Addendum to the East Contra Costa County Habitat Conservation Plan / National Community Conservation Plan Final Environmental Impact Statement and Environmental Impact Report and Final Initial Study / Mitigated Negative Declaration for the Roddy Ranch Golf Course

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1.0 INTRODUCTION

1.1 SUMMARY

This is an Addendum, prepared for the East Bay Regional Park District (EBRPD), to the East Contra Costa County (ECCC) Habitat Conservation Plan (HCP) / Natural Community Conservation Plan (NCCP) Final Environmental Impact Statement and Environmental Impact Report (Final EIS/EIR) (Final EIS/EIR; SCH No. 2005092129) and the Final Initial Study / Mitigated Negative Declaration (Final IS/MND) for the Roddy Ranch Golf Course (Final IS/MND; SCH No. 1998072090). This introduction describes the purpose of an Addendum, substantiates why an Addendum is appropriate for the proposed changes to the previously approved Project, and provides a summary of the background of the planning and environmental review process conducted for the East Contra Costa County HCP/NCCP (Original Project) and the Roddy Ranch Golf Course (Golf Course Project).

The Final IS/MND was approved by the East County Regional Planning Commission on September 14, 1998. The Final IS/MND evaluated the impact of the rezoning of 2,161 acres from the existing A-4 (Agricultural Preserves) to A-20 (Exclusion Agricultural District); a Parcel Map creating one 200-acre Parcel and Remainder Parcel; and the request for a Land Use Permit to construct the Roddy Ranch Golf Course. The 230-acre Roddy Ranch Golf Course Project included the golf course, practice areas, facilities, a parking area, entry driveway, landscaping, septic system, irrigation water storage, pumping and pipeline facilities, and a non-potable waterline.

The Final EIS/EIR was certified by East Contra Costa County Habitat Conservancy Governing Board on October 17, 2007. The Final EIS/EIR evaluated the impact of the East Contra Costa County HCP/NCCP (Original Project). The area covered by the HCP/NCCP (or Plan) encompasses approximately 174,018 acres in eastern Contra Costa County, California, and included the Roddy Ranch Golf Course. The main element of the HCP/NCCP conservation strategy is the creation of a Preserve System that would preserve approximately 23,800 acres of land with the initial urban development area, or approximately 30,300 acres of land under the maximum urban development area.

The Revised Project is the Roddy Ranch Habitat Restoration and Public Access Project (Revised Project), which is encompassed within the East Contra Costa County Habitat Conservancy's (Conservancy) East Contra Costa County HCP/NCCP area, and a revision to the Golf Course Project. The purpose of the Revised Project is to open the former Roddy Ranch golf course as a regional park while restoring and enhancing ecological habitats that benefit the Conservancy's target species. Further, the Revised Project will provide additional progress towards the objectives described in the EBRPD's 2013 Master Plan and with the HCP/NCCP.

This Addendum has been prepared because the Revised Project does not meet the criteria requiring a subsequent EIR or negative declaration as described under Section 15162 of the *State California Environmental Quality Act (CEQA) Guidelines*. This Revised Project proposes restoring the former Roddy Ranch golf course – which is within the boundaries of the East Contra Costa County HCP/NCCP, and for which the EBRPD was a co-Lead Agency—in order to open the land as a regional park. The changes to the Original Project and Golf Course Project would not create new or significantly increase environmental impacts from those documented by the approved Final EIS/EIR and Final IS/MND. Nor would any new information or changed circumstances result in new or a substantially more severe significant environmental effect or newly feasible or new mitigation. Therefore, no subsequent EIR or IS/MND for this proposed development is required under State statute.

Based on the preceding context, the following sections of the Addendum assess the potential environmental effects associated with the proposed changes to the previously approved Original Project and Golf Course Project. Except as described herein, no other changes are being proposed as compared to the approved Original Project or Golf Course Project.

Appropriateness of an Addendum for the Proposed Project

Per 14 CCR § 15162, when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines on the basis of substantial evidence in the light of the whole record, one or more of the following:

> *(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
>
> *(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

As descried herein, the Revised Project does not involve substantial changes or changed circumstances that will involve new environmental effects or a substantial increase in the severity of previously identified significant effects.

> *(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR or IS/MND was certified as complete or the negative declaration was adopted, shows any of the following:*
>
> *(A) The project will have one or more significant effects not discussed in the previous EIR or IS/MND;*

As described herein, no new significant effects will occur due to implementation of the Revised Project.

> *(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or IS/MND;*

As described herein, significant effects previously described will not increase in severity due to implementation of the Revised Project.

> *(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*

As described herein, no new feasible alternatives or mitigation measures have been identified based on review of the proposed Revised Project.

> *(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or IS/MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

There are no new mitigation measures or alternatives that would reduce the Revised Project's significant effects.

Proposed Project Objectives

The primary objective of the Revised Project is to restore and enhance the ecological habitats of the former Roddy Ranch golf course and open the site as a regional park. Further, the project will provide additional progress towards the objectives described in the EBRPD's 2013 Master Plan and with the HCP/NCCP. These objectives include:

- Provide a diversified system of regional parklands, trails and related services that will offer outstanding opportunities for creative use of outdoor time.
- Acquire and preserve significant biologic, geologic, scenic and historic resources within Alameda and Contra Costa counties.
- Manage, maintain and restore the parklands so that they retain their important scenic, natural and cultural values.
- Interpret the parklands by focusing educational programs on the visitor's relationship to nature, natural processes, ecology, the value of natural conditions and the history of the parklands.

- Balance environmental concerns and outdoor recreational opportunities within regional parklands.
- Support the development and retention of well-trained, dedicated and productive employees.
- Improve access to and use of the parks by members of groups that are underrepresented, such as persons with disabilities, the economically disadvantaged and elderly park visitors.
- Provide recreational development that fosters appropriate use of parklands while preserving their remoteness and intrinsic value.
- Create quality programs that recognize the cultural diversity represented in the region.
- Participate in partnerships with public agencies, nonprofit organizations, volunteers and the private sector to achieve mutual goals.
- Provide leadership to help guide land use decisions of East Bay governments that relate to the EBRPD.
- Ensure open and inclusive public processes.
- Pursue all appropriate activities to ensure the fiscal health of the EBRPD.
- Monitor the effects of climate change on EBRPD resources and utilize adaptive management techniques to adjust stewardship methods and priorities to preserve the natural, cultural and scenic values of the parks and trails

1.2 PURPOSE OF THIS ADDENDUM

The purpose of this Addendum to the Final EIS/EIR and Final IS/MND is to evaluate the environmental effects associated with the changes to the previously approved Original Project and Golf Course Project as a result of implementation of the proposed Revised Project.

Final Environmental Impact Statement and Environmental Impact Report

The Final IS/MND was prepared in compliance with CEQA and analyzed the following elements:

1. Rezoning requested from A-4 to A-20 is in conformance with the General Plan designation of Agricultural Lands (AL).
2. Parcel Map and Land Use Permit to construct and operate an 18- hole daily fee golf course.

The Final EIS/EIR was prepared in compliance of the National Environmental Policy Act (NEPA) and CEQA. The Original Project analyzed the following elements:

1. Permit Areas: two permit areas which reflect the range of expected growth in the area:

   – An initial urban development area (which would authorize 9,796 acres of ground-disturbing urban development activities).

   – A maximum urban development area (which would authorize up to 13,029 acres of ground-disturbing urban development activities).

2. Covered Activities in the HCP/NCCP, permitted by the California Department of Fish and Game and the U.S. Fish and Wildlife Service (USFWS):

   – Activities and projects associated with urban growth, in accord with local general plans

   – Specific infrastructure projects outside the Urban Limit Line (ULL). The proposed plan would allow up to 1,126 acres of impact from rural infrastructure projects for either the initial or maximum urban development area.

   – The following activities inside the proposed HCP/NCCP preserves:

      - construction and maintenance of recreational or management facilities,
      - habitat enhancement, restoration, and creation,
      - management activities necessary to achieve the HCP/NCCP's biological goals,
      - surveys for covered species, vegetation communities, and other resources,
      - agricultural activities on adjoining land within one mile of the preserve boundary,
      - low-intensity recreational use, and
      - construction and maintenance of utility infrastructure.

3. A Preserve System that would preserve approximately 23,800 acres of land with the initial urban development area, or approximately 30,300 acres of land under the maximum urban development area

4. Proposed HCP/NCCP conservation measures to address the following objectives:

   - Design of covered activities to avoid or minimize impacts on covered species and covered vegetation communities.
   - Preservation of covered vegetation communities.
   - Preservation of covered species populations and habitats.
   - Restoration of covered species habitat and vegetation communities to compensate for direct and indirect impacts on specific species and vegetation communities.
   - Restoration of species habitat to contribute to the recovery of listed covered species and help prevent the listing of non-listed covered species.
   - Management of preserves to maximize the functions of habitats for covered species.

Revised Project as a Component of the Original Project

The entire Project site was considered as part of the final design for the East Contra Costa County HCP/NCCP. The Revised Project will restore and enhance the ecological habitats of the former Roddy Ranch golf course and open the site as a regional park. The Revised Project is a component of the approved HCP/NCCP. It would not create additional impacts nor substantially change the findings in the originally approved Final EIS/EIR or Final IS/MND. The Original Project analyzed in the Final EIS/EIR encompassed 174,018 acres, including the 230 acres analyzed in the Final IS/MND, which will encompass the proposed Revised Project. The habitat restoration and preservation activities proposed in the Revised Project (details provided in **Section 2.0, Project Description**) were considered in the Final EIS/EIR.

1.3 CEQA REQUIREMENTS

According to Section 15164(a) of the *State CEQA Guidelines*, "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR and/or IS/MND if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR and/or IS/MND have occurred. A brief explanation of the decision not to prepare a subsequent EIR or IS/MND must also be provided in the addendum, findings or the public record pursuant to Section 15164(d) of the *State CEQA Guidelines*.

Section 15162 of the *CEQA Guidelines* lists the conditions that would require the preparation of a subsequent EIR or negative declaration rather than an addendum. These include the following:

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

The Revised Project is described in **Section 2.0** of this Addendum and would be within the parameters analyzed in the Final EIS/EIR and Final IS/MND. The Revised Project would remain in conformance and not result in additional impacts beyond those considered in the environmental review for the Original Project or Golf Course Project. The Revised Project has been reviewed in light of Sections 15162, 15163 and 15164 of the *State CEQA Guidelines*. The EBRPD, as the lead agency for this Revised Project, has determined that (1) the Final EIS/EIR and Final IS/MND provide information and analysis of impacts that is relevant and of value to the environmental review for the Revised Project, and (2) based on the analysis presented herein, none of the conditions apply which would require preparation of a subsequent or supplemental EIR. Thus, an Addendum to the Final EIS/EIR and Final IS/MND is the appropriate environmental documentation under *State CEQA Guidelines* for the proposed Project.

Section 3.0 analyzes, impact by impact, how the environmental impacts for the Revised Project compared to impacts of the Original Project and Golf Course Project previously identified in the Final EIS/EIR and

Final IS/MND. The Mitigation Monitoring and Reporting Program (MMRP) adopted with the Final EIS/EIR (see **Appendix A**) and *Additional Information to Environmental Checklist including Discussion of Impacts and Proposed Mitigations* (PM) adopted with Final IS/MND (see **Appendix B**) would continue to apply to the Revised Project.

1.4 SUMMARY COMPARISON OF IMPACTS IN FINAL EIS/EIR AND FINAL IS/MND COMPARED TO IMPACTS OF THE PROPOSED PROJECT

Environmental impacts identified for the Final EIS/EIR and Final IS/MND as compared to impacts of the Revised Project are summarized in **Table 1** below:

Table 1
Comparison of Impacts Certified Final EIS/EIR & IS/MND Compared to Impacts of Currently Proposed Project

Environmental Issue	Final IS/MND	Original Project	Revised Project	Conclusion
Visual Resources				
Views	LTS	NI	NI	No change
Visual Character	NI	NI	NI	No change
Light and Glare	NI	NI	NI	No change
Shade/Shadow	NI	NI	NI	No change
Agricultural Resources				
Important Farmland	Not Considered	LTS	NI	No additional impacts
Williamson Act Contract	LTS	LTS	NI	No additional impacts
Conversion of Farmland	Not Considered	LTS	NI	No additional impacts
Air Quality				
Consistency with AQMP	LTS	LTS	LTS	No change
Construction	LTS	LTS/Mitigation	LTS/Mitigation	No change
Operation	LTS	LTS	LTS	No change
Toxic Air Contaminants	Not Considered	LTS/Mitigation	LTS/Mitigation	No change
Greenhouse Gas	Not Considered	Not Considered1	LTS	No additional impacts
Biological Resources				
Habitat Modification	LTS/Mitigation	LTS	LTS	No change
Sensitive Natural Community	LTS/Mitigation	LTS	LTS	No change
Federally Protected Wetlands	LTS/Mitigation	LTS	Beneficial	No additional impacts

Environmental Issue	Final IS/MND	Original Project	Revised Project	Conclusion
Native Resident or Migratory Bird	LTS/Mitigation	LTS	LTS	No Change
Tree Preservation	LTS/Mitigation	LTS	LTS	No Change
Habitat Conservation Plan	LTS	NI	NI	No Change
Sensitive Natural Community	LTS	LTS/Mitigation	LTS/Mitigation	No Change
Cultural Resources				
Historic	LTS	LTS/Mitigation	LTS/Mitigation	No change
Archaeological	LTS/Mitigation	LTS/Mitigation	LTS/Mitigation	No change
Paleontological	Not Considered	LTS/Mitigation	LTS/Mitigation	No change
Hazards and Hazardous Materials				
Transport, Use, or Disposal	LTS	NI	NI	No change
Release into the Environment	LTS	NI	NI	No change
Within ¼ mile of a School	NI	NI	NI	No change
List of Hazardous Materials Sites	Not Considered	NI	NI	No change
Within 2 miles of a Public Airport	Not Considered	Not Considered	NI	No additional impacts
Within vicinity of a Private Airstrip	Not Considered	Not Considered	NI	No additional impacts
Land Use/Planning				
Physically Divide Community	Not Considered	LTS	NI	No additional impacts
Conflict with Land Use Plan	LTS	LTS	NI	No additional impacts
Conflict with Habitat Conservation	LTS	LTS	NI	No additional impacts
Noise				
Construction Noise	LTS	LTS/Mitigation	LTS/Mitigation	No Change
Operation Noise	LTS	LTS	LTS	No Change
Airport Land Use Plan	Not Considered	Not Considered	NI	No additional impacts
Population and Housing				
Induce Population Growth	LTS	NI	NI	No change
Displace Existing Housing	LTS	LTS	NI	No additional impacts
Displace People	Not Considered	NI	NI	No Change

Environmental Issue	Final IS/MND	Original Project	Revised Project	Conclusion
Public Services				
Fire	LTS	LTS	LTS	No Change
Police	LTS	LTS	LTS	No Change
Schools	LTS	NI	NI	No change
Recreation	LTS	Beneficial	Beneficial	No Change
Libraries	LTS	Not Considered	NI	No additional impacts
Socioeconomic and Environmental Justice				
Employment	Not Considered	LTS	LTS	No change
Property Values	Not Considered	LTS	LTS	No change
Minority, Low-Income Populations	Not Considered	LTS	LTS	No change
Transportation/Traffic				
Trip Generation	LTS	LTS	LTS	No change
Site Access and Circulation	LTS/Mitigation	LTS/Mitigation	LTS/Mitigation	No change
Conflict with Plans	Not Considered	LTS/Mitigation	LTS/Mitigation	No change
Utilities				
Wastewater	LTS	NI	NI	No change
Water	LTS	NI	NI	No change
Stormwater	LTS	NI	NI	No change
Water Supply	LTS	NI	NI	No change
Wastewater Treatment	LTS	NI	NI	No change
Landfill Capacity	LTS	NI	NI	No change
Solid Waste	LTS	NI	NI	No change
Energy	LTS	NI	NI	No change

Notes:

LTS = Less than significant; LTS/Mitigation = Less than significant with mitigation; NI = No impact

The Certified Final EIS/EIR and Final IS/MND found no environmental impacts to be significant and unavoidable after the imposition of all feasible mitigation measures, regulatory measures and project design features. As discussed below, consistent with Title 14, California Code of Regulations, Section 15164,

and 15168, the Project will not result in any significant environmental effects that were not adequately disclosed in the Final EIS/EIR and Final IS/MND and does not require subsequent environmental review.

1.5 SUMMARY OF IMPACTS

Section 3.0 of this Addendum includes a detailed evaluation of the potential change in environmental impacts associated with the Revised Project compared to the impacts identified in the Final EIS/EIR and Final IS/MND. As summarized above, impacts would either be comparable or reduced as compared to those identified in the Final EIS/EIR and Final IS/MND. This Addendum addresses the Revised Project's effects related to these environmental topics and mitigation measures addressed in the Final EIS/EIR and Final IS/MND, which is used as the baseline for review. The criteria for determining significance of environmental impacts in this Addendum are the same as those contained in the Final EIS/EIR and Final IS/MND. Since the Revised Project would not trigger any of the conditions that require the preparation of a Subsequent or Supplemental EIR in Sections 15162 and 15163 of the *State CEQA Guidelines*, an Addendum to the Final EIS/EIR and Final IS/MND is the appropriate document to address the proposed Revised Project.

2.0 PROJECT DESCRIPTION

2.1 PREVIOUSLY APPROVED PROJECT

1998 Roddy Ranch Golf Course Final Initial Study/Mitigated Negative Declaration

In 1998, an IS/MND for the Roddy Ranch Golf Course project was certified. The IS/MND was prepared pursuant to CEQA. Roddy Ranch, LLC, applied for a rezoning of ten parcels (the entire 2, 161-acre Roddy Ranch) from the existing A-4 (Agricultural Preserves) to A-20 (Exclusive Agricultural District); a Parcel Map creating one 200-acre Parcel and a Remainder Parcel; and the request for a Land Use Permit to construct a golf course. The Remainder Parcel was to be used for continued ranching activities associated with the Roddy Ranch.

The golf course would total 230 acres and includes the course, non-illuminated practice and range areas, starter house with snack facilities within a pre-manufactured building (1, 500 square feet), mid-course refreshment stand, cart storage (5, 000 square feet), maintenance and cleaning facilities (6,000 square feet) within a pre-manufactured building, parking area, entry driveway and associated landscaping, septic system, and irrigation water storage (water features), pumping and pipeline facilities, and electric and phone service relocation. The Golf Course Project also proposed to construct a non-potable waterline and a pump station.

The Golf Course Project proposed approximately 600,000 cubic yards of cut and fill to grade the golf course improvements as described, including the access driveway, the golfcart paths, starter shack, and safety improvements (four feet of pavement widening) at the entry on Deer Valley Road.

The Final IS/MND concluded that the impacts associated with the Roddy Ranch Golf Course were less than significant with incorporated mitigation measures.

2006 East Contra Costa County Habitat Conservation Plan and Natural Community Conservation Plan Final Environmental Impact Statement / Environmental Impact Report

In 2006, a combined Final EIS/EIR for the ECCC HCP/NCCP was certified. The Final EIS/EIR was prepared pursuant to NEPA and CEQA.

Contra Costa County (County), the Cities of Brentwood, Clayton, Oakley, and Pittsburg, the Contra Costa County Flood Control and Water Conservation District, the EBRPD, and the HCP/NCCP Implementing Entity applied for incidental take permits (ITPs) from the U.S. Fish and Wildlife Service (USFWS), pursuant

to Section 10(a)(1)(B) of the Endangered Species Act (ESA) of 1973, as amended; and from the California Department of Fish and Game (DFG), pursuant to Section 2835 of the Fish and Game Code. The permits would authorize take of certain state- and federally listed species during the course of otherwise lawful activities. As a required component of the application for these permits, the applicants prepared an HCP/NCCP for ECCC. The area covered by the proposed HCP/NCCP (or Plan) encompasses approximately 174,018 acres in eastern Contra Costa County, California.

The Final EIS/EIR evaluated the potential impacts of approval of the ECCC HCP/NCCP, including issuance of ITPs by USFWS and DFG, and adoption of an implementing agreement (IA) for the proposed HCP/NCCP and other alternatives, including the no-action alternative.

The Final EIS/EIR evaluated the HCP/NCCP's conservation strategy—the creation of a Preserve System that would preserve approximately 23,800 acres of land with the initial urban development area, including the site of the Revised Project, or approximately 30,300 acres of land under the maximum urban development area.

The proposed HCP/NCCP conservation measures address the landscape-level, community-level (or habitat), and species-level impacts, and includes measures to address the following objectives:

- Design of covered activities to avoid or minimize impacts on covered species and covered vegetation communities.
- Preservation of covered vegetation communities.
- Preservation of covered species populations and habitats.
- Restoration of covered species habitat and vegetation communities to compensate for direct and indirect impacts on specific species and vegetation communities.
- Restoration of species habitat to contribute to the recovery of listed covered species and help prevent the listing of non-listed covered species.
- Management of preserves to maximize the functions of habitats for covered species.

The Final EIS/EIR concluded that the impacts associated with the HCP/NCCP were found to be primarily less than significant or less than significant with mitigation, or in some instances beneficial. .

2.2 PROPOSED PARK AT THE FORMER RODDY RANCH GOLF COURSE

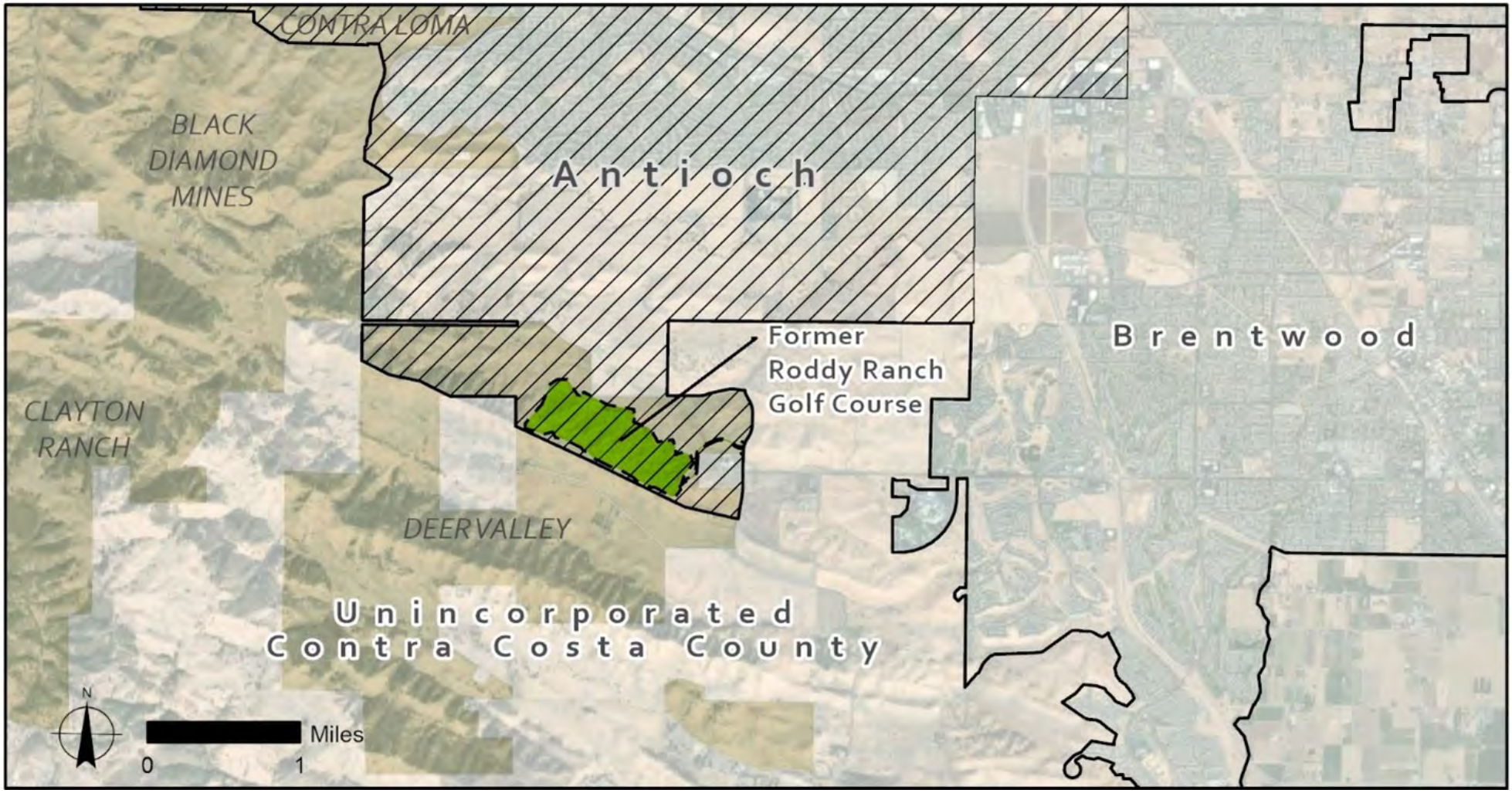
The Revised Project proposes to construct a new regional park on the lands of a former golf course, located in Antioch, CA. The project site, located at 1 Tour Way, off Deer Valley Road in southern Antioch, is formerly the Roddy Ranch Golf Course, a 230-acre, 18-hole golf course. After the course closed in 2016, the property was purchased by the Conservancy and the EBRPD and is now owned in fee title by EBRPD.

