley Link joining BART from San Joaquin Valley will matter to Livermore commuters. How likely will Livermore residents/commuters, who have been contributing to BART through taxes and through bus and BART ridership from the beginning, be able to utilize Valley Link when San Joaquin commuters fill the Valley Link train cars?
- B13-5** | 4. The Livermore City Council approved the 2018 Isabel Neighborhood Specific Plan contingent on the BART Board of Directors approval of an extension of BART to Isabel Avenue. Since BART is no longer going to be extended into Livermore, BART's transit housing village is no longer a requirement.
- B13-6** | 5. During construction, dirt movement and its movement/removal outside this planned Isabel area can significantly impact air quality.
- B13-7** | 6. Potential flooding is another concern I have. Up to 4,095 new housing units and up to 2,104,000 square feet of for new office, commercial, and industrial uses, increases impervious surfaces within the Planning Area which would increase stormwater runoff and increase the water flowing into the arroyos. My back fence from my residence is approximately 40-50 feet from an arroyo and then there is pastureland. During a wet winter that we had a few years ago, water exceeded the banks of the arroyo and flooded acres of pastureland. With climate change, we should expect additional extremely wet winters.
- B13-8** | 7. I question the report's growth estimate of 9,800 new residents. Most planners multiply housing units by three to obtain an estimated number of new residents. Therefore, 4,095 new housing units should represent an estimated increase in Livermore's population by 12,285.
- B13-9** | 8. I am concerned about the City's ability to provide the same level of services, i.e. fire, police, education/schooling, etc. I don't want this City to follow Dublin's current problem in which parents are fed up with how crowded the schools are.  
 9. Also, I am concerned about the ability of water services to provide sufficient quantities of quality water to all residents.
- B13-10** | 10. A friend of mine used to live in a home in east Pleasanton and she constantly complained about the noise of aircraft flying into and out of Livermore's Municipal Airport. I think that the SEIR glosses over the increase of noise complaints expected from residents pertaining to aircraft at Livermore's Municipal Airport. The airport is an important commercial business and it could hold more importance during times of disasters. I don't want the airport shutdown because nearby residents want it shutdown.

B13-11

Thank you.

Carol Silva

A Livermore native resident

B14-A-1

From: [BERNARD CABANNE](#)  
 To: [Ashley Vera](#); [donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com)  
 Subject: Fwd: draft SEIR comments ---Water Supply and Water Quality2  
 Date: Friday, August 7, 2020 3:23:15 PM

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To Ms. Vera  
 Planning Department

Please add the following comments and questions for the Draft SEIR review for the Isabel Neighborhood Amendment Plan.

I am submitting these comments as a 37 year resident of Livermore, a Sierra Club member and a member of the Center for Biological Diversity.

B14-A-2

Increased Water Demand/Limits on Sewer Capacity

1. The massive Isabel Neighborhood Plan will add a very significant demand for water. In addition to other approved housing units in Livermore, how many commercial and industrial developments have been approved that will compete for limited water supplies?
2. The Tri-Valley recently suffered through a multi-year drought. How will the City and California Water Service Company meet large future commercial, industrial and housing demands for water? Will current residents be forced to pay higher water bills to accommodate new growth? If so, what percent increase in water prices should current residents expect?
3. Does development of Isabel Neighborhood require the use of recycled water for landscaping with separate purple piping indicating the use of recycled water? If not, why not? **Could the addition of 11,000 new residents at this neighborhood require the use of recycled water for drinking for all residents in Livermore?**
4. Current residents have opposed the use of recycled water for drinking because the latest research show large viruses **cannot** be removed by this process. Also endocrine disruptors (hormones such as estrogen) cannot not be removed from recycled water and could lead to health problems with long term use. Our water supply comes from a closed basin, therefore hormones cannot be flushed from water supplies as it has been done in other areas using recycled water for drinking. Finally, the expense of using recycled water has been cost prohibitive. **What other sources of water could the City of Livermore use if water demands generated by large developments such as Isabel Neighborhood cannot be met using traditional sources?**
6. Could the demand for water generated by the Isabel Neighborhood and other commercial and industrial developments lead to poorer water quality-- **-more salt, more total dissolved solids in drinking water??** Changes in taste and color of water?
7. The state is now requiring all cities to inventory the amount of PFAS in water

B14-A-2

supplies. Some deep wells in the Tri-Valley have shown extremely high levels of PFAS---the forever chemicals---and may cause the state and local water agencies to restrict or remove these wells from usage. Many of these deep wells are relied upon as extra water sources during droughts. **How would the possible permanent removal of deep wells as a water source impact water supplies that will be greater given the amount of demand from new developments such as Isabel Neighborhood?**

8. Many in the Livermore Wine Industry are stating the urgent need to develop more mid-sized wineries for the Livermore Wine Industry to remain viable for the long term. Wineries are also asking to increase on-site production which will further increase water demands. The development of more mid-sized wineries and increased on site production **would increase water demands permanently. How would a large development such as the Isabel Neighborhood compete with water demands made by future mid-sized wineries and in-site wine production activities?**

B14-A-3

9. Livermore has had re-occurring sewer capacity issues. The city only has a finite sewer capacity due to pipe size and the amount of treated sewer water that can be disposed of into the bay. How would the addition of 11,000 new and permanent residents at Isabel Neighborhood affect sewer capacity needs that will also be impacted by commercial and industrial interests? **Will developers pay for additional sewer capacity for Isabel Neighborhood if it is needed?** Or will additional sewer capacity fees for this development be paid for by all residents?

B14-A-4

10. The city of Livermore has required all new developments to pay for lighting and landscaping through monthly landscaping and lighting maintenance fees. Will the Isabel Neighborhood be a separate lighting/landscaping district and will residents be required to pay these fees? If so, what might the monthly fees be?

Please acknowledge receipt of these comments by sending me an email.

Sincerely,  
Donna Cabanne  
donna.cabanne@gmail.com

B14-B-1

From: [BERNARD CABANNE](#)  
 To: [Ashley Vera](#); [donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com); [bcabanne@comcast.net](mailto:bcabanne@comcast.net)  
 Subject: comments for Draft SEIR for Isabel Neighborhood Plan /requesting time extension/increased mail notification  
 Date: Friday, August 7, 2020 3:34:49 PM

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To Ms. Vera  
 Livermore Planning Department

I am submitting these comments/questions as a 37 year resident of Livermore, as an member of the TRi-Valley Sierra Club Executive Committee, and a member of the Center for Biological Diversity.

B14-B-2

1. The Sierra Club respectfully requests the comment period for the Draft SEIR for the Isabel Neighborhood be extended to at least six weeks **after** the release of the DRAFT EIR for Valley Link.. The revisions to the Isabel Neighborhood Plan -- originally discarded after the rejection of the BART link to Livermore ---cannot be commented upon in a comprehensive or meaningful way until the public can study the Draft EIR for Valley Link. Without the DRAFT EIR for Valley Link, the city assumes that Valley Link will be a suitable replacement transit system for BART;however, without the DRAFT EIR documentation for Valley Link, the public and the city cannot determine this to be the case.

B14-B-3

2. The Sierra Club also asks for an extension of the comment period for the Draft SEIR for the Isabel Neighborhood Plan due to difficulties receiving material and delays receiving materials due to covid 19 constraints.

B14-B-4

3. The adoption of the Isabel Neighborhood Plan, adding at least 11,000 new residents and with significant revisions will have city wide impacts and changes that will generate city wide interest. City staff must expand the mailing notifications to all current residents about future Planning Commission and City Council meetings addressing the Isabel Neighborhood Amendment Plan. Notifying only residents within the current plan area is insufficient for the size of this future development.

Please acknowledge receipt of this email.

Sincerely,  
 Donna Cabanne  
[donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com)

B14-C-1

From: [BERNARD CABANNE](#)  
 To: [Ashley Vera](#); [donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com); [bcabanne@comcast.net](mailto:bcabanne@comcast.net)  
 Subject: comments for Draft SEIR Isabel Plan/ lack of alternatives /contingency clause  
 Date: Friday, August 7, 2020 3:52:34 PM

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To Ms. Vera  
 Livermore Planning Department

Dear Ms. Vera:

I am submitting the following comments for the Draft SEIR review of the Isabel Neighborhood Plan. I am submitting the comments as a 37 year resident of Livermore, as a member of the Tri-Valley Sierra Club Executive Committee and as a member of the Center for Biological Diversity.

B14-C-2

1. **The comment period for the Draft SEIR needs to be extended beyond August 7th,2020.** The proposed Isabel Neighborhood plan amendment is directly linked and dependent upon the Valley Link Rail System that is currently in a conceptual planning stage. The public cannot determine if the Valley Link rail system will be an adequate or appropriate replacement for BART without specific, concrete details about the location of Livermore Valley Link Stations, time tables, frequency of trains, etc. The capacity of trains arriving in Livermore after loading passengers at several stations in San Joaquin may leave little to no room for Livermore passengers. This already happened with ACE trains. The public cannot ascertain if proposed mitigations will reduce impacts to Isabel Neighborhood when the critical aspects of the Valley Link System have not been circulated for public review. **The Draft SEIR for the Isabel Neighborhood Plan Amendment must be recirculated for a minimum of 45 days AFTER the VALLEY LINK documents have undergone public review and comments. Without the VALLEY LINK EIR ---scheduled for release in FALL 2020--- any comments about the impacts to the Isabel Neighborhood Plan are meaningless because they could be subject to significant changes.**

B14-C-3

2. The DRAFT SEIR for the Isabel Neighborhood Plan Amendment does NOT provide an adequate analysis of alternatives to the Valley Link Rail System. Why? This is required under CEQA law. At the very least, the Draft SEIR must provide an updated analysis for no project, a medium project and identify the superior environmental choice. Using alternatives in Isabel Neighborhood Plan certified in 2018 with BART alternatives is **unacceptable and not legal.**

B14-C-4

3. The legality of switching bond money to Valley Link that was originally allocated for a BART extension to Livermore needs to be addressed in the Draft SEIR. **Why is this critical information missing?** Measure BB clearly states...." Under no circumstances may the proceeds of this transportation sales tax be applied to any purpose other than transportation improvements benefiting Alameda County." Valley Link would violate Measure BB by forcing Alameda County to divert bond and tax money to pay for an expensive new railroad through the Altamont Pass and subsidize San Joaquin commuters who have paid nothing and will not pay the tax. **Without the**

B14-C-4 | **400 million from Measure BB paid for exclusively by all Alameda residents, the Valley Link Rail System does not have enough funding to be viable and thereby the Isabel Neighborhood Plan is not viable either. The Draft SEIR must address the legality of funding.**

B14-C-5 | 4. The Draft SEIR for Isabel Neighborhood Amendment Plan do NOT provide an analysis for the use of express buses; nevertheless, this is mandated by Senate Bill 916 (2003). This bill states that the MTC/Bay Area Toll Authority "shall fund....improvements on I-580 in Alameda County for use by express buses." Bus systems are more flexible and have lower capital and operating costs.  
**Why is the express bus alternative missing from the Draft SEIR?** An extensive, express bus network, modeled after the highly-used and efficient high tech buses used in San Francisco and Silicon Valley would be a better way to connect Livermore residents to all transportation systems. An analysis of an **extensive express bus system** ---NOT a single bus line over the Altamont duplicating the proposed railroad--  
**- must be provided for public review and comments.**

B14-C-6 | 5. The Draft SEIR states that Valley Link will provide stations at Greenville and Isabel. This has not yet been finalized. Why is a station being proposed at Greenville? There is not a significant population located there now to support a station. The Greenville station proposal would, in fact, be further growth inducing and may violate provisions of Measure D. **The selection of Greenville as station location must be explained further with data that is lacking from the Draft SEIR.**

B14-C-7 | 6. The original Isabel Neighborhood Plan was certified with only a BART extension to Livermore and contained a **critical contingency clause**. It stated that if the BART extension to Livermore was **not** approved, then none of the Isabel Neighborhood housing would be constructed.  
**A similar legally-binding and irreversible clause needs to be added to the current Isabel Neighborhood Plan Amendment . If funding for Valley Link is denied or postponed, permitting and construction of the 4095 residential units shall be invalidated.**  
We were promised BART and paid taxes for BART for over 50 years and we received nothing. The Isabel Neighborhood Plan must include guarantees of Valley Link funding and completion of stations to Livermore before housing construction at Isabel begins. **If the Valley Link stations to Livermore are not operational, housing should occur as infill in areas of Livermore that already have adequate access to infrastructure, libraries, schools, etc.**

B14-C-8 | 7. **Housing units and any construction for changes to allow the Isabel Neighborhood to advance--- cannot be built until adequate funding for Valley Link is secured and Valley Link connections to Livermore actually exist.** The projected soft start date for Valley link in 2028 is not realistic giving the serious reduction of tax dollars during this Covid crisis that could last for months, with possible covid spikes and shutdowns for years.

B14-C-9 | 8. If Measure BB funding is switched to Valley Link Authority, the **use of the 400 million must go to a vote of the people.** Has any ballot measure been written to

B14-C-9 | allow this switch ? **What would be the earliest date for a ballot measure allowing the switch of Measure BB funding to Valley Link?**

B14-C-10 | 9. Valley Link Authority has stated San Joaquin residents shall pay for their costs in San Joaquin. Will San Joaquin residents also help pay for initial planning and construction of Valley Rail links? If not, why not? **When is the earliest date a San Joaquin ballot measure to increase taxes to pay for Valley Link could occur?** Why is Livermore considering certifying a DRAFT EIR for Isabel Neighborhood whose purpose is to support transit housing ----when we don't know or have any control over what voters in San Joaquin may do??  
This Draft SEIR needs to be recirculated after San Joaquin voters agree to pay significant new transportation taxes to fund Valley Link.  
It would be **fiscally irresponsible** to proceed with housing units and/or any implementation of the Isabel Neighborhood Plan without a binding legal financial commitment to Valley Link by San Joaquin voters. **Livermore residents need to know what portion San Joaquin residents will be willing to pay before deciding if we will absorb the added infrastructure costs of starting a neighborhood from scratch along the east portion of 580.**

B14-C-11 | 10. The existence of the Isabel Neighborhood depends on a viable, large transit system to validate the construction of housing units along I 580 instead of using infill to meet housing goals which Livermore has done in the past and continues to do. How many stations in San Joaquin will be built for Valley Link? What percent of Valley Link stations will actually be built in Livermore? **What percent of Valley Link funding will be paid for by Alameda residents? by San Joaquin residents???** This information must be given to Livermore residents in order to decide if the Isabel Neighborhood Plan is viable long term.

