

STAFF REPORT TO THE ANTIOCH PLANNING COMMISSION

DATE: Regular Meeting of August 20, 2025

SUBMITTED BY: Kevin Valente, Contract Planner,

Raney Planning and Management, Inc.

APPROVED BY: Zoe Merideth, Planning Manager

SUBJECT: Wildflower Station Townhomes 2 Multifamily Residential Project

(TM-02 and AR-23-05)

REQUESTS

The project applicant, Kathryn Watt, with DeNova Homes Inc, is seeking approval of a Vesting Tentative Subdivision Map and Design Review for the Wildflower Townhomes Project (proposed project). Necessary entitlements from the City of Antioch include the following:

- 1. Vesting Tentative Subdivision Map. The proposed project requires approval of a Vesting Tentative Subdivision Map for condominium purposes that would subdivide the project site for the development of 19 townhome buildings totaling 159 residential units.
- 2. *Design Review*. The proposed project requires Design Review approval of the project's architecture, design, and landscaping.

STAFF RECOMMENDATION

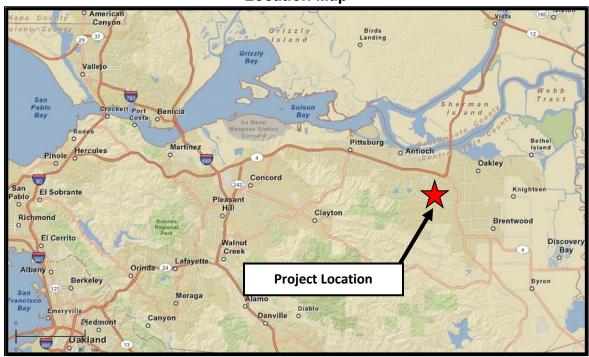
Staff recommends that the Planning Commission:

Adopt the resolution recommending City Council approval of a Vesting Tentative Subdivision Map and Design Review for the development of the Wildflower Station Townhomes 2 Multifamily Residential Project.

SITE LOCATION

The proposed 10.35-acre vacant project site, identified by Assessor's Parcel Numbers (APNs) 052-140-013, -014, -015, and -016, is located east of Hillcrest Avenue and west of Wildflower Station Place. Surrounding existing uses include commercial uses to the north; townhomes to the east across the Wildflower Station Place roadway; commercial uses within a shopping center to the south, beyond Hillcrest Avenue; and single-family residences to the west, across Hillcrest Avenue. The project site is designated High Density Residential (HDR) in the Antioch general Plan and the site is zoned High Density Residential District (R-25).

Location Map







Background

The project site was part of the larger 23-acre Wildflower Station project that includes single family homes, condominiums, and planned commercial development that was entitled in 2018. The single-family homes and townhomes were constructed, but the commercial parcels along Hillcrest Avenue (the current project site) were not constructed and the land sat undeveloped.

As part of the City's Sixth Cycle Housing Element Update (2023-2031) process, the City identified the proposed 10.35-acre project site for future multi-family housing, and therefore, amended the General Plan land use designation for the site from Mixed Use to HDR and rezoned the project site from Planned Development (P-D) to R-25 in January 2023.

In February 2023, the City of Antioch certified the Antioch Housing, Environmental Hazards, and Environmental Justice Elements Project Draft Environmental Impact Report (SCH No. 2021110146), hereafter referred to as the "Housing Element EIR."

The applicant submitted a Preliminary Application under SB 330 (The Housing Crisis Act of 2019). Through the Preliminary Application process put in place under SB 330, housing developments may only be subject to the ordinances and objective standards in effect at the time when a completed Preliminary Application is submitted. The Preliminary Application requires information regarding site characteristics, planned project, certain environmental concerns, the locations of recorded public easements, facts related to any potential density bonuses, certain coastal zone concerns, and the number of units to be demolished. The developer has 180 days from the submittal of the preliminary application to submit the full development application. The applicant submitted a complete Preliminary Application on April 25, 2023 as well.

At the July 16, 2025 Planning Commission meeting, staff requested that the project be continued to regular meeting of August 20, 2025. The Planning Commission opened the public hearing and one member of the public spoke on behalf of the Wildflower Station Place Homeowners Association (HOA) about the security concerns at the existing Wildflower Station Place condominium project, appreciation for DeNova for incorporating resident feedback into the proposal, and the HOA's acceptance of the offer to contribute their fair share towards maintenance of fencing and gates. The Planning Commission then voted 6-0, with one member absent, to continue the item to the August 20, 2025 meeting. The meeting minutes are included as Attachment F.