The future park at the former Roddy Ranch golf course is part of a larger system of habitat conservation land and future parklands purchased by the Conservancy and EBRPD and owned by EBRPD, called "Deer Valley Regional Preserve." These properties, totaling approximately 3,700 acres, remain in Land Bank status and are not open to the public, as shown in **Figure 1**.

Project Location and Surrounding Land Uses

The project site is wholly within Antioch city limits. It is located at the southern end of the city. A nearby area generally north and east of Empire Mine Road and west of Deer Valley Road is referred to as the Sand Creek Focus Area and is being considered by the City of Antioch for a mix of housing, commercial development, parks, and trails. The Roddy Ranch Golf Course opened in 2000 with the expectation that executive homes would be built on the surrounding ranch land. Originally in unincorporated Contra Costa County, the golf course property was annexed by Antioch in 2006 as interest grew in building housing developments near the golf course. However, the housing was not built, and the City of Antioch created a Roddy Ranch Focus Area, specifically zoning the golf course and much of the surrounding land as "open space" in the city's General Plan. Allowed uses at Roddy Ranch include agriculture, conservation activities, habitat restoration, and, with a use permit or master plan, a public park.

Land uses immediately adjacent to the future park are primarily open-space, agriculture, parks, wetlands and other non-urban uses within the jurisdiction of Contra Costa County and the City of Antioch. Agricultural properties are located east from the site along Deer Valley Road and south along Chadbourne Road. The nearest park and preserve to the site are the Black Diamond Mines Regional Preserve and the Contra Loma Regional Park. These EBRPD facilities are located approximately 2.5 miles northwest and 2.4 miles north from the site, respectively.



SOURCE: Google Earth, 2022

FIGURE **1**

IMPACT SCIENCES

Former Roddy Ranch Golf Course Context

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The nearest residential occupancies to the site are the Brentwood Lakes and Deerwood Country Club neighborhoods located approximately 1.2 miles to the east, in the City of Brentwood. Heritage High School, Adams Middle School and Brentwood Union Elementary School serve these neighborhoods. Kaiser Antioch Medical Center is located approximately 1.5 miles northeast from the site.

Project Purpose and Consistency with Other Plans

EBRPD currently is developing the Revised Project in coordination with the Conservancy to restore native grassland habitat, develop wetlands and include paths and facilities for passive public recreation, such as walking, jogging, bicycling, horseback riding, and picnicking. EBRPD and Conservancy's habitat restoration goals at the former Roddy Ranch Golf Course are to:

- Maximize the goals of the Conservancy's HCP/NCCP for enhancement and restoration for sensitive species and habitat creation.
- Improve function of grassland habitat.
- Restore, create, enhance, and manage water resources on site (ponds and seasonal wetlands) to provide optimal habitat for wildlife.
- Support wetlands with stormwater drainage and installation of "green infrastructure" (RDG, 2021).

EBRPD's recreation goals are to:

- Open the former golf course as a regional park.
- Provide passive recreation opportunities while using existing infrastructure.
- Plan for eventual public access to Black Diamond Mines through trail connections, while meeting requirements for habitat protection.
- Support diversity of outdoor recreational activities, including picnic areas, interpretive opportunities, and restrooms (RDG, 2021).

The Plan is consistent with the East Contra Costa County Habitat Conservancy's HCP/NCCP. The purpose of the project is to open the former Roddy Ranch golf course as a regional park while restoring and enhancing ecological habitats that benefit the Conservancy's target species. Further, the project will provide additional progress towards the objectives described in the EBRPD's 2013 Master Plan and with the HCP/NCCP. These objectives include:

- Provide a diversified system of regional parklands, trails and related services that will offer outstanding opportunities for creative use of outdoor time.
- Acquire and preserve significant biologic, geologic, scenic and historic resources within Alameda and Contra Costa counties.
- Manage, maintain and restore the parklands so that they retain their important scenic, natural and cultural values.
- Interpret the parklands by focusing educational programs on the visitor's relationship to nature, natural processes, ecology, the value of natural conditions and the history of the parklands.
- Balance environmental concerns and outdoor recreational opportunities within regional parklands.
- Support the development and retention of well-trained, dedicated and productive employees.
- Improve access to and use of the parks by members of groups that are underrepresented, such as persons with disabilities, the economically disadvantaged and elderly park visitors.
- Provide recreational development that fosters appropriate use of parklands while preserving their remoteness and intrinsic value.
- Create quality programs that recognize the cultural diversity represented in the region.
- Participate in partnerships with public agencies, nonprofit organizations, volunteers and the private sector to achieve mutual goals.
- Provide leadership to help guide land use decisions of East Bay governments that relate to the EBRPD.
- Ensure open and inclusive public processes.
- Pursue all appropriate activities to ensure the fiscal health of the EBRPD.
- Monitor the effects of climate change on EBRPD resources and utilize adaptive management techniques to adjust stewardship methods and priorities to preserve the natural, cultural and scenic values of the parks and trails

2.3 PROJECT DEVELOPMENT

Project development will be conducted in compliance with a Building (including grading) permit to be issued by the City of Antioch Building Division.

Demolition

The first phase of converting the site from a former golf course to a regional park involves demolition and removal of existing infrastructure and land features. The approximately six miles of concrete golf cart paths will be demolished and regraded to a natural topography. The demolished and regraded trails will be seeded with a native or sterile seed mix. Over 100 remnant sand traps throughout the site will also be regraded to a natural topography with the sand folded into native soils available on site. Small rock walls will be demolished, the area around them will be regraded to a natural topography, and the rock will be reused on site.

Existing irrigation infrastructure will remain abandoned in place except for where it conflicts with planned grading. The storm drain network (e.g., subterranean pipes) will be dismantled with some remaining where it does not conflict with grading.

Three existing vault toilets will be removed from the site. Existing lights near the parking lot will be removed. Approximately 25,000 square feet of asphalt surfacing in the parking area will be removed and the surface will be regraded and seeded with native or sterile seed mix. As budget allows, infrastructure related to the remnant irrigation ponds (e.g., pumps, pump house, and underground pipes) may be removed.

Construction

Primary construction access will occur via One Tour Way and through the existing Emergency and Maintenance Vehicle Access points along Empire Mine Road. Staging will occur on-site within the limits of disturbance.

Entry and Parking Lot

At the entrance to the site at Deer Valley Road and Tour Way, the EBRPD will install a new entry sign and remodel the existing access control gate. Road improvements will be made to the intersection of Deer Valley Rd and Tour Way to improve accessibility to the site and ensure that the intersection is compliant with current City, County, and Caltrans specifications, policies, and regulations.

Parking lot

As mentioned in the Demolition section, approximately 25,000 square feet of asphalt parking lot will be removed, regraded, and planted with seed mix. Approximately 30,500 square feet of asphalt surface will be removed and replaced with gravel for equestrian trailer parking. The remaining approximately 53,000

square feet of asphalt parking lot will be resurfaced. 10 to 25 trees will be planted in and near the parking area. These trees will be watered from the existing on-site well until they are established.

Following the modifications, the existing 142-stall parking lot will provide approximately 100 parking spaces, including a minimum of 5 accessible spaces to comply with the City of Antioch Municipal Code.

The EBRPD will install no more than eight picnic tables, trash receptacles, and drinking fountains (serviced by an existing on-site well). The EBRPD will construct a new shade structure/shade pavilion in the picnic area northwest of the parking lot that will not exceed 2,000 square feet. The parking and picnic areas will be serviced by a new 4- to 6-stall plumbed toilet using the existing on-site septic system.

Trails

The existing cart-path network was designed for golf carts and is mostly not suitable for multi-use trails as imagined by the EBRPD. As mentioned previously in the Demolition section, approximately six miles of concrete golf cart paths will be demolished and regraded to a natural topography. The demolished and regraded trails will be seeded with a native or sterile seed mix. The EBRPD will construct a new trail network shown in **Figure 2**, **Habitat Restoration and Public Access Plan**. Trails are, for the most part, aligned to avoid a 300-foot buffer around the planned pond and wetland restoration to remain consistent with the HCP/NCCP. Salvaged boulders from on site will be placed along the trails to provide low retaining walls and informal barriers to encourage users to keep to established trails. Similarly, boulders may be placed at overlooks and viewpoints to help define and delineate the space. The EBRPD will not install any benches along the trails but relocated existing boulders may provide natural, informal seating.

Accessible Loops and Spurs

The EBRPD will construct approximately 1.6 miles of new trails that meet the requirements for Accessibility Guidelines for Outdoor Developed Trails (AGODA) shown on **Figure 2** as dashed lines. These trails will provide short, AGODA-accessible walks near the parking area and the top of the ridge. The network of accessible trails will be comprised of an approximate 0.65 mi. inner loop; an approximate 0.75 extension will create a larger outer loop; the equestrian connector (to the equestrian parking) will be approximately 0.09 miles; and the spur to the overlook will be approximately 0.07 miles. The accessible trails may not have any bridges or boardwalks and instead may have small culverts to allow for drainage. The extended loop trail will have a stabilized aggregate surface and the inner loop trails will be concrete.

TRAIL KEY

ACCESSIBLE TRAILS (AGODA) TOTAL		**1.6 MI.**
ACCESSIBLE LOOP TRAIL	0.65 MI.	
EXTENDED ACCESSIBLE TRAIL	0.75 MI.	
OVERLOOK SPUR	0.07 MI.	
EQUESTRIAN CONNECTOR	0.09 MI.	
MULTI-USE TRAILS TOTAL		**2.3 MI.**
WEST LOOP TRAIL	1.10 MI.	
LOWER CONNECTOR TRAIL	0.40 MI.	
EAST LOOP TRAIL	0.80 MI.	
ALL NEW TRAILS TOTAL		**3.9 MI.**

D 1- D7	DRAINAGES
P 30 - P 33	PONDS
B 2 - B 7	BASINS
	PROPERTY BOUNDARY
	300 FT AQUATIC BUFFER
	CHANNEL/ SWALE
	PONDS & BASINS
	INFILTRATION AREA
	STORM DRAIN OUTFALL
	VERNAL POOL COMPLEX
	BRIDGES & BOARDWALKS

Figure 2

East Loop Trail

Starting in the northwest corner of the parking area, a multi-use loop trail will connect the parking area to the lower, eastern section of the property. The approximately 0.8-mile multi-use loop trail will cross three restored drainages with bridges or boardwalks and may include small culverts. The trails will have an earthen surface that may be upgraded to aggregate if funding allows.

Lower Connector Trail

An approximately 0.4-mile multi-use connector trail will run between the east loop and west loop near the bottom of the ridge. The trail will cross two restored drainages with a bridge or boardwalk and may include small culverts to accommodate drainage. The trails will have an earthen surface that may be upgraded to aggregate if funding allows.

West Loop Trail

An approximately 1.1-mile loop will traverse the western part of the property (a small portion of the loop is part of the Accessible loop). The trail will not have any bridges or boardwalks but may have small culverts to accommodate drainage. The trails will have an earthen surface that may be upgraded to aggregate if funding allows.

Drainage Restoration

The former Roddy Ranch Golf Course consists of seven parallel drainages numbered D1-D7 (east to west). These areas were heavily graded and filled to create the golf course fairways, greens, and other landscape features. An extensive underground storm drain system remains below the surface of the site. As mentioned above in the Demolition section, the EBRPD will remove much of the storm drain network with some remaining where it does not conflict with restoration grading. The removal of the storm drain network will allow for the restoration of surface flow and infiltration.

The restoration of the drainages will involve earthwork to restore stability to the drainages. Fill placed in channels to create the golf course will be removed and placed in adjacent uplands. New earthen and vegetated channels will be formed at the bottom of each drainage to direct surface flow into pond/wetland features.

The cut and fill involved in this grading will be balanced on site and not require any off haul of soil suitable for reuse on-site. There is no known dumping on-site that would require off-haul of unsuitable soil material, but if it is discovered during the grading work, this soil would be disposed of legally off-site. Shallow depressions will be graded to allow for increased infiltration. As mentioned in the Demolition

section, over 100 remnant sand traps throughout the site will also be regraded to a natural topography with the sand folded into native soils available on site. Approximately 170 acres of the site will be disturbed during construction, with a total of 75,000 to 150,000 cu (cubic) yards of material moved locally on-site. All grading will follow BMPs for erosion control in compliance with the City of Antioch Municipal Code and Contra Costa County codes.

Drainage 1

The storm drain network for this channel collects runoff from the parking lot. Grading will capture stormwater and direct it into a bioretention area that will treat stormwater from the parking lot and slow and infiltrate the stormwater before continuing downstream. Grading of channel flow paths will allow surface flow to drain into Pond 33 (P33) at the bottom of the drainage.

Drainage 2

The EBRPD will regrade the lower channels as they enter Pond 32 (P32) and Basin 2 (B2) to reduce the risk of erosion and allow for most if not all of the storm drain network to be abandoned in place. The newly graded channels will direct flow into Pond 32. The EBRPD will regrade the upper part of Drainage 2 to restore natural topography, allow for infiltration and direct surface flows downslope.

Drainage 3

The EBRPD will abandon the storm drain system and regrade fill areas of Drainage 3 to a natural topography to route flows into Drainage 2 and into Pond 32.

Drainage 4

The EBPRD will abandon the storm drain network and excavate fill to restore a natural topography, restore channels, and grade infiltration areas. The restored topography will allow for infiltration and route drainage indirectly into Basin 3 (B3).

Drainage 5

Drainage 5 has the smallest subsurface drainage network of all the drainages. The EBRPD will abandon the subsurface drains, excavate fill to restore a natural topography and grade channels to direct flows into Pond 31 (P31). In the upper drainage, the EBRPD will install willow poles or other wood vegetation for habitat and channel stability purposes.

Drainage 6

At nearly 60 acres this is the largest drainage on site. The EBRPD will abandon the storm drain network, excavate fill to restore a natural topography and grade channels to direct flow into Pond 30 (P30). In the upper drainage, the EBRPD will install willow poles or other wood vegetation for habitat and channel stability purposes.

Drainage 7

One quarter of this drainage is off-site to the west. On-site, the EBRPD will abandon the storm drain network, excavate fill to restore a natural topography and grade channels to direct flow into Basin 7 (B7). In the upper drainage, the newly graded topography will include shallow basins to allow for infiltration. Most of the potential instability in Drainage 7 is in the lower watershed. The EBRPD will regrade this lower area to one or two broad basins, one of the basins will include a complex of 4 to 5 vernal pools. The grading of these basins will include recontouring surface channels to have a stable slope appropriate for the drainage area.

Wetland Restoration

The former Roddy Ranch golf course includes four constructed ponds (P30-P33) and five constructed basins (B2-B5 and B7). Of these, Basins 2 and 3 and Pond 33 are seasonal wetlands. Basins 5 and 7 are permanent wetlands. Basin 4 and Ponds 30, 31, and 32 do not qualify as wetlands. In general, the ponds will be adapted to support aquatic habitat, and the basins will be naturalized to a more gradual side slope. The inlet/outlet infrastructure will be rehabilitated for ponds and basins by reconfiguring the outlet through grading and stabilizing with rock armoring. The Revised Project will increase the size and habitat function of the wetlands. **Table 2** below shows the current size and post-restoration size of the basins and ponds.

Table 2
Existing and Post-Restoration Size of Basins and Ponds

Feature	Existing Size (acres)	Post-restoration Size (acres)	2020 Wetland Designation
Pond 30	n/a	0.1 to 0.4	n/a
Pond 31	n/a	0.2 to 0.5	n/a
Pond 32	n/a	0.1 to 0.3	n/a
Pond 33	0.143	0.143 to 0.2	Seasonal wetland
Basin 2	0.022	0.022 to 0.1	Seasonal wetland
Basin 3	0.083	0.083 to 0.1	Seasonal wetland
Basin 4	n/a	removed	n/a
Basin 5	0.103	0.103 to 0.2	Permanent wetland
Basin 7	0.159	0.159 to 0.2	Permanent wetland

Source: Restoration Design Group Inc.

Ponds 30 and 31

The existing shotcrete perimeter of both ponds will be removed, and the pond slopes will be graded to a more relaxed slope to reduce erosion risk and allow the pond to be more accessible to wildlife. Grading will extend back into the hillslopes and require fill within the pond to work around existing infrastructure.

The EBRPD may raise Pond 30 with fill to reduce the bank heights, allow for more frequent spilling to Pond 31 and improve the overland flow connection from upland drainages to the pond itself. The pond will be filled with loose subsoils to improve the growing medium in the ponds/wetlands. To improve water quality and avoid residual elevated nutrient loads within the ponds, sediment will be removed from each pond and nutrient heavy topsoil removed from any fill used to recontour the ponds.

Pond 32

The existing shotcrete perimeter of the pond will be removed, and the pond slopes will be graded to a more relaxed slope to reduce erosion risk and allow the pond to be more accessible to wildlife. Grading will extend back into the hillslopes and require fill within the pond to work around existing infrastructure.

To improve water quality and avoid residual elevated nutrient loads within the ponds, sediment will be removed, and nutrient heavy topsoil removed from any fill used to recontour the ponds.

Pond 33

Remnant pumps, pipes and refuse will be removed from this pond and the existing spillway modified to stabilize the overflow. Grading of the existing berms will occur to naturalize the feature.

Basins

As described in the Drainage Restoration section, stable surface channels will be graded to direct drainage from the site into the basins. The sides of the basins themselves will be graded to have more gradual and natural side slopes, and the spillway/outlet structures will be modified to address instability and erosion. In addition, the project will remove old golf course infrastructure within and adjacent to the basins.

Revegetation

Freshly graded areas with bare soils will be replanted with a sterile seed mix or a native seed mix potentially including seed collected on-site such as *Grindelia spp.* As described in the Drainage Restoration section, select areas along channels will be replanted with willow poles or other woody species to provide habitat and channel stability. 10 to 25 trees will be planted in the parking area for shade.

The EBRPD and Conservancy have been managing the grasslands on site for the past several years and those activities will continue separate from this project. All of the revegetation actions of this project will be designed to not interfere with on-going grassland management.

Vegetation Management

Livestock grazing is a common land use practice in the Bay Area.[1,2] The EBRPD uses grazing as a conservation management tool to minimize wildfire potential, maintain and enhance native grassland communities, and to enhance wildlife habitat and wetland habitat values. The future Deer Valley Regional Preserve has a seasonal grazing system, meaning livestock are present sometime between November to June. Typical cattle grazing operations found on the Preserve include either a cow/calf or yearling operation.

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1 California Native Grasslands Association. *Safeguard Native Grasses and Forbs for a More Wildfire Resilient California*. 2019. Available online at: https://cnga.org/resources/Documents/Grasslands%20Journal/Grasslands%20Articles/Perspective%20and%20Review%20Articles/Hanson_Safeguard%20Natives_Grasslands_V29_No4_2019.pdf, accessed January 27, 2022.

2 UC Berkeley Rausser College of Natural Resources. Benefits of cattle grazing for reducing fire fuels and hazard. 2020. Available online at: https://nature.berkeley.edu/news/2020/09/benefits-cattle-grazing-reducing-fire-fuels-and-fire-hazard, accessed January 27, 2022.

Livestock grazing may be used seasonally in the project area to reduce fine herbaceous fuel loads, reduce weed populations and maintain grassland habitat. Grazing has been shown to benefit breeding habitat for listed species like the California tiger salamander and the California red-legged frog by creating open water pond habitat and reducing thatch that may impede migration to and from breeding sites.

Sensitive and Threatened Species

Park planning considers known locations of sensitive plant species, which consists of one population of Big Tarplant (*Blepharizonia plumosa*), a CNPS List 1B.1 species. No park improvements are anticipated within this mapped footprint.

3.0 IMPACT ANALYSIS

3.1 ENVIRONMENTAL SETTING AND IMPACT ANALYSIS

The Final EIS/EIR for the Original Project and the Final IS/MND for the Golf Course Project provides relevant analysis of the environmental impacts associated with the Revised Project. The potential effects of the Revised Project were examined to determine whether they would result in any effects that would meet the criteria set forth in *State CEQA Guidelines* Section 15162. Only those issue areas that could potentially be impacted by the Revised Project were subject to new technical analysis.

Based on the preliminary screening, it was determined that *visual resources, public services (schools and libraries), recreational facilities, public hazards and hazardous materials, utilities and services systems, and energy* resources would not be adversely affected by the Revised Project. These resource topics were not discussed in detail in the Final IS/MND and Final EIS/EIR, as it was determined that the Original Project and Golf Course Project would have a less than significant impact on these resources.

The initial screening found that the following resources could potentially be significantly affected by the Revised Project.

- Agricultural Resources
- Air Quality
- Biological Resources.
- Cultural Resources
- Geology, Soils, and Seismicity
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Public Services (fire, police, recreational facilities).
- Socioeconomics and Environmental Justice
- Transportation

3.2 AGRICULTURAL RESOURCES

The potential for the Original Project to result in new or substantially more adverse significant impacts to agricultural resources was evaluated in relation to the Final EIS/EIR analysis and did not require mitigation measures contained in the Final EIS/EIR.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

As documented in the Final EIS/EIR, areas identified in the HCP/NCCP Plan for acquisition contain land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. However, the Prime or Unique Farmland to converted to nonagricultural use is extremely small, and some important lands would not be converted to nonagricultural use because they would continue to be grazed after acquisition.

The Revised Project is located on land that is classified as "Urban and Built-Up Land."[3] Therefore, as with the Original Project and Golf Course Project, the Revised Project would not result in impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No mitigation measures are necessary and no further analysis of this issue in an EIR is required.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to a conflict with existing zoning for agricultural use, or a Williamson Act contract?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

3 California Department of Conservation, California Important Farmland Finder. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/, accessed March 14, 2022.