Please acknowledge receipt of this email.  
Sincerely,  
Donna Cabanne  
donna.cabanne@gmail.com



B14-D-1

From: [BERNARD CABANNE](#)  
 To: [Ashley Vera](#); [donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com); [bcabanne@comcast.net](mailto:bcabanne@comcast.net)  
 Subject: comments for Draft SEIR for Isabel Neighborhood /Growth Inducing  
 Date: Friday, August 7, 2020 4:06:09 PM

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To Ms. Vera

Livermore Planning Department

Dear Ms. Vera

I am submitting the following comments to be included in the Draft SEIR for the Isabel Neighborhood Plan. I am submitting these comments as a thirty seven year resident of Livermore, as a member of the Tri-Valley Sierra Club Executive Committee and as a member of the Center for Biological Diversity.

B14-D-2

Growth Inducing

1. The Draft SEIR states build out of the proposed Isabel Neighborhood would occur in 2040. That means building would commence in 2020 but best case scenarios have Valley Link starting in 2028. **Explain why the city would begin building transit based housing units 8 years in advance of any possible rail link???**

**How many housing units would be built before 2028?** What happens if the operational start of Valley Link is postponed to a later date? Is construction of the Isabel Neighborhood housing units delayed or postponed to coincide with Valley Link start dates? **What happens if Valley Link is only partial funding or NOT funded at all? Is Livermore still legally bound to build all 4095 units???**

B14-D-3

2. The Draft SEIR states this project will increase Livermore growth in this planning area to 6.5 percent for the next 20 years. What is the current growth rate in Livermore? What has the growth rate in Livermore been in the last 5 years? last ten years? **How much of a deviation in growth rate increase does this project represent? Has Livermore ever approved a planned development this large before? If so when? If not, why not?**

B14-D-4

3. In addition to the Isabel Neighborhood project, how many other housing units have been approved but not built in Livermore? What is the actual growth rate when all approved housing projects in Livermore are added to the 4095 units? How many additional housing projects in Livermore are in the planning process but have not yet been approved?

B14-D-5

4. How many units per year will be built for the Isabel Neighborhood

B14-D-5 | Plan? Will the number of units built for Isabel Neighborhood be the same each year??? Will more units be constructed during the earlier phases of building? Does the city have the legal ability to reduce the total number of units for the Isabel Neighborhood if the city cannot meet water, sewer or other essential needs or infrastructure needs?

B14-D-6 | 5. Table 4.2-1 entitled Growth Projections Related to the Cumulative Context (2040) page 4-5 shows Livermore's population would grow from 90,269 to 113,730 in 2040 with the Isabel Neighborhood project---a 26% increase in population, while neighboring city Pleasanton is projected to grow from 82,372 to 83,115 by 2040 or a 1% increase over the next twenty years. The Draft SEIR states Livermore must increase housing units to meet ABAG goals.

**Explain why Pleasanton is not required to fill ABAG goals and can retain a projected growth rate of 1% ?** Isn't true that ABAG housing goals are just goals and cannot be legally enforced if cities cannot pay for or **choose not to pay for** infrastructure and water demands to meet these housing goals?

6. Unlike many cities in the Bay Area, Livermore has met and continues to meet its housing ABAG goals. **Why would the city start a new transit housing project of 4095 units without the transit portion ---Valley Links ---constructed???**

B14-D-7 | 7. The Draft EIR states the number of new jobs in the planning area would increase to 17,990 but provides no breakdown of new jobs according to type, salary, and whether these jobs are permanent or temporary and/or related to the construction of the area. Please clarify the types of jobs, entry level or requiring extensive training/ certification, permanent or temporary, full time or part time. Without this breakdown, the jobs increase data is meaningless.

B14-D-8 | 8. The Valley Link connection is proposed as a solution to connect San Francisco Bay Area and San Joaquin Valley. **Why is it Livermore's responsibility exclusively to provide housing for this jobs/housing imbalance created and maintained by other counties ?** How will additional housing units in Livermore reduce the impacts of the 22 recently approved large housing projects in Tracy, Stockton and other cities in San Joaquin? Why aren't companies required to move jobs to San Joaquin? Why are cities such as San Francisco, Palo Alto, Menlo Park, and Cupertino allowed to profit from large job generating companies such as Google, Facebook, Twitter, Apple but not required to provide housing for their employees within Santa Clara, San Mateo, and San Francisco counties?

B14-D-9 | 9. The regional housing demand was not created by Livermore, nor will it be solved by Livermore alone. In addition to the 22 newly approved housing developments in San Joaquin, how many new housing developments have been approved in Dublin which has a projected growth rate of 36% by 2040? How many housing developments have been approved for Mountain House? Have many additional units have been approved for San Ramon? Pleasanton? Approved housing developments from all of these neighboring cities will add to cumulative traffic impacts on 580 and

B14-D-9 | cumulative air, water and other environmental impacts in the Tri-Valley. **Why did the Draft SEIR fail to include a breakdown of approved housing units/developments in surrounding cities?**

B14-D-10 | 10. Livermore residents have consistently voted to support sustainable growth. **Shouldn't a housing project this large---4095 units be put to a vote by the current residents, especially because the essential purpose of the Isabel Neighborhood--- originally required for a BART station---has now changed to be a transportation link for San Joaquin residents??**

Please acknowledge receipt of this email.

Sincerely,

Donna Cabanne

donna.cabanne@gmail.com

B14-E-1 | **From:** [BERNARD CABANNE](#)  
**To:** [Ashley Vera](#); [donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com); [bcabanne@comcast.net](mailto:bcabanne@comcast.net)  
**Subject:** Fwd: Noise impacts and lack of noise studies/request for full EIR  
**Date:** Friday, August 7, 2020 4:24:42 PM

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To Ms. Vera  
 Livermore Planning Department

Dear Ms. Vera

Please submit the following comments to the Draft SEIR review of the Isabel Neighborhood Plan. I am submitting these comments as a thirty seven year resident of Livermore, a member of the Tri-Valley Sierra Club Executive Committee and a member of the Center for Biological Diversity.

- B14-E-2 | 1. The Draft SEIR is deficient because it does not include the noise studies of trucks traveling on adjacent 580. 580 is a major corridor for trucks transporting goods from the Bay Area to Freeway 5 and the rest of California. As such, the truck travel is heavy and continuous.  
 Before placing 12,000 residents next to 580, the Draft EIR must undertake noise level studies to measure what current noise levels are generated by trucks. This data would be especially important during the night hours when residents would be trying to sleep. If noise levels generated by trucks specifically and overall traffic cannot be mitigated, the city needs to consider other areas for housing units.  
**It is unhealthy and unreasonable to expect future residents to be subjected to excessive and possibly damaging noise every night.**
- B14-E-3 | 2. In addition, the construction of housing units at Isabel is projected to occur over twenty years. Cumulative noise impacts from the freeway, the noise from flights from the Livermore Airport (specifically small jets), noise from the Pacific Railroad cargo trains and railways, mining operations from Cemex all must be measured and added to construction noises that will occur within the planning area. Noises generated from all commercial and industrial sites nearby must be measured and included in the DRAFT SEIR for the Isabel Neighborhood Plan.
- B14-E-4 | \*\*\*\*\* The scope and size of the Isabel Neighborhood Plan ---adding 11,000 new residents---with numerous and significant environment impacts--- warrants the need for a full EIR for this project. Trying to use data from a previously certified 2018 EIR is not adequate because air quality, traffic impacts, water impacts, noise impacts and visual resources, as well as many other critical environmental areas have significantly changed and have not been adequately measured or analysed in the 2018 EIR or in the Draft SEIR. Furthermore, the DRAFT SEIR cannot be
- B14-E-5 | commented on sufficiently or in a meaningful manner without the Draft EIR for Valley Link. The public cannot make informed decisions without the essential information from the Draft EIR for Valley link. Finally the Draft SEIR does not present or analyze
- B14-E-6 | alternate transit systems or alternate areas for housing. **The Draft SEIR must select a superior environmental choice that was not included; nor was a medium**

B14-E-6 | **project or no project included in the document.** All of the deficits support the need for a complete EIR for the Isabel Neighborhood Project, not a revision of past environmental documents. According to recent court cases, any individual or group can request a full EIR be completed for unresolved concerns involving development.

Please acknowledge receipt of the this email.

Sincerely,

Donna Cabanne

[donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com)

B14-F-1

From: [BERNARD CABANNE](#)  
 To: [Ashley Vera](#); [donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com); [bcabanne@comcast.net](mailto:bcabanne@comcast.net)  
 Subject: Draft SEIR for Isabel neighborhood ---traffic impacts -- significant and unavoidable  
 Date: Friday, August 7, 2020 4:37:35 PM

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To Ms. Vera  
 Livermore Planning Department

Dear Ms. Vera

Please include the following comments and questions in the Draft SEIR for the Isabel Neighborhood Plan. I am submitting these comments as a thirty seven year resident of Livermore, as a member of the Tri-Valley Sierra Club Executive Committee and as a member of the Center for Biological Diversity.

B14-F-2

1. The Draft EIR states the traffic impacts to both the freeway (580) and circulation on city streets at major intersections will be level F or gridlock with the addition of the Isabel Neighborhood project at buildout--even with Valley Link transit. Traffic estimates are seriously flawed and underestimated in the Draft SEIR as tables do not account for traffic from approved development in neighboring cities San Ramon, Dublin, Pleasanton, Mountain House and San Joaquin cities including but not limited to Tracy, Lathrop, Stockton, Ripon etc. Traffic counts from known approved developments in these cities must be added to address the true impacts of regional traffic.

B14-F-3

2. The Draft SEIR states that level of service on 580 at 2025 will be adequate; that statement is NOT accurate. **The segment of Freeway 580 that borders Livermore experiences gridlock or Level F most afternoons from 4pm to 6pm. This is why commuters and trucks traveling east use First Street, Wetmore, Arroyo and Vasco Road--- and other city streets--- to avoid the gridlock on 580 every weekday afternoon.**

B14-F-4

3. The addition of 11,000 new residents at Isabel Neighborhood--right next to 580--- will have serious and unavoidable impacts on 580 that cannot be corrected with widening 580, metering or the use of Valley Link. Not all Isabel residents will use Valley link; many will opt to use their cars. It is not realistic to assume residents will bicycle to school, work, for groceries etc. In fact, planners generally assume each household makes a least ten car trips per day. **Why were these daily trips generated by Isabel residents not added to city circulation counts and freeway traffic counts?**

B14-F-5

4. **Commuters and trucks use First Street, Wetmore, Las Positas, Arroyo, and Vasco Road to avoid gridlock on eastbound 580 every afternoon. Trucks will not be able to use Valley Link, nor will a majority of commuters.** Yet the Draft SEIR did not include traffic counts for these critical city roads and intersections on city

B14-F-5 | streets that will be significantly impacted by Isabel Neighborhood with an additional 11,000 residents. **Why were these critical city streets and intersections omitted from traffic counts in the Draft EIR?** The omission of the true impacts of traffic created by Isabel residents on major city intersections and city circulation render the DRAFT SEIR traffic data incomplete and seriously flawed. Current traffic counts on these city streets and intersections and future projections of cut through traffic on critical city streets must be added and the Draft SEIR recirculated to allow for meaningful public comments.

B14-F-6 | 5. The Draft SEIR states that traffic conditions will seriously degrade at the intersection of North Livermore Avenue and Portola Ave. as result of adding 4095 housing units at Isabel. These streets connect current residents to **critical** commercial and service areas. **How will travel times for current residents be delayed with gridlock conditions at these intersection as residents attempt to use the Kaiser Facility and medical offices, Costco, Walmart, Home Depot, Target, Big Five Sporting Goods, Verizon,etc. ? Why were traffic counts for North Livermore and Las Positas omitted from the Draft SEIR?**

B14-F-7 | 6. The true traffic impacts of adding 11,000 new residents will place many residential streets and intersections in gridlock and/or unacceptable level of service as residents and commuters alike will use smaller residential streets to avoid the freeways and congested city areas due to the 11,000 additional residents. The widening of some residential streets may be possible but it would **not** occur before the development of Isabel and in some neighborhoods the widening of residential streets is **not feasible**. **Circulation on major city streets will be significantly and permanently degraded with 11,000 new residents.**

Please acknowledge receipt of this email.

Sincerely,  
Donna Cabanne  
donna.cabanne@gmail.com



B14-G-1 | **From:** [BERNARD CABANNE](#)  
**To:** [Ashley Vera](#); [donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com); [bcabanne@comcast.net](mailto:bcabanne@comcast.net)  
**Subject:** Draft SEIR Isabel Neighborhood Plan ---additional infrastructure needs /a divided community  
**Date:** Friday, August 7, 2020 4:56:32 PM

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Dear Ms. Vera;

Please submit the following comments to the Draft SEIR for the Isabel Neighborhood Plan. I am submitting this comments as a Livermore resident, a Sierra Club member and a member of the Center for Biodiversity.