ANALYSIS

The proposed project includes the development of 19 townhome buildings totaling 159 residential units on a 10.35-acre property. The proposed project would include a total of 2.8 acres of landscaping and open space, consisting of two open play areas and open space for bioretention. Each residential unit would include either a single-care or two-car

garage, and the two centrally located play areas would include 25 additional vehicle parking spaces with another 57 surplus shared parking spaces with the adjacent Wildflower Station development. The 159 residential units would consist of a mix of two-and three-bedrooms units, ranging in size from 1,135 to 1,381 square feet.

Consistency with the General Plan, Specific Plan, and Zoning

As described above, as part of the City's Sixth Cycle Housing Element Update, the 10.35-acre project site was designated HDR and rezoned from P-D to R-25 and identified for future multi-family housing. Consistent with the proposed project, the City's HDR land use designation is intended for multi-family dwellings.

The R-25 High Density Residential zoning district allows for multiple-family development at a minimum of 20 dwelling units per acre (du/ac) and a maximum of 25 du/ac. Consistent with the R-25 district, the proposed project has a proposed net density of 20.05 du/ac. In addition, the proposed project includes proposed building heights that range from 37 feet to 41 feet, consistent with the maximum building height of 45 feet for the R-25 district regulations. The proposed building setbacks, as well as the open space and parking requirements for the project, are also consistent with the R-25 development standards.

Vesting Tentative Subdivision Map

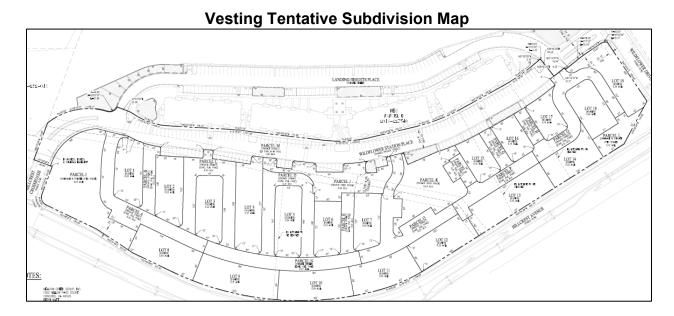
The proposed Vesting Tentative Subdivision Map would subdivide the project site for the development of 19 townhome buildings, the associated internal roadway network, and landscaping. The proposed map is for condominium purposes and would allow for the sale of each residential unit. Each townhome building would contain between eight (8) and ten (10) units, for a total of 159 residential units. Additionally, 17 separate parcels are proposed for the internal roadway network (Parcels A-K and M-Q), as well as common areas (Parcels J-L). Parcel I would be located along the northern project site boundary and contain a bioretention area.

Primary access to the project site would be provided by three driveways from Wildflower Station Place. Automatic gates are proposed as an option at the entrances, pending approval from the current homeowners on Wildflower Station Place, and their homeowner's association (HOA). All internal roadways would be privately owned and maintained by the HOA. Pedestrian access consisting of stairs and an accessible ramp would be provided along Hillcrest Avenue between buildings 10 and 11.

Existing utilities located in Hillcrest Avenue, Wildflower Station Place, and Wildflower Drive are adequately sized to serve the proposed development. As required by the City, all in-tract utilities (domestic water, water for fire service, sanitary sewer, storm drain, and bio-retention facilities) would be privately owned and maintained by the HOA. Eight-inch water lines would extend into the project site from Wildflower Station Place and from Hillcrest Avenue. Eight-inch sanitary sewer lines would also extend from the same connections to the existing utility lines in the Wildflower Station Place and Hillcrest Avenue roadways. In addition, eight-inch stormwater connections would be extended into

the project site from the surrounding roadways and would lead to the bio-retention facilities located at the northern area of the project site.

It should be noted that proposed street names also require Planning Commission approval. The proposed street names have been reviewed by Engineering staff and the Antioch Police Department. The proposed street names are included as a recommended condition of approval in Attachment A.