The Revised Project site is zoned as the Roddy Ranch Master Plan District, which accommodates various types of development including residential, commercial, and recreational uses. The site is not zoned for agricultural use and the land is not enrolled under the Williamson Act. Therefore, as with the Original Project and Golf Course Project, no conflict exists with agricultural zoning or Williamson Act contracts, and no impact will occur. No mitigation measures are necessary and no further analysis of this issue in an a subsequent EIR is required.

(c) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

Non-Prime Farmland and Farmland of Local Importance is designated in the surrounding area. Livestock grazing occur on the Project site between November and June. The Revised Project will continue to permit seasonal grazing. As such, the Revised Project would not involve the conversion of farmland to other uses, either directly or indirectly. As with the Original Project and Golf Course Project, no impacts to agricultural land or uses would occur. Therefore, no mitigation measures are necessary and no further analysis of this issue in a subsequent EIR is required.

3.3 AIR QUALITY

The potential for the Revised Project to result in new or substantially more adverse significant impacts to air quality was evaluated in relation to the Final EIS/EIR and Final IS/MND analysis and required mitigation measures contained in the Final EIS/EIR.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to conflict with or obstructing implementation of the applicable air quality plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

In accordance with the San Francisco Bay Air Basin and the Bay Area Air Quality Management District (BAAQMD), the applicable air quality plan for the Original Project area is the Air Quality Management Plan (AQMP) developed by BAAQMD. The Final IS/MND determined that there would be no substantial air emissions or deterioration of ambient air quality. The Final EIS/EIR concluded that Original Project would not exceed the de minimus emission thresholds over the 30-year term of the permit.

Construction emissions from the Revised Project may result from vehicle trips for implementation of the Plan and maintenance of preserve lands, and use of heavy equipment for excavation and earth moving required for habitat restoration or enhancement. As compared to the Original Project, the Revised Project does not propose any substantial changes, nor have any substantial changes that have occurred with respect to project circumstances. The Revised Project would be consistent with the AQMD. Therefore, the Revised Project would not have a more significant impact than the Original Project. As a result, no new mitigation is required.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final EIS/EIR concluded there would be significant short-term increases in vehicle emissions (CO, ozone precursors, and PM10) and fugitive dust from construction of preserves, preserve-related structures, associated roadways, and worker commute trips. Additionally, there would be significant short-term increases in CO, Reactive Organic Gas, PM10, and NOx from prescribed burning. The Final EIS/EIR implemented **Mitigation Measures AIR-1** through **AIR-5** to reduce the short-term impacts to a less than significant impact.

Additionally, as stated in the Final EIS/EIR, construction projects that temporarily emit precursors of ozone (i.e., ROG or NOx) are accommodated in the emission inventories of state and federally required air plans and thus cumulative development would not have a significant impact on the attainment and maintenance of ozone AAQS.

The Final EIS/EIR found that the Original Project would not create new stationary sources of emissions or new land uses that would generate operational air emissions. Open space land use would not result in a substantial number of motor-vehicle trips that would increase emissions.

The Revised Project poses restoration work, including grading to restore natural drainage patterns and return the land to a natural topography. Approximately 170 acres of the site will be disturbed during construction. The Revised Project does not propose any substantial changes regarding construction activity from the Original Project, nor have any substantial changes that have occurred with respect to project circumstance. There has been no new information of substantial importance with respect to air quality impacts. Therefore, no further analysis of this issue in a subsequent EIR is required and no new mitigation is required.

(c) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to expose sensitive receptors to substantial pollutant concentrations?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final EIS/EIR concluded that while some of the acquisition sites may be adjacent to sensitive receptors, the majority of land uses adjacent to the HCP/NCCP acquisition areas are open space, agriculture, and parks. The Revised Project is located in an area surrounded by open space and is not within the vicinity of

sensitive receptors. Therefore, the Revised Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, no further analysis of this issue in a subsequent EIR is required and no new mitigation is required.

(d) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to result in other emissions (such as those leading to odors) adversely affect a substantial number of people?		
Topic not considered in the 2006 EIS/EIR	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances		x
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances		x
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances		x
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent		x

The Original Project would not include any odor-causing uses identified by the BAAQMD. The BAAQMD *CEQA Guidelines* (2017) identifies certain land uses as sources of odors, including, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, painting operations, landfills, and chemical and fiberglass modeling. The Revised Project is the establishment of a habitat conservation preserve and would not include any of the land uses that have been identified by the BAAQMD as odor sources. Construction activities associated with the Revised Project may generate detectable odors from heavy-duty equipment exhaust. However, construction-related odors would be short-term in nature and cease upon project completion. As compared to the Original Project, the Revised Project's construction would be less intensive and result in less air pollutant emissions and associated odor. In addition, the project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. As described above, the Revised Project would not generate odor emissions during operation and construction will be less intense than the Original Project. Therefore, the Revised Project would not have a more significant impact than the Original Project. As a result, no new mitigation is required.

3.4 BIOLOGICAL RESOURCES

The potential for the Original Project to result in new or substantially more adverse significant impacts to biological resources was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis and adopted

mitigation measures contained in the Final IS/MND and Final EIS/EIR. The following types of activities associated with conservation measures may result in disturbance to biological resources:

- Disturbance to biological resources from increased human presence as part of surveys, monitoring, or recreational use.
- Disturbance to biological resources from construction of trails and recreation facilities.
- Disturbance to biological resources from conversion of habitat associated with restoration, enhancement, or creation activities.
- Removal of vegetation during construction of temporary staging areas and access roads.
- Removal of vegetation as part of management by controlled burns, grazing activities, or herbicide application.
- Disturbance to biological resources through active or passive relocations of individuals.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

As was analyzed in the Final IS/MND and Final EIS/EIR, the impacts to covered special-status species would be less than significant. The Final IS/MND implemented several mitigation measures during construction and operation to prevent impacts to sensitive species. Additionally, the proposed HCP/NCCP establishes a conservation strategy to avoid, minimize, and mitigate, to the maximum extent practicable, impacts to each covered species, and to establish and maintain habitat to preserve and recover each covered species. However, the Final EIS/EIR identified impacts to several non-covered special status species including loss of valley elderberry longhorn beetle and their habitat, and temporary disturbance to the nesting habitat during restoration activities for double crested cormorant, great blue heron, Northern

harrier, white-tailed kite, American peregrine falcon, California black rail, California horned lark, loggerhead shrike, and Bell's sage sparrow. The Final EIS/EIR implemented **Mitigation Measures BIO-1, BIO-2**, and **BIO-3**, to survey and document any special status species prior to construction activities.

The Revised Project is a component of the HCP/NCCP, and therefore would further the conservation strategy of the HCP/NCCP. The Revised Project will be constructed on a previously developed golf course. The existing concrete cart-path network will be demolished and regraded to a natural topography and seeded with native or sterile seed mix. The new trail system will avoid a 300-foot buffer around the pond and wetland restoration. A portion of the existing parking lot will be removed, regraded and planted with seed, and 10-25 trees will be planted. The Revised Project will improve habitats for sensitive species. As such, no new or substantially greater impacts would occur, and no new mitigation measures would be required.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final EIS/EIR analyzed the impacts of riparian and vegetation communities such as annual grassland, alkali grassland, oak woodland and oak savanna, riparian woodland/scrub, and cropland. The Final EIS/EIR concluded that with implementation of Habitat Conservation Measures included as part of the HCP/NCCP, impacts on riparian habitat or other sensitive natural community would be less than significant, and no mitigation measures would be required.

The Revised Project is a component of the HCP/NCCP, and therefore would be subject to the Habitat Conservation Measures included in the HCP/NCCP. As such, no new or substantially greater impacts would occur, and no new mitigation measures would be required.

(c) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruptions, or other means?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND and Final EIS/EIR analyzed the impact of wetlands, ponds, sloughs, and streams. As documented in the Final IS/MND, the project design avoids wetlands and all trees. Additionally, the HCP/NCCP contains several measures designed to avoid, minimize, and compensate for impacts on these habitats. Additionally, the NCP/HCCP requires acquisition of wetland habitats. Impacts to streams require preservation at a 2:1 ratio for perennial streams and a 1:1 ratio for intermittent and ephemeral streams. Impacts to perennial or intermittent streams also require restoration at a 1:1 ratio where feasible. Where infeasible, restoration of seasonal wetlands or perennial wetlands was required to be substituted.

The Project site includes a subsurface drainage system and three lined irrigation ponds that were once fed by a currently disconnected non-potable water supply, and several water quality basins, some of which are permanent or seasonal wetlands. The Revised Project proposes to remove the storm drain network to allow for the restoration of surface flow and infiltration. Additionally, the ponds will be adapted to support aquatic habitat, and the basins will be naturalized to a more gradual side slope. The inlet/outlet infrastructure of the ponds and basins will be rehabilitated. Therefore, the Revised Project will benefit the existing wetland habitat. As such, no new mitigation measures would be required.

(d) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of wildlife nursery sites?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND and Final EIS/EIR analyzed impacts to common wildlife species and their nesting habitats, including migratory birds. The Final EIS/EIR found that there would be temporary disturbance to nesting habitat for double crested cormorant, great blue heron, Northern harrier, white-tailed kite, American peregrine falcon, California black rail, California horned lark, loggerhead shrike, and Bell's sage sparrow during restoration activities. Construction activities could cause individuals to abandon their nests. As discussed in the Final EIS/EIR, the HCP/NCCP includes specific measures to avoid impacts on migratory birds, including Conservation Measure 1.11. The Final IS/MND included several mitigation measures to avoid impacts to plant and animals, and the Final EIS/EIR implemented **Mitigation Measure BIO-2** to protect the above-mentioned species during construction. With these measures in place, the Final IS/MND and Final EIS/EIR concluded that impacts would be less than significant.

The Revised Project is a component of the HCP/NCCP, and therefore would be subject to the Habitat Conservation Measures included HCP/NCCP. Additionally, aside from temporary construction impacts, implementation of the conservation strategy would benefit these special-status species through land preservation, habitat enhancement, restoration, and creation, as well as a variety of other measures such as reducing urban effects and enhancing the prey base in grassland foraging habitat. As such, no new or substantially greater impacts would occur, and no new mitigation measures would be required.

(e) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		
Topic not considered in the 2006 EIS/EIR	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances		
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances		
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances		
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent		

Similar to the Original project, the Revised Project will be subject to the East Contra Costa County HCP/NCCP, which contains several conservation goals to protect and enhance biological resources, such as maintaining the current canopy coverage of oaks and other over-story trees within oak woodland and oak savanna land cover types. Additionally, the Revised Project must comply with Contra Costa Tree Protection and Preservation Ordinance, which requires a permit before removing a protected tree. The Final IS/MND included **Mitigation Measure 4a** to conduct a special status plant survey prior to construction to avoid grading in impacted areas. Therefore, no new impact would occur, and no new mitigation measures are required. No additional EIR is needed.

(f) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other Approved local, regional, or state habitat conservation plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

Both the Original and Revised Project are subject to the East Contra Costa County HCP/NCCP. The main element of the HCP/NCCP conservation strategy is the creation of a Preserve System that would preserve approximately 23,800 acres of land with the initial urban development area, or approximately 30,300 acres of land under the maximum urban development area. The Revised Project is a component of this plan, will rehabilitate the former Roddy Ranch golf course as a regional park, and will restore and enhance ecological

habitats that benefit the Conservancy's target species. Further, the project will provide additional progress towards the objectives described in the EBRPD's 2013 Master Plan and with the HCP/NCCP. Therefore, the Project would not conflict with any approved conservation plans. No new impacts would occur, and no new mitigation measures are required.

3.5 CULTURAL RESOURCES

The potential for the Revised Project to result in new or substantially more adverse significant impacts to cultural resources was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis and required mitigation measures contained in the Final IS/MND and Final EIS/EIR.

As stated in the Final IS/MND, the archaeological surveys of the Roddy Ranch, conducted as part of the golf course project, resulted in the relocation and reevaluation of the two previously recorded historic sites, and the discovery and recording of three new historic archaeological properties. All three sites are located outside the area of direct impact.

As stated in the Final EIS/EIR, impacts on cultural resources from the Original Project would be mitigated to a less-than-significant level through implementation of the applicable jurisdictions' general plan policies and the adoption of specific mitigation measures.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to a substantial adverse change in the significance of a historical resource as defined in §15064.5?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

Evaluation of the potential for cultural and historical resources was conducted for the Final EIS/EIR and included a review of available literature and records. Based on a preliminary survey of the Project site and a review of relevant background data, the Final EIS/EIR concluded that the approved Project may have potentially significant impact on cultural resources but could be mitigated to a less-than-significant level with **Mitigation Measures CR-1** and **CR-2**.

The Revised Project is not located within close proximity to a historical resource as defined in §15064.5. As a result, the Revised Project would not create additional adverse impacts to cultural resources.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Roddy Ranch Golf course was built in 2000 and opened in 2001. Construction of the course involved 600,000 cubic yards of grading across 170 of the 230 acres of land. The Final IS/MND conducted an archeological survey and concluded that no archeological sites are within the proposed golf course or access roads areas and impacts would be less than significant with mitigation measures.

The Revised Project poses restoration work, including grading to restore natural drainage patterns and return the land to a natural topography. Approximately 170 acres of the site will be disturbed during construction, with a total of 75,000 to 150,000 cu yards of material moved locally on-site. All grading will follow BMPs for erosion control in compliance with the City of Antioch Municipal Code and Contra Costa County codes. The 170 acres to be disturbed will be the same area that was disturbed during the original construction of the golf course. No archaeological resources were found during the Golf Course construction.

In April 2020, PaleoWest contacted the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File (SLF). The objective of the SLF search was to determine if the NAHC had any knowledge of Native American cultural resources within the immediate vicinity of the Project area. The NAHC responded on April 28, 2020, stating that the records search did not identify any Native American resources. Additionally, several tribes were contacted in June 2020 (Amah Mutsun Tribal Band of Mission San Juan Bautista; Guidiville Indian Rancheria; Indian Canyon Mutsun Band of Costanoan; Muwekma Ohlone Indian Tribe of the San Francisco Bay Area; North Valley Yokuts Tribe; The Confederated Villages of Lisjan; The Ohlone Indian Tribe; and Wilton Rancheria). No responses were received.

As a result, with implementation of **Mitigation Measures CR-1** and **CR-2** from the Final EIS/EIR, the Revised Project would not have a significant impact on archaeological resources. No new impacts would occur, and no new mitigation measures are required.

(c) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

As discussed above, construction of the golf course involved 600,000 cubic yards of grading across 170 of the 230 acres of land. No paleontological resources were discovered at that time. The Revised Project poses restoration work requiring 170 acres of ground disturbance, with a total of 75,000 to 150,000 cu yards of material moved locally. All proposed ground disturbance is anticipated to cover the same footprint as the original 170 acres. All grading will follow BMPs for erosion control in compliance with the City of Antioch Municipal Code and Contra Costa County codes. As discussed above, outreach to the NAHC and nearby Native American Tribes was conducted in 2020, and no resources were identified. Therefore, with implementation of **Mitigation Measures CR-1** and **CR-2**, the Revised Project would not have a significant impact on paleontological resources. No new impacts would occur, and no new mitigation measures are required.

3.6 GEOLOGY, SEISMICITY, AND SOILS

The potential for the Original Project to result in new or substantially more adverse significant impacts to geological resources was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis. The Final IS/MND implemented mitigations measures to reduce the impacts of grading, and no mitigation measures were included in the Final EIS/EIR.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
ii. Strong seismic ground shaking?
iii. Seismic-related ground failure, including liquefaction?
iv. Landslides?

	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final EIS/EIR indicated the Original Project in its totality would create less than significant impacts to geology and soils. The Original Project did not propose any structures for human occupancy for construction to support implementation of the proposed Plan or the Preserve System. The Final IS/MND concluded the Golf Course Project would not expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or other hazards.

The Project site is located in the seismically active Bay Area region, which is characterized by major faults and fault zones. Faults are classified as active, potentially active, or inactive. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped within Contra Costa County. Active and potentially active faults which are deemed capable of producing fault rupture due to seismic activity have ground rupture potential and may be expected to generate movement at the surface ranging from a few inches to approximately six feet.

A report regarding Geotechnical Constraints for the proposed Roddy Ranch Project was prepared in 2020. As discussed in the report, the Project site is not located within a State-designated Alquist-Priolo Earthquake Fault Zone and there are no active faults mapped through or very near to the site. The risk of surface fault rupture is therefore considered to be low. There is potential for considerable ground shaking at the project site resulting from an earthquake of moderate to high magnitude generated within the San Francisco Bay Region. This, however, was adequately addressed in the Final IS/MND and Final EIS/EIR

and is not a new significant impact. No mitigation measures were required in the Final IS/MND and Final EIS/EIR.

The structures that Revised Project proposes constructing are a shade structure/shade pavilion in the picnic area northwest of the parking lot, and a plumbed toilet building. This minor construction would be built according to appropriate standards, including the current Uniform Building Code and CBSC. Therefore, though the project site is subject to seismic hazards, no new impacts will result from the Revised Project and no additional EIR or negative declaration is needed.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to substantial soil erosion or the loss of topsoil?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND and Final EIS/EIR concluded that restoration activities would include ground-disturbing earthwork such as digging, trenching, grading, and other activities that may promote soil erosion and/or loss of topsoil. The Final IS/MND included **Mitigation Measure 2a** to conduct a geotechnical investigation reduce erosion during grading and the Final EIS/EIR included **Mitigation Measure WQ-1**, which requires implementation of appropriate BMPs when undertaking ground-disturbing activities affecting more than one acre of land, and implementation of a SWPPP subject to the requirements of Section 402 of the federal CWA and NPDES to control erosion and sedimentation. With implementation of **Mitigation Measure WQ-1**, impacts on soil erosion and topsoil loss would be reduced to a less-than-significant level.

All ground-disturbing activities were analyzed in the Final EIS/EIR. The Revised Project will be subject to **Mitigation Measure 2a** and **WQ-1** from the Final IS/MND and Final EIS/EIR. No additional mitigation would be required and there would be no new or greater impacts than those identified in the Final EIS/EIR.

(c) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to being located on a geologic unit or soil that is unstable, or that would be unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

A small amount of earthwork required for habitat restoration and creation, may create temporary or permanent slopes that could become unstable if improperly designed or constructed. These activities would take place only in areas that are not open to the public. As a result, the Final EIS/EIR concluded that there is no additional risk to humans or structures from habitat restoration or creation activities and no mitigation measures would be required.

The 2020 Geotechnical Constraints report confirmed that previously filled areas could be subject to long-term settlement from fill compression or consolidation of native soils. Settlement hazards could be avoided by remedial grading design. Previous geotechnical explorations revealed fine-grained soils that would not be subject to liquefaction. Additionally, liquefaction maps do not identify high levels of liquefaction on the site. The report also confirmed that landslide hazards at the site are low and confined to localized steep slopes. The Revised Project will comply with **Mitigation Measure 2a** contained in the Final IS/MND to ensure slope stability during construction. All construction would be compliant with the California Building Standards Code and all grading would be conducted under the terms of the Grading Permit for the project. Therefore, no new impacts will result from the Revised Project and no additional environmental review is needed.

(d) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial risks to life or property?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

Expansive soils are typically those of high clay content that swell and shrink during wet and dry climatic events, respectively. The Final EIS/EIR determined that impacts as a result of expansive soils was less than significant, with compliance with the California Building Standards Code, which contains provisions for design and construction on expansive soils. The 2020 Geotechnical Constraints report determined that soil materials at the site are expected to be moderately to critically expansive. The negative effects of expansive soils can be avoided by proper design of foundation pavements and other improvements. All on-site construction of the Revised Project would comply with current Building Code requirements, which ensure impacts related to expansive soils are less than significant. Therefore, no new impacts will result from the Revised Project and no additional EIR is needed.

(e) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to soils incapable of adequately supporting the use of septic tanks or alternative wastewater systems, where sewers are not available for the disposal of wastewater?		
Topic not considered in the 2006 EIS/EIR	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances		
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances		
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances		
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent		

The former golf course installed a septic system. The Revised Project will be served by existing septic system infrastructure. Therefore, no impacts would occur from the Revised Project and no additional EIR is needed.

3.7 GREENHOUSE GAS EMISSIONS

The Final IS/MND and Final EIS/EIR did not explicitly address greenhouse gas emissions associated with the Original Project. Global climate change was not routinely analyzed prior to AB32, effective in 2007, and the *CEQA Guidelines* did not address greenhouse gases or global climate change at the time the Final IS/MND and Final EIS/EIR for the Original Project were certified.

However, the Final EIS/EIR did consider impacts from Reactive Organic Gases (ROG: precursors to GHG) in the context of short-term emissions. The Final IS/MND did not consider this analysis.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

As stated in **Section 3.3, Air Quality**, construction of the Revised Project would generate short-term and temporary GHG emissions during active construction activities. Sources of GHG emissions include exhaust emissions from heavy-duty equipment, delivery trucks, and worker commutes. Additionally, there would be significant short-term increases in CO, Reactive Organic Gas, PM10, and NOx from prescribed burning. While the Final IS/MND and Final EIS/EIR did not analyze GHG emissions specifically, the Final EIS/EIR analyzed components of GHGs and implemented **Mitigation Measures AIR-1** through **AIR-5** to reduce the short-term impacts to a less than significant impact. The Revised Project will consume fossil fuel resources and generate mobile source emissions from vehicle and truck trips. Daily visitors traveling by car to the project site will add to mobile source emissions during operation. However, the Revised Project is much smaller in scope than what was analyzed in the Original Project. Additionally, the Revised Project will not permit motorized vehicles within the park and will increase the amount of native vegetation on the project site, thereby increasing the amount of carbon sequestration on the site. As a result, GHG emissions associated with the Revised Project would be substantially less than what was discussed in the Final EIS/EIR, and consistent with the less-than-significant determination.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Revised Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the *State CEQA Guidelines.*

Pursuant to Appendix G of the *CEQA Guidelines*, a significant GHG impact is identified if the project could conflict with applicable GHG reduction plans, policies, or regulations. Development projects would be subject to complying with SB 32, Plan Bay Area 2050, as well as local policies and plans. SB 32 is a statewide reduction goal aimed at reducing emissions to 40% below 1990 levels by 2030. CARB's 2017 Scoping Plan sets a framework for the State to meet the reduction targets of SB 32.

Consistency with the Final 2017 Scoping Plan Update

CARB issued the Final 2017 Scoping Plan Update in November 2017 and establishes emissions reduction strategies necessary to meet SB 32's 2030 reduction goals. **Table 3, Project Consistency with CARB 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies,** identifies the Scoping Plan policies that are applicable to the Revised Project. It should be noted that the key sectors for emission reductions relate primarily to project operation. Because the Revised Project does not feature a significant operational component, the Revised Project would not generate significant GHG emissions, and would be consistent with the Final 2017 Scoping Plan. This impact is considered less than significant.

Table 3
Project Consistency with CARB 2017 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Implement SB 350 by 2030:	
• Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and grid reliability	**Not Applicable.** The measure is not related to development projects but intended for energy providers.
• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**Not Applicable.** This measure is directed towards policymakers, not development projects.
• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in the IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions planning targets through a combination of measures as described in IRPs.	**Consistent.** Development projects will be required to adhere to the latest CALGreen building Codes and Title 24, which will result in a more efficient buildings. The Revised Project is a habitat restoration of a former golf course and will generate a substantial level of operational emissions. However, the proposed Project will adhere to applicable CALGreen building codes and Title 24 for the minor construction of park structures
Implement Mobile Source Strategy (Cleaner Technology and Fuels):	
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	**Not Applicable.** This measure is directed towards policymakers, not development projects.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road use, parking pricing, transit discounts).	**Not Applicable.** This measure is directed towards policymakers, not development projects.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Not Applicable.** This measure is directed towards CARB, CalRecycle, CDFA, SWRCB, and local air districts.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	**Not Applicable.** This measure is directed towards policymakers, not development projects.