B14-G-2 | Greater infrastructure needs

1. The addition of at least 11,000 new residents will create serious issues for current city infrastructure. How many new elementary schools will be needed as a result of this large scale development? How many additional middle schools will be needed? How many high schools? Will students living in Isabel Neighborhood be able to walk to school? Will students living here have to be bused?

2. How many new libraries will be needed to serve this new development of 11,000 new residents? How many new fire stations will be required? How many new police officers will be needed to provide security for 4095 additional housing units?

B14-G-3 |

3. The creation of 4095 housing units separated from the rest of Livermore by a freeway will lead to a divided community. We have already experienced this with many Springtown residents who do not feel their needs were addressed in the same manner or with the same importance as other more established residential areas of Livermore. How will connections between Isabel Neighborhood and other areas of Livermore be created other than the pedestrian and bicycle crossings over 580? A transit-oriented Neighborhood will have connectivity issues other than commuting that have **not** been sufficiently addressed in the Draft SEIR for the Isabel Neighborhood.

Please acknowledge receipt of this email

Sincerely  
 Donna Cabanne  
[donna.cabanne@gmail.com](mailto:donna.cabanne@gmail.com)

B15-1 | **From:** [Jean King](#)  
**To:** [Ashley Vera](#)  
**Subject:** Isabel Neighborhood EIR  
**Date:** Friday, August 7, 2020 4:03:34 PM

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Thank you for the opportunity to comment on the Draft Supplemental Isabel Neighborhood EIR.

B15-2 | Since Livermore is the Lead Agency on the EIR it is important to delay the comment period until after the Valley Link's Draft EIR is published. Environmental concerns should be studied completely.

B15-3 | A new EIR should be conducted since there are several major difference from the original plan with BART.

At the time of the approval of the Isabel Plan, the public was assured that it would only be implemented if a full BART station would be built. That is no longer the plan. Isabel will not be the end station on a BART route. It will be part of a much different system ultimately between Stockton and BART Dublin/Pleasanton with many stations to the east with increased adjacent development. The ridership could be much changed. The westbound trains may be full before they reach Livermore. The Dublin BART trains may be full when Valley Link makes connection.

The car traffic situation in and around Livermore could be quite different. There could be increased traffic resulting from Valley Link ridership in both directions.

B15-4 | What will be the effect of the changes in air quality, ridership on public transportation and virtual working that have occurred because of the effects of the pandemic since the last EIR.

What lasting effects from the pandemic will there be on the planned retail and office space? How will the entire city be affected by this development?

B15-5 | Since affordable housing has become a higher priority, what percentage of these housing units will be affordable? 100 percent? Will 4,095 housing units increase growth beyond the desired percentage rate in the city?

B15-6 | Will the school needs be addressed adequately?

City sewage capacity?

Water?

Thanks for your consideration.

Jean King  
4205 Colgate Way  
Livermore CA 94550

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## 3 Responses to Comments

This chapter includes responses to each comment received during the public comment period, in the same order as presented in Chapter 2. The responses are marked with the same number-letter combination as the comment to which they respond, as shown in the margin of the comment letters.

### A. Agencies and Organizations

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- A1 Gordon D. Jacoby; Livermore Venture Partners, L.P. (LVP)
- A1-1 **The commenter provides background on the property's history including its relationship with Las Positas College and requests for annexation.** The comments are noted.
- A1-2 The commenter requests an explanation as to why the proposed Project and SEIR do not include references to an affordable housing financing plan. The affordable housing financing plan is not relevant to the topics evaluated in the Draft SEIR, which is limited to discussion of impacts related to air quality, climate change and energy, noise, and transportation. In addition, an affordable housing financing plan was not available during preparation of the Draft SEIR. The comments have been noted.
- A1-3 The commenter requests that the proposed Project be modified to clarify consistency with the California Department of Housing and Community Development (HCD) May 2020 Guideline on Housing Inventories. The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.
- A1-4 The comment is the closing of the letter and is noted.
- A2 David Best, Shea Homes Northern California
- A2-1 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.
- A2-2 The commenter notes an inconsistency between the Draft SEIR and the draft Isabel Neighborhood Specific Plan related to a roadway extension north of intersection #15. The roadway extension north of intersection #15 was not included in the traffic analysis. Therefore, Figure 3.2-1, Study Area and Study Intersections, has been revised to remove this roadway extension, and is included in Chapter 4, Revisions to the Draft SEIR.

A2-3 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

A2-4 The commenter states that a new traffic signal at the intersection of Portola and Road 1 (Intersection #23) will increase traffic at peak hours. As shown in Tables 3.12-13 and 3.12-13, Intersection #23 would operate at LOS A under the proposed Project in 2040 in the AM and PM peak traffic conditions. At the intersection of Collier Canyon Road and North Canyons Parkway (Intersection #10), traffic conditions would improve from LOS C in the AM and PM conditions to LOS B under the proposed Project under the AM and PM conditions. The comment related to elimination of the proposed new traffic signal is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR.

A2-5 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

A3 Dick Schneider, Sierra Club Tri-Valley Group

A3-1 The comment is the salutation of the letter and is noted.

A3-2 The commenter states that the Draft SEIR process should be suspended until the Valley Link EIR is available. The Draft SEIR analysis is not contingent on anything that may be included in the Valley Link Project EIR. The Valley Link project is not a City of Livermore-initiated project, and the City of Livermore is not the Lead Agency for the Valley Link EIR. According to the Notice of Preparation of the Valley Link EIR, that EIR will analyze Phase I improvements at a project level of detail based on preliminary engineering and Phase II improvements at a programmatic level. The Notice of Preparation may be reviewed at the following link:

[https://docs.wixstatic.com/ugd/b4e315\\_1440e9bd212a4337a74c9bbef01e4c08.pdf](https://docs.wixstatic.com/ugd/b4e315_1440e9bd212a4337a74c9bbef01e4c08.pdf).

Therefore, the commenter may refer to the Valley Link Draft EIR, once published, for impacts associated with the Valley Link project. The Isabel Avenue station is anticipated in **Valley Link's future planning and environmental analysis**. However, the Valley Link proposal is not part of the proposed Project (Isabel Neighborhood Specific Plan). Construction and operation of the Valley Link project is a condition that will likely exist in the future, and a project that will likely occur. The 2018 Isabel Neighborhood Specific Plan (INSP) was contingent on BART Board of Directors approval of an extension to Isabel Avenue. Unlike the 2018 Isabel Neighborhood Specific Plan, the 2020 Isabel Neighborhood Specific Plan is not contingent on Valley Link approval so that the City of Livermore can allocate specific affordable residential sites as part of the future Housing Element update and Regional Housing Needs Assessment housing inventory process.

A3-3 The commenter states that the projected population used in the Draft SEIR is significantly underestimated. The commenter states that the Draft SEIR uses an average household size assumption of 2.52 based on 2013 ABAG Projections with a vacancy rate of five percent and population increase of 9,800, and that the average household size for the City of

Livermore increased to 2.85 in the 2017 ABAG Projections. For this reason, the commenter states that the analysis in the SEIR is not valid, and that impacts need to be recalculated and the SEIR recirculated.

This assertion is incorrect, as explained below.

The existing and buildout population in the Draft Isabel Neighborhood Specific Plan (INSP) and Draft SEIR is provided for informational purposes as a projection of future buildout. Housing planned in the INSP is higher density and transit-oriented, which would comprise of smaller, multifamily units, with a lower average household size than for the city as a whole. The INSP states (see footnote on page 2-45) that while Livermore currently has an average household size of 2.75, an average household size of 2.52—which was the citywide average in 2013—represents a reasonable assumption for housing in INSP.

However, topics evaluated in the Draft SEIR do not use the project description population or household size directly. The traffic analysis in the Draft SEIR is based on population generation factors included in the regional transportation model (see below) and the remaining topics evaluated in the Draft SEIR—air quality; energy, greenhouse gases, and climate change; and noise and vibration—use the traffic modeling results to evaluate the impacts.

For traffic and transportation, as stated on page 3.2-24 of Draft SEIR, traffic modeling for the proposed Project was based directly on the modeling from the BART to Livermore Extension (BLVX) study and modified to replace BART with Valley Link as the primary transit serving the INSP area with a station at Isabel Avenue. The BLVX study used the Alameda County Transportation Commission (CTC) Countywide Travel Demand Model with Association of Bay Area Governments (ABAG) Plan Bay Area Projections and network assumptions. The model has a base year of 2013, and horizon years of 2028 and 2040 conditions. Year 2028 and 2040 No Project Conditions include Plan Bay Area land use assumptions outside of the INSP area and Livermore General Plan assumptions within the INSP area. Additional modeling was conducted to represent the future INSP circulation in more detail than was represented in the BLVX modeling. The more detailed modeling was used to generate and distribute the INSP area trips to the new streets and connections to the existing city arterial roadways so that detailed traffic operational analysis could be conducted to determine access control and size the new streets and intersections.

The Alameda CTC Countywide model uses factors to convert housing unit information to population. The average household size used varies across traffic analysis zones (TAZs) based on the mix of single family and multifamily units in the zone. For Livermore, the average household size used varies from 2.67 to 3.22 persons per household and do not include vacancy rates. If these household sizes (2.67 for multifamily and 3.22 for single family) were to be applied to the city's current mix of single family and multifamily housing units (78.4 percent single family, and 22.6 percent multifamily and mobile homes, as estimated by the California Department of Finance [DOF] for 2020 for the city; see Report E-5 published by DOF), the average household size used for traffic analysis citywide, even without allowance for housing vacancy, would be 3.1 persons per household, which is much higher than the ABAG projection of 2.85. For TAZs within the INSP, average

household size in the model ranges from 2.67 to 3.00 persons per household, with no allowance for vacancy, resulting in a total population of 13,531 in 2040 for the 5,475 projected housing units in the Planning Area, for an increase in population of 10,115, which is slightly higher—rather than lower—than 9,800 residents as stated in the plan.

Thus, the traffic analysis for the proposed Project uses a slightly higher population number for traffic generation both within the INSP and outside, thereby slightly overstating—rather than understating—potential traffic impacts. More critically, factors utilized to convert housing units to population are consistent with those used in regional modeling and for Plan Bay Area, and for regional planning studies such as the BART to Livermore EIR.

Because outputs from traffic modeling feed directly into air quality, noise, greenhouse gases, and energy calculations, these impacts are also likely slightly overstated in the Draft SEIR. If a slightly higher buildout population is used, this would also result in lower per capita energy consumption and greenhouse gas emissions.

Thus, no change to the Draft SEIR is warranted.

A3-4 The commenter requests that the Draft SEIR include the most recent air quality data available. The Draft SEIR uses air quality data from the California Air Resources Board (CARB), specifically the Select 8 Summary tool available at <https://www.arb.ca.gov/adam/select8/sc8start.php>. While the NOP for the Draft SEIR was published in 2019, 2018 is the most recent year for which air quality data is available from CARB. Bay Area Air Quality Management District (BAAQMD) provides 2019 data for ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (N<sub>2</sub>O), and fine particulate matter (PM<sub>2.5</sub>) concentrations but does not provide data on PM<sub>10</sub> concentrations. Table 3.1-1 is revised to include 2019 ambient air quality monitoring data from BAAQMD for informational purposes and is included in Chapter 4, Revisions to the Draft SEIR. 2019 ambient air quality monitoring data was not complete at the time the NOP was published. As shown in the revised table, maximum concentrations of the above pollutants in 2019 reflect pollutant concentration trends from 2016 to 2018 and do not affect the significance of environmental impacts discussed in Chapter 3.1. This data does not constitute significant new information pursuant to Section 15088.5 of the CEQA Guidelines and therefore recirculation of the Draft SEIR is not required.

A3-5 The commenter requests that the Draft SEIR include mitigation related to Small Off Road Engines (SORE) used for landscaping businesses to reduce air quality impacts. SORE emissions include ozone, particulate matter, nitrogen oxide, carbon monoxide, and carbon dioxide. It is not anticipated that SOREs will have a significant contribution to PM<sub>10</sub> emissions compared to the number of cars traveling through the Planning Area on I-580 and driving within the Planning Area. Additionally, the California Air Resources Board and BAAQMD have implemented incentive programs and regulations for off-road equipment. Livermore City Council received a verbal presentation on SOREs on July 27, 2020 and did not receive any specific mitigation recommendations. The City of Livermore may consider implementing mitigation related to SOREs as part of the Climate Action Plan update that is currently underway. The proposed Project applies only to boundaries of the

Planning Area; therefore, implementation at a citywide scale at a later date may be more **successful at achieving the commenter's goal.**

- A3-6 The commenter states that air quality data for the pollutant ozone (O<sub>3</sub>) is missing from the Draft SEIR. This comment is false. Table 3.1-1 provides data on existing concentrations of ozone and NO<sub>2</sub> (an ozone precursor). Tables 3.1-7 and 3.1-8 provide projected maximum operational emissions of reactive organic gases (ROG) and NO<sub>2</sub>, which are the primary precursors for ozone. As discussed under Impact 3.1-3, emissions of the two precursors **would not exceed BAAQMD's conservative project-level thresholds of significance**, and emissions of NO<sub>2</sub> would decrease. Impact 3.1-4 further discusses air quality and health related impacts of project emissions of ozone.
- A3-7 The commenter states that air quality data for the pollutant PM<sub>2.5</sub> is missing from the Draft SEIR. This comment is false. Utilizing the most recent data from CARB and BAAQMD, Table 3.1-1 shows that PM<sub>2.5</sub> concentrations exceeded the National Ambient Air Quality Standard (NAAQS) a total of 14.6 days in 2018. See response to comment A3-4.
- A3-8 The commenter states that implementation of best construction practices is inadequate mitigation to address construction emissions. The commenter is referring to proposed Policy P-ENV-14, which requires construction projects to implement BAAQMD-recommended measures and is not a mitigation measure. Policy P-ENV-14 would be implemented during construction activities along with Policy P-ENV-15 and Mitigation Measures AQ-1, AQ-2, and AQ-3 to reduce emissions through a variety of tactics. Impact 3.1-3 discusses air quality impacts associated with operation of the proposed Project after construction is completed.
- A3-9 The commenter requests that the Draft SEIR chapter on greenhouse gases discuss GHG emissions associated with the Altamont Landfill. The comment is noted; Altamont Landfill does generate large amounts of GHG emissions. However, CEQA requires a discussion of impacts associated with implementing the proposed Project, such as energy consumed and emissions generated by development under the Project, rather than impacts to residents from existing sources. The Altamont Landfill is not located within the Planning Area and discussion of its emissions is not relevant to the Draft SEIR. The emissions inventory included within the Draft SEIR does include emissions from solid waste generated in the Planning Area.
- A3-10 The comment is related to proposed Project policies and not the environmental analysis conducted in the Draft SEIR. The comment has been noted.
- A3-11 The commenter requests an explanation for residential development adjacent to I-580, a known source of air pollutants. Impact 3.1-5 in Chapter 3.1: Air Quality of the Draft SEIR discusses impacts of exposing sensitive receptors to sources of air pollutants. Table 3.1-9 and the discussion following explicitly references health risks associated with I-580 and other major roadways in the Planning Area. This comment is primarily related to proposed Project land uses rather than the environmental analysis conducted in the Draft SEIR.