Design Review

Pursuant to the Antioch Municipal Code Section 9-5.2607(A)(1), proposed development of any new building or construction in the R-25 zoning district is subject to Design Review. The City of Antioch adopted citywide Multi-family Residential Objective Design Standards relating to all aspects of multi-family residential and mixed-use development on sites zoned for multi-family housing in the City of Antioch. The Multi-family Residential Objective Design Standards (ODS) are used to review projects including their building siting, architectural style, parking, and landscaping.

Each proposed townhome building would be three stories (approximately 37 to 41 feet tall), as measured to the roof ridge, consisting of either "Row Townhomes" units (63 units) or "Back to Back" (B2B) units (96 units). The eight Row Townhome buildings would be located along Hillcrest Avenue with units within each building designed in a side-by-side layout. The eleven B2B buildings would be sited generally in the central portion of the project site along Wildflower Station Place, with units within each building designed in a side-by-side and back-to-back layout. Both unit styles would include living areas primarily on the second and third levels. All units would have at least one 78-square-foot private deck, a storage area of at least 250 cubic feet, and an attached garage.





The Row Townhome buildings include entryways with covered porches at the front elevations and garages at the rear elevations. The B2B buildings include entryways with covered porches and garages at both the front and rear elevations. Each building would have eight (8) and ten (10) units. Five Row Townhome floorplan types would be offered with two-bedrooms and either a single-car garage or a two-car garage, ranging in size from 1,135 to 1,238 square feet. Two B2B floorplan types would be offered with two- and three-bedrooms and a two-car garage, ranging in size from 1,293 to 1,381 square feet.

The architectural style of the proposed residential buildings would be contemporary in design and would make use of stucco and siding finishes in several different colors on each building. The front façades of all buildings would be articulated to emphasize front entries and decks, while the sides and rears would include varying vertical and horizontal planes, and different finishes to provide articulation. The proposed residential buildings

complies with the articulation and planning requirements found in the ODS, including in section 2.2.1 Building Massing and Articulation.

The proposed project provides centrally located common open space areas with amenities consisting of seating, picnic tables, a large shade structure, a play area for children, and a multi-purpose turf area. Such amenities would serve as recreation areas for future residents, while making use of the otherwise unbuildable areas within the Contra Costa County Flood Control and Water Conservation District pipelines easement. Mailboxes and areas for bicycle parking would be located to the west of the common open space. The ODS 2.1.7.A requires a minimum of 200 square feet of usable open space per unit, with 50% of this provided as common open space and the remaining 50% provided as either private or common open space. The project exceeds these requirements by providing 385 square feet per unit, through a mix of private and common open space. The ODS requires a play area be provided because the project is more than 15 units of at least one bedroom. The applicant is meeting this requirement.

Street trees in the parkway strips would be located along all streets in addition to shrubs for privacy. The planting palette includes flowering trees such as the western redbud and the crape myrtle. Shrubs include dwarf bottlebrush, fortnight lily, New Zealand flax, and sage. Including the bioretention area in the northern portion of the site, the open space areas total approximately 32 percent of the project site, exceeding the City's 25 percent landscaping requirement.

On October 24, 2024 the Parks and Recreation Commission reviewed the park in-lieu fee payment as required by Antioch Municipal Code Section Title 9, Chapter 4, Article 10: Regulations for the Dedication of Land, the Payment of Fees, or Both, for Park and Recreation Lands, which requires either a dedication of land or payment of an in lieu fee for park and recreation lands. The ordinance requires the payment of in lieu fees based on the type and number of housing units in a project. The Parks and Recreation Commission recommended a payment of \$151,050, consistent with the ordinance. This fee has been added as a recommended condition of approval. The meeting minutes are included as Attachment B.

Public Comments

The project application was routed to City Departments and outside agencies for review. Comment letters have been provided by City Engineering staff and the Contra Costa County Fire Protection District. These comments were incorporated into the proposed project where applicable or have been included as draft conditions of approval, which would be implemented as part of the improvement plan prior to building permit approval. The comment letters received from outside agencies are included as Attachment C. Staff also received a number of comment letters from residents in the Wildflower Station condominiums requesting this project provide gated access. These comments are included as Attachment D. As discussed above, the project plans show this as a possibility, but ultimately the HOAs will need to approve this.