Source: Impact Sciences, 2022; CARB. California's 2017 Climate Change Scoping Plan. Available online at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan Update.

Consistency with Plan Bay Area 2050

At the regional level, Plan Bay Area 2050, the region's RTP and Sustainable Communities Strategy, represent the region's Climate Action Plan that defines strategies for reducing GHGs. Plan Bay Area 2050 includes several goals related to reducing GHG emissions. Specifically, the Plan calls for expanding access to parks and open space through "EN5. Protect and manage high-value conservation lands," and "EN6.

Modernize and expand parks, trails and recreation facilities." Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in Plan Bay Area 2050.

Consistency with City of Antioch's Climate Action and Resilience Plan

Construction of the Revised Project would generally be consistent with City of Antioch's Climate Action and Resiliency Plan (CARP). The CARP includes overarching goals related to resilience, sustainability, and equity, and actions related to transportation, energy, waste, hazard preparedness, and community capacity building. The Revised Project would meet many of these goals. Specifically, construction of the Revised Project is consistent with actions related to green infrastructure and reduced water use in landscaping. The Revised Project will restore and enhance the ecological habitats of the former Roddy Ranch golf course and open the site as a regional park. Therefore, the Revised Project will support sustainability and resilience goals. In addition, construction of the Project would not interfere with any of the Plan's other goals. As a result, the Project would be consistent with the CARP.

Consistency with the City of Antioch General Plan

Construction of the Revised Project would be consistent with the County's General Plan. Specifically, the Revised Project would be compliant with goals outlined in the Resource Management Element, including 10.3.1: Maintain, preserve and acquire open space and its associated natural resources by providing parks for active and passive recreation, trails, and by preserving natural, scenic, and other open space resources; and 10.4.1: Preserve natural streams and habitats supporting rare and endangered species of plants and animals. The Revised Project will restore and enhance the ecological habitats of the former Roddy Ranch golf course and open the site as a regional park. As a result, the Revised Project would increase open space accessible to the public and would restore and preserve natural habitat.

Conclusion

The Revised Project will restore and enhance the ecological habitats of the former Roddy Ranch golf course and open the site as a regional park. As a result, the Revised Project itself would not generate daily operational emissions. The Revised Project would adhere to all required measures to reduce waste and associated emissions during construction. Therefore, the Revised Project is consistent with CARB's 2017 Scoping Plan, Plan Bay Area 2050, City of Antioch Climate Action and Resilience Plan, and the General Plan. The generation of GHG emissions from the Revised Project would not conflict with any applicable plans and would therefore be less than significant. Further, as compared to the Original Project, the Revised Project would create significantly less GHG emissions than what was originally analyzed due to the significantly smaller scope. As described above, the Revised Project would be consistent with the most

recent applicable GHG reduction plans and, as a result, the Revised Project would not have a more significant impact than the Original Project. As a result, no new mitigation is required.

3.8 HYDROLOGY AND WATER QUALITY

The potential for the Revised Project to result in new or substantially more adverse significant impacts to hydrology and water quality resources was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis and required mitigation measures contained in the Final IS/MND and Final EIS/EIR.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to water quality standards or waste discharge requirements?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND included several SWPPP measures in the project design and the Erosion Control Plan, including soil stabilization and erosion controls, and golf course management best practices, including pesticide and fertilizer monitoring. The Project site is made up of primarily permeable surfaces. The Revised Project proposes to expand the area of permeable surfaces by removing the concrete golf cart paths and replacing them with natural topography and will significantly reduce the irrigation water needs from the existing golf course use. Furthermore, a portion of the existing parking lot will be removed and planted with seed mix or replaced with gravel. As a result, the Revised Project will have a beneficial impact on storm water quality and will reduce runoff.

As discussed in the Final EIS/EIR, the Original Project complies with the conditions in SWRCB's General Permit for Stormwater Discharges Associated with Construction Activity for projects over 1 acre. Compliance with this general permit requires preparation of a SWPPP, implementation of BMPs identified in the SWPPP, and monitoring to ensure that effects on water quality are minimized. Further, the Provision C.3 Amendments of the Contra Costa County Clean Water Program's (CCCCWP's) amended NPDES Permit (Order No. R2-2003-0022; Permit No. CAS 002912) contain performance standards to reduce construction and post construction impacts of new development on local water quality for projects over 0.25 acre (10,000 square feet). With the implementation of federal, state, and local clean water requirements,

no mitigation measures are necessary. No new or substantially increased significant hydrology impacts would result from the Roddy Ranch Project beyond those discussed in the Final EIS/EIR and Final IS/MND.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to depleting groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND evaluated the addition of a ground water well from the Horse Water groundwater basin to serve the golf course. The Final IS/MND determined that the average annual production of the on-site groundwater well will be far below the natural recharge of the aquifer.

The Revised Project would not involve any deep excavation that would have the potential to intercept existing aquifers, nor would it involve direct additions or withdrawals of groundwater. In addition, since the Project site is currently almost all permeable, and the Revised Project is increasing the amount of permeable surfaces, the Project would increase the amount of surface water filtering into the groundwater table. The Revised Project's water usage will be significantly less than what was required for golf course operation.

The Project will comply with HCP/NCCP Conservation Measure 1.7 (Stream Setbacks) and Conservation Measure 1.10 (Hydrology and Erosion Control). As a result, Project development would not impact groundwater supplies or groundwater recharge. Therefore, no mitigation measures are necessary and no further analysis of this issue in a subsequent EIR or negative declaration is required.

(c) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final EIS/EIR evaluated the potential for short-term and long-term degradation of surface or groundwater quality and implemented **Mitigation Measure WTR-1, Implement erosion and sediment control BMPs**. The Final IS/MND evaluated impacts to water resources and found potential impacts less-than-significant.

The Revised Project is proposing restoration of the existing drainage network. The existing storm drain network will be removed, increasing surface flow and infiltration. New earthen and vegetated channels will be constructed to direct surface flow into pond/wetland features. The restoration of the drainages will involve earthwork to restore stability. In addition to adhering to Mitigation Measure WTR-1, all grading will follow BMPs for erosion control in compliance with the City of Antioch Municipal Code and Contra Costa County codes. Once constructed, the Revised Project site will have an improved drainage pattern. Therefore, no mitigation measures are necessary and no further analysis of this issue in a subsequent EIR or negative declaration is required.

(d) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒

Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

As discussed above, the Revised Project is proposing restoration of the existing drainage network, allowing for greater surface flow and infiltration. As a result, the Revised Project will have less of an impact on runoff than discussed in the Final EIS/EIR and Final IS/MND. No mitigation measures are necessary and no further analysis of this issue in a subsequent EIR or negative declaration is required.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (e) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Revised Project does not contain housing and the Project site is not located within or near a 100-year flood plain, as indicated on FEMA Flood Maps.[4] Therefore, the Project would not place housing within a 100-year flood plain as mapped on a flood hazard delineation map. No mitigation measures are necessary and no further analysis of this issue in a subsequent EIR is required.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (f) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒

4 FEMA. *Flood Map Service Center*. https://msc.fema.gov/portal/search?AddressQuery=antioch%20ca#searchresultsanchor, accessed January 18, 2022.

Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Project site is not located within or near a 100-year flood plain, as indicated on FEMA Flood Maps. Additionally, the Project does not propose the construction of structures that would impede or redirect flood flows. No mitigation measures are necessary and no further analysis of this issue in an EIR or negative declaration is required.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (g) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Project site is not located within a delineated potential inundation area resulting from the failure of a levee or dam.[5] Therefore, the location of the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding. No mitigation measures are necessary and no further analysis of this issue in an Environmental Impact Report or negative declaration is required.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (h) Inundation by seiche, tsunami, or mudflow?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒

5 California Department of Water Resources. *Dam Breach Inundation* Map. Available online at: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed January 18, 2022.

Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave produced by a significant undersea disturbance. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. The Revised Project is not located within Inundation and Tsunami Hazard Areas delineated by the California Department of Conservation.[6] The Revised Project site is also not in the vicinity of, or downslope from, a reservoir or storage tank capable of creating a seiche.

Since the Project site is located within a liquefaction and a liquefaction landslide overlap zone, mudflows could occur as a result of liquefaction or a landslide. However, as discussed in Section 3.6, earthwork required for habitat restoration, activities would take place only in areas that are not open to the public. As a result, the Final EIS/EIR concluded that there is no additional risk to humans or structures from habitat restoration or creation activities and no mitigation measures would be required. The location of the Project would not expose people or structures to a significant risk of loss, injury or death involving seiches, tsunamis or mudflows.

3.9 LAND USE AND PLANNING

The potential for the Revised Project to result in new or substantially more adverse significant impacts related to land use and planning was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis and did not require mitigation measures.

6 California Department of Conservation. *Contra Costa County Tsunami Hazard Area*. Available online at; https://www.conservation.ca.gov/cgs/tsunami/maps/contra-costa, accessed January 18, 2022.

(a) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to physically dividing an established community?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances.	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

While this impact was not discussed in detail in the Final IS/MND, it did conclude that the project would not impact existing surrounding land uses such as cattle grazing. As such, the Golf Course Project would not divide an established community. The Final EIS/EIR states, "Acquisition of lands for conservation purposes, preserve development, potential recreational uses, and ongoing preserve maintenance activities would not physically divide any established communities in the inventory area." The Project site is surrounded by open space. Residential areas are located approximately 2.2 miles north and 1.9 miles east. The Revised Project would not impact the Final IS/MND and Final EIS/EIR findings or result in any new impact related to physically dividing an established community. No mitigation measures are necessary and no further analysis of this issue in an EIR or negative declaration is required.

(b) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND evaluated the rezoning of the Project site from A-4 (Agricultural Preserve District) to A-20 (General Agriculture). The City of Antioch has now zoned the Project site as "RRMP Roddy Ranch Master Plan District." According to the zoning code, "this district accommodates various types of

development, consistent with the General Plan, including residential, neighborhood and district shopping centers, visitor serving commercial uses as well as significant open space and recreational uses. This district is intended to enable and encourage flexibility in the design and development of the land, pursuant to a discretionary non-legislative final development plan prepared according to the regulatory zoning requirements described in this article, so as to promote its most appropriate use in the context of Roddy Ranch's unique natural qualities and existing recreational uses."

The Revised Project would not conflict with any applicable land use plan, policy, or regulation, including the General Plan and the Zoning Code of the City of Antioch because it would not materially alter the originally approved Project. The Revised Project proposes to preserve and rehabilitate a former golf course into a regional park, which would be beneficial to the overall area. The Revised Project would be consistent with the local Community Plan. Therefore, consistent with the Final EIS/EIR, no impacts would occur. Impacts would be less than significant. No new or greater impacts would occur, and no new mitigation is required.

(c) Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to any applicable habitat conservation plan or natural community conservation plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Original Project in the Final EIS/EIR is the approval of the East Contra Costa County HCP/NCCP. The Revised Project falls within the HCP/NCCP Plan Area and will maximize the conservation strategy of the HCP/NCCP by acquiring land for enhancement and restoration for sensitive species and habitat creation. The Revised Project will be subject to the controls of the Plan. No new or greater impacts would occur, and no new mitigation is required.

3.10 MINERAL RESOURCES

The potential for the Revised Project to result in new or substantially more adverse significant impacts related to mineral resources was evaluated in relation to the Final EIS/EIR analysis and required mitigation measures contained in the Final EIS/EIR.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (a) Result in the loss of availability of a known mineral resource that be value to the region and the residents of the state? (b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

No known mineral resources are known to occur in the Project vicinity.[7] Additionally, the Project site is not within a mineral resource protection area designated in the Contra Costa County General Plan.[8] Since the Project area is not a designated mineral extraction site or a regionally or locally-important significant mineral resource area, implementation of the Revised Project would not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Proposed excavation would be about three to four stories below ground level. Because no known mineral resources are located in the Project vicinity, it is highly unlikely additional excavation would impact existing mineral resources.

Further, as compared to the Original Project, the Revised Project does not propose any substantial changes, nor have any substantial changes that have occurred with respect to project circumstance. There has been no new information of substantial importance with respect to Mineral Resources. Therefore, there would be no impact.

7 California Department of Conservation. *Mines and Mineral Resources*. Available online at: https://maps.conservation.ca.gov/mineralresources/#webmaps, accessed January 19, 2022.

8 Contra Consta County. *Conservation Element*. 2005. Available online at: https://www.contracosta.ca.gov/DocumentCenter/View/30918/Ch8-Conservation-Element?bidId=, accessed January 19, 2022.

3.11 NOISE

The potential for the Original Project to result in new or substantially more adverse significant impacts related to noise was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis and required mitigation measures contained in the Final EIS/EIR.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (b) Generation of excessive groundborne vibration or groundborne noise levels? (c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND concluded that the Golf Course Project would not result in an increase of existing noise levels. Additionally, as analyzed in the Final EIS/EIR, construction noise, although temporary, would be above existing ambient noise levels and may be heard by residents and visitors to nearby parks. Habitat restoration and other preserve-related construction activities would result in noise levels exceeding 60 dBA. This impact was considered significant but mitigated to a less-than significant level with **Mitigation Measure NOISE-1**, which employs noise-reducing construction practices such as only performing construction during daylight hours. Similar to the Final EIS/EIR analysis, the Revised Project would generate noise and vibration levels that exceed reasonable levels during the excavation and earthwork phase of the Project's construction. This impact would be temporary and be subject to **Mitigation Measure NOISE-1**. No new or substantially increased noise impacts would result from the Revised Project beyond those discussed in the Final EIS/EIR and Final IS/MND. Therefore, the impact would be less than significant and no further analysis is necessary.

The Revised Project is not within two miles of an airport or airstrip, and therefore would not expose people to excessive noise levels.

3.12 PUBLIC SERVICES – POLICE, FIRE, SCHOOLS, AND OTHER FACILITIES

The potential for the Original Project to result in new or substantially more adverse significant impacts to public services was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis and did not require mitigation measures.

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services listed below.		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

Fire Protection

The Final IS/MND and Final EIS/EIR analyzed fire protection and emergency medical service to the Project site, which is provided by the East Contra Costa Fire Protection District (ECCFPD). New recreational uses would lead to an increase in the number of visitors to these areas through the implementation of new trail systems, viewing areas, and other recreational facilities. The risk of fire would likely increase because more people would be participating in recreational activities that may pose potential fire hazards. The Final IS/MND concluded that the Contra Costa County Fire Protection District will adequately serve the emergency needs of the Golf Course Project. As described in the Final EIS/EIR, ECCFPD has adequate existing facilities to accommodate the potential increased needed, and funding for additional fire protection would come from provisions in the HCP/NCCP. The Revised Project does not propose any substantial changes compared to the Original Project. Additionally, the Revised Project is incorporating vegetation management, such as livestock grazing, to minimize wildfire potential. As a result, no new impacts would occur and no further analysis of this issue in an EIR or negative declaration is required.

Police Protection

The Final IS/MND and Final EIS/EIR analyzed police protection to the Project site, which is provided by the Contra Costa County Sheriff's Department. EBRPD Police also respond to incidents within and near regional parks and preserves. The new preserve system would attract new visitors, and the addition of recreational areas would increase the demand for law enforcement. As described in the Final IS/MND, the Roddy Ranch Golf Course was required to pay an impact fee to provide funding for police services. The Final EIS/EIR determined that the current police reserves are adequate, and funding for additional police protection would come from provisions in the HCP/NCCP. The Revised Project does not propose any substantial changes compared to the Original Project and the need for police protection for the Revised Project will be less than the Golf Course Project. As a result, no new impacts would occur and no further analysis of this issue in an EIR or negative declaration is required.

Schools

The Final IS/MND stated that a golf course does not affect or increase school attendance levels. The Final EIS/EIR did not analyze impacts to schools. However, the Revised Project does not involve construction of housing or other structures that would result in an increase in population. Therefore, the Revised Project will not generate new students or have an impact on schools in the area.

Parks and Recreation

The Final IS/MND and the Final EIS/EIR found that the Original Project would increase the amount of recreational parkland in East Contra Costa County, creating a beneficial impact. Furthermore, Conservation Measure 1.5 in the proposed HCP/NCCP states that recreation will only be allowed in areas where it is compatible with the preservation and restoration of vegetative and biological communities.

The Revised Project does not propose any substantial changes compared to the Original Project. The Revised Project will not result in population growth and therefore would not increase demand on existing neighborhood and regional parks, or other recreational facilities causing substantial physical deterioration. As a result, no impacts would occur and no further analysis of this issue in an EIR or negative declaration is required.

3.13 TRANSPORTATION AND CIRCULATION

The potential for the Revised Project to result in new or substantially more adverse significant impacts related to transportation and circulation was evaluated in relation to the Final IS/MND and Final EIS/EIR analysis and required mitigation measures.

The potential for the Original Project to result in new or substantially more adverse significant impacts to transportation as measured by vehicle miles traveled (VMT) was not evaluated in relation to the Final IS/MND, nor the Final EIS/EIR analysis because the SB 743 mandate was implemented in July 2020.

VMT is a measure of the estimated daily or annual vehicle miles traveled by the occupants of or workers at a project site. VMT is typically defined as the number of vehicles generated by the project multiplied by the number of miles driven by each vehicle over the period of a year. *CEQA Guidelines* Section 15064.3(b)(1) discusses how to consider the significance of increases in VMT resulting from a land use project: Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (a) An increase in the number of vehicles generated by the project multiplied by the number of miles driven by each vehicle over the period of a year.		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

While the Final IS/MND and Final EIS/EIR did not measure transportation impacts by VMT, it did evaluate the impacts on potential traffic increases during construction and operation. The Final IS/MND determined that the golf course would add approximately 650 average daily trips, maintaining a Level of Service "A." The golf course would be subject to a traffic impact mitigation fee.

The Final EIS/EIR determined that construction activities, while temporary, could result in traffic and safety hazards, and in response, required **Mitigation Measure TR-1: Prepare and implement a traffic control plan,** during the construction phase of the project. The Final EIS/EIR did not find any significant impacts related to the operation and maintenance of the preserves, and increased vehicle trips would be minor and not result in long-term degradation of LOS on adjacent streets.

Fehr & Peers provided a technical Memorandum titled *Former Roddy Ranch Golf Course Restoration and Public Access –Transportation Assessment*). The results of that analysis indicate the Revised Project would generate approximately 713 average daily trips and the intersection would remain at LOS A. As stated in the Final EIS/EIR, these vehicle trips would be broadly distributed, and operation would not generate sufficient additional travel to impact LOS on adjacent streets.

The memo determined that the Revised Project would generate approximately 4,800 daily vehicle miles and would result in a less than significant impact for VMT because it would meet the applicable County screening criteria pertaining to VMT, as the proposed Roddy Ranch Habitat Restoration and Public Access Project aligns with the County's definition of a public facility. As a result, the Revised Project does not result in a new transportation impact beyond those discussed in the Final EIS/EIR and Final IS/MND and no new mitigation is required.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (b) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final EIS/EIR analyzed potential conflicts with transportation plans, programs, and planned projects and found a significant impact. However, with **Mitigation TRA-2: Avoid planned transportation improvement sites**, the impact was reduced to a less-than-significant level.

The Revised Project is not within a planned transportation improvement site and proposes to improve the intersection of Deer Valley Rd and Tour Way to improve accessibility to the site and ensure that the intersection is compliant with current City, County and Caltrans specifications, policies and regulations. As a result, the Revised Project does not result in a new transportation impact beyond those discussed in the Final EIS/EIR and Final IS/MND and no further analysis of this issue in an EIR or negative declaration is required and no new mitigation is required.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

Fehr & Peers found that the Revised Project's driveway is expected to operate at an appropriate level of service with minimal vehicular delays. While, a potentially hazardous condition was identified due to the lack of adequate stopping sight distance, the installation of a northbound left turn lane on Deer Valley Road entering the Tour Way driveway addresses this hazard. The Final IS/MND included the analysis of this safety hazard, and the County included safety improvements to Deer Valley Road as a Condition of Approval for the issuance of a building permit. The safety improvements include signs, striping, and minor roadway widening to allow for safe entry to and exit from Deer Valley Road. It was determined that these improvements would reduce safety risks and would not impact traffic volumes along Deer Valley Road.

Similar to the roadway improvements that were included in the project design of the Roddy Ranch Golf Course and were analyzed as part of the Final IS/MND, the Revised Project includes the installation of a northbound left turn lane on Deer Valley Road entering the Tour Way driveway. This will ensure there is no significant safety impact. As a result, no new or substantially increased significant impacts would result from the Revised Project beyond those discussed in the Final EIS/EIR and Final IS/MND and no further analysis of this issue in an EIR or negative declaration is required and no new mitigation is required.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (d) Result in inadequate emergency access?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The Final IS/MND and Final EIS/EIR determined that the project would not alter or prevent emergency access into the Project area. As discussed in the Final EIS/EIR, implementation of **Mitigation Measure TR-1** to prepare and implement a traffic control plan to address construction-related traffic nuisances will ensure adequate emergency access. The traffic control plan will include the following measure: "if lane closures occur, local fire and police departments will be notified of construction locations, and alternative evacuation and emergency routes will be designed to maintain response times during construction periods, if necessary." As a result, no new or substantially increased significant impacts would result from the Revised Project beyond those discussed in the Final EIS/EIR and Final IS/MND. No further analysis of this issue in an EIR or negative declaration is required, and no new mitigation is required.

3.14 MANDATORY FINDINGS OF SIGNIFICANCE

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		
	Yes	No
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

As discussed in the individual sections of this Addendum, the Revised Project would not result in any new significant impacts with respect to degradation of the quality of the environment, habitat or population of fish or wildlife species, plant or animal communities or examples of the major periods of California history or prehistory. The Revised Project would not degrade the quality of the environment with compliance with the HCP/NCCP, the Mitigation Measures included in the Final IS/MND and Final EIS/EIR, as well as local policies, regulations, and ordinances. As discussed in **Section 3.4, Biological Resources**, the Revised Project is a component of the HCP/NCCP, and therefore would further the conservation strategy of the HCP/NCCP. In addition to the mitigation measures included in the Final IS/MND, the Final EIS/EIR implemented **Mitigation Measures BIO-1**, **BIO-2**, and **BIO-3**, to survey and document any special status species prior to construction activities.

As discussed in **Section 3.5, Cultural Resources**, although the Final IS/MND did not find any impact to cultural resources through archeological surveys, the Final EIS/EIR concluded that the Revised Project may have potentially significant impact on cultural resources but could be mitigated to a less-than-significant level with **Mitigation Measure CR-1**. Additionally, as stated in the Final EIS/EIR, impacts on cultural resources would be mitigated to a less-than-significant level through implementation of general plan policies and the adoption of identified mitigation measures.

As discussed in **Section 3.6, Geology and Soils**, **Mitigation Measure WQ-1**, which was included in the Final EIS/EIR must be implemented to ensure that ground-disturbing earthwork does cause soil erosion or loss of topsoil.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project site result in impacts that are greater than the impacts of the Project alone. The Final EIS/EIR and Final IS/MND analyzed cumulative impacts and determined that with identified mitigation measures the Original Project and Golf Course Project would not have any significant cumulative impacts. The Revised Project would not create new or significantly increased cumulative impacts from those documented by the approved Final EIS/EIR and Final IS/MND. Nor would any new information or changed circumstances result in the Revised Project having new or a substantially more severe cumulative effects or result in new mitigation or alternatives that would substantially reduce any significant cumulative impact.

The Final EIS/EIR evaluated cumulative impacts by project and by resource. The Revised Project does not propose any substantial changes compared to the Original Project and encompasses the same geographical scope as the Golf Course Project. There is no further analysis of this issue in an EIR required.