- A3-12 The commenter states that data about toxic air contaminants (TACs) is not included in the Draft SEIR. This comment is false. Table 3.1-2 inventories existing stationary sources of TACs within and in proximity to the Planning Area and provides data about the cancer risk, chronic health index, and PM<sub>2.5</sub> concentration associated with these stationary sources. Table 3.1-9 provides data about the cancer risk, chronic health index, and PM<sub>2.5</sub> concentration associated with mobile emissions of TACs from major roadway sources in the Planning Area.
- A3-13 The commenter requests that growth-inducing impacts of any proposed Greenville station Transit-Oriented Development be acknowledged in the Draft SEIR. While the commenter is correct in that the Valley Link project also anticipates a station at Greenville Road, there are no proposals for any TOD development planning at this site. The Draft SEIR concerns development in the Isabel Neighborhood and the City has expressed that the Isabel area is **a priority for future TOD development. Additionally, the City's General Plan Objective LU-3.1 Policy P1 states that "Prior to or concurrent with approval of any development applications, a specific plan shall be prepared and approved for the Greenville BART TOD". Thus, should there be any development in the Greenville area in the future, that development would be subject to a specific plan and any environmental analysis.**
- A4 Elke Rank, Zone 7 Water Agency
- A4-1 The comment is the salutation of the letter and is noted.
- A4-2 The commenter notes that the Zone 7 Water Agency manages certain, but not all channels through the Planning Area. The clarification is included in Chapter 4, Revisions to the Draft SEIR.
- A4-3 The commenter describes the Development Impact Fee Ordinance. The comment is noted.
- A4-4 The commenter states that the project should be consistent **with the basin's Alternative Groundwater Sustainability Plan (GSP) and Zone 7's Sustainable Groundwater Management Ordinance**, as well as State and county-wide policies. Consistency with these plans and policies is evaluated in Chapter 3.9: Hydrology and Water Quality of the 2018 Draft EIR. The Initial Study on the proposed Project determined that no new or more severe significant impacts would occur as a result of project changes for the following topics: Land Use, Population, and Housing; Aesthetics; Biological Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; Utilities and Service Systems; Public Services and Recreation; Geology and Soils; Cultural and Tribal Resources; and Agricultural Resources. Specifically, the Initial Study concluded that the proposed Project would not result in new significant impacts related to the quality and management of hydrological features and resources that were not identified in the 2018 EIR.
- A4-5 The commenter notes the presence of groundwater wells within the Planning Area. As discussed in the Initial Study, since the certification of the 2018 EIR, no new information has emerged, nor have environmental conditions changed such that new environmental impacts related to groundwater wells would be expected to emerge or previously identified impacts would become more severe.

- A4-6 The commenter encourages the use of water-wise landscaping. The comment is noted. The proposed Project includes several policies that support water efficient landscaping, including Policies P-PF-37, P-PF-41, and P-PF-42.
- A4-7 The commenter notes that comments previously submitted in relation to the 2018 EIR and the BART to Livermore EIR are included as Attachment 1. The comment is noted.
- A4-8 The commenter provides contact information for future notices and referrals. The comment is noted.
- A4-9 The comment is the closing of the letter and is noted.
- A4-10 The comment is a letter submitted by Zone 7 Water Agency regarding the 2018 Draft EIR. See responses to comments A1-1 through A1-4 and comments A1-6 through A1-8 on pages 185 and 186 of the 2018 Final EIR. The commenter identifies a Zone 7 flood control easement in the Planning Area and requests that the land not be designated for commercial uses. Figure 2-3, Figure 2-4, and Table 2-3 are revised to identify this area as designated open space rather than commercial and are included in Chapter 4, Revisions to the Draft SEIR. This comment is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. This revision does not constitute the addition of significant new information that would require recirculation of the Draft SEIR.

## B. Individuals

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B1 Teddy Lee

- B1-1 The commenter states that they are located in an area of high noise because of adjacency to I-580, and expresses concern over potential noise generated by the proposed Project and construction of the Valley Link rail project.

To provide further clarity regarding noise levels along I-580, Table 3.4-11 is revised in Chapter 4, Revisions to the Draft SEIR, to provide future noise levels along I-580 for informational purposes. As shown in Appendix D: Noise for the Draft SEIR, under existing conditions, existing noise levels along the segment of I-580 adjacent to their residence (Isabel Avenue to North Livermore Avenue) are 76.3 dBA, which exceeds the land use compatibility guidelines for low-density, single family, duplex, and mobile homes of 60, 65, and 70 dBA. The commenter is correct that their house is located in an area where noise levels currently exceed the standard. However, the Project will not result in significant increase in noise levels along I-580.

Along the segment of I-580 between Isabel Avenue to North Livermore Avenue, noise levels in 2040 will increase to 77.1 dB with implementation of the proposed Project, an increase of 0.8 dBA. Noise levels along all segments of I-580 within the Planning Area would exceed land use compatibility standards; however, the maximum noise level along all segments under 2040 with Project conditions would be 0.9 dBA, a less than significant impact. Additionally, the community noise modeling done for the project does not take

into consideration the existing freeway noise barrier, resulting in substantially reduced freeway noise in the area.

Tables 3.4-10 and 3.4-11 do not include the roadway segments of Sandalwood Drive south of Portola Avenue or Tranquility Drive south of Portola Avenue, which are more representative of noise conditions at the **commenter's house than along Portola Avenue**, a major roadway. Under the proposed Project, noise levels along Sandalwood Drive south of Portola Avenue would increase from 46 dBA to 52 dBA. Despite the increase of 6 dB, future noise levels along Sandalwood Drive would be consistent with the **City's General Plan Noise Compatibility standard**. Noise levels along Tranquility Drive south of Portola Avenue would increase by 1 dB from 61 dBA to 62 dBA. This does not represent a significant increase in noise levels, **and the City's General Plan Noise Compatibility standard states that noise levels of 65 dBA or below are "Conditionally Acceptable" for single-family residential uses.**

The commenter expresses concern about additional noise that could be generated as a result of the Valley Link rail project and possible highway widening. There are no proposals to widen the I-580 freeway, and the train will go in the I-580 median. Train noise impacts associated with the Valley Link rail project will be discussed in the Valley Link EIR.

B2-A Dennis Kolb

B2-A-1 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

B2-B Dennis Kolb

B2-B-1 The comment is the salutation of the letter and is noted.

B2-B-2 The commenter requests that the traffic analysis include the intersection of Heligan Lane and Collier Canyon Road. The traffic analysis included in Chapter 3.2: Traffic and Transportation evaluates traffic at Collier Canyon Road and North Canyons Parkway, which is the adjacent intersection. Impacts at this intersection would be less than significant. As shown in Figure 3.2-1, a select number of study intersections were chosen in the Planning Area to reflect potential areas of significance and high traffic demand.

B2-B-3 The commenter states that the extension of Alnwick Avenue to Portola Avenue will not be sufficient to handle traffic associated with the Shea Center residential development. Comments related to planned traffic circulation are related to proposed Project contents. See response to comment A2-4. As shown in Tables 3.2-13 and 3.2-14, traffic conditions at Portola Avenue and Road 2 (Intersection 24) will be LOS C in the peak AM and PM hours, which meets the standard of Mid D.

B2-B-4 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

B2-B-5 The commenter identifies discrepancies in maps showing trail systems in the Planning Area, including proposed Project Figure 3-14 and Draft SEIR Figures 3.2-4 and 3.2-5. Therefore, Figure 3.2-4 and Figure 3.2-5 have been revised to show accurate trail information, and are included in Chapter 4, Revisions to the Draft SEIR.

B2-B-6 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

B2-C Dennis Kolb

B2-C-1 The comment is the salutation of the letter and is noted.

B2-C-2 The commenter addresses traffic in the Montage neighborhood within the Planning Area. Existing and projected traffic conditions at study intersections, including Portola Avenue & Montage Drive, are provided in Tables 3.2-1, 3.2-9, 3.2-10, 3.2-11, 3.2-12, and 3.2-13. As shown in Table 3.2-13, **traffic conditions at Montage Drive will meet the City's level of service standard and impacts would be less than significant.**

B2-C-3 The comment is the closing of the letter and is noted.

B3 Steven Dunbar

B3-1 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

B3-2 The commenter states that mitigation measures included in the Draft SEIR to address Project-related increases in vehicle miles traveled (VMT) would be ineffective. The commenter expresses a preference for explicit requirements rather than goals and policies. As discussed in Chapter 3.2: Traffic and Transportation, the VMT in this analysis was not used for impact findings, but is provided for informational purposes only. As expected, VMT increases over time due to local and regional growth. However, VMT per capita is projected to decrease due to increase in service population in the INSP study area. This is related to a number of factors, including increase in population, new transit choices, shorter trip making to new destination opportunities, and more opportunities for walk and bike trips. Implementation of proposed Project goals and policies would therefore address VMT. As discussed in Chapter 3.2, no mitigation is feasible to reduce significant impacts to general purpose freeway segments and arterial segments associated with traffic congestion.

B3-3 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

B3-4 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted. Refer to 2018 Final EIR Responses C2-2 on the jobs-housing balance and C2-7 on the Affordable Housing Strategy.

B4 Brad McDowell

B4-1 The commenter asks if planned parkland in the Planning Area will be sufficient to accommodate increased population under the proposed Project. The Draft SEIR does not discuss impacts to public facilities, including parks and recreational facilities. However, the 2018 EIR determined that the impact of the adoption and implementation of the INSP on the quality of park facilities and any associated environmental impacts would be less than significant. There are no changes contained within the proposed Project that would substantially change the number of new residents anticipated at buildout, nor the amount of parkland to be contained in the Planning Area. Additionally, the proposed Project is anticipated to result in 9,800 new residents, not 15,000 new residents as the commenter claims.

B5 Sue Carroll

B5-1 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.

B6 John Stein

B6-1 The commenter states that the Gandolfo Ranch is a historical amenity that deserves protection. This concerns a topic that is not in the scope of the Supplemental EIR. By way of information, the 2018 Draft EIR analyzes potential impacts to cultural resources resulting from the implementation of the proposed Project, which includes re-zoning the Gandolfo Ranch from agricultural to residential and park uses. As stated on 2018 Draft EIR page 3.13-14 to 3.13-15 of Section 3.13, Cultural and Tribal Resources, future development resulting from this change in use would require subdivision of the property and the potential for demolition, relocation and/or alteration of the historic resource. A significant and unavoidable impact was identified in the 2018 Draft EIR as a result of the proposed Project. However, preservation of the house and trees are not precluded by the proposed Project. Policy P-PF-19 proposes incorporating elements commemorating Gandolfo Ranch into the park development south of the freeway, east of Stealth Street in order to **promote understanding among visitors of the site's historical significance**. The preservation of structures or other character-defining features is strongly encouraged. Additionally, policy P-LU-27 requires development of the Gandolfo property to acquire Prime farmland at a 1:1 ratio of compensatory mitigation under permanent easement.

B6-2 The commenter provides background information on previous proposals for residential development and expresses concern for noise impacts from aircraft traffic. Impact 3.4-1 on pages 3.4-40 to 3.4-44 of the Draft SEIR discusses noise impacts from the Livermore Municipal Airport on future residential development and concludes that impacts would be less than significant.