Traffic Impact Analysis

In compliance with the Antioch General Plan and the Contra Costa County Transportation Authority and TRANSPLAN, a Transportation Impact Analysis (TIA) was prepared for the project. The TIA is available here: https://www.antiochca.gov/fc/community-development/planning/23-12-05-Wildflower-Townhomes-2-Project-TIA.pdf

The goal of the City of Antioch and TRANSPLAN is to maintain Level of Service (LOS) of D or better at all intersections on Routes of Regional Significance in the project study area. The East County Action Plan establishes LOS D as the standard for Hillcrest Avenue and Deer Valley Road, which are identified as Routes of Regional Significance. Level of Service is a scale describes traffic flow with six ratings ranging from A to F, with "A" indicating relatively free flow of traffic and "F" indicating stop-and-go traffic characterized by traffic jams. The TIA found that all project study intersections would continue to operate at acceptable parameters and there would be no significant traffic or transportation impacts, and no off-site transportation improvements required.

ENVIRONMENTAL REVIEW

As described above, the project site was included in the City's Sixth Cycle Housing Element Update (2023-2031) and identified for future multi-family development. In February of 2023, the City of Antioch adopted the Housing Element EIR (SCH No. 2021110146), which analyzed adoption and implementation of the City's Sixth Cycle Housing Element Update (2023-2031), including the adoption and implementation of rezoning and General Plan amendments to accommodate the City's Regional Housing Needs Allocation (RHNA). Therefore, the proposed project has been adequately analyzed in the previous environmental review under the California Environmental Quality Act (CEQA) and further evaluation is not required. Per CEQA Guidelines Section 15183, a project that is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except when it is necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

Therefore, a Section 15183 Consistency Memorandum was completed for the proposed project to demonstrate that the project has been adequately analyzed in the previous environmental review under CEQA and that further evaluation is not required. Per the CEQA Guidelines, a project that is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except when it is necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

The Wildflower Townhomes 15183 Consistency Memorandum indicates whether the proposed project would result in a significant impact that: (1) is peculiar to the project or the project site; (2) was not identified as a significant effect in the Housing Element EIR; or (3) are previously identified significant effects, which as a result of substantial new

information that was not known at the time that the Housing Element EIR was certified, are determined to have a more severe adverse impact than discussed in the Housing Element EIR.

The Housing Element EIR anticipated the project site would be developed in accordance with the standards established for the R-25 zoning district, which allows for a density of 20 to 25 du/ac. The proposed project would result in a density of approximately 20 du/ac, and therefore, be consistent with the development anticipated for the project site within the Housing Element EIR. It should be noted that the Housing Element EIR did not identify any significant impacts and associated mitigation measures. Therefore, the Housing Element EIR does not include any additional mitigation measures that would be applicable to the proposed project. Thus, with respect to the foregoing issue areas, the proposed project would result in similar impacts as those identified within the Housing Element EIR. Compliance with applicable federal, State, and local policies, regulations, and standards would ensure impacts related to the aforementioned issue areas would be reduced to a less-than-significant level.

On July 15, 2025, the City of Antioch received one comment letter on the proposed project that included comments regarding the 15183 Consistency Memorandum. The comment letter was received from Adams Broadwell Joseph & Cardozo on behalf of the Contra Costa Residents for Responsible Development. The comments were related to Air Quality and Greenhouse Gas Emissions, Noise, and Vehicle Miles Traveled (VMT). Minor revisions have been made to the 15183 Consistency Memorandum to address the comments received. None of the revisions result in new impacts or change the conclusions in the 15183 Consistency Memorandum. A condition of approval specifically requiring a Noise Mitigation Plan in conformance with General Plan Policy 11.8.2(o) has been added for clarity, even though compliance with this General Plan Policy was already required. Additionally, as described in the response to comments, a condition of approval requiring compliance with the Housing Element EIR Mitigation Measure AIR-3a has also been added. The comment letter and the detailed responses are included as Attachment E.

<u>ATTACHMENTS</u>

A. Resolution recommending City Council approval of a Vesting Tentative Subdivision Map and Design Review to allow for the development of the Wildflower Station Townhomes 2 Multifamily Residential Project.