The Final EIS/EIR determined that there may be cumulative impacts to biological resources, however those impacts will be inherently mitigated by the HCP/NCCP conservation plan, combined with the implementation of **Mitigation Measures BIO-1, BIO-2**, and **BIO-3**, as well as with other conservation projects in the region. Additionally, there could be potential cumulative impacts to previously unknown cultural resources. However, implementation of mitigation measures **CR-1** and **CR-2**, as well as adherence to the HCP/NCCP, would offset these impacts to a less than significant level.

Transportation and traffic may be temporarily impacted by construction and habitat restoration. Similarly, Noise levels may be impacted in the short term from habitat restoration activities. These impacts would be mitigated by **Mitigation Measure T-1**, **T-2**, and **N-1**, and would not have cumulative impacts.

As analyzed in each section above, the potential for cumulative impacts related to agricultural resources; air quality; geology and soils, land use; hydrology and water quality; mineral resources; and public services would not result in additional impacts in conjunction with related projects. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the Revised Project would have no impact. Given the mitigation measures already adopted and the design of and elements incorporated into the Revised Project, the Revised Project's contribution to a significant cumulative impact will not be any greater than already considered in the Final EIS/EIR and Final IS/MND and will be less than cumulatively considerable and thus not significant.

Does the proposed Project require Subsequent or Supplemental CEQA Documentation with respect to the following: (c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		
	Yes	No
New Significant Environmental Effect Caused by a Change in the Project or Circumstances	☐	☒
Substantial Increase in the Severity of a Previously Identified Significant Effect Caused by a Change in the Project or Circumstances	☐	☒
New or Substantially More Severe Significant Impacts Shown by New Information or Changed Circumstances	☐	☒
Ability to Substantially Reduce a Significant Effect Shown by New Information but Declined by Proponent	☐	☒

Consistent with Section 15065(a)(4) of the *CEQA Guidelines*, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect people would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include community risks from air emissions, soil and seismic hazards, hazardous materials, traffic hazards, and noise.

As discussed in the individual sections of this Addendum, the construction and habitat restoration activities of the Revised Project may result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As discussed in **Section 3.3, Air Quality**, construction of preserves, preserve-related structures, and associated roadways may result in a temporary increase in criteria air pollutants emissions. The Final IS/MND concluded that there would not be substantial air emissions and deterioration of ambient air quality associated with the Golf Course Project, and adherence to **Mitigation Measures**, **AIR-1, AIR-2, AIR-3, AIR-4**, and **AIR-5** implemented along with the Final EIS/EIR would ensure that impacts to air quality will be less than significant and not any greater than already considered in the Original Project or Golf Course Project.

Additionally, as described in **Section 3.13, Transportation and Circulation**, construction activities could result in temporary traffic and safety hazards. However, implementation of **Mitigation Measure TR-1 during** the construction phase of the Project would reduce impacts to a less than significant level. A study conducted in 2020 determined that the Revised Project's operation would result in result in a less-than-significant impact under CEQA pertaining to VMT. The Final IS/MND and the study found a potentially hazardous condition was identified due to the lack of adequate stopping sight distance along Deer Valley Road. The Revised Project includes installation of a northbound left turn lane on Deer Valley Road entering the Tour Way driveway, which will ensure the Project does not create a hazardous condition.

As discussed in **Section 3.11, Noise**, construction noise levels on the surrounding area would not be greater than analyzed in the Final IS/MND or Final EIS/EIR. The Final EIS/EIR implemented **Mitigation Measure NOISE-1**, which would reduce impacts to noise and vibrations to a less than significant level. Additionally, implementation of measures in accordance with the City's General Plan and Municipal Code, and other applicable plans, policies, regulations, and ordinances would ensure that potential impacts would be less than significant. No other direct or indirect adverse effects on human beings have been identified. Therefore, the impacts on human beings of the Revised Project would be less than significant, and the Revised Project would not result in any new significant impacts with respect to such impacts.

3.15 CONCLUSION

The Revised Project as described in **Section 2.0** of this Addendum, would be within the environmental consequences analyzed in the Final IS/MND and Final EIS/EIR. The Revised Project has been reviewed by EBRPD in light of Sections 15162, 15164 and 15168 of the *CEQA Guidelines*. As the CEQA Lead Agency, EBRPD has determined, based on the analysis presented herein, that none of the conditions (identified in **Section 1.0**) apply which would require preparation of a subsequent or supplemental EIR or negative declaration and that an Addendum to the certified East Contra Costa County HCP/NCCP FEIR and Roddy

Ranch Golf Course Final IS/MND is the appropriate environmental documentation under CEQA for the Revised Project.

Section 3.0 discusses issue-by-issue how the impacts anticipated for the Revised Project would be within those previously identified in the Final IS/MND and Final EIS/EIR. The MMRP adopted with the Final IS/MND and Final EIS/EIR would continue to be in effect, as applicable to the Revised Project to ensure that all impacts continue to be reduced as necessary and feasible. In this regard, all relevant mitigation measures from the Final IS/MND and Final EIS/EIR will be applied to the Revised Project. The analysis documented in this Addendum has not identified the need for any additional mitigation required to reduce impacts.

As discussed throughout this Addendum, the Revised Project would result in environmental impacts similar to or less than those disclosed in the Final IS/MND and Final EIS/EIR for every issue with implementation of applicable mitigation measures from the Original Project and Golf Course Project.

This Revised Project does not qualify for a subsequent EIR as described under Section 15162 of the *CEQA Guidelines.* This Project will restore and enhance the ecological habitats of the former Roddy Ranch golf course and open the site as a regional park; it would not create new or significantly increase environmental impacts as documented by the approved Final IS/MND and Final EIS/EIR. It would have minor changes to the Original Project but would be substantially smaller in scope than the Original Project analyzed in the Final EIS/EIR and reduce or result in no new impacts as compared to the Golf Course Project. No additional mitigation measures nor changes to the approved measures are necessary. There are no new significant environmental impacts caused by the Revised Project or resulting from any changed circumstances or new information. Nor is there any new information that revealed new mitigation or alternatives that would reduce any previously identified significant effects.

Therefore, no subsequent EIR for this Revised Project is required under State statute.

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5.0 LIST OF PREPARERS

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APPENDIX A

East Contra Costa County Habitat Conservation Plan / Natural Community Conservation Plan Mitigation Monitoring & Reporting Plan

Exhibit B

East Contra Costa County Habitat Conservation Plan / Natural Community Conservation Plan
Mitigation Monitoring and Reporting Plan

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November 2006

Jones & Stokes. 2006. East Contra Costa County Habitat Conservation Plan and Natural Community Conservation Plan, Mitigation Monitoring and Reporting Plan. November. (J&S 01478.01.) Oakland, CA.

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Reporting Plan
Introduction

Purpose of and Need for Monitoring

In compliance with the California Environmental Quality Act (CEQA), an environmental impact report (EIR) was prepared for the East Contra Costa County Habitat Conservation Plan and Natural Community Conservation Plan (HCP/NCCP) (Proposed Project). The EIR identified significant impacts in the following resource areas. The EIR also identified mitigation measures to reduce these impacts to less than significant levels:

- Biological resources
- Hydrology and water quality
- Cultural resources
- Traffic and circulation
- Noise
- Air quality
- Mineral Resources

CEQA requires that a lead agency adopt a mitigation monitoring and reporting plan (MMRP) for the revisions the agency has required to a project and the measures it has proposed to avoid or mitigate significant environmental effects (CEQA Guidelines Section 15097). The purpose of the MMRP is to ensure that the project revisions and mitigation measures identified in the EIR are implemented and to identify who is responsible for their implementation.

Table 1 of this MMRP, which follows this introductory section, identifies the mitigation measures for the Proposed Project and identifies the parties responsible for implementing and monitoring the mitigation measures, as well as the timing of the mitigation.

Project Description

The proposed HCP/NCCP plan contains the elements described below.

Permit Areas

Two permit areas which reflect the range of expected growth in the area would be established.

- An initial urban development area (which would authorize 9,796 acres of ground-disturbing urban development activities).
- A maximum urban development area (which would authorize up to 13,029 acres of ground-disturbing urban development activities).

Covered Activities

Covered activities (i.e., specific activities or projects) in the proposed HCP/NCCP which would be permitted by DFG and USFWS include the followingthree distinct categories.

- Activities and projects associated with urban growth, in accord with local general plans.
- Specific infrastructure projects outside the Urban Limit Line (ULL). The proposed plan would allow up to 1,126 acres of impact from rural infrastructure projects for either the initial or maximum urban development area.
- The following activities inside the proposed HCP/NCCP preserves:
    - construction and maintenance of recreational or management facilities,
    - habitat enhancement, restoration, and creation,
    - management activities necessary to achieve the HCP/NCCP's biological goals,
    - surveys for covered species, vegetation communities, and other resources,
    - agricultural activities on adjoining land within one mile of the preserve boundary,
    - low-intensity recreational use, and
    - construction and maintenance of utility infrastructure.

Other activities or projects not specifically described above may be evaluated for coverage under the proposed HCP/NCCP on a case-by-case basis.

Preserve System

The main element of the proposed HCP/NCCP conservation strategy is the creation of a Preserve System that would preserve approximately 23,800 acres of land with the initial urban development area, or approximately 30,300 acres of

land under the maximum urban development area. Likely locations for land acquisition have been divided into Acquisition Analysis Zones, and are under study as detailed in Chapter 2 of the EIR.

Conservation Measures

The proposed HCP/NCCP conservation measures address the landscape-level, community-level (or habitat), and species-level impacts, and includes measures to address the following objectives.

- Design of covered activities to avoid or minimize impacts on covered species and covered vegetation communities.
- Preservation of covered vegetation communities.
- Preservation of covered species populations and habitats.
- Restoration of covered species habitat and vegetation communities to compensate for direct and indirect impacts on specific species and vegetation communities.
- Restoration of species habitat to contribute to the recovery of listed covered species and help prevent the listing of non-listed covered species.
- Management of preserves to maximize the functions of habitats for covered species.

Mitigation Monitoring Program

This MMRP has been prepared for the Proposed Project in accordance with Public Resources Code 21081.6, which specifies that when a public agency makes findings required by paragraph (1) of subdivision (a) of Section 21081, it "...shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." Public Resources Code 21081.6 further specifies that the MMRP will "...ensure compliance during project implementation." This MMRP is intended to ensure the effective implementation of mitigation measure, including monitoring where identified, throughout all phases of development and operation of the Proposed Project.

The HCP/NCCP Implementing Entity (IE) will be the primary agent responsible for implementation, monitoring, and reporting related to the MMRP.

Procedures for Construction Monitoring and Reporting

Monitoring and reporting procedures prior to and during project construction and operation will conform to the following steps.

Step 1. Monitoring

This step will be executed by a monitor designated by the IE. The monitor will investigate noncompliance allegations and identify how IE staff or its designees should correct implementation of the mitigation measure to ensure compliance.

The monitor will have the following responsibilities:

- Prepare an implementation plan prior to execution of contracts and prior to advertisement of bid documents to detail the monitoring actions and compliance requirements listed in this MMRP.
- Be knowledgeable in the mitigation that is to be monitored.
- Verify implementation of mitigation by:
    - verifying, prior to advertisement for contract bids, that bid documents, contracts, plans, and specifications include requirements to implement identified mitigation measures;
    - verifying in the field that required implementation has been properly executed during and after construction; and
    - contacting the project manager and requesting that the situation be remedied if mitigation is not being implemented or executed properly.
- Prepare mitigation status reports and submit to the IE, as identified in Step 3 of this MMRP.

Step 2. Action

This step will be executed by the IE project manager (IE PM) for specific restoration activities. During construction activities associated with the HCP/NCCP (e.g restoration activities), the IE PM will document monthly all actions taken as part of this MMRP and report periodically to IE executive director. The IE executive director or designees will immediately commence the correction of measures being inadequately implemented.

The IE PM will have the following responsibilities.

- Review the mitigation status reports and any other information presented by the monitor as monitoring occurs, as detailed below in Step 3.
- Oversee amendments to the MMRP, if changes in monitoring activities are deemed necessary, to implement the mitigation measures.
- Ensure that the mitigation measures in the MMRP are undertaken, by staff, contractors, or consultants.
- Ensure that penalties to contractors for noncompliance are incorporated into contracts.
- Verify and document monthly that mitigation actions are properly undertaken. This may include designating other staff or consultants to enforce effective and timely compliance with regard to specific mitigation measures outlined in this MMRP or in required permits.
- Ensure that procedures and assignments to implement the MMRP are in place if the IE staff structure is reorganized prior to completion of the MMRP actions.

Step 3. Reporting

This step will be executed by an IE monitor or designeee.

The monitor will have the following responsibilities.

- Compile all mitigation status forms into a report of compliance on a quarterly basis. Convey the status and any recommendations to the IE PM. Recommendations may include updating the frequency of monitoring, changing the type of monitoring, and suggesting better ways to implement mitigation.
- Assist the IE PM in reviewing the contractor's implementation of mitigation requirements, detailing corrective action and time of completion to resolve issues raised by the monitor and/or IE PM. If the monitor deems mitigation is unsatisfactorily addressed, the monitor will document this in report format. The IE PM will submit the reports to the IE Executive Director.
- Submit all completed reports and statements to the IE PM for submittal to the IE Executive Director.

Table 1. Mitigation Monitoring and Reporting Plan for the East Contra Costa County HCP/NCCP

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation Measure BIO-1: Conduct surveys for elderberry shrubs and avoid during restoration activities in suitable habitat. Within suitable habitat for the valley elderberry longhorn beetle a qualified biologist would identify and mark all elderberry shrubs with stems 1.0 inch or more in diameter within 100 feet of the construction area. A 100-foot buffer would be established around all elderberry shrubs, and no construction activities would be permitted within the buffer zone without consultation with USFWS. In areas where encroachment on the 100-foot buffer has been approved by USFWS, no ground-disturbing activities would be permitted within 20 feet of the dripline of each elderberry shrub unless the activity is necessary to complete the project. No riparian vegetation within 100 feet of elderberry shrubs would be removed by construction activities.	Prior to project construction	IE or contractors	IE Project Manager
Mitigation Measure BIO-2: Conduct preconstruction surveys to locate double crested cormorant, great blue heron, Northern harrier, California horned lark, loggerhead shrike, and Bell's sage sparrow nest sites or rookeries before construction is initiated and avoid breeding sites. A qualified biologist will conduct surveys in suitable habitat to locate nest sites of the above-mentioned species in the spring of each construction year. Survey results will be submitted to CDFG before restoration activities may proceed. If the survey does not identify any nesting special-status bird species in the area potentially affected by the proposed activity, no further mitigation is required. If nest sites or young are located, a no-disturbance buffer will be established around the active nest. The biologist will consult with CDFG to determine the size of the no-disturbance buffer.	Prior to project construction	IE or contractors	IE Project Manager
Mitigation Measure BIO-3. Document special status plant populations and avoid or minimize impacts. The Implementing Entity, or its designated agents, will retain a qualified botanist to document the presence or absence of non-covered special-status plant species in the preserves. Surveys for non-covered special-status species may be conducted either as part of project-level environmental review for a specific preserve activity (i.e., restoration project, construction project), or as part of the comprehensive plant survey described in Chapter 6 of the HCP/NCCP. These surveys would conform to Plan requirements (planning surveys for [covered] plants in impact areas and potential preserves) and would determine the presence, location, and extent of any populations of non-covered special-status plant species. If special-status plants are found, the population would be incorporated into the project or restoration design to avoid, to the extent feasible, direct or indirect impacts to these species. Special-status plants near the project site will be protected during construction by installing environmentally sensitive area fencing (orange construction barrier fencing) around special-status plant populations. The Implementing Entity would coordinate with the appropriate agencies (CDFG, USFWS) to develop appropriate avoidance and mitigation measures.	Prior to project construction	IE or contractors	IE Project Manager

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation WTR-1: Implement erosion and sediment control BMPs. For construction or restoration of habitat within the preserves, the Implementing Entity or its designated agents will implement multiple erosion and sediment control BMPs in areas with potential to drain to surface waters. These BMPs will be selected to achieve maximum sediment removal and represent the best available technology that is economically achievable. BMPs to be implemented as part of this mitigation measure could include the following. • Temporary erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) will be employed to control erosion from disturbed areas. • Drainage facilities in downstream offsite areas will be protected from sediment using BMPs acceptable to the County and RWQCBs. • Grass or other vegetative cover will be established on the construction site as soon as possible after disturbance. At minimum, vegetative application will be completed by September 15 to allow plants to establish. No disturbed surfaces will be left without erosion control measures in place between October 15 and April 15. BMPs would be consistent with Contra Costa County and participating city ordinances, and with grading, erosion, and sediment control standards. The final selection of BMPs will be subject to review by the County.	During project contruction	IE or contractors	IE Project Manager

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation Measure CR-1: Develop HCP/NCCP cultural resources management plan. The HCP/NCCP Implementing Entity will prepare a cultural resources management plan to ensure that implementation of the proposed HCP/NCCP would not result in significantly adverse impacts on prehistoric or historic resources. The cultural resources management plan would consist of the following. • Establishment of an APE for the HCP/NCCP, in consultation with SHPO, ACHP, and USFWS. • Summary of known resources in the APE that are currently listed in the NRHP, CRHP, or local historic registries. • Identification of areas of potential cultural sensitivity in the APE. • Development of a Standard Mitigation Measures Agreement that establishes the mitigation and recordation measures to treat the adverse effects of undertakings such as: ❑ relocation (of individual structures), ❑ recordation, ❑ data recovery, and ❑ curation.			
The cultural resources management plan will be developed as a basis for establishment of a programmatic memorandum of agreement (MOA) between USFWS, SHPO, and ACHP for general compliance with the requirements of the NHPA Section 106 process.	After plan adoption	IE or contractors	IE Executive Director

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation Measure CR-2: Stop work if cultural materials are discovered during ground-disturbing activities. Because specific locations of preserves and the conservation activities within the preserves are not known at present, no archaeological surveys of such preserves could be conducted, and the presence or absence of subsurface archaeological deposits remains unknown. Conservation activities involving ground disturbance could have a significant impact on archaeological deposits. There is a potential for the discovery of buried archaeological deposits. If archaeological deposits, such as chipped stone or groundstone, historic debris, or building foundations, are discovered during construction-related activities, all ground-disturbing activities will cease within a 100-foot radius. A qualified archaeologist will be notified immediately to assess the discovery. If human remains of Native American origin are discovered during ground-disturbing activities, it will be necessary to comply with state laws regarding the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (Pub.Res. Code Sec. 5097). If human remains are discovered or recognized in any location other than a dedicated cemetery, there will be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: 1. The county coroner has been informed and has determined that investigation of the cause of death is required; and 2. If the remains are of Native American origin: a. The descendents of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Pub. Res. Code Sec. 5097.98; or b. The Native American Heritage Commission was unable to identify a descendent or the descendent failed to make a recommendation within 24 hours after being notified by the commission. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). Section 7050.5 requires that excavation be stopped in the vicinity of the discovered human remains until the coroner can determine whether the remains are those of a Native American.	During project construction	IE or contractors	IE Project Manager
Mitigation Measure TR-1: Prepare and implement a traffic control plan. For any restoration or construction activity requiring a grading permit from the County or a city, the Implementing Entity or its designated contractor will, as part of the application for a grading permit, prepare a traffic control plan to address construction-related traffic nuisances and public safety. The purpose of the traffic	During project design	IE or contractors	IE Project Manager

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
control plan will be to accomplish the following objectives. • Reduce, to the extent feasible, the number of vehicles (construction and other) on the roadways adjacent to the construction site. • Reduce, to the extent feasible, the interaction between construction equipment and other vehicles. • Promote public safety through actions aimed at driver and road safety. • Ensure safety for bicyclists and pedestrians throughout the construction area. The traffic control plan will include the following measures. • Through access for emergency vehicles will be provided at all times. • Access will be maintained for driveways and private roads. • Adequate off-street parking will be provided for construction-related vehicles through the construction period. • Pedestrian and bicycle access and circulation will be maintained during construction. If construction encroaches onto the trail or a sidewalk, a safe detour will be provided for pedestrians at the nearest painted crosswalk. If construction encroaches on a bike lane, warning signs will be posted that indicate that bicycles and vehicles are sharing the roadway. • Lane closures (partial or entire), traffic controls, and construction materials delivery will be restricted to between 9:00 a.m. and 4:00 p.m. on weekdays to avoid more congested morning and evening hours. • Traffic controls on arterials and collectors should include flag persons wearing bright orange or red vests and using a “stop/slow” paddle to warn drivers. • Access to public transit should be maintained, and movement of public transit vehicles will not be impeded as a result of construction activities. • Construction warning signs will be posted, in accordance with local standards or those set forth in the Manual on Uniform Traffic Control Devices, in advance of the construction area and at any intersection that provides access to the construction area. If lane closures occur, local fire and police departments will be notified of construction locations, and alternative evacuation and emergency routes will be designed to maintain response times during construction periods, if necessary. • Written notification will be provided to appropriate contractors regarding appropriate routes to and from construction sites, and weight and speed limits for local roads used to access construction sites. • A sign with the name, telephone number, and email address to contact with complaints regarding construction traffic will be posted at all active construction sites.			