B6-3 The commenter expresses concern for impacts from aviation gasoline. The 2018 Draft EIR, Impact 3.8-5 (page 3.8-20 of the 2018 Draft EIR) discusses safety hazards to people residing or working in the Planning Area associated with the Livermore Municipal Airport, and concludes that impacts would be less than significant. Chapter 3.2 of the Draft SEIR

- discusses air quality impacts to sensitive receptors associated with asbestos, diesel particulate matter, carbon monoxide, and odors on pages 3.1-45 to 3.1-52.
- B6-4 The commenter states that the Gandolfo Ranch site will be replaced with industrial buildings and would be better used as a park operated by a local park district such as Livermore Area Recreation and Parks District (LARPD). This concerns a topic that is not in the scope of the Supplemental EIR. By way of information, the proposed Project envisions residential development and park uses. LARPD will incorporate **the Plan's parks** into their system and the City will work with LARPD as the Plan is implemented.
- B6-5 The commenter requests the Gandolfo Ranch site to be preserved. See response to comment B6-1.
- B6-6 The comment is the closing of the letter and is noted.
- B7-A Chad Greer
- B7-A-1 The comment is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. Chapter 7 of the proposed Project discusses implementation and financing strategies. The comment has been noted.
- B7-A-2 The commenter asks that the Planning Commission designate G&M farms as a historical site. The comment is related to potential actions taken by the Planning Commission and not the environmental analysis conducted in the Draft SEIR, which does not discuss impacts to historic resources. Impacts to historic resources are discussed in Chapter 3.13: Cultural Resources of the 2018 EIR. The comment has been noted.
- B7-B Chad Greer
- B7-B-1 The comment is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. Chapter 7 of the proposed Project discusses implementation and financing strategies. The comment has been noted.
- B7-B-2 The comments are related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comments have been noted.
- B8 Kelsey Van Aken
- B8-1 The commenter opposes increased density in the Planning Area under the proposed Project and discusses potential impacts to public schools, aesthetics and community character, traffic congestion, and parkland. Public services and facilities, including schools and parkland, and aesthetics are not topics addressed in the Draft SEIR; however, the 2018 EIR found impacts to these resource areas to be less than significant. Existing and projected traffic conditions at study intersections in the Planning Area are provided in Tables 3.2-1, 3.2-9, 3.2-10, 3.2-11, 3.2-12, and 3.2-13. As discussed in Chapter 3.2, no mitigation is feasible to reduce significant impacts to general purpose freeway segments and arterial segments associated with traffic congestion.

B9 Evan Branning

B9-1 The commenter expresses support for the comments made in comment letter B3. See response to comments B3-1 through B3-4.

B9-2 The commenter expresses concern regarding bike access and mobility in the proposed Project. The comment is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. Proposed Project Figure 3-14, Bicycle Circulation, has been revised to identify an extension of a Class IV bike lane south of Portola to Isabel Avenue.

B10 Maureen [No last name provided]

B11-1 The commenter expresses concern over the potential historic and cultural impacts of re-zoning the Gandolfo Ranch. See response to comment B6-1.

B11 Mark Palajac

B11-1 The commenter requests that potential home buyers be notified that the Airport protection area was modified under the proposed Project to allow construction of housing. This concerns a topic that is not in the scope of the Supplemental EIR. By way of information, Policy P-ENV-1 states, "Increase resident awareness of their proximity to the Livermore Municipal Airport.

- Provide overflight notifications or **avigation easements and Buyer's Awareness Measures** on new residential development within the Airport Influence Area (AIA).
- Send annual reminders to residents that they knowingly purchased property in the AIA.
- **Provide information on the City's website** about the APA overlay zone and Airport Land Use Compatibility Plan (ALUCP).
- Proactively advise potential residents who inquire about buying property in the overlay zone that their property will be subject to aircraft noise (via the Permit Center)."

Therefore, the commenter's concern has already been addressed by proposed policies.

B12 Tamara Reus

B12-1 The comment is the salutation of the letter and is noted.

B12-2 See response to comment A3-2.

B12-3 See response to comment A3-3.

B12-4 The commenter states that the cumulative impacts analysis does not address the impact of infill development planned for the rest of Livermore through 2040. This assertion is incorrect. The Draft SEIR traffic and air quality impacts reflect expected growth in the rest of Livermore as well as the region. As stated in the Draft SEIR, by their nature, the air quality; transportation; noise; and energy, greenhouse gas emissions, and climate change

- analyses presented in Chapter 3 represent a cumulative analysis, reflecting both growth within the Planning Area and outside, because the effects specific to the proposed Project cannot reasonably be differentiated from the broader effects of regional growth and development.
- B12-5 The commenter notes that significant cumulative and irreversible impacts would occur under the proposed Project. The comment is noted. These impacts were previously disclosed as part of the 2018 EIR to better inform the public and the decision-makers. The City Council considered those impacts in 2018 and certified the EIR and adopted a Statement of Overriding Considerations. While no new significant impacts are identified in the SEIR and a new Statement of Overriding Considerations is not needed, the City Council may consider an updated Statement of Overriding Considerations reflecting the updated analysis in the Draft SEIR.
- B13 Carol Silva
- B13-1 The comment is the salutation of the letter and is noted.
- B13-2 See response to comment A3-2.
- B13-3 The commenter asks if the City intends to pursue growth anticipated under the proposed Project if Valley Link is not constructed. This is a **comment on the City's policy** rather than on the Draft SEIR and is noted. The Valley Link proposal is not part of Isabel Neighborhood Specific Plan. It is a condition that is projected to occur in the future, and part of the regional transportation improvements planned for Alameda and San Joaquin Counties. The commenter asks about recently constructed and recently approved residential development. This is not relevant to the analysis within the Draft SEIR, which considers development under existing conditions and at full buildout of the proposed Project.
- B13-4 The comment is related to Valley Link usage and not the environmental analysis conducted in the Draft SEIR. The comment has been noted.
- B13-5 See response to comment A3-2.
- B13-6 The commenter notes that construction may result in significant impacts to air quality. Impact 3.1-2 in Chapter 3.1: Air Quality of the Draft SEIR discusses construction-related impacts to air quality. Policy P-ENV-14 and Mitigation Measures MM-AQ-1, MM-AQ-2, and MM-AQ-3 would reduce construction-related impacts and address the commenter's concerns.
- B13-7 The commenter expresses concern about impacts related to flooding. The Draft SEIR does not discuss impacts related to hydrology; however, the 2018 EIR does conclude that impacts related to flooding would be less than significant.
- B13-8 See response to comment A3-3.



B13-9 The commenter expresses concern about impacts to public services. The Draft SEIR does not discuss impacts to public services; however, the 2018 EIR does conclude that impacts to public services and facilities including fire, police, schools, parks, recreational, and water facilities would be less than significant.

B13-10 The commenter expresses concern about noise-related impacts associated with Livermore Municipal Airport. As all proposed land uses associated with the proposed Project would be located in areas where they would be compatible with the noise from the Livermore Airport per the adopted 2012 Livermore Airport Land Use Compatibility Plan, the Draft SEIR concludes that impacts related to the exposure of people residing or working in the Planning Area to excessive noise levels from aircraft at a public airport would be less than significant. In addition, policies P-ENV-1 and P-ENV-5 would help to further reduce any annoyance associated with occasional overflight noise.

B13-11 The comment is the closing of the letter and is noted.

B14-A Donna Cabanne

B14-A-1 The comment is the salutation of the letter and is noted.

B14-A-2 The commenter expresses concern about impacts associated with increased water demand and limits on sewer capacity. The Draft SEIR does not discuss impacts to hydrology and utilities; however, the 2018 EIR does conclude that impacts to water supply, sewer capacity, and water quality would be less than significant.

B14-A-3 See response to comment B11-A-2. Chapter 7 of the proposed Project discusses Isabel Neighborhood Specific Plan implementation and financing strategies.

B14-A-4 The comment is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. Chapter 7 of the proposed Project discusses implementation and financing strategies. The comment has been noted.

B14-B Donna Cabanne

B14-B-1 The comment is the salutation of the letter and is noted.

B14-B-2 See response to comment A3-3.

B14-B-3 The commenter asks for an extension of the comment period due to the COVID-19 pandemic. As discussed in the Executive Summary and Introduction chapters of the Draft SEIR, copies of the Draft SEIR were made available for public review online. The review period for the Draft SEIR ran for 45 days, from Tuesday, June 23, 2020 to Friday, August 7, 2020. A public hearing to receive comments on the Draft SEIR was scheduled for July 7, 2020, 14 days after the public review period began to provide additional public commenting opportunity. In accordance with Executive Orders N-33-20 and N-29-20, this meeting was conducted through videoconferencing (Zoom or a phone call) without a physical location from which members of the public may observe and offer public comment. One member

of the public provided comments at the July 7, 2020 meeting; however, comments were related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR (see response to comment letter B3). Additionally, Executive Order N-54-20 explicitly did not suspend provisions governing the time for public review of CEQA documents.

B14-B-4 The commenter requests that City staff notify all current residents about future Planning Commission and City Council meetings addressing the Isabel Neighborhood Specific Plan. The comment is not related to the environmental analysis conducted in the Draft SEIR and is noted.

B14-C Donna Cabanne

B14-C-1 The comment is the salutation of the letter and is noted.

B14-C-2 See response to comment A3-3.

B14-C-3 The commenter states that the Draft SEIR does not provide an adequate analysis of alternatives. CEQA Guidelines Section 15163(e) states the supplement is in addition to the rest of the prior EIR, including the prior alternatives analysis. Because a supplemental EIR by definition only involves minor changes to the prior analysis, the prior alternatives satisfactorily address the proposed project as modified. No new significant impacts are identified as part of the SEIR. Therefore, an updated analysis of alternatives is not necessary.

B14-C-4 The commenter requests that the Draft SEIR address the legality of funding Valley Link via Measure BB revenues. This comment is noted; however, discussion of funding via Measure BB is not relevant to the environmental analysis presented.

B14-C-5 The commenter requests that the Draft SEIR provide an analysis for the use of express buses. The proposed Project does not propose use of express buses. The 2018 BART to Livermore Extension EIR evaluated several alternatives to the proposed project, including an Express Bus/Bus Rapid Transit (BRT) Alternative and an Enhanced Bus Alternative. See response to comment B11-C-3.

B14-C-6 See response to comment A3-3.

B14-C-7 See response to comment A3-2.

B14-C-8 See response to comment A3-2.

B14-C-9 The commenter proposes a ballot measure that would allow the switch of Measure BB funding to Valley Link. Such a ballot measure is not related to the environmental analysis conducted in the Draft SEIR.

B14-C-10 The commenter proposes a ballot measure for San Joaquin County residents to increase taxes to pay for Valley Link. Such a ballot measure is not related to the environmental analysis conducted in the Draft SEIR.

B14-C-11 The commenter requests information regarding construction and funding of Valley Link stations in San Joaquin and Alameda Counties. This comment is not relevant to the environmental analysis conducted in the Draft SEIR.

B14-D Donna Cabanne

B14-D-1 The comment is the salutation of the letter and is noted.

B14-D-2 The commenter comments on potential timing of Valley Link, and commentary on City growth and potentially allowing development to precede Valley Link start. These are comments on the Specific Plan and City policy, and not on the environmental analysis presented in the Draft SEIR, and are noted.

B14-D-3 **The commenter requests information regarding Livermore's** historic and future population growth rate. This information is not pertinent to the environmental analysis presented in the Draft SEIR.

B14-D-4 The commenter requests examples of housing units that have been approved or are in the planning process but have not been built in Livermore and the citywide growth rate. The comment is not relevant to the environmental analysis conducted in the Draft SEIR.

B14-D-5 The commenter requests information on the number of housing units per year that would be constructed under the proposed Project. The Specific Plan anticipates development of 4,095 housing units, and 2,104,200 square feet of non-residential development at buildout in 2040. The plan does not propose a specific annual numerical limit on the number of housing units that could be built per year, thus the pace of development could vary and would largely be determined by property owners and market conditions. The proposed Project includes Goal G-IMP-3 and Policy P-IMP-4, which requires the City to review the progress of the proposed Project every two years and evaluate the public infrastructure to ensure continued public health and safety.

B14-D-6 The commenter requests an explanation of growth projections and fulfillment of ABAG goals, pointing to neighboring City of Pleasanton. The comment is not related to the environmental analysis conducted in the Draft SEIR.

B14-D-7 The commenter requests a breakdown of new jobs according to type, type, salary, and permanence. By its nature as a specific plan, the proposed Project does not propose any specific development projects. Specific buildings and jobs filled would be driven by market forces and private applicants. Implementation of the proposed Project ultimately would result in the net new development of 4,095 multi-family residential dwelling units, and 2,104,200 square feet of non-residential development at buildout in 2040. As shown in Table 2-3, new non-residential development is anticipated to include 1,730,500 square feet of office uses, 180,390 square feet of business park uses, 167,185 square feet of neighborhood commercial uses, and 159,700 square feet of general commercial uses. 270,175 square feet of industrial uses will be converted to other uses. The proposed Project's Economic Development Strategy is discussed on pages 2-50 through 2-53 of the Isabel Neighborhood Specific Plan.

B14-D-8 The commenter requests information on jobs and housing in Livermore and San Joaquin, Santa Clara, San Mateo, and San Francisco Counties. The comment is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The comment has been noted.

B14-D-9 The commenter discusses housing developments approved in neighboring cities, and the potential impacts to traffic, air, water, and other resource areas in Tri-Valley, and faults the Draft SEIR for not including housing growth projected in the region. This comment is incorrect. Traffic modeling conducted for the Draft SEIR incorporates regional growth projections and external-internal trips to account for regional travel demand, including traffic associated with the cities mentioned in the comment. The analysis of air quality, greenhouse gases, energy, and noise in the Draft SEIR is based on this traffic modeling. The 2018 EIR discusses potential impacts to hydrology and other resource areas, including cumulative impacts.

B14-D-10 The comment is related to proposed Project contents and actions taken by the City of Livermore City Council and Planning Commission, and is not relevant to the environmental analysis conducted in the Draft SEIR. The comment has been noted.

B14-E Donna Cabanne

B14-E-1 The comment is the salutation of the letter and is noted

B14-E-2 The commenter requests that the SEIR include noise level studies of trucks traveling on I-580. Table 3.4-11 is revised in Chapter 4, Revisions to the Draft SEIR, to provide future noise levels along I-580 for informational purposes. Noise levels along all segments of I-580 within the Planning Area would exceed land use compatibility standards; however, noise levels would increase by no more than 0.9 dBA between existing and 2040 with Project conditions. the proposed Project would not result in a significant increase of 3 dB or more in noise levels. Additionally, the community noise modeling done for the project does not take into consideration the existing freeway noise barrier, resulting in substantially would reduced freeway noise in the area substantially. B11-E-3 The commenter requests that the Draft SEIR discuss noise generated from all commercial and industrial sites, I-580, Livermore Municipal Airport, the Pacific Railroad, and mining operations. Chapter 3.4: Noise of the Draft SEIR discusses noise impacts associated with construction, traffic, noise-generating stationary equipment, special event operation, and airports.