Exhibit A – Wildflower Townhomes 15183 Consistency Memorandum

Exhibit B – Vesting Tentative Subdivision Map and Proposed Architectural Plans

Exhibit C – Draft Conditions of Approval

- B. Parks and Recreation Meeting Minutes from October 24, 2024
- C. Agency Comments Received
- **D.** Public Comments Received
- **E.** Response to Comments
- F. Draft Planning Commission Meeting Minutes of July 16, 2025

ATTACHMENT "A"

PLANNING COMMISSION RESOLUTION NO. 2025-XX

RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF ANTIOCH FORWARDING A RECOMMENDATION TO THE CITY COUNCIL TO ADOPT THE PROPOSED VESTING TENTATIVE SUBDIVISION MAP (TM-02) AND DESIGN REVIEW (AR-23-05) FOR THE DEVELOPMENT OF THE WILDFLOWER STATION 2 TOWNHOMES MULTIFAMILY RESIDENTIAL PROJECT

- **WHEREAS**, the City of Antioch ("City") received an application from DeNova Homes, Inc. ("Applicant") seeking City approval of a Vesting Tentative Subdivision Map and Design Review for the development of the Wildflower Townhomes Project ("Project"); and
- **WHEREAS,** the Project site is in the northeastern section of the City of Antioch, on the eastern side of Hillcrest Avenue and west of Wildflower Station Place (APNs 052-140-013, -014, -015, and -016); and
- **WHEREAS**, the Project consists of a multi-family project on approximately 10.35 acres consisting of 19 three-story buildings totaling 159 residential units; and
- **WHEREAS,** in February 2023, the City of Antioch adopted the 6th Cycle Housing Element Update (2023-2031), which identified the project site as multi-family development; and
- WHEREAS, the City, as lead agency under the California Environmental Quality Act ("CEQA"), certified the Antioch Housing, Environmental Hazards, and Environmental Justice Elements Project Final Environmental Impact Report (SCH No. 2021110146); and
- **WHEREAS,** the City, as lead agency pursuant to CEQA, has prepared a Section 15183 Consistency Memorandum (attached hereto as Exhibit A) to demonstrate that the proposed project has been adequately analyzed in the previous environmental review under CEQA and that further evaluation is not required; and
- **WHEREAS**, the proposed project requires approval of a Vesting Tentative Subdivision Map (attached hereto as Exhibit B) for condominium purposes and would; and
- **WHEREAS,** the proposed project requires approval of Design Review for the development of the proposed 19 three-story buildings totaling 159 residential units; and
- **WHEREAS**, the Planning Commission duly gave notice of a public hearing as required by law; and
- **WHEREAS**, On July 16, 2025, the Antioch Planning Commission continued the public hearing to a date certain, August 20, 2025; and

PLANNING COMMISSION RESOLUTION NO. 2025-XX

August 20, 2025 Page 2

WHEREAS, on August 20, 2025, the Antioch Planning Commission duly held a public hearing on the matter, received presentation by City staff, and considered evidence, both oral and documentary, and all other pertinent documents regarding the proposed request.

NOW, THEREFORE, BE IT RESOLVED AND DETERMINED, that the Antioch Planning Commission does hereby make the following findings for recommending City Council approval of the Vesting Tentative Subdivision Map, as conditioned:

- 1. That the subdivision, design and improvements are consistent with the General Plan, as required by Section 66473.5 of the Subdivision Map Act and the City's Subdivision Regulations. The site has a General Plan Land Use Designation of High Density Residential (HDR) and is zoned High Density Residential (R-25) and the subdivision will accommodate uses that are consistent with the General Plan on each of the lots created by the subdivision; and,
- 2. That the subdivision proposed by the Vesting Tentative Subdivision Map complies with the rules, regulations, standards and criteria of the City's Subdivision Regulations. The proposed subdivision meets the City's criteria for the map. The City's Planning and Engineering staff have reviewed the Vesting Tentative Subdivision Map and evaluated the effects of the subdivision proposed and have determined that the Vesting Tentative Subdivision Map, as conditioned, complies with and conform to all the applicable rules, regulations, standards, and criteria of the City's Subdivision Regulations.
- 3. The conditions of approval protect the public safety, health and general welfare of the users of the project and surrounding area. In addition, the conditions ensure the project is consistent with City standards.

NOW, THEREFORE, BE IT RESOLVED AND DETERMINED, that the Planning Commission has determined the proposed project is in compliance with the City's adopted Multi-Family Residential Objective Design Standards relating to all aspects of multi-family residential and mixed-use development.