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation TRA-2: Avoid planned transportation improvement sites. As part of the process of identifying suitable sites for proposed HCP/NCCP land acquisition, the Implementing Entity will avoid lands that are within or adjacent to proposed alignments for the following planned transportation projects. • Byron Highway-Vasco Road Connector. • Kirker Pass Road widening. • Marsh Creek Road realignment at selected curves. • Vasco Road widening/SR 84. • Bridge replacement, repair, and retrofit. • Marsh Creek regional trail. • SR 239 (Brentwood–Tracy Expressway). These projects are identified in CCTA's Contra Costa CTP or MTC's RTP. Lands within or adjacent to the proposed rights-of-way should not be considered for acquisition unless it is determined that, as part of acquisition, adequate avoidance and minimization measures could be provided to permit construction of the proposed project and avoid inconsistencies with the goals and objectives of the proposed HCP/NCCP.	Prior to an during preserve assembly.	IE or contractors	IE Executive Director

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation Measure NOISE-1: Employ noise-reducing construction practices. To reduce noise levels to the maximum extent practicable, the remediation contractor will employ the following noise-reducing construction practices. • During construction phases, the contractor will ensure that construction is performed in accordance with noise standards for the County and any city within 1 mile. • During construction phases, noise-generating activities within 300 feet of an occupied residence will only be performed during normal daylight hours (6:00 a.m.–10:00 p.m.) Monday through Saturday, wherever feasible. • Mufflers should be kept operable and effective on all construction equipment, generators, and vehicles. All internal combustion engines must be operated with exhaust and intake silencers. Wherever possible, noise-generating construction equipment should be shielded from nearby residences by noise-attenuating buffers such as structures or truck trailers. • Prior to construction within 1,000 feet of residences, written notice should be provided to potentially affected residences identifying the type, duration, and frequency of construction activities. Notification materials will also identify a mechanism for residents to register complaints if construction noise levels are overly intrusive or construction occurs outside the required hours. • Construction staging and stockpile areas will be located at least 1,000 feet from occupied residences, or contractors will be required to provide appropriate noise-reducing engine-housing enclosures. Equipment warm-up areas, water tanks, and storage areas should be located in the established staging area or in other portions of the site more than 1,000 feet from existing residences, as feasible. • Throughout the construction period, the contractor will implement appropriate additional noise mitigation measures, including changing the location of stationary construction equipment, shutting off idling equipment, rescheduling construction activity, or installing temporary barriers around stationary construction noise sources at the request of the County or affected city.	During project construction	IE or contractors	IE Project Manager

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation Measure AIR-1: Implement NOx-reducing construction practices. The project proponent will implement the following NOx-reducing construction practices, as required, during construction of preserve elements. • Require use of Purinox instead of diesel fuel. • All machinery will be retrofitted with lean-NOx catalysts to reduce NOx emissions. • Install high-pressure injectors on all vehicles, where feasible. • Use Caterpillar prechamber diesel engines or equivalent, together with proper maintenance and operation. • Maintain equipment according to manufacturers' specifications, except as specified above. • Restrict the idling of construction equipment to 10 minutes. • Install catalytic converters on gasoline-powered equipment. • Use only diesel equipment or diesel vehicles with engines built in 1996 or later.	During project construction	IE or contractors	IE Project Manager
Mitigation Measure AIR-2: Implement PM10-reducing construction practices. The project proponent will implement the PM10-reducing construction practices indicated in Table 4.12-2 during construction of preserve elements. These mitigation measures are required by BAAQMD for all construction activities within its jurisdiction.	During project construction	IE or contractors	IE Project Manager
Mitigation Measure AIR-3: Comply with California Air Resource Board's (ARB's) Smoke Management Guidelines for Agricultural and Prescribed Burning. The proposed HCP/NCCP will comply fully with ARB's Smoke Management Guidelines for Agricultural and Prescribed Burning. California's Smoke Management Program addresses potentially harmful smoke impacts from agricultural, forest, and rangeland management burning operations.	Prior to and during prescribed burning.	IE or contractors	IE Project Manager
Mitigation Measure AIR-4: Comply with BAAQMD Regulation 5 requirements for wildland vegetation management burning. The proposed NCP/HCCP will comply fully with BAAQMD Regulation 5 requirements for all prescribed burns. Compliance entails submission of a smoke management plan for each burn. Each smoke management plan will include specific objectives of the burn, acreage, tonnage to be burned, burn schedule, and particulate matter emissions estimates. If burning were to significantly change from what was originally detailed in the smoke management plan, consultation with BAAQMD staff would be required, and a new smoke management plan may be required, depending on the type of burn.	Prior to and during prescribed burning.	IE or contractors	IE Project Manager
Mitigation Measure AIR-5: Implement BAAQMD requirements for the management of PM10. For all construction activities, all appropriate mitigation measures from Table 4.12-2 shall be implemented.	During project construction	IE or contractors	IE Project Manager

Mitigation Measure	Timing	Implementing Entity	Monitoring Entity
Mitigation MIN-1: Evaluate mineral resources. The Implementing Entity shall, when evaluating lands for acquisition in Zones 3 and 5, determine if the lands are within mineral resource protection areas designated in the Contra Costa County General Plan. Lands within the mineral resource protection area will be considered for acquisition only if the Implementing Entity determines that acquisition would not impair future mineral resource extraction in the area by introducing an inherently incompatible use, or by restricting access to other mineral resource areas. Lands adjacent or in proximity to the designated mineral protection area will also be evaluated to assess compatibility with potential future mineral extraction operations, such as quarry transport trucks.	Prior to an during preserve assembly.	IE or contractors	IE Executive Director

APPENDIX B

1998 Roddy Ranch Golf Course Mitigation

Additional Information to Environmental Checklist
including Discussion of Impacts and Proposed Mitigations

Project Description

The Roddy Ranch Golf Course project is located in eastern Contra Costa County immediately south of the City of Antioch and 1½ miles west of the City of Brentwood. See Exhibit 1 for location and Exhibit 2 for Regional Context. The project evaluated by this environmental document includes the rezoning of ten parcels (the entire 2,161 acre Roddy Ranch) from the existing A-4 (Agricultural Preserves) to A-20 (Exclusive Agricultural District); a Parcel Map creating one 200±-acre Parcel and a Remainder Parcel; and the request for a Land Use Permit to construct a golf course. See Table A for a breakdown of properties affected by each action. In addition, The East Contra Costa Irrigation District (ECCID) and Local Agency Formation Commission (LAFCO) will use this environmental document as responsible agencies for annexation of the golf course project to the ECCID Service Area.

The Rezone requested from A-4 to A-20 is in conformance with the General Plan designation of Agricultural Lands (AL). Properties surrounding the ranch which are also not under Williamson Act Contracts, have been similarly rezoned by the County upon contract expiration. See Exhibit 3 for Zoning and Williamson Contract Status of Surrounding Properties.

The Parcel Map (Exhibit 4) and Land Use Permit is requested in order to construct and operate an 18-hole daily fee golf course. The Remainder Parcel will be used for continued ranching activities associated with the Roddy Ranch. The golf course will total 230± acres by utilizing a portion of two 20-acre parcels that are a part of the A-20 rezoning proposal. The golf course project includes the course, non-illuminated practice and range areas, starter house with snack facilities within a pre-manufactured building (1,500 square feet), mid-course refreshment stand, cart storage (5,000 square feet), maintenance and cleaning facilities (6,000 square feet) within a pre-manufactured building, parking area, entry driveway and associated landscaping, septic system, and irrigation water storage (water features), pumping and pipeline facilities, and electric and phone service relocation. See Exhibit 5 for facility location and Table B for building and site areas.

The golf course project also proposes to construct a non-potable water lateral on Fairview Avenue and Balfour Road from East Contra Costa Irrigation District's (ECCID) main canal. See Exhibit 6. An existing unused non-potable waterline within Balfour Road may be utilized, if feasible. In addition to the lateral, a pump station will be installed at the ECCID main canal and on the project site.

The project proposes to balance on-site (within the golf course project area) approximately 600,000 cubic yards of cut and fill to grade the golf course improvements as described, including the access driveway, the golf cart paths, starter shack, and safety improvements (four feet of pavement widening) at the entry on Deer Valley Road. See Exhibit 7.

The Roddy Ranch is located west of the intersection of Deer Valley Road and Balfour Road, and south of Empire Mine Road in Eastern Contra Costa County. See Exhibit 8. There are two existing residences and several ancillary structures in Deer Valley associated with the working ranch. The ranch is characterized by two west to east running valleys - Horse Valley in the north and Deer Valley in the south - and two ridges - a minor ridge to the north and a major ridge to the south. The northern ridge (adjacent to where the golf course is proposed) is characterized as gently rolling. As with the southern major ridge, the minor ridge has a steep south facing slope. The ranch topography varies from relatively flat within the valleys to nearly 3:1 on the south facing slopes. Overall, the elevations across the proposed golf course range from an elevation of 530 feet on Hole No.5 to 290 feet on Hole No.14. The ranch is within the Marsh Creek watershed (Drainage Areas 104, 105, and 107) and ultimately drains northeasterly towards the San Joaquin River. The golf course is primarily within Drainage Area 104.

The proposed golf course has been sited north of the minor ridge defining Horse Valley. All existing trees are proposed to be incorporated into the golf course design. See Exhibit 8.

The City of Antioch's Sand Creek Specific Plan Area (SCSP) is located to the north of the Roddy Ranch. The SCSP covers 2,700 acres and includes housing and commercial uses. The City of Brentwood's Special Planning Areas "G" & "H" (SPA G&H) are located to the east of the Roddy Ranch. SPA G&H plans include annexation to the City of Brentwood, and housing and commercial uses on 850 acres. See Exhibit 2. A mixture of large parcels and ranchettes located within the unincorporated County area characterize the lands to the south of the Roddy Ranch. Large tracts of private land under Williamson Act Contract and the East Bay Regional Park District's Black Diamond Mines Regional Preserve are located to the west of the Roddy Ranch.

1. GEOLOGY/EARTH

Surface Soils

The soil types within the site have been mapped by the Soil Conservation Service (1977). Most of the site (the up-slope and middle sections) have "Briones loamy sand", which has low shrink-swell potential and moderate to high erosion hazard. Some of the lower (northeasterly) sections of the site contain "Altamont clay", which has high shrink-swell potential and slight to moderate erosion hazard. Fingers of "Rincon clay loam" extend up from the bottom of Horse Valley. This unit has moderate shrink-swell potential and slight erosion hazard.

The lack of clay binder makes the Briones loamy sand susceptible to erosion if left bare. There

are no landslides found within the site. Two areas of accelerated erosion on the western edge of the site were found that could require attention during design and construction to reduce the amount of erosion.

Seismic Activity

The project site is located in the seismically active East Bay area. No faults are known to traverse the site nor is it located within an Aliquist-Priolo Special Studies Zone. However, there are several faults within the regional vicinity that could cause seismic ground shaking at the site. The Antioch Fault is the nearest potentially active fault located one mile to the northeast. This fault is estimated to have a repeat time of greater than 10,000 years.

Graded Slopes

Several County policies and ordinance sections address the issue of grading on slopes of 26% or greater. These policies generally apply to "significant ridgelines" and "open hillsides" which are "to be protected through implementing zoning measures and other appropriate actions" (Zoning Section 82-1.016). Development on hillsides with a grade of 26% is discouraged and considered unsuitable for types of development that require extensive grading or other land disturbance (General Plan policies 8-14, 8-67, 9-11, 10-24, 10-29). Figure 10-7 of the General Plan shows the areas of the County with slopes of 26% or greater and indicates that the south side of the ridge between Horse and Deer Valleys is over 26% . This area is not a part of the golf course project.

The golf course has been sited in an area with varying slopes up to greater than 26%. Less than 5% of the golf course site is greater than 26%. Approximately 60% of this 5% will be graded, and those are isolated areas that provide short transitions within flatter terrain and are not visually dominant. See Exhibit 7. More than half of the golf course site contains less than 15% slope.

The County finds that the proposed grading does not conflict with the above mentioned policies for the following reasons:

1. The golf course is not located on or below a significant ridgeline.

2. The general topography of the golf course after grading can be characterized as similar to the existing topography and be contoured into the existing hillside. No sharp or unsightly transitions are proposed or required.

3. The portion of the golf course lands that are greater than 26% are minimal and represent small transitioned areas.

4. The steeper portions of the golf course lands which are proposed to be graded are not visually dominant as they are lower than the ridgeline and interspersed among non-graded areas and graded areas with flatter slopes.

Discussion of Evaluation

The project proposes to balance on-site approximately 600,000 cubic yards of cut and fill for the golf course, including the parking area, the starter house, cart storage, the maintenance facilities, and the access driveway. In the area of grading, the topsoil will be stripped, stockpiled on-site, and replaced. Proposed off-site improvements to Deer Valley Road at the access driveway, and the construction of the ECCID lateral line along Fairview Avenue and Balfour Road will require very minor localized grading. Grading activities on the golf course site will expose the soil and could result in construction related short-term increases in erosion and sedimentation in the project area. However, implementation of standard erosion control techniques in design and construction, such as hydroseeding graded areas, silt fencing, and straw bales to prevent sediment runoff, will reduce potential impacts to less than significant.

Based on the data and conclusions of the Preliminary Geologic Evaluation, prepared by Terrasearch (April 30, 1998) and Letter update (July 8, 1998), the project's impact to geologic substructures and exposure of people to geologic hazards is considered insignificant. The activity of grading soils with moderate erosion hazard, the physical change to topography by grading of the site, and the construction related potential exposure of soils, the impact to soils could be significant. However, the County finds that compliance with the County Grading Ordinance, NPDES requirements, requirement for an in-depth geotechnical investigation, and incorporation of the following Mitigations will reduce the impact to less than significant.

Mitigations

2a. An in-depth geotechnical investigation shall be undertaken prior to completion of final design. Prior to issuance of any grading permits or building permits, a geotechnical report with site specific recommendations for grading design and construction shall be prepared and submitted to the County for review and approval. Recommendations for slope stability, erosion, and sedimentation control shall be detailed in the report and included in the construction documents.

2b. There shall be no grading operations allowed within or immediately adjacent to the surface waters on the project site. These areas shall be protected by the installation of temporary construction fencing.

2c. Silt fencing shall be installed at selected locations around the perimeter of the project to prevent siltation of off-site water courses. Silt fencing shall also be installed, where runoff leaves the sites, within the project area in drainage swales that drain to on-site water courses.

3. WATER

Absorption Rates, Drainage Patterns, and Surface Runoff

The proposed golf course will minimally alter the natural drainage pattern and amount of impervious surface. Currently, the site is undeveloped and used for cattle ranching. Under current conditions, the percent of impervious area of the golf course site is near zero with a runoff coefficient of 0.30. After development, the impervious area will increase only slightly (4% of the total golf course parcel) and the runoff coefficient is expected to remain the same for all practical purposes. Any increase in runoff will be insignificant considering the large area of the watershed(s) and the small amount of impervious surface created by the ancillary golf course facilities, parking, and access driveway.

Of the total golf course project area of 230 acres, about 175 acres are proposed to be graded for the 18-hole golf course, parking, maintenance, and starter area. The preliminary design of the golf course maximizes the use of the natural terrain and the proposed surface grading maintains the present drainage patterns. Graded areas will generally be flatter than existing which will increase the infiltration, likely improving the long-term absorption rate of the turf areas. This grading will cause minor local alteration of the direction and quantity of runoff from the site. A minor diversion of storm water to a different drainage area may take place. Approximately one acre of the parking area lies in Drainage Area 105, with the remainder of the golf course area in Drainage Area 104. Final design could result in the drainage of this one acre being diverted to Drainage Area 104.

Flood Waters

Contra Costa County was mapped by the Federal Emergency Management Agency (FEMA) in 1987, as part of the National Flood Insurance Program. The resulting flood insurance rate map indicates no flood hazard in the golf course area.

Water Quality

The proposed golf course could affect water quality both during construction and ongoing operations. Implementation of current County standards for erosion control and the NPDES Best Management Practices will reduce sedimentation impacts to less than significant for both construction and operation. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared prior to issuance of grading permits. The following erosion and sedimentation controls are typical of the types that will be detailed in the project design as part of the Erosion Control Plan, as well as incorporated into the project's SWPPP.

Soil Stabilization Controls

Soil stabilization controls shall be implemented on all freshly graded slopes immediately following completion of the grading activity.

Straw and Tack Treatment: Graded slopes on the site shall be hydroseeded. A mixture of annual and perennial grass seed and mulch will be applied using hydroseeding.

Watering for Dust Control: Care shall be taken to sprinkle areas of exposed soil, as necessary, during windy periods. Only the minimum amount of water shall be used; no runoff shall result from this practice.

Erosion and Sediment Controls

Perimeter Silt Fence: A silt fence shall be installed around the perimeter of the project wherever runoff could leave the site. The filter fabric used in the silt fence shall be sized in accordance with the conditions at the site.

Velocity Control (Straw Bale) Dikes: Temporary barriers consisting of straw bales staked across the slope shall be used to reduce flow velocities and allow sediments to drop out. The velocity control dikes will be used to slow runoff on project driveways during construction.

Diversion Berms: Temporary diversion berms shall be constructed on site soils to divert sediment-laden runoff from the graded areas into the silt basins.

All controls shall be constructed in accordance with the California Storm Water Best Management Practice Handbook for Construction Activity.

Potential operation impacts include runoff of pesticides, herbicides, and fertilizers, as well as

sediment runoff from over-irrigation. In the absence of appropriate precautions, the concentration of pesticides, herbicides, and fertilizers in on-site or off-site water features could have a negative impact on plant and animal life. The project applicant has provided a "Golf Course Operation Guidelines for the Roddy Ranch Golf Course", dated May 1998, included as part of the application submitted, describing the management approach that will be employed at the Roddy Ranch to reduce environmental impacts. These guidelines include the following:

"Planning and Design

Throughout the planning and design process, numerous programs will be implemented to ensure minimal negative effects to the environment. These can be summarized as follows:

- *Design that maximizes the use of the natural terrain and, therefore, minimizes the earthwork.*
- *Limited grading on the steeper areas of the golf course corridor.*
- *Surface grading that maintains present drainage patterns.*
- *The use of numerous catch basins that will decrease runoff velocity. Approximately 115 acres of runoff water will be directed to the irrigation storage ponds for reuse.*
- *A landscape planting plan based on the selection of native plant material and the use of low maintenance grasses that are suitable to the area which will minimize the use of chemicals yet still provide quality playing conditions.*
- *State of the art irrigation system composed of a computer controlled irrigation system. This will allow watering by low uniform application rates and frequent repeat cycles to allow for improved infiltration. Also, the system will be governed by a weather station that will shut off the irrigation system during adverse or unnecessary watering conditions, such as high wind conditions or in the event of unanticipated rain.*

- *The irrigation system will be equipped with a fertigation system. The use of a fertigation system will provide for the micro feeding of necessary plant nutrients to the turf. This will decrease the runoff/leaching potential that can result from the application of granular fertilizer.*

- *Greens that will be built to USGA recommendations which will ensure a high quality growing environment resulting in decreased chemical usage. Tees will also be built to modified USGA recommendations. For all other disturbed areas, existing topsoil will be stripped, stockpiled, and then reused.*

- *Employment of a Golf Course Superintendent who is experienced working with sensitive environmental areas.*

Goals of Management Operations

Several goals and objectives will be achieved once construction of the project is completed and normal golf course operations are underway. These goals and objectives are:

- *Practice water conservation by watering on an as-needed basis as determined by site weather data.*

- *Protect native and re-established natural habitats by minimizing the extent of turfgrass areas and re-establishing native vegetation in out of play areas that are disturbed.*

- *Periodically monitor effects to the environment and decrease or eliminate operations, as necessary, to correct any negative impacts to the environment.*

- *Use grass mowing methods that will eliminate the need to haul grass clippings off-site and that will also recycle nutrients in the clippings back into the turfgrass ecosystem.*

Ongoing Management Practices for the Golf Course

The strategy being proposed for future maintenance of the golf course is decidedly a "minimalist" approach. This is a philosophy based on information that turf is actually healthier when it is not provided with as much nitrogen or watered as frequently as previously thought necessary.

One of the key tools that a golf course manager utilizes to achieve a healthier turf is Integrated Pest Management (IPM). IPM integrates pest identification with appropriate non-polluting cultural, biological, and chemical control measures in those areas where

the problem has exceeded acceptable threshold limits. This is determined by "scouting" the course and taking a periodic assessment of disease, insect, and weed levels and determining select areas that require control measures. IMP stresses a curative approach rather than broad non-selective preventative measures. This reduces any possible harm to the environment and also saves considerable money that would have been spent on broad based chemical applications. In combination with natural buffer zones, the goal is to affect no degradation to the environment.

The four steps of IMP implementation are:

1. *Monitor all areas and identify specific areas that have potential pest problems.*

2. *Set tolerance levels for pest populations (i.e., pest levels at which a degradation in turf quality is likely to occur).*

3. *Taking appropriate action by applying tactics (cultural, biological, and chemical) that will alleviate the identified problem.*

4. *Assessment and evaluation of the results of the control measures and possible adjustments to the program methods. Periodic inspection of the project to review and assess the current cultural practices and how they are affecting the environment.*

Identification of Fertilizers and Pesticides to be used in the Golf Course Operation

Fertilizers will be applied at very low rates by the following means:

- *The use of fertilizers that are documented to be very slow release and environmentally safe, such as those manufactured by the Scotts Company.*

- *The use of soluble fertilizers applied through the irrigation fertigation system. The actual amounts of nutrients applied are measured in the parts per million range.*

- *The use of natural organic sources.*

In general, fertilizer is typically applied when the grass is actually growing in small repeated applications that will deliver approximately one pound of actual nitrogen per month to the greens, and one pound of actual nitrogen every six to eight weeks to all other maintained areas of the golf course.

Periodic monitoring of the soil profile will be done to determine the nutrient levels available to the turfgrass, and correspondingly the actual amount of supplemental nutrients that should be applied, thereby reducing the possibility of over application of fertilizers.

Pesticides are divided into the following three main groups:

1. *Herbicides*

   A post-emergent herbicide, such as Trimec, may be used to control broadleaf weeds. Trimec is composed of 2,4-Dichlorophenoxyacetic acid, 2-(2-methyl-4-chlorophenoxy) and diacamba (3,6-dichloro-o-anisic acid).

   However, due to the very aggressive nature of the proposed grasses and the very low height of mowing that will occur on these grasses, the use of herbicides on a regular basis is not anticipated.

2. *Insecticides*

   In the proposed golf course area, grubs and leaf eating surface worms are the most common insect pests. Grubs are controlled by the use of Dursban, which is composed of chlorpyrifos [O-O-diethyl O-(3,5,6-tri-chloro-2-pyridinyl) phosphorothioate. However, only under unusually severe outbreak conditions will a chemical application for insect control be made.

   In 1997, a new group of insecticides, called Growth Regulators (IGRs) became available. This group of insecticides imitates the growth hormone of the target insect and accelerates the growth of the pupae stage which results in death. IGRs will preclude the need of chemicals to control many insect species.

3. *Fungicides*

   Typically, the main diseases on turf grasses in this area are brown patch, dollar spot, and leaf rust. These diseases are controlled on an as needed basis using a broad spectrum fungicide, such as Daconil or Benomyl DG. The active ingredient for Benomyl DG is benomyl [methyl 1-(butylcarbamoyl)-2-benzimidazolecarbamate] and for Daconil the active ingredient is chlorothalonil (tetrachloroisophthalonitirle).

The golf course playing area (greens, tees, fairways, and roughs) will be seeded with new

varieties of grasses developed for their resistance to diseases and pests. The regular and extensive use of pesticide chemicals is not anticipated. Chemicals will be applied as needed, based on monitoring of the problem area. All chemicals that will be used shall adhere to prevailing regulations.

Methods of Application

Fertilizers will be applied through the irrigation system or spread mechanically/manually by calibrated spreaders. The irrigation system will be controlled by a weather station that will shut down the irrigation system during periods of rain or excessive wind conditions.

All pesticides will be applied through calibrated spraying rigs.

Time of Application

Chemical applications will be scheduled when the application will be effectively absorbed by the target plant and will avoid application during rainy periods.

Requirement and Qualifications of the Golf Course Superintendent

A Certified Golf Course Superintendent, who is experienced in the prudent and economic use of chemicals, will be employed. Additionally, all maintenance chemicals shall be prepared, handled, and applied by licensed person(s) in accordance with all prevailing regulations.

Irrigation Ponds

Irrigation ponds will be approximately eight feet deep, be lined and experience high turnover rates, and will be drawn down frequently to minimize or avoid undesirable growth. Pond water quality will be periodically monitored to test for accumulations of chemicals that are detrimental to the environment."

Groundwater

A domestic water well will be established on-site to serve the needs of the ancillary golf course facilities. The Horse Valley groundwater basin will be the source of water for the well. The entire 1,840-acre basin has similar soils, vegetation, and climatic conditions. Based on Hydrogeologic Evaluation, Horse Valley Estates, prepared by Harding Lawson Associates (HLA) (November 5, 1984), the recharge area is about 1,640 acres of the total 1,840-acre basin. In an average year of 2.8 inches (0.23-foot) of recharge, there is 383 acre-feet of recharge by infiltration of

precipitation. The aquifer is estimated to have 350 acres of surface area and an average saturated thickness of 25 feet. HLA assumed an average specific yield of 15% would provide approximately 1,300 acre-feet of storage in the aquifer. The average annual production of the on-site groundwater well will be far below the natural recharge of the aquifer, and thus is considered an insignificant change to the quantity and rate of flow of ground water.

Amount of Water Use

The East Contra Costa Irrigation District (ECCID) has indicated an available supply of non-potable water to meet the irrigation needs of the golf course project. The project's annual 600 to 800 acre-feet has been included in ECCID's irrigation water supply master planning studies. See Utilities, Section 16, for more information.