B14-E-4 See response to comment A3-3.

B14-E-5 See response to comment A3-2.

B14-E-6 See response to comment B10-C-3.

B14-F Donna Cabanne

B14-F-1 The comment is the salutation of the letter and is noted.

B14-F-2The commenter states that traffic estimates in the Draft SEIR do not account for development in neighboring cities. This comment is false. Trip generation was forecast using the Alameda CTC Countywide model for all horizon years and scenarios. The Alameda CTC Countywide model is a regional trip-based model that includes the most current land use and socioeconomic database and produces forecasts that are generally consistent with the travel demand forecasts that MTC has produced for Plan Bay Area 2040 for the Plan horizon year of 2040 and meets the regional model consistency requirements. Traffic from future development in the 9-county Bay Area region plus San Joaquin County is reflected in the estimates provided in the Draft SEIR.

B14-F-3The commenter states that the level of service on I-580 under the proposed Project will not be adequate. The Draft SEIR assumes that all planned improvements for I-580 will be completed between existing conditions and 2028/2040. The level of service for segments of I-580 are shown in Tables 3.2-22 and 3.2-23 on pages 3.2-61 and 3.2-62 of the Draft SEIR. While the freeway level of service either improves or remains about the same between Project and No Project conditions, there are three freeway segments where the general purpose lanes are projected to be significantly impacted by the proposed Project in the year 2040: North Livermore Avenue to Isabel Avenue General Purpose (Segment #4), Springtown Boulevard/ First Street to North Livermore Avenue (Segment #5), and Vasco Road to Springtown Boulevard/ First Street (Segment #6) as indicated in the Draft SEIR on pages 3.2-61 and 3.2-62.

As discussed on page 3.2-72 of the Draft SEIR, typical mitigation measures that would address significant impacts to general purpose freeway segments entail operational improvements to the freeway, such as adding or modifying ramp metering, adding express lanes, and constructing other capacity enhancements such as additional travel lanes. However, the transportation analysis already accounts for these types of planned and programmed operational improvements along the study area segments of I-580, as described in the Freeway Segment Assumptions subsection above.

No additional improvements would be feasible to address this significant impact. Specifically, while adding travel lanes to I-580 would increase the capacity of the freeway and reduce this impact, physical constraints and the existing ROW along the affected freeway segment make this infeasible. For example, widening I-580 would conflict with bridge columns at some locations and would impact homes, businesses, and/or an existing park (Northfront Park). Furthermore, adding travel lanes can lead to additional social and environmental impacts such as induced travel demand (e.g., increased passenger vehicles on the roadway because of greater freeway capacity). The additional passenger vehicles would have adverse environmental impacts, including degradation of air quality, increased noise from vehicles, and reductions in transit use, as less congestion or reduced driving time may make driving more attractive than transit. Therefore, the impact remains significant and unavoidable.

B14-F-4The commenter requests clarification on trips generated by Isabel neighborhood residents. Trip generation in the Draft SEIR was forecast using the Alameda CTC Countywide model for all horizon years and scenarios. The model computes daily person trips and then applies mode split to generate daily vehicle trips. The model accounts for trip reduction due to

internalization and mode split for carpooling, transit, bike and pedestrian modes. Daily vehicle trips are further processed into peak hour vehicle trips for the detailed peak hour impact analysis. The transportation analysis used in the Draft SEIR involved a multi-step process to generate the performance analysis metrics necessary to quantify the proposed **Project's impact. This process used a set of land use and transportation network** assumptions in a travel demand model to generate projections of transit ridership, vehicle trip demand, roadway link volumes, and Valley Link station parking demand and access by various modes (buses, bicycles, pedestrians, etc.). The process then used these outputs in freeway segment and intersection operations analysis methodologies to generate estimates of freeway and intersection performance. The model does not assume that all residents will walk, bike, or use Valley Link.

B14-F-5 The commenter asks why several city streets and intersections were not included in the traffic analysis conducted in the Draft SEIR. The local roadway network for the study area includes arterials, collectors, and local streets. Traffic generated by Project land uses is highest within and adjacent to the Project area. Project traffic generally disperses and becomes less impactful as it gets further from the Project area. Most of the proposed Project traffic will use I-580. The roadway and intersections included in the Draft SEIR are based on consultation with City staff, those roadways and that may be affected by the proposed Project.

B14-F-6 The commenter asked about delay caused by the Project traffic at the intersection of N. Livermore Avenue and Portola Avenue. As shown in Table 3.2-14 of the Draft SEIR, the intersection of N. Livermore Avenue/Portola Avenue (#3) is projected to be significantly impacted by Project traffic in the year 2040 during the PM peak hour when motorists would experience about 70 second of average vehicle delay for the critical intersection movements. This delay is an increase of about 14 seconds over No Project conditions. The commenter also asked why traffic counts for the intersection of N. Livermore Avenue and Las Positas Road were not included. See response to comment B11-F-5.

B14-F-7 The comment is related to widening of residential streets as proposed by the proposed Project and planned improvements. Chapter 3.2: Traffic and Transportation of the Draft SEIR discusses potential impacts to traffic associated with growth under the proposed Project. Residential streets outside the Project plan area are not expected to be impacted by the Project. No widening of residential streets is proposed, except as depicted by the proposed Project and planned improvements.

B14-G Donna Cabanne

B14-G-1 The comment is the salutation of the letter and is noted.

B14-G-2 See response to comment B9-9.

B14-G-3 The commenter expresses concern regarding connectivity between the Planning Area and the rest of Livermore. As stated in the Initial Study, the 2018 EIR determined that the adoption and implementation of the INSP would have a less-than-significant impact on **the continuity of established communities. As described in the 2018 EIR, the INSP's goals**

and policies, along with its land use diagram and development standards for each land use designation, were designed to promote compatibility with existing uses. The INSP also includes a fine-grained street grid, transportation improvements, and policies for multi-modal accessibility, all of which would enhance connectivity within the Planning Area and improve linkages with surrounding areas. The INSP does not allow for development of new neighborhoods distant or divided from established communities. By creating a high-intensity neighborhood with a variety of land uses near a Valley Link rail station, the project would help implement existing General Plan goals to promote multi-modal transportation and create high-intensity mixed-use development near transit. Additionally, the INSP's emphasis on mixed-use, compact development and pedestrian- and bicycle-friendly streets within the Isabel Priority Development Area (PDA) and the opportunities to attract new jobs, retail, and housing are compatible with the goals of Plan Bay Area and SB 375.

Proposed improvements to existing roadways and infrastructure would not introduce new physical divisions. The proposed new streets would help provide multi-modal connectivity between and within new residential communities, rather than divide existing communities.

B15 Jean King

B15-1 The comment is the salutation of the letter and is noted.

B15-2 See response to comment A3-2.

B15-3 The commenter states that there are several major differences from the 2018 Isabel Neighborhood Specific Plan based on development of a BART station. The Initial Study for the Draft SEIR notes that the 2020 Isabel Neighborhood Specific Plan retains the land use designations, densities/intensities, proposed streets/street system, and other features of the previously adopted Plan. The Initial Study evaluated the proposed Project and determined that no new or more severe significant impacts would occur as a result of project changes for the following topics: Land Use, Population, and Housing; Aesthetics; Biological Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; Utilities and Service Systems; Public Services and Recreation; Geology and Soils; Cultural and Tribal Resources; and Agricultural Resources. The Initial Study concluded that impacts related to air quality, climate change and energy, noise, and transportation may be different than those previously evaluated given the changed rail transportation system. The Draft SEIR uses updated traffic data in the form of VMT, which addresses the commenter's concern.

B15-4 The commenter requests that the Draft SEIR address impacts associated with the COVID-19 pandemic. While the COVID-19 pandemic may result in potential impacts to the Planning Area, the potential impacts are entirely circumstantial. The proposed Project includes Goal G-IMP-3 and Policy P-IMP-4, which requires the City to review the progress of the proposed Project every two years and evaluate the public infrastructure to ensure continued public health and safety. The City will also monitor the progress of the Valley Link rail project leading up to the anticipated opening in year 2028 and has the discretion to require additional environmental analysis for developments within the Planning Area should the Valley Link rail opening date change.

- B15-5 The commenter requests information on the affordable housing units in the INSP area. The comment is related to proposed Project contents and not the environmental analysis conducted in the Draft SEIR. The proposed Project's Affordable Housing Strategy, proposed policies, and existing policies are discussed on pages 2-45 through 2-49 of the Isabel Neighborhood Specific Plan. The comment has been noted.
- B15-6 The commenter expresses concern about impacts to utilities, hydrology, and public services. The Draft SEIR does not discuss impacts to these resource areas; however, the 2018 EIR does conclude that impacts to utilities (including sewage capacity), hydrology, and public services (including schools) would be less than significant.



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## 4 Revisions to the Draft SEIR

Revisions to the Public Hearing Draft Isabel Neighborhood Specific Plan may result in inconsistencies in policy numbering between the Public Hearing Draft Plan and the Draft SEIR. Because policies in the plan are numbered consecutively, some of the numbering may have shifted. Policy numbering for the Final SEIR has been revised to match the Public Hearing Draft Isabel Neighborhood Specific Plan.

### Chapter 1: Introduction

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On page 1-5, revise the text as follows:

- Zone 7 Water Agency. Zone 7 supplies treated drinking water to retailers in Livermore, including the City of Livermore Water Service. Zone 7 also owns land within and manages the flood control of certain, but not all waterways through the Planning Area. The Plan proposes several trails along waterways, some of which would be located on Zone 7 property.