NOW THEREFORE BE IT FURTHER RESOLVED that the Antioch Planning Commission does hereby recommend the Antioch City Council APPROVE the proposed Vesting Tentative Subdivision Map (TM-02) and Design Review (AR-23-05), for the Wildflower Townhomes Project, subject to the conditions of approval attached hereto as Exhibit C.

PLANNING COMMISSION RESOLUTION NO. 2025-XX

August 20, 2025 Page 3

I HEREBY CERTIFY that the foregoing resolution was adopted by the Planning Commission of the City of Antioch at a regular meeting thereof held on the 20th day of August 2025, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

DAVID A. STORER, AICP SECRETARY TO THE PLANNING COMMISSION

CITY OF ANTIOCH COMMUNITY DEVELOPMENT DEPARTMENT



Wildflower Townhomes Section 15183 Consistency Memorandum

March 2024

Prepared by

RANEY
PLANNING & MANAGEMENT, INC.

1501 Sports Drive, Suite A, Sacramento, CA 95834

A. INTRODUCTION AND SUMMARY

The purpose of this Memorandum is to demonstrate that the Wildflower Townhomes Project (proposed project) has been adequately analyzed in the previous environmental review under the California Environmental Quality Act (CEQA) and that further evaluation is not required. As will be demonstrated below, consistent with CEQA Guidelines Section 15183, additional environmental review is not required.

B. PROJECT BACKGROUND

In February 2023, the City of Antioch adopted the Antioch Housing, Environmental Hazards, and Environmental Justice Draft Environmental Impact Report (SCH# 2021110146), hereafter referred to as the "Housing Element EIR." The Housing Element EIR was prepared pursuant to Title 14, Section 15070 of the California Code of Regulations.

The Housing Element EIR analyzed adoption and implementation of the City's 6th Cycle Housing Element Update (2023-2031), including the adoption and implementation of rezoning and General Plan amendments to accommodate the City's Regional Housing Needs Allocation (RHNA). An RHNA obligation represents the total number of housing units that must accommodate the housing needs of all residents during the eight-year planning period. RHNA obligation numbers are determined by a methodology established by the State of California's Department of Finance (DOF) and Housing and Community Development (HCD) Department. RHNA obligation numbers are ascribed to each region of the State and further allocated to local communities by the designated regional planning entity for each region.

The City of Antioch's "fair share" of this RHNA obligation is 3,016 units, as determined by the Association of Bay Area Governments (ABAG). The Housing Element demonstrates that the City has capacity to accommodate 1,559 housing units beyond its RHNA obligation of 3,016 housing units, for a total of 4,575 units. The Housing Element also includes a compilation of sites suitable for residential development, which are comprised of 182 sites totaling 230 acres. Of these 182 sites, 125 (69 percent) are non-vacant and under-utilized, and 57 (31 percent) are vacant. The aforementioned sites are anticipated to accommodate the potential future development of up to 4,575 residential units.

The Housing Element EIR also analyzed the City's updates to the Environmental Hazards Element of its General Plan, as well as the development and adoption of an Environmental Justice Element. The Environmental Hazards Element is meant to implement policies that minimize the negative impacts and risks of natural and man-made hazards such as fires, floods, droughts, earthquakes, landslides, climate change vulnerability, adaptation, and resiliency. Pursuant to Senate Bill (SB) 1000, an Environmental Justice Element is intended to reduce the unique or compounded health risks experienced by disadvantaged communities, to encourage civic engagement in the public decision-making process within disadvantaged populations, and to prioritize improvements and programs that benefit disadvantaged populations. "Disadvantaged communities" are defined as a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. Additionally, "low-income area" is defined as an area with household incomes at or below 80 percent of the statewide median income (\$109,600 for a household of 4) or with household incomes at or below the threshold designated as low income by HCD's list of State-adopted income limits.