Discussion of Evaluation

As a standard requirement of the project, the applicant will be responsible for preparing and submitting to the Public Works Department a Storm Water Pollution and Prevention Plan (SWPPP) in conformance with the California NPDES (National Pollution Discharge Elimination System) General Permit for storm water discharges associated with construction activity and ongoing operations. The SWPPP will address methods to reduce the amount of pollutants contained in storm water runoff during construction of the project. In addition to the SWPPP, the applicant will prepare an Erosion Control Plan that adheres to the requirements of the Regional Water Quality Control Board (RWQCB) and the County Grading Ordinance. The Golf Course Operation Guidelines, prepared by JMP, dated May 1998, addresses on-site potential pollutants to on-site drainage runoff sources. Best Management Practices will be implemented to address storm water quality and control for the operation of the golf course. Based on the above requirements and Mitigations below, the County finds that the project's impact to water quality will be insignificant. However, to ensure that any such potential effect is minimized, all surface runoff from the irrigated golf course areas shall be collected and conveyed to the on-site ponds and tested prior to release to downstream water courses. Discharged water shall follow along the existing natural drainage courses. This overland flow, along grass lined swales of 1,600 linear feet and 2,200 linear feet, will allow for additional filtering for improved water quality before discharged waters reach the nearest aquatic habitat site. See Exhibit 9. The following mitigation measures will reduce any impact to an insignificant level:

Mitigation Measures

3a. A NPDES program shall be developed for County review and approval (by August 13, 1998) prior to public hearing.

3b. Pond construction and maintenance criteria and a management program shall be submitted to the County for review and approval by August 13, 1998. Construction criteria and management plan shall specifically address control and removal of unwanted vegetation growth.

3c. All drainage from maintained golf course turf areas shall be directed to the irrigation ponds in order to capture runoff for water quality testing.

3d. A final "Golf Course Operation Guidelines" shall be submitted for the review and approval of the County prior to issuance of any grading permits. These "Guidelines" shall include site-specific performance standards and shall address the management of irrigation, pest control, weed control, and turf fertilization.

3e. A Water Quality Management Plan shall be prepared with the assistance of a hydrologist specializing in water quality management. The Plan shall specify performance standards and a monitoring program. Baseline studies shall be conducted. Water quality within the on-site irrigation ponds and water well, and off-site downstream wetland and pond area within the Roddy Ranch shall be periodically tested for changes in water quality that could adversely affect plant and animal life. If adverse changes are detected (standards are exceeded), then management practices shall be adjusted accordingly, i.e., new pest control methods shall be instituted. A contingency plan for treatment shall be described.

4. PLANT and 5. ANIMAL LIFE

Overview

The proposed project site is situated within 32,000 acres of surrounding non-native grasslands in eastern Contra Costa County. Adjacent lands are also privately owned and managed primarily for cattle ranching. Biological resources within the golf course site include plant and animal species associated with the annual grasslands habitat. However, no special-status species were found during surveys and assessments conducted between March and June 1998.

Although the proposed golf course project would result in conversion of annual grassland habitat to golf course facilities, this conversion is not considered a significant impact to the breeding, migration, dispersion, or foraging habitats of biological resources in the region because the 230-acre project is located within the context of 32,000 acres of undeveloped land dominated by annual grasslands. See Exhibit 2.

The applicant has performed the following surveys for special-status plant, animal, and invertebrate species in the proposed golf course site:

- Special Status Amphibian and Reptile Habitat Assessment
- Site Assessment for California Red-Legged Frog
- Botanical Assessment
- Letter Report from H. T. Harvey & Associates dated June 19, 1998, addressing Invertebrates, the Berkeley Kangaroo Rat, the San Joaquin Kit Fox, the Burrowing Owl, Birds, and the California Horned Lizard
- Preliminary Wetlands Delineation and Jurisdictional Determination for the Roddy Ranch (May 18, 1998) and Addendum (June 17, 1998)
- Letter Report regarding Special Status Bats (July 1998)
- San Joaquin Kit Fox, Preliminary Report, Roddy Ranch (July 1998)

PLANT LIFE

Vegetation Communities

Vegetation on the project site is dominated by non-native grassland, supporting a few scattered blue oak and hop trees. Riparian vegetation is absent in the proposed project site, but a single clump of willows is present at the side of Deer Valley Road, south of the proposed golf course, which will not be disturbed.

Special-Status Plant Species

Based on a review of the California Natural Diversity Database for the Antioch South and Brentwood U.S.G.S. quads and a summary of special-status plant species, recorded in Contra Costa County, a total of 36 special-status plant species were determined to have the potential for occurring in the project region. Site-specific surveys for special-status plants were performed during the spring of 1998, and no special-status plant species were detected within the proposed golf course envelope. The presence of any of the target special-status plant species is considered unlikely. A summer survey will be necessary to confirm the absence of all special-status plant species (see mitigation measure 4a below).

Special-Status Natural Communities (e.g. wetlands)

Areas of wetlands or other "waters of the United States" subject to the jurisdiction of the U.S. Army Corps of Engineers (ACOE) within the proposed golf course site include approximately 420 square feet of freshwater marsh wetland habitat and three isolated sections of unvegetated drainage features that convey water during the rainy season. See Exhibit 7. The applicant has

conducted a formal delineation of these ACOE jurisdictional areas, and the ACOE has certified that delineation in a letter dated June 29, 1998. Each of these areas, as well as all trees on the project site, are indicated on the proposed routing and grading plans. All of these features, including the trees, will be completely avoided during project grading and construction, and thus will not be affected by the project. Accordingly, no permit will be required from the ACOE under Section 404 of the federal Clean Water Act. Likewise, no streambed alteration agreement with the California Department of Fish and Game is required under Section 1603 of the Fish and Game Code.

Impacts

Non-native annual grassland vegetation is prevalent in the vicinity of the proposed project. The alteration of 230 acres of this habitat for a golf course does not create a significant impact to special-status plants or special-status natural communities. However, one final summer survey is required to confirm that no special-status plant species exist on the site. All existing trees within or adjacent to the proposed project site are proposed to remain, and therefore would not be impacted by the project.

Mitigations

4a. The applicant shall perform a final special-status plant survey in late/early August 1998, and report the findings to the County. If special-status plants are found during the survey, the applicant shall (1) avoid grading in impacted areas, or (2) collect, propagate, plant, and monitor during establishment, special-status plants at a location to be agreed upon with the County. The relocated plant area shall be managed as a plant conservation area and be equal in size to the area impacted by grading.

ANIMAL LIFE

Potentially Occurring Special-Status Animal Species

Special-status wildlife species have potential to use habitats that are present in the project vicinity. Prior to site-specific surveys, species considered to have a moderate or high potential to occur within or immediately adjacent to the proposed project included:

AMPHIBIANS: the California Red-Legged Frog, the California Tiger Salamander, the Western Spadefoot, the Foothill Yellow-Legged Frog

REPTILES: the Western Pond Turtle, the California Horned Lizard, the Alameda Whipsnake

AVIAN SPECIES (NESTING HABITAT): the Northern Harrier, the White-Tailed Kite, the Golden Eagle, the Burrowing Owl, the California Horned Lark, the Loggerhead Shrike

MAMMALS: the San Joaquin Kit Fox, the Berkeley Kangaroo Rat, Small-Footed Myotis, Townsend's Western Big-Eared Bat, Pallid Bat, Long-Eared Myotis, Fringed Myotis, Long-Legged Myotis, the Yuma Myotis, the Western Mastiff Bat.

INVERTEBRATES: Curved-Foot Hygrotus Diving Beetle, Molestan Blister Beetle, and Helminthoglypta nickliniana bridgesi.

These species, and their occurrence or absence from the project site, are discussed below:

California Red-Legged Frog

The California red-legged frog (RLF) is listed as a "threatened" species under the federal Endangered Species Act. While not listed as threatened or endangered under the California Endangered Species Act, it is a California "protected amphibian" (Section 40.00 and Section 40.10, Title 14 CCR). The California Department of Fish and Game considers the RLF to be a Species of Special Concern.

As reported by the applicant's biological consultants, RLF utilize different habitats during each life stage and over the course of the year. It breeds in still or slow-moving aquatic habitats, including coastal lagoons, marshes, ponds, and backwater portions of streams. Large egg masses are attached to emergent vegetation, generally between December and March. Larvae hatch 6 to 14 days after fertilization and metamorphosis occurs four to seven months after hatching. During the non-breeding season, RLF may inhabit a variety of upland and aquatic habitats, and individuals may travel considerable distances between breeding habitats and other habitats during the rainy season. Adult RLF are known to occupy ephemeral bodies of water, including streams and springs, during the non-breeding season. They may take refuge in small mammal burrows, leaf litter, or other moist areas during periods of inactivity to avoid desiccation. RLF have been shown to forage in upland habitats during spring and summer rains. Sycamore Associates, *Site Assessment for California Red-Legged Frog (Rana Aurora Draytonii) at the Proposed Roddy Ranch Golf Course* (June 19, 1998)(pp. 3-4).

The applicant performed a site assessment for RLF at and in the vicinity of the proposed golf course site in spring 1998, according to current, non-binding guidelines issued by the U.S. Fish and Wildlife Service (February 1997). All habitat within one mile of the proposed project was assessed, as well as current RLF locality records. A search of the California Natural Diversity Data Base revealed five records of RLF presence within five miles of the proposed project. All of these locations are at least 1.5 miles from the proposed golf course site. In March 1998, RLF

were observed at a pond located approximately 700 feet north of the northern boundary of the proposed golf course, outside the boundaries of the golf course on the other side of Empire Mine Road. See Exhibits 9 and 10. The applicant also assessed habitat conditions at 12 ponds and two ephemeral streams (Deer Creek and Horse Creek) on the Roddy Ranch which are within one mile of the proposed golf course. The two streams were determined not to provide breeding habitat. Of the 12 ponds, seven appeared to be the most potentially suitable for RLF. All are located between 1,400 and 5,500 feet from the golf course site. Sycamore Associates, pp. 7-8.

No actual or potential aquatic RLF habitat will be affected by the project. There are no aquatic habitats suitable for RLF on-site. None of the actual or potentially suitable aquatic RLF habitats will be directly affected by project grading, and none of these off-site locations will be indirectly affected by runoff from the golf course site. Refer to Section 3, Water Quality. Consequently, there is no actual or potential RLF breeding habitat within the project site, and no actual or potential breeding habitat outside of the project site, which will be affected by the project. Also, no RLF have been observed on the project site. Therefore, the only potential impact of the project on RLF would be if any RLF associated with the actual and potential breeding locations noted above happened to be temporarily foraging, sheltering, or dispersing on the project site at the time of construction (such activities would not be prevented following construction of the golf course). However, given the abundance of upland habitats adjacent to the off-site actual and potential RLF aquatic habitats which will not be disturbed by the project and which provide ample potential foraging, sheltering, and dispersal areas, the likelihood that RLF will be foraging, sheltering, or dispersing on the project site at the time of construction is low. Thus the likelihood of the project having any effect on RLF is low.

Nevertheless, to ensure that any potential effect is minimized, the following mitigation measures have been identified (in addition to the water quality mitigation measures in Section 3 that will prevent any indirect adverse effects on aquatic habitats). Based on the site-specific survey work, and these mitigation measures, the County finds that the project will not reduce the number or restrict the range of the RLF, and will not otherwise result in a significant impact to the RLF.

Mitigations

5a. A qualified biologist shall survey the project site for the presence of RLF immediately prior to the start of grading, and shall be on-site during rainy periods during grading operations. If the biologist observes RLF on-site, grading in the area of occurrence shall be halted. The applicant shall notify the County and contact USFWS for consultation. If no RLF are found, scalp all vegetation off the entire golf course site, prior to construction, to eliminate any cover that could be used by RLF during potential dispersal and foraging.

5b. Following one preconstruction survey, all vegetation with the exception of the trees, shall be scalped from the site to eliminate any potential dispersal and foraging.

5c. The perimeter of the project site shall be flagged, prior to grading, to ensure that grading does not extend beyond the project boundary and thereby affect off-site aquatic habitats.

5d. Install and maintain orange construction fencing around perimeter of golf course. Any dispersing RLF would not become trapped, but would be able to pass through the fencing. Lack of cover on the golf course site will make it inhospitable to potentially dispersing and foraging RLF.

5e. No water shall be allowed to pool or pond during grading or other phases of construction to prevent the creation of potential breeding or non-breeding aquatic habitat.

5f. No barriers to potential dispersal and movement of RLF through the golf course site, such as long high walls, shall be constructed.

5g. Golf course ponds shall be surveyed for the presence of RLF and predators annually by a qualified biologist. If RLF are found, the USFWS shall be contacted and consultation under Section 7 or 10 of the Endangered Species Act shall be initiated.

5h. A RLF and CTS Predator Control Plan shall be developed and implemented to prevent bullfrogs and other RLF/CTS predators from colonizing the golf course lakes and migrating to potential RLF/CTS breeding sites outside of the golf course. Golf course ponds shall not be stocked with species predatory to RLF, such as bullfrogs and mosquito fish. The golf course ponds shall not be drained during the spring or early summer.

5i. A Water Quality Management Plan to prevent golf course runoff from adversely affecting potential RLF breeding sites off-site shall be developed and submitted for the review and approval of the County.

<u>California Tiger Salamander</u>

The California tiger salamander (CTS) is not listed as threatened or endangered under either the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). The CTS is a "Candidate" for potential future listing under the ESA. The California Department of Fish and Game considers the CTS to be a Species of Special Concern, and it is a California "protected amphibian" (Section 40.00 and 40.10 Title 14 CCR).

As reported by the applicant's biological consultant, generally speaking CTS inhabit grassland and oak savanna habitats in the valleys and low hills of central and coastal California. Adults spend

most of their lives underground, typically in burrows of ground squirrels and other animals. During winter rains, adults emerge to court and breed in aquatic habitats, such as vernal pools and semi-permanent, quiet waters. Developing embryos hatch in 1-2 weeks and continue to develop for three to four months. Following transformation, juveniles then seek refuge, typically in mammal burrows, in which they remain until the following winter's rains. CTS have been located up to ¾ of a mile or more from the nearest breeding sites. Sycamore Associates, *Special-Status Amphibian and Reptile Habitat Assessment at the Proposed Roddy Ranch Golf Course* (June 19, 1998)(pp. 6-7).

There is no actual or potential breeding habitat within the project site for CTS due to the absence of suitable aquatic features. However, the species is known to breed in six locations in the vicinity of the golf course site, within between 1,300 feet and 5,500 feet of the boundary of the golf course site. Three of these ponds (identified by Sycamore as Nos. 4, 5, and 6) are in the northeast corner of the Ranch, between 1,300 and 2,400 feet from the northeast boundary of the golf course site. See Exhibit 7. Pond No. 3 is located near the northern boundary of the Ranch, 1,900 feet from the northwest corner of the golf course site. Pond No. 16 is located near the southwest corner of the Ranch, 4,800 feet from the southerly border of the golf course site. Pond No. 1 is located near the northwest corner of the Ranch, 5,500 feet from the northwest corner of the golf course site. CTS are also known to exist 1,300 feet north of the northerly boundary of the golf course site, across Empire Mine Road. Sycamore Associates, p. 10. See Exhibit 10.

None of the known CTS breeding locations, or any additional potential CTS breeding locations will be affected by the proposed project. There are no actual or potential breeding locations on-site, none of the actual or potentially suitable CTS aquatic habitats off-site will be directly affected by project grading, and none of those off-site locations will be indirectly affected by runoff from the golf course site (refer to Section 3, Water Quality). Also, no CTS have been observed on the project site. There is no reliable way of determining the location of CTS in upland areas during the dry season. Therefore, the only potential impact of the project on CTS would be if any CTS associated with the actual and potential off-site breeding locations noted above happened to be in underground burrows on portions of the golf course site at the time of grading and the loss of upland over summering habitat in the proposed golf course, deemed insignificant due to the abundance of adjacent upland habitat unaffected by the project. Abundant areas of potential CTS upland habitat immediately adjacent to these off-site breeding locations will not be affected by the proposed project.

To ensure that any potential impact on CTS is minimized, the following mitigation measures have been identified (in addition to the water quality mitigation measures in Section 3, which will prevent any indirect adverse effects on aquatic habitats). Based on the site specific survey work, and these mitigation measures, the County finds that the project will not have a significant impact on CTS.

Mitigations

5j. Prior to grading, the applicant shall survey those areas of the project site nearest CTS breeding locations for the presence of burrows and other features that may provide potential over summering habitat for CTS. Those features, and similar features located between the locations and the breeding locations, but beyond the golf course boundary, shall be mapped and submitted for the review and approval of the County. The applicant may be withheld from grading until the 1998-1999 rainy season begins and any CTS which may be present are given an opportunity to move from dry season habitats to off-site aquatic breeding habitats. Before the beginning of the rainy season, in September, scalp all vegetation from the golf course site to eliminate any cover potentially suitable for use by CTS.

5k. A qualified biologist shall survey these areas of the project site periodically during grading, including during rainy periods, to determine whether any CTS present on-site have migrated to off-site ponds. No grading shall occur in areas where CTS are observed.

5l. Exclusion of CTS from the grading envelope could safely be implemented through either of two alternatives. Construction of a permanent one-way curb barrier around the perimeter of the golf course site prior to grading would prevent CTS from migrating onto the site while permitting CTS to leave the site. A second alternative would involve the construction of a temporary two-way barrier, (i.e., low silt fencing buried below ground level). A temporary barrier would require the regular placement of debris or shelters on the project side of the fence that would provide cover for CTS migrating outward. Cover sites would need to be monitored regularly during the rainy season; captured CTS would then need to be relocated to suitable habitat nearby.

5m. A qualified biologist in possession of a scientific collector's permit from CDFG will monitor the golf course site during grading between September and December. Any CTS that are exposed during grading, or are found traversing the site shall be placed in a moist cooler and taken to ground squirrel or pocket gopher holes outside of the golf course site near ponds 5 or 6.

5n. Cover habitat shall be created near ponds 5 and 6 (see Exhibit 9) prior to golf course construction. Cover habitat shall be constructed through the placement of piles of large woody debris and/or rocks in upland areas surrounding these ponds.

5o. A permanent curb barrier shall be constructed around the perimeter of the golf course to prevent movement of CTS onto the golf course site following construction and to prevent colonization of the golf course ponds by CTS.

5p. Prior to issuance of a grading permit, a Water Quality Management Plan to prevent golf course runoff from affecting potential CTS breeding sites off-site shall be submitted for the review and approval of the County.

5q. Gopher, ground squirrel, and other rodent control within the golf course shall be limited to trapping; no rodenticides shall be used.

Other Amphibians and Reptiles

Five other special-status amphibians and reptiles were considered to have a potential of occurring at the proposed golf course site, but none were found during habitat surveys on the site. These five species are each discussed briefly below:

California Horned Lizard

The California horned lizard is not listed as threatened or endangered under either the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). The California Department of Fish and Game considers it to be a Species of Special Concern. As reported by the applicant's biological consultant, the lizard occupies a variety of open habitats including coastal scrub, oak savanna and grasslands. The species appears to be restricted to localized populations because of its close association with loose soils that have a high sand content. They feed primarily on native ants. Sycamore Associates, Special-Status Amphibian and Reptile Habitat Assessment at the proposed Roddy Ranch Golf Course (June 19, 1998). Both Sycamore, and H.T. Harvey & Associates (using herpetologist Dr. Mark Jennings) have assessed the project site with respect to horned lizards on behalf of the applicant. At Sycamore's recommendation, Harvey surveyed the project site both for suitable habitat and any evidence of horned lizard presence, and found the habitat to be marginal due to the compact clay soil and the scarcity of native ants. No sandy soils are present on or immediately adjacent to the golf course site, and no horned lizards or evidence of site usage was found. H. T. Harvey & Associates, Letter Report to Sycamore Associates (June 22, 1998). Based on this information, the County finds that the proposed project will not have a significant impact on this species.

Western Spadefoot

The Western spadefoot is not listed as threatened or endangered under either the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). The California Department of Fish and Game considers it to be a Species of Special Concern and the U.S. Fish and Wildlife Service considers it to be a Special Concern species. As reported by the applicant's biological consultant, this toad inhabits the Central Valley and adjacent foothills, as well as the central and south coastal regions of California. Adults are almost entirely terrestrial and prefer grassland habitats, though they utilize seasonal wetlands for breeding. They feed primarily on insects. Adults and recently metamorphosed juveniles aestivate in underground burrows they construct themselves. There are no recent or historical records of the Western spadefoot in Contra Costa County. Also, no Western spadefoot larvae were observed during aquatic sampling performed outside of the proposed golf course site but within the boundaries of the Roddy Ranch. (There is no suitable aquatic habitat on the golf course site itself). As a result, Sycamore concluded that this species has a low potential to inhabit the proposed golf course site, and recommended that no further survey work be conducted. Sycamore Associates, Special-Status Amphibian and Reptile Habitat Assessment at the proposed Roddy Ranch Golf Course (June 19, 1998). Based on this information, the County finds that the proposed project will not have a significant impact on this species.

Foothill Yellow-Legged Frog

The Foothill yellow-legged frog is not listed as threatened or endangered under either the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). The California Department of Fish and Game considers it to be a Species of Special Concern and the U.S. Fish and Wildlife Service considers it to be a Special Concern species. As reported by the applicant's biological consultant, this frog inhabits the Coast Range and the western Sierra Nevada foothills. It lays egg masses during the spring in small to medium sized streams with cobble-sized substrate. Metamorphosis occurs between July and September, thus requiring perennial streams or at least water courses that flow during that time of year. There are no streams on the golf course site, and none of the streams on the remainder of the Roddy Ranch have cobble-sized substrate or flow into late summer. Therefore, there is no breeding habitat on or adjacent to the project site. Thus, Sycamore concluded that this species has a low potential to inhabit the proposed golf course site, and recommended that no further survey work be conducted. Sycamore Associates, Special-Status Amphibian and Reptile Habitat Assessment at the proposed Roddy Ranch Golf Course (June 19, 1998). Based on this information the County finds that the proposed project will not have a significant impact on this species.

Alameda Whipsnake

The Alameda whipsnake is listed as threatened under both the ESA and CESA. As reported by the applicant's biological consultant, it inhabits the hills east of San Francisco Bay and west of the

Central Valley in Alameda and Contra Costa counties. Optimal habitat appears to consist of open-canopied sage scrub on south facing slopes with rocky outcroppings, rodent burrows and an abundance of lizards. No suitable habitat for the whipsnake is present on or within 500 feet of the proposed golf course site, although suitable habitat is present elsewhere on the Roddy Ranch, along the ridge south of Deer Valley. Thus, Sycamore concluded that this species has a low potential to inhabit the proposed golf course site, and recommended that no further survey work be conducted. Sycamore Associates, Special-Status Amphibian and Reptile Habitat Assessment at the proposed Roddy Ranch Golf Course (June 19, 1998). Based on this information, the County finds that the proposed project will not have a significant impact on this species.

Western Pond Turtle

The Western pond turtle is not listed as threatened or endangered under either the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). The California Department of Fish and Game considers it to be a Species of Special Concern. As reported by the applicant's biological consultant, it ranges from western Washington to northern Baja California, mostly west of the Sierra Nevada-Cascade crest. It primarily inhabits permanent water sources including ponds, rivers and streams. The species can move overland in response to fluctuating water level. In addition, it can over-winter (not true hibernation, but a period of low activity) on land or in water. Eggs are laid in shallow nests in open, grassy areas near water bodies. There are no existing permanent water sources on the proposed golf course site, and no Western pond turtles were observed during the aquatic sampling of ponds elsewhere on the Roddy Ranch. Given the lack of aquatic habitat on the proposed golf course site and distance between permanent water sources and the proposed project, Sycamore concluded that this species has a low potential to inhabit the proposed golf course site. No further survey work was recommended. Sycamore Associates, Special-Status Amphibian and Reptile Habitat Assessment at the proposed Roddy Ranch Golf Course (June 19, 1998). Based on this information, the County concludes that the proposed project will not have a significant impact on this species.