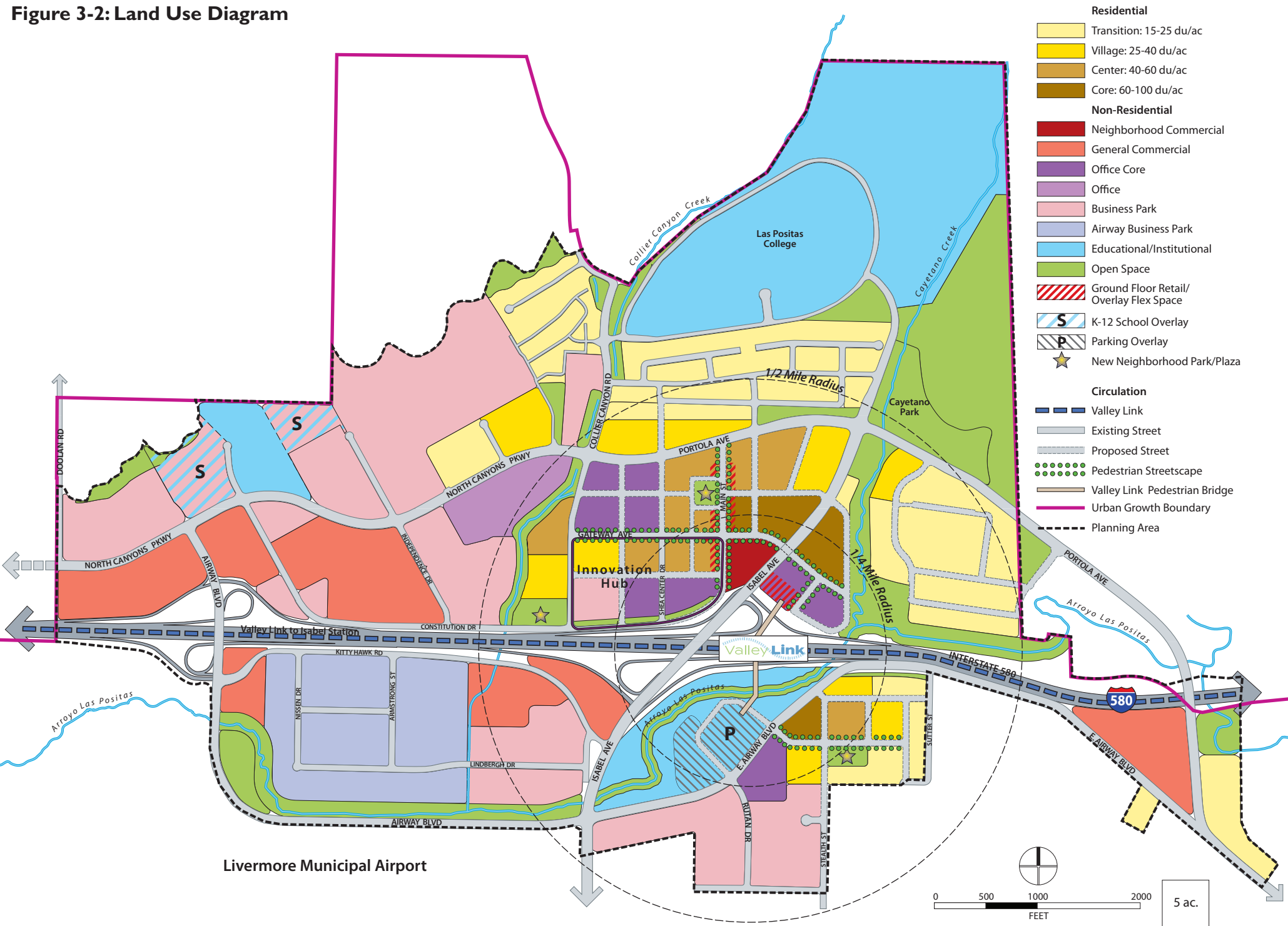
### Chapter 2: Project Description

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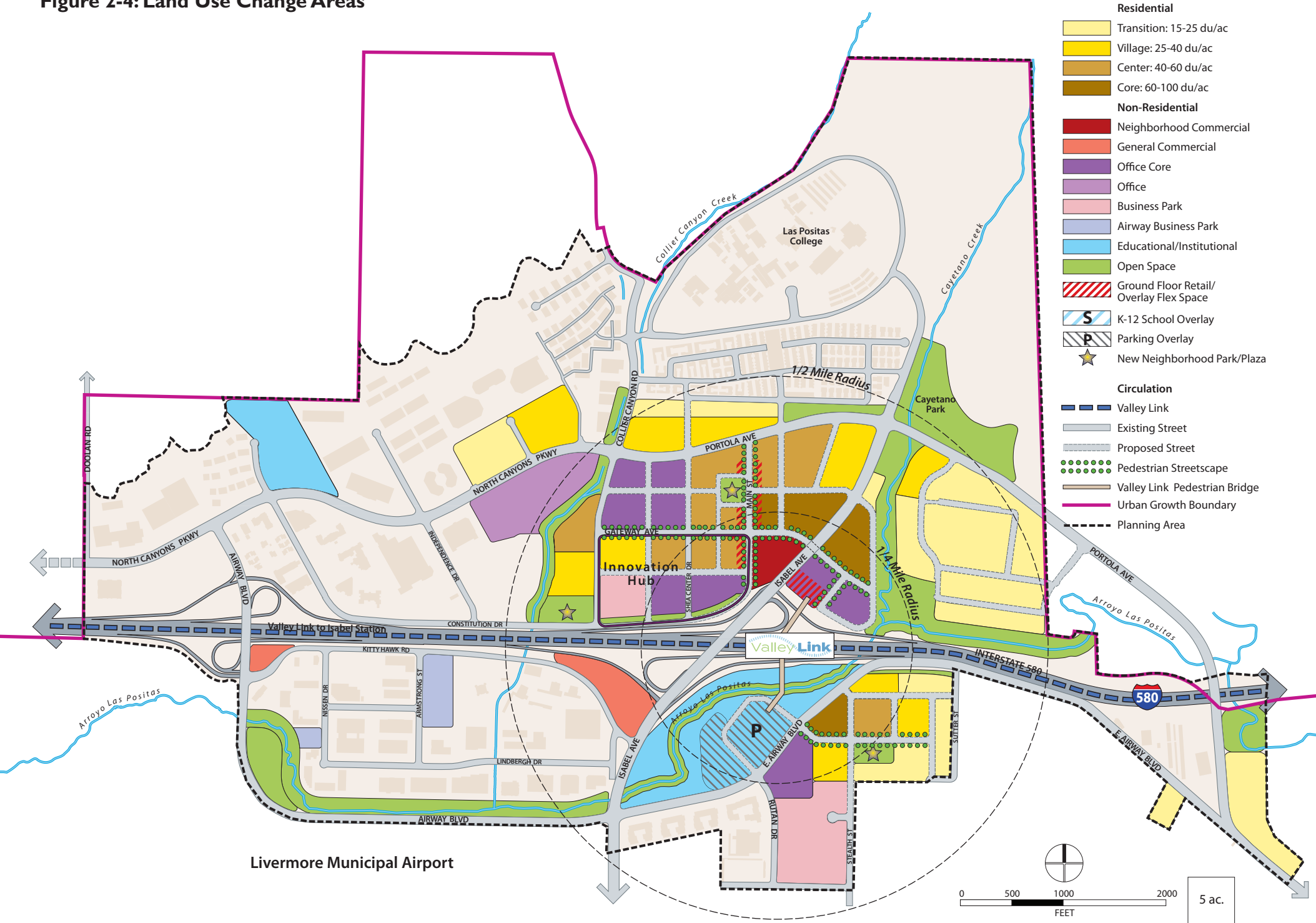
On page 2-9, revise Figure 2-3 as follows:

On page 2-10, revise Figure 2-4 as follows:

**Figure 3-2: Land Use Diagram**

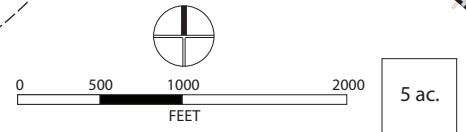


**Figure 2-4: Land Use Change Areas**



- Residential**
- Transition: 15-25 du/ac
- Village: 25-40 du/ac
- Center: 40-60 du/ac
- Core: 60-100 du/ac
- Non-Residential**
- Neighborhood Commercial
- General Commercial
- Office Core
- Office
- Business Park
- Airway Business Park
- Educational/Institutional
- Open Space
- Ground Floor Retail/Overlay Flex Space
- K-12 School Overlay
- Parking Overlay
- New Neighborhood Park/Plaza
- Circulation**
- Valley Link
- Existing Street
- Proposed Street
- Pedestrian Streetscape
- Valley Link Pedestrian Bridge
- Urban Growth Boundary
- Planning Area

Livermore Municipal Airport



On page 2-17, revise the text as follows:

Table 2-3. Estimated 2040 Net New Development

	Within ½ mile radius of Valley Link station	Outside ½ mile radius	Planning Area Total
Residential (housing units)	3,525	570	4,095
Non-residential (square feet)			
Office	1,578,000 <sup>1</sup>	152,500	1,730,500
Business Park	73,590	106,800	180,390
Neighborhood Commercial	167,185 <sup>2</sup>	0	167,185
General Commercial	107,200	<del>189,100</del> 52,500	<del>296,300</del> 159,700
General Industrial <sup>3</sup>	(270,175)	0	(270,175)
Total	1,655,800	<del>448,400</del> 311,800	<del>2,104,200</del> 1,967,600
Jobs	8,000	1,200	9,200

Notes:

1. Includes existing LAM property
2. Includes Ground Floor Retail/Flex Space
3. As build out of the Planning Area occurs, General Industrial uses will be replaced with Office, Business Park, Neighborhood Commercial, and General Commercial uses.

Source: Dyett & Bhatia, 2020.

## Chapter 3.1: Air Quality

On page 3.1-5, revise the text as follows:

Table 3.1-1. Ambient Air Quality Monitoring Data from Livermore 793 Rincon Avenue Monitoring Station<sup>a</sup>

Pollutant Standards	2016	2017	2018	2019 <sup>f</sup>
<b>Ozone (O<sub>3</sub>)</b>				
Maximum 1-hour concentration (ppm)	0.102	0.109	0.099	<u>0.080</u>
Maximum 8-hour concentration (ppm)	0.085	0.086	0.078	<u>0.068</u>
Number of days standard exceeded <sup>b</sup>				
CAAQS 1-hour (>0.09 ppm)	2	5	2	<u>0</u>
CAAQS 8-hour (>0.070 ppm)	6	6	3	<u>1</u>
NAAQS 8-hour (>0.070 ppm)	4	6	3	<u>1</u>
<b>Carbon Monoxide (CO)</b>				
Maximum 8-hour concentration (ppm)	1.2	1.7	1.9	<u>0.8</u>
Maximum 1-hour concentration (ppm)	0.9	1.3	1.6	<u>3.3</u>
Number of days standard exceeded <sup>b</sup>				
NAAQS 8-hour (≥9 ppm)	0	0	0	<u>0</u>
CAAQS 8-hour (≥9.0 ppm)	-	-	-	-
NAAQS 1-hour (≥35 ppm)	0	0	0	<u>0</u>
CAAQS 1-hour (≥20 ppm)	-	-	-	-
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>				
State maximum 1-hour concentration (ppb)	41	45	56	<u>48</u>
State second-highest 1-hour concentration (ppb)	37	45	55	<u>37</u>
Annual average concentration (ppb)	8	8	8	<u>8</u>
Number of days standard exceeded <sup>b</sup>				
CAAQS 1-hour (180 ppb)	0	0	0	<u>0</u>
<b>Particulate Matter (PM<sub>10</sub>)</b>				
National <sup>c</sup> maximum 24-hour concentration (μg/m <sup>3</sup> )	18.7	41.2	99.3	-
National <sup>c</sup> second-highest 24-hour concentration (μg/m <sup>3</sup> )	18.6	29.9	31.9	-
State <sup>d</sup> maximum 24-hour concentration (μg/m <sup>3</sup> )	19.0	41.0	105.0	-
State <sup>d</sup> second-highest 24-hour concentration (μg/m <sup>3</sup> )	19.0	32.0	32.0	-
National annual average concentration (μg/m <sup>3</sup> )	6.2	6.5	8.6	-
State annual average concentration (μg/m <sup>3</sup> ) <sup>e</sup>	11.5	*	16.2	-

Table 3.1-1. Ambient Air Quality Monitoring Data from Livermore 793 Rincon Avenue Monitoring Station<sup>a</sup>

Pollutant Standards	2016	2017	2018	2019 <sup>d</sup>
Measured number of days standard exceeded <sup>b,f</sup>				
NAAQS 24-hour (>150 µg/m <sup>3</sup> )	0	*	0	-
CAAQS 24-hour (>50 µg/m <sup>3</sup> )	0	*	11.5	-
<b>Particulate Matter (PM2.5)</b>				
National <sup>g</sup> maximum 24-hour concentration (µg/m <sup>3</sup> )	22.3	41.5	172.6	<u>102</u>
National <sup>g</sup> second-highest 24-hour concentration (µg/m <sup>3</sup> )	19.6	37.6	136.2	<u>53</u>
State <sup>h</sup> maximum 24-hour concentration (µg/m <sup>3</sup> )	22.3	41.5	172.6	<u>102</u>
State <sup>h</sup> second-highest 24-hour concentration (µg/m <sup>3</sup> )	19.6	37.6	136.2	<u>53</u>
National annual average concentration (µg/m <sup>3</sup> )	7.4	8.4	11.2	<u>6.3</u>
State annual average concentration (µg/m <sup>3</sup> )	7.4	8.3	11.2	<u>6.3</u>
Measured number of days standard exceeded <sup>b</sup>				
NAAQS 24-hour (>35 µg/m <sup>3</sup> )	0	2	14.6	<u>24</u>

Notes:

Ppm = parts per million

NAAQS = National Ambient Air Quality Standards

CAAQS = California Ambient Air Quality Standards

µg/m<sup>3</sup> = micrograms per cubic meter

mg/m<sup>3</sup> = milligrams per cubic meter

- = data not available

\* = insufficient data available to determine the value

a Data for Carbon Monoxide (CO) and Particulate Matter (PM10) were unavailable from the Rincon Avenue Monitoring Station. Consequently, CO and PM10 monitored data presented are taken from the Concord Monitoring Station at 2956-A Treat Boulevard, which is the next nearest monitoring station located (approximately 20 miles north of the Planning Area in Contra Costa County) that monitors these two pollutants.

b An exceedance is not necessarily related to a violation of the standard.

c National statistics are based on standard conditions data. In addition, national statistics are based on samplers using federal reference or equivalent methods.

d State statistics are based on approved local samplers and local conditions data.

Table 3.1-1. Ambient Air Quality Monitoring Data from Livermore 793 Rincon Avenue Monitoring Station<sup>a</sup>

Pollutant Standards	2016	2017	2018	<u>2019</u>
e	State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.			
f	Measurements usually are collected every 6 days.			
g	National statistics are based on samplers using federal reference or equivalent methods.			
h	State statistics are based on local approved samplers.			
i	<u>2019 ambient air quality monitoring data from BAAQMD is provided for informational purposes.</u>			

Source: California Air Resources Board, 2019; BAAQMD, 2020.

On page 3.1-36, revise the text as follows:

While the details of future development within the Planning Area are currently unknown, since development would be driven by market forces and private applicants, it is known that implementation of the proposed Project ultimately would result in the net new development of 4,095 multi-family residential dwelling units, and ~~2,104,200~~ 1,967,700 square feet of non-residential development at buildout in 2040. As such, it is anticipated that in any given year, multiple land use development projects would be constructed within the Planning Area.

On page 3.1-47, revise the text as follows:

As implementation of the proposed Project ultimately would result in the net new development of 4,095 multi-family residential dwelling units, and ~~2,104,200~~ 1,967,700 square feet of non-residential development in the Planning Area at buildout in 2040, the increase in vehicle traffic from the proposed Project would generate additional vehicle-related TACs (including DPM and other TACs) on the local roadways located within and near the Planning Area and increase their health risks on nearby sensitive receptors.