C. PROJECT DESCRIPTION

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

Project Location and Setting

The project site is located east of Hillcrest Avenue and west of Wildflower Station Place in the City of Antioch, California (see Figure 1). The 10.35-acre project site, identified by Assessor's Parcel Numbers (APN) 052-140-013, -014, -015, and -016, is undeveloped (see Figure 2). The project site is comprised of ruderal grasses that are regularly mowed. Surrounding existing uses include commercial uses to the north; townhomes to the east across the Wildflower Station Place roadway; commercial uses within a shopping center to the south, beyond Hillcrest Avenue; and single-family residences to the west, across Hillcrest Avenue. A portion of Wildflower Drive borders the southern boundary of the project site. The project site is designated as High Density Residential by the Antioch General Plan, and the site is zoned High Density Residential (R-25).

It should be noted that the Wildflower Station Place drive aisle, as well as parking spaces and bio-retention facilities, are located within the project site boundaries. An Emergency Vehicle Access (EVA) and shared parking easement allow all current residents of the townhomes east of the project site to traverse Wildflower Station Place and use the parking spaces. The joint usable area of 1.90 acres has been netted out of the overall 10.35 gross acres of the site, given that the easement precludes any development of the private street and parking areas. Without the 1.90-acre area, the acreage of the project site totals 8.45 acres.

The site is traversed by several utility easements within the northern portion of A Street (see Figure 3) and are intended to be used for the benefit of the proposed project. The easements (storm drain, sanitary sewer, water, and fire service water) dictate the placement of buildings, certain amenities, and trees because such development may not be constructed or placed within the easement. The primary 100-foot-wide easement, located between Lots 12 and 13 and extending north through the site, includes one large water distribution line and one large irrigation distribution line owned and maintained by Contra Costa Water District (CCWD). Given that structures or trees may not be placed within the easement, the 0.5-acre portion of the easement area not located in a street could also be subtracted from the site's gross acreage, bringing the new total to 7.95 acres.

Project Components

The project includes approval of a Vesting Tentative Subdivision Map for condominium purposes and Design Review. The project components are discussed in further detail below.

Vesting Tentative Subdivision Map

The proposed Vesting Tentative Subdivision Map would divide the project site into 19 lots for condominium purposes (see Figure 4). Each lot would contain one townhome building, and associated sidewalks and landscaping, for a total of 159 units and a density of approximately 20.05 dwelling units per acre (du/ac). Separate parcels are proposed for the internal roadway network (Parcels A-K, M-Q) and private common areas (Parcels J-L). Finally, Parcel I would be located along the northern project site boundary and contain a bio-retention area.

Primary access to the project site would be provided by two new entrances: one from Wildflower Drive at the southern end of the project site onto Wildflower Station Place, and one from Hillcrest Avenue at the northeast corner of the site to the private street Hillcrest Commons.

Figure 1 Regional Vicinity

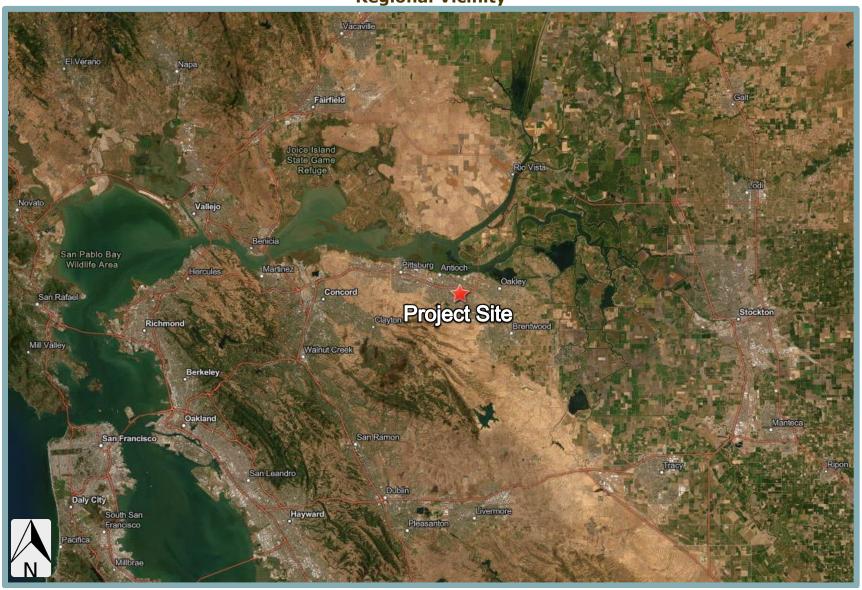


Figure 2
Project Site Boundaries