Avian Species

As reported by the applicant's biological consultant, for a number of bird species present in the general vicinity of the proposed project, the project site does not contain suitable nesting habitat. These bird species are Cooper's hawk, merlin, ferruginous hawk, short-eared owl, tricolored blackbirds, long-billed curlew, and mountain plover. Six special-status birds were considered to have potential for nesting within or adjacent to the proposed golf course site and surveys for nests were recommended: northern harrier, white-tailed kite, golden eagle, burrowing owl, California horned lark, and loggerhead shrike. Sycamore Associates Biological Resources of the Proposed Golf Course at the Roddy Ranch, dated June 12, 1998. During surveys conducted in June 1998, no special-status bird species were detected nesting in the trees or on the ground on the project

site or within a 200-foot zone surrounding the project site. In addition, no suitable burrows for Burrowing owls were present on the project site, or within the same 200-foot zone. See Letter Report from H. T. Harvey dated June 19, 1998. Based on this information, the County concludes that the proposed project will not have a significant impact on these species.

San Joaquin Kit Fox

The San Joaquin kit fox (SJKF) is listed as a threatened species under the California Endangered Species Act and as an endangered species under the federal Endangered Species Act.

As reported by the applicant's biological consultants, the SJKF was once widely distributed throughout the San Joaquin Valley and adjacent foothills. The first documentation that SJKF were present in Contra Costa County was not published until the early 1970s. Further investigation subsequently confirmed the presence of SJKF in the foothills and valleys of the Interior Coast Range from Los Banos north to the Byron region. They have been observed as far north as Black Diamond Mines Regional Park. SJKF are known to occur in grasslands in the northern part of their range. Habitat components important for SJKF survival include available refugia habitat (i.e., den sites) and prey. SJKF in the northern portion of their range depend largely on dens that have been dug by other species, notably California ground squirrel and American badger. SJKF in the north feed primarily on California ground squirrels, as well as other small mammals (including voles, rabbits, hares, etc.), birds and insects. Thus, moderate to high quality SJKF habitat in this region supports a relatively abundant ground squirrel population with an overall relatively abundant prey base. Resident or breeding populations of SJKF are not expected to inhabit a site that is lacking either a sufficient prey base or refugia habitat. Coyote is a primary predator of SJKF. Sycamore Associates, *Biological Resources of the Proposed Golf Course at the Roddy Ranch* (June 12, 1998); H.T. Harvey and Associates, *San Joaquin Kit Fox, Preliminary Report, Roddy Ranch* (July 1998).

Consistent with the voluntary survey protocol for SJKF developed by the U.S. Fish and Wildlife Service (April 1997), the consultant performed an early evaluation of the suitability of the project site to support SJKF. First, the consultant reviewed all known sightings of the SJKF within a 10-mile radius of the project site. A total of 20 sightings have occurred within this 10-mile radius since 1972. Fifteen of those sightings occurred nearly six miles east of the project site, in the Altamont Hills between Byron Hot Springs and Old Vasco Road. Two sightings from Round Valley (1988 and 1992) are approximately 5.2 miles from the project site, and one sighting on Marsh Creek Road is 3.8 miles southwest of the project site. The closest sightings are three (1992 - 1997) in Black Diamond Mines Regional Park, 2.4 miles northwest of the project site.

Second, the consultant performed a detailed site evaluation of the 230-acre golf course site and a 250-foot buffer surrounding the project site. Walking transects 15-30 m apart were conducted in

June 1998, to determine the location and distribution of any potential dens. Burrows were measured, and then mapped if they measured four inches by four inches or greater in diameter. Burrow size, shape, orientation, location, sign (tracks and scat), and mound were described in field notes. Evidence of potential prey populations were also noted. This field work yielded the following results. One potential den was located on the project site. This den appeared unused as no animal sign was present and no digging was apparent. A camera station was set up on June 16, 1998, and operated for ten consecutive nights. No animals were detected during this operation. Little or no rodent activity or potential prey was observed on-site. Ground squirrels and their burrows were absent from the site. One black-tailed hare was observed in the southeast corner of the site. Also, coyote-sized scat and one coyote were detected on-site. Coyotes are not only a potential competitor of the SJKF, but they are also known to prey on SJKF. Based on this work, the applicant's consultant concluded that the project site has low potential to support resident SJKF due to the lack of potential dens and ground squirrel colonies. The probability of SJKF denning on-site is low to non-existent. Kit fox could possibly use the site for limited foraging. The site is situated in an area of grasslands between two areas where SJKF have been detected (Black Diamond Mines Regional Park and sites to the south and southeast of the project site). Thus, there is the potential that the project site could provide a movement corridor. However, additional on-site surveys would probably do little to assess the value of the site for any potential inter-population movements across the site.

To ensure that any potential impact to the SJKF is minimized, the following mitigation measures have been identified. Based on the site-specific field work, these mitigation measures, and the fact that the golf course would not prohibit SJKF movement across the site nor would it otherwise constitute a significant reduction in potential inter-population movement areas given the size of the project in relation to the many thousands of acres of grassland which surround it, the County finds that the project will not reduce the number or restrict the range of the SJKF, and will not otherwise result in a significant impact to the SJKF.

Mitigations

5s. Preconstruction surveys shall be conducted no less than 14 days and no more than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity likely to impact the San Joaquin kit fox.

5t. An employee education program shall be conducted for any project that has expected impacts to kit fox or other endangered species (in this case, burrowing owls, red legged frogs, and badgers).

5u. Project related vehicles shall observe a 20-mph speed limit in all project areas, except on County roads and State and Federal highways. Night time construction is prohibited. Off-road traffic outside of designated project areas shall be prohibited.

5v. To prevent inadvertent entrapment of kit foxes or other animals during the construction phase of the project, all excavated, steep-walled holes or trenches more than two-feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals.

5w. All construction pipes, culverts, or similar structures with a diameter of four-inches or greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in anyway. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity.

5x. All food related trash items, such as wrappers, cans, bottles, and scraps shall be disposed of in a closed container and removed at least once a week from a construction or project site.

5z. No firearms shall be allowed on the project site.

5aa. To prevent harassment, mortality of kit foxes, or destruction of dens by dogs or cats, no pets shall be permitted on project sites.

5bb. Use of rodenticides and herbicides in project areas shall be restricted.

5cc. If SJKF are observed on-site, grading in the area of occurrence shall be halted and the County notified. CDFG and USFWS shall be consulted.

Berkeley Kangaroo Rat

The Berkeley kangaroo rat is not listed as threatened or endangered under either the ESA or CESA. The U.S. Fish and Wildlife Service considers it to be a Special Concern species. As reported by the applicant's consultant, this species inhabits grassland, coastal scrub and blue oak/digger pine woodlands. It historically inhabited the Berkeley Hills, Livermore Valley, and Mount Diablo regions. A survey of the proposed golf course site by the applicant's biological

consultant in June 1998, determined that no habitat suitable for the Berkeley kangaroo rat exists on site due to the predominance of clay soils and tall grasses; kangaroo rats typically burrow in more friable or sandy soils. Also, no indications of kangaroo rat presence were observed. H.T. Harvey & Associates, Letter Report to Sycamore Associates (June 22, 1998). Based on this information, the County concludes that the proposed project will not have a significant impact on this species.

Bat Species

The project site is within the known range of the following bat species, none of which are listed as threatened or endangered under the California Endangered Species Act or the federal Endangered Species Act, but which the California Department of Fish and Game considers to be a Species of Special Concern ("SSC"), or which it has proposed to be considered as a Species of Special Concern ("PSSC"), or which the U.S. Fish and Wildlife Service considers to be a Special Concern species ("SC"). These species, and their designations by the two wildlife agencies, are as follows: Western mastiff bat (SSC, SC), Pallid bat (SSC), Townsend's big-eared bat (SSC, SC), Western red bat (PSSC), Small-footed myotis (SC), Long-eared myotis (SC), Fringed myotis (SC), Long-legged myotis (SC), and Yuma myotis (SC). The project site is also within the known range of the following additional bat species: Mexican free-tailed bat, Big brown bat, Hoary bat, California myotis, and Western pipistrelle.

The applicant's biological consultant visited the project site and surrounding areas on three days in June 1998. Both the project site and selected areas immediately adjacent thereto were evaluated for potential bat roost sites (e.g., rock crevices, caves, hollows, and rafter joints and enclosed attics in buildings) and foraging areas (e.g., water sources, concentrations of trees, and grasslands). Acoustic surveys were also used to detect the ultrasonic foraging calls of bats. Mist nets were also employed at a stock pond to capture flying bats in foraging areas.

The results of this field work are as follows. First, potential roosting areas consist of sandstone outcrops, mature trees, and buildings. The sandstone outcrops were deemed unsuitable as they were too vulnerable to predators. Blue oak and eucalyptus trees on-site contain possible roosting habitat. Several buildings contain roosting habitat and evidence (guano) of bat use. Second, the stock pond near the intersection of Deer Valley and Empire Mine Roads offers the best foraging habitat. Other potential foraging areas include tree clusters. Third, California myotis, Mexican free-tailed bat, and Western red bat were observed.

No special status bats were detected on the site. One bat species, which has been proposed for special status (Western red bat), was detected at a pond located outside of the project site. Since no trees or buildings will be removed as part of the golf course project, roosting habitat will not be affected. Ponds which serve as actual and potential foraging areas will not be affected by the project. Based on the site-specific survey work, and the fact that no trees or buildings will be removed by the project and water quality in off-site ponds will not be affected, the County finds that the project will not have a significant impact on these bat species.

Invertebrates

Three invertebrate species considered by the U.S. Fish and Wildlife Service to be Special Concern species are known to occur in the region. They are (1) curved foot Hygrotus diving beetle, (2) Molestan blister beetle, and (3) Helminthoglypta mickliniana bridgesi. The applicant's biological consultant surveyed the project site for these three species and concluded that there is no suitable habitat for these three invertebrates on the project site. H.T. Harvey & Associates, Letter Report to Sycamore Associates (June 22, 1998). Based on this information, the County finds that the proposed project will not have a significant impact on these species.

8. LAND USE AND PLANNING

Discussion of Evaluation

The Roddy Ranch operates cattle grazing in and around the home, located off Chadbourne Road in Deer Valley. The 18-hole golf course proposed along the south side of Horse Valley has been designed to have minimal impact to the working cattle ranch.

Per Contra Costa County's General Plan and A-20 zoning permit, a recreational facility, such as a golf course, may be allowed by issuance of a Land Use Permit in Agricultural Lands (AL) designated areas. This golf course provides growth and maintenance of the County's quality of life by providing needed recreational opportunities.

The project includes a request to rezone the property from A-4 (Agricultural Preserve District) to A-20 (General Agriculture). The A-4 designation reflects the previous Williamson Act on the property, which expired in 1992. Properties surrounding the ranch which are also not under the Williamson Act Contract have been similarly rezoned by the County upon contract expiration. The proposed Rezoning and the 18-hole golf course development are both consistent with the existing land uses and pattern of development in the area. See Exhibit 3.

9. NATURAL RESOURCES

Discussion of Evaluation

The Roddy Ranch site lies within the East Contra Costa Irrigation District (ECCID) historic service area. On July 14, 1998, the Board of Directors for ECCID authorized the initiation of annexation proceedings to bring the golf course parcel into their current Water Service Area Boundary. ECCID operates under a State Water Permit and is supplied water from the California Water Project, whose source of supply is the Sacramento Delta River System. ECCID also operates and utilizes wells to supplement the supply. ECCID has indicated in a commitment letter, dated April 30, 1998, that it has available non-potable water supply to serve the Roddy Ranch Golf Course under its current State permit allocation.

The annual 600-800 acre-feet of water required to serve the golf course is proposed to be delivered via a new lateral along Fairview Avenue and Balfour Road, from ECCID's main canal located off of Fairview Avenue. An existing, unused, non-potable waterline may be utilized as part of the proposed extension. See Exhibit 6.

The Contra Costa County General Plan encourages the use of non-potable water for landscape areas as a supplement to existing water supplies. In addition, the County General Plan goals direct the identification and assistance in development of opportunities for expanded uses of non-potable water resources.

The golf course project will result in an increase in the beneficial use of this natural resource as directed by the General Plan. The County finds that the availability and use of non-potable water from ECCID makes this impact less than significant.

10. RISK OF UPSET

Discussion of Evaluation

Operation of the golf course may involve the daily or periodic use and storage of solvents, fuels, herbicides, insecticides, fungicides, and other associated chemicals. The presence of these types of chemicals requires regulation and review by the County's Health Services Department, Hazardous Materials Section. A hazardous materials questionnaire has been submitted to the Hazardous Materials Section. In a letter dated May 7, 1998, the Hazardous Materials Section has responded that a Business Plan and Hazardous Waste Plan are required to be submitted within 30 days after opening for business.

The County finds that, through the implementation of the Golf Course Operation Guidelines for the Roddy Ranch and requirements of the Hazardous Materials Section of the County Health Services Department, the impacts related to risk of exposure will be brought to a level considered less than significant.

13. TRANSPORTATION/CIRCULATION

Vehicular Movement and Safety

The development of the golf course will add approximately 650 average daily trips, including 42 A.M. peak hour trips and 60 P.M. peak hour trips to the area. The project would not generate 100 or more peak hour trips, and is, therefore, below the threshold that would require a Measure "C" traffic impact study for the Contra Costa Transportation Authority (CCTA). When the project traffic is added to the existing background traffic, all roadway capacity conditions remain

at Level of Service "A".

The project is subject to a traffic impact mitigation fee imposed by the County. These funds are used for regional transportation projects in eastern Contra Costa County.

The County will require safety improvements at the intersection of Deer Valley Road and the new entrance drive, per the Traffic Study dated June 1998. The safety improvements will include signs, striping, and minor roadway widening to allow for safe entry to and exit from Deer Valley Road. Widening of Deer Valley Road to allow for left-turn channelization on into the project is not proposed due to the low number of peak hour trips projected. The exit from the project onto Deer Valley Road would operate with little or no delay with stop sign control.

Parking Facilities

The project will require 120 parking spaces on days of peak demand at the course. All of these spaces will be provided on-site. This project will not cause any alterations to present patterns of circulation or movements of people and/or goods, to waterborne, rail, or air traffic, or increase in traffic hazards to motor vehicles, bicycles, or pedestrians.

Discussion of Evaluation

The development of the proposed project will result in a minor increase to traffic volumes and frequencies of trips within the general area. The traffic generated by implementation of the proposed project would be attributed to golfers, maintenance/golf course employees, commercial trucking for deliveries, and trash collection. Implementation of the proposed project would not alter or prevent emergency access into the project area. It is anticipated that during construction activities, all roads would remain open and accessible for emergency vehicles.

Based on the Traffic Report by Abrams and Associates, dated June 1998, the County finds that the project's impact to traffic circulation and safety is insignificant.

14. PUBLIC SERVICES

Fire Protection

The East Diablo Fire Protection District (EDFPD) provides fire protection, emergency medical, and hazardous materials response service. Station 52 is located 5.6 miles away at 3981 Walnut Boulevard in Brentwood. and is responsible for providing initial fire response to the project site. Another station, Station 54, is located three blocks away from Station 52. The fire response time to the project from Station 52 is currently 11 minutes, according to Richard Ryan of the Contra Costa Fire Protection District, and is considered adequate in this non-urban area to serve the golf course needs.

The Contra Costa County Fire Protection District (CCCFPD) reviews land use plans for compliance with fire protection guidelines for all buildings and development in Contra Costa County. The District requires buffers or other design modifications to minimize exposure of development to wild land fire danger. The CCCFPD will require building and/or on-site fire hydrants, as needed. Water storage facilities (tank or pond) will be required to provide required fire flows. The County finds that the project's impact to fire protection is considered insignificant.

Police Protection

The golf course would receive law enforcement service from the Contra Costa County Sheriff's Department (CCCSD) for non-traffic related offences. The project site is within the service area of CCCSD's Delta substation, and is considered adequately staffed to provide for the golf course law enforcement needs. Golf courses are exempt from the requirement to annex to the P-6 police service district. Instead the project will be required to pay an impact fee. This County wide police service district provides funding for non-traffic related law enforcement service only. This project's impact to police protection is considered insignificant.

The California Highway Patrol (CHP) provides law enforcement for traffic related offences in the unincorporated areas of the county. Staffing levels in the area restrict patrol activities on unincorporated County roadways. The CHP is currently limited to responding to traffic accidents and enforcing repeat violations of traffic laws reported by local residents. The County finds that the project's impact to police protection is considered insignificant.

Schools

The Roddy Ranch is in the Liberty Union High School District and the Brentwood Elementary School District. A golf course does not affect or increase attendance levels, school facilities, or other child care needs in the County. The County finds that the project's impact to schools is considered insignificant.

Parks or Other Recreational Facilities

According the Market and Financial Analysis of the Roddy Ranch Golf Course, prepared by Economic Research Associates (April 1998), the San Francisco Bay Area is one of the worst supplied regions in the country for public golf. The golf course will complement both the desires of the County General Plan to provide additional recreational opportunities to its residents, and the market need for a public course located in this area of the County. (Based on a market supply ratio for the primary market area which is a 25-minute drive). The County finds that the project's impact to parks is considered insignificant.

Maintenance of Public Facilities

The County finds that the proposed project effect on the maintenance of public facilities is considered insignificant because the golf course does not exceed any level of service or require additional or alteration to governmental services currently provided, except for non-potable water infrastructure. Further discussion of this item, as well as electricity, natural gas, communications, solid waste, potable water, sewer, and storm drainage can be found in Utilities, Section 16.

16. UTILITIES

Power, and Communications Systems

Pacific Gas and Electric (PG&E), and Pacific Bell have existing facilities with adequate capacity near the site along Deer Valley Road and Empire Mine Road. Both companies are capable of providing service to the golf course and have provided "will serve" letters dated April 21, 1998 (PG&E) and April 23, 1998 (PacBell). The County finds that this project's impact to power and communication systems is insignificant.

Local or Regional Water Treatment and Distribution

Groundwater will be the source of domestic water for the golf course ancillary facilities. The water system will consist of a privately built well on a concrete slab with its associated pump, storage tank, and piping. A sustainable quantity of groundwater was originally found by the Hydrogeological Evaluation, prepared by Harding Lawson Associates (November 1984), and therefore, this impact is considered insignificant. Bottled water will also be available for drinking and no need is identified for further municipal water service or extensions.

Irrigation water will be provided by the East Contra Costa Irrigation District (ECCID) via a proposed lateral on Fairview Avenue and Balfour Road, from the main canal. See Exhibit 6. The golf course is within the area of water rights for ECCID and is proposed to be annexed into the Irrigation District. ECCID has indicated an available supply of untreated water to meet the irrigation needs of the golf course project. In addition to construction of the lateral extension to the golf course site, a pump station will be installed at the ECCID canal. The County finds that the impact of the non-potable waterline on cultural and biologic resources is considered less than significant.

Sanitary Sewer

On-site septic systems will be used for wastewater disposal. Design, construction, and maintenance of the system will be in accordance with the Contra Costa County Health Services. The County finds no significant impact to sanitary sewer systems.

Storm Drain

The golf course project is within the Contra Costa Flood Control and Water Conservation District (CCCFC&WCD) Drainage Areas 104 and 105. Both drainage areas are within the Marsh Creek Drainage Basin.

The CCCFC&WCD considers golf courses to be open space for the purpose of calculating drainage impacts and does not collect drainage fees because the increase in runoff is considered insignificant. The golf course project will not be subject to fee collection requirements or downstream drainage improvements. The County finds that the golf course's impact on storm water drainage is considered insignificant. See discussion under Section 3.

Solid Waste Disposal

Contra Costa County (CCC) would be responsible for providing landfill space. CCC contracts with several private hauling companies to provide solid waste collection services to the developed portions of the County.

The project's landfill needs will be served by the CCC Keller Canyon landfill located in Pittsburg. At this time, the facility estimates it has capacity for the next 60-70 years. The project proposes to incorporate on-site composting for much of its golf course waste. This on-site program will complement the County's efforts towards the same by diverting yard wastes from landfills and composting to create fertilizers. The County finds that the project's impact on solid waste disposal systems is considered insignificant.

17. HUMAN HEALTH

Discussion of Evaluation

Operation of the golf course may involve the daily or periodic use of herbicides, insecticides, fungicides, fertilizers, and raw water. Posting of signs will deter users from direct contact with the water features. The storage and use of these chemicals creates a risk of exposure, but does not specifically create a health hazard. Further discussion of this item can be found in Risk of Upset, Section 10.

18. AESTHETICS

Discussion of Evaluation

The easterly edge of Roddy Ranch runs along Deer Valley Road, which has been designated as a

County rural recreational route. Both Deer Valley Road and Empire Mine Road are considered Scenic Routes by the County General Plan. The proposed golf course will be consistent in enhancing the scenic corridor by providing a major recreational amenity.

The golf course is approximately 230 acres. Of this area, approximately 124 acres is dedicated to the maintained golf playing area which is identified as three acres of putting greens, three acres of tees, and approximately 40 acres of fairway. Primary and secondary roughs will comprise approximately 78 acres. The remainder of the golf course, approximately 105 acres, will be left undisturbed or revegetated with natural grasses requiring little or no maintenance.

In order to maintain the scenic potential of the site, the project incorporates design features that maximize the use of the natural terrain and minimizes the earthwork required to create the golf course. The County's review of the grading plans confirms that grading is limited on the steeper portions of the site and landscaping will be designed to blend the project into the existing landscape. A coordinated landscape theme for the golf course and project entryway will be incorporated.

The proposed golf course will be consistent in maintaining the scenic corridor by including design features for this recreational amenity. The County finds that, based on construction and design considerations, the project's impact on aesthetics is considered insignificant.

20. CULTURAL RESOURCES

Discussion of Evaluation

The Cultural Resources Assessment Report for the Roddy Ranch Golf Course Project, prepared by William Self Associates (April 1998), was prepared to identify resources listed on or eligible for listing on either the National Register of Historic Places (36 FR 800) or the California Register of Historic Resources, and in compliance with applicable provisions of the California Environmental Quality Act Guidelines, Appendix K.

The record search conducted at the Northwest Information Center at Sonoma State University indicated that some of the Roddy Ranch lands adjoining the project area had been surveyed in 1984, resulting in recording of two historic archaeological sites (CA-CCO-496H and CCO-497H). Neither of the two sites, nor any of the previous survey was contained within the proposed golf course or access road areas.

The archaeological surveys of the Roddy Ranch, conducted as part of the golf course project, resulted in the relocation and reevaluation of the two previously recorded historic sites, and the discovery and recording of three new historic archaeological properties. All three sites are located outside the area of direct impact.

Site CA-CCO-496H is within 200 feet of the access driveway and proposed waterline. Artifacts from this site could extend into this area warranting observation during construction. Based on the Cultural Resources Assessment Report and the mitigation below, the County finds that the projects impact to Cultural Resources will be insignificant.

Mitigations

20a. All grading and trenching within 500 feet of Site CA-CCO-496H shall be monitored by a qualified archaeologist, or until such time during grading and trenching that the archaeologist determines that monitoring is no longer necessary.

APPENDIX A

East Contra Costa County Habitat Conservation Plan / Natural Community Conservation Plan Mitigation Monitoring & Reporting Plan

APPENDIX B

1998 Roddy Ranch Golf Course Mitigation

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