## Chapter 3.2: Traffic and Transportation

On page 3.2-2, revise Figure 3.2-1 as follows:

On page 3.2-17, revise Figure 3.2-4 as follows:

On page 3.2-18, revise Figure 3.2-5 as follows:



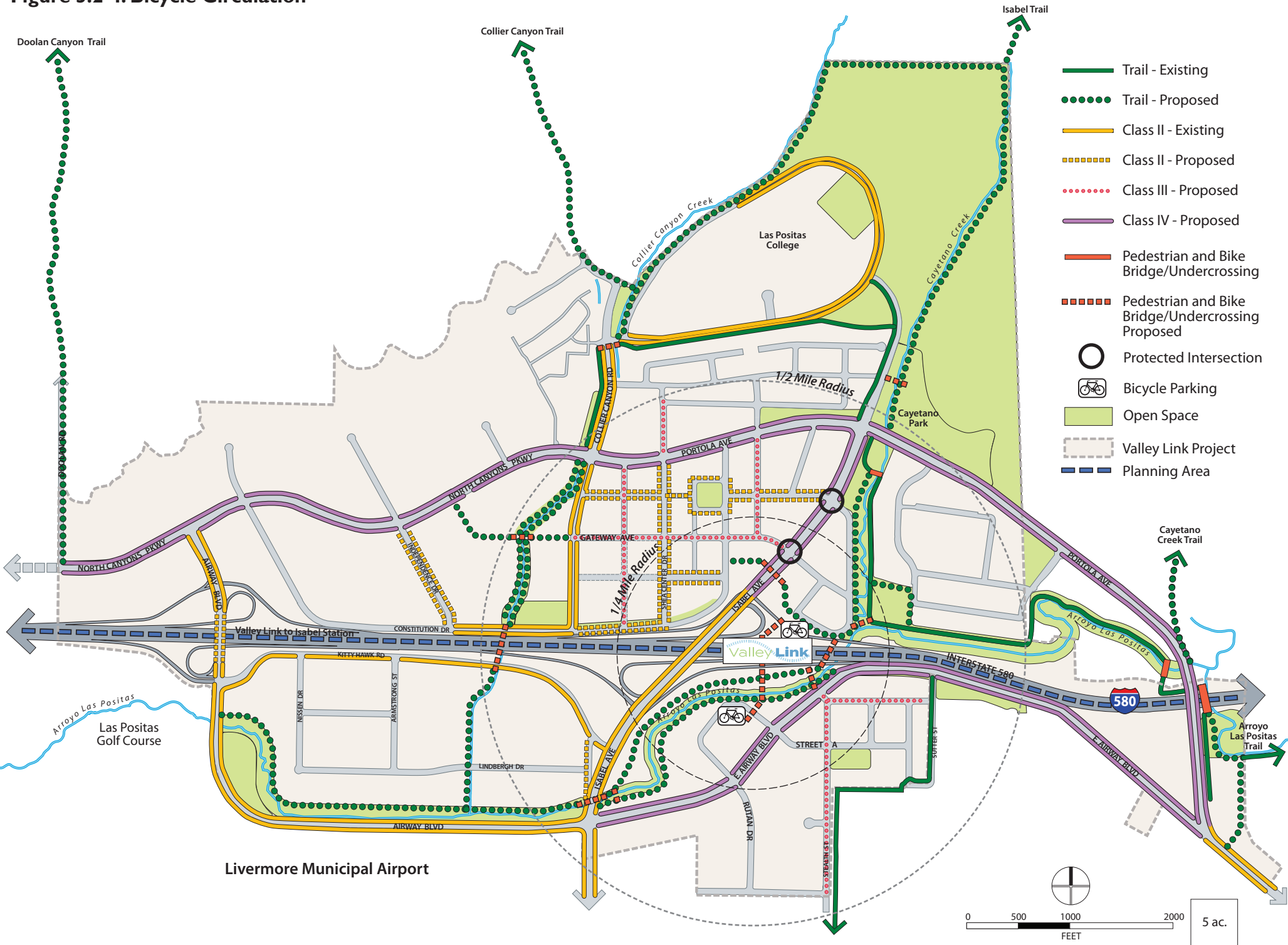
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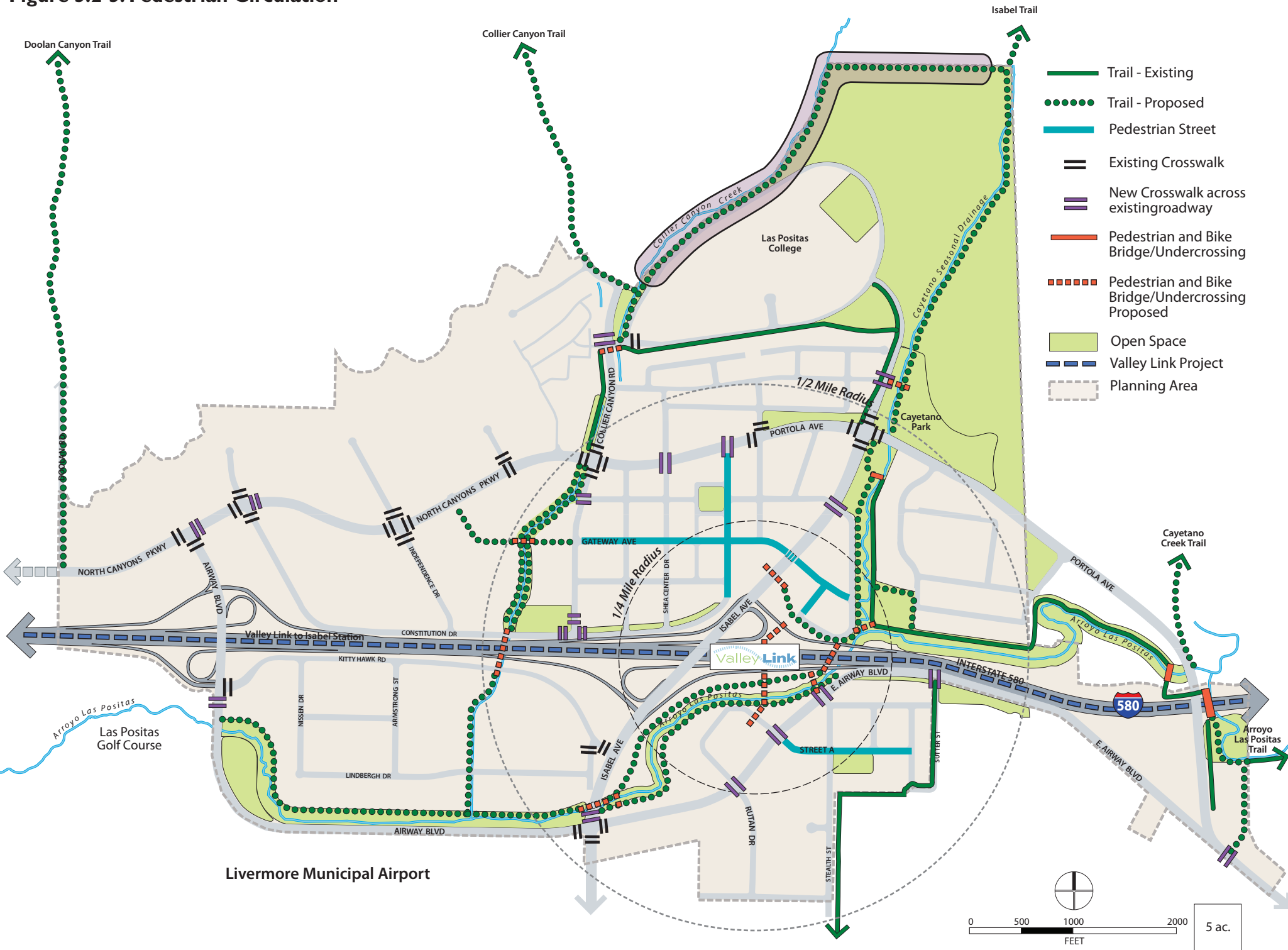
**Study Area and Study Intersections  
Livermore, CA**

**Figure  
3.2-1**

**Figure 3.2-4: Bicycle Circulation**



**Figure 3.2-5: Pedestrian Circulation**



- Trail - Existing
- ⋯ Trail - Proposed
- Pedestrian Street
- Existing Crosswalk
- New Crosswalk across existing roadway
- Pedestrian and Bike Bridge/Undercrossing
- Pedestrian and Bike Bridge/Undercrossing Proposed
- Open Space
- Valley Link Project
- Planning Area

On page 3.2-31, revise the text as follows:

~~BART~~ Valley Link Forecasts

## Chapter 3.3: Energy, Greenhouse Gases, and Climate Change

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On page 3.3-25, revise the text as follows:

As implementation of the proposed Project ultimately would result in the net new development of 4,095 multi-family residential dwelling units, and ~~2,104,200~~ 1,967,700 square feet of non-residential development in the Planning Area at buildout in 2040, the increase in vehicle traffic from the proposed Project would generate additional vehicle-related TACs (including DPM and other TACs) on the local roadways located within and near the Planning Area and increase their health risks on nearby sensitive receptors.

## Chapter 3.4: Noise

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On page 3.4-28, revise the text as follows:

Table 3.4-11: Roadway Segments with Project-related Traffic Noise Level Increases of 3 dB or More above General Plan Land Use Compatibility Standard

Roadway	Segment Location	Future Land Use Type	Land Use Compatibility Guideline (dBA Ldn) for Future Uses	Year 2040 + Project dB Ldn	Exceedance of Compatibility Standard?
North Canyons Parkway	West of Gateway Drive	LD/SFR/Duplex/MH & C	60/70	67.3	Yes
North Canyons Parkway	East of Gateway Drive <sup>a</sup>	LD/SFR/Duplex/MH	60	65.5	Yes
North Canyons Parkway	West of Collier Canyon Road <sup>a</sup>	LD/SFR/DUPLEX/MH	60	67.9	Yes
North Canyons Parkway	East of Collier Canyon Road	LD/SFR/DUPLEX/MH	60	66.1	Yes
Portola Avenue	West of Road 1	LD/SFR/DUPLEX/MH & MFR	60/65	65.9	Yes
Portola Avenue	East of Road 1 and West of Road 2	LD/SFR/DUPLEX/MH & MFR	60/65	65.9	Yes
Portola Avenue	East of Road 2 and West of Main Street	LD/SFR/DUPLEX/MH & MFR	60/65	66.3	Yes
Portola Avenue	East of Main Street and West of Montage Drive/Road 3	LD/SFR/DUPLEX/MH & MFR	60/65	66.3	Yes
Portola Avenue	East of Montage Drive/Road 3 and West of Road 4	LD/SFR/DUPLEX/MH & MFR	60/65	66.2	Yes
Portola Avenue	East of Road 4	MFR	65	66.2	Yes
Portola Avenue	West of Tranquility Circle	LD/SFR/DUPLEX/MH	60	67.9	Yes

Table 3.4-11: Roadway Segments with Project-related Traffic Noise Level Increases of 3 dB or More above General Plan Land Use Compatibility Standard

Roadway	Segment Location	Future Land Use Type	Land Use Compatibility Guideline (dBA Ldn) for Future Uses	Year 2040 + Project dB Ldn	Exceedance of Compatibility Standard?
Portola Avenue	East of Tranquility Circle	LD/SFR/DUPLEX /MH	60	67.2	Yes
Portola Avenue	North of E. Airway Blvd	LD/SFR/DUPLEX /MH	60	67.2	Yes
Portola Avenue	South of Intersection w E. Airway Blvd	LD/SFR/DUPLEX /MH	60	68.9	Yes
Portola Avenue	West of Murrieta	LD/SFR/DUPLEX /MH	60	68.6	Yes
Portola Avenue	East of Murrieta	LD/SFR/DUPLEX /MH	60	69.0	Yes
E. Airway Boulevard	East of Valley Link Access and West of Stealth Street	MFR	65	66.5	Yes
E. Airway Boulevard	East of Stealth Street	LD/SFR/DUPLEX /MH	60	65.8	Yes
E. Airway Boulevard	West/N of Portola Avenue	LD/SFR/DUPLEX /MH	60	66.3	Yes
Isabel Avenue	North of Portola Avenue	LD/SFR/DUPLEX /MH	60	63.6	Yes
Isabel Avenue	South of Portola Avenue <sup>b</sup>	LD/SFR/DUPLEX /MH	60	68.3	Yes
Isabel Avenue	North of Road 5 <sup>b</sup>	LD/SFR/DUPLEX /MH	60	67.1	Yes
Isabel Avenue	South of Road 5 and North of Valley Link Parking	MFR	65	68.2	Yes

Table 3.4-11: Roadway Segments with Project-related Traffic Noise Level Increases of 3 dB or More above General Plan Land Use Compatibility Standard

Roadway	Segment Location	Future Land Use Type	Land Use Compatibility Guideline (dBA Ldn) for Future Uses	Year 2040 + Project dB Ldn	Exceedance of Compatibility Standard?
	Road/Access (North)				
Isabel Avenue	South of Valley Link Parking Road/Access <sup>c</sup>	C	70	73.9	Yes
Isabel Avenue	North of WB ramps <sup>c</sup>	C	70	74.5	Yes
Collier Canyon Road	North of N Canyons Pkwy	LD/SFR/DUPLEX /MH	60	63.3	Yes
Valley Link Access	South of E. Airway Boulevard	LD/SFR/DUPLEX /MH & MFR	60/65	60.1	Yes
I-580	From Isabel Avenue to North Livermore Avenue	LD/SFR/DUPLEX /MH & MFR	60/65/70	77.1	Yes
I-580	From Fallon Road to Airway Blvd	C	70	76.9	Yes
I-580	Between Airway Blvd Ramps (under the overpass)	C	70	76.7	Yes
I-580	From Airway Blvd to Isabel Avenue	LD/SFR/DUPLEX /MH & MFR	60/65/70	76.9	Yes
I-580	Between Isabel Avenue Ramps (under the overpass)	MFR	65	76.9	Yes

Table 3.4-11: Roadway Segments with Project-related Traffic Noise Level Increases of 3 dB or More above General Plan Land Use Compatibility Standard

<i>Roadway</i>	<i>Segment Location</i>	<i>Future Land Use Type</i>	<i>Land Use Compatibility Guideline (dBA Ldn) for Future Uses</i>	<i>Year 2040 + Project dB Ldn</i>	<i>Exceedance of Compatibility Standard?</i>
Notes:					
LD/SFR/Duplex/MH= Residential – Low Density, Single Family, Duplex, Mobile Homes					
MFR = Multi-Family Residential					
C = Office Buildings, Businesses, Commercial and Professional					
I = Industrial, Manufacturing, Utilities, Agriculture					
NA = no currently developed sensitive use located along this segment.					
In areas where multiple uses are located along a single segment, the most stringent (aka 60 dBA Ldn) standard applies.					
a. These two segments represent North Canyons Parkway between Gateway Drive and Collier Canyon Road. Traffic volumes at each end of the roadway segment are different as a result of driveway access between the two intersections that is not specifically addressed in the traffic analysis.					
b. These two segments represent Isabel Avenue between Portola Avenue and Road 5. Traffic volumes at each end of the roadway segment are different as a result of driveway access between the two intersections that is not specifically addressed in the traffic analysis.					
c. These two segments represent Isabel Avenue between the Valley Link Parking Road/Access Road and the WB I-580 ramps located north of I-580. Traffic volumes at each end of the roadway segment are different as a result of driveway access between the two intersections that is not specifically addressed in the traffic analysis.					

Source: Salter, 2020.



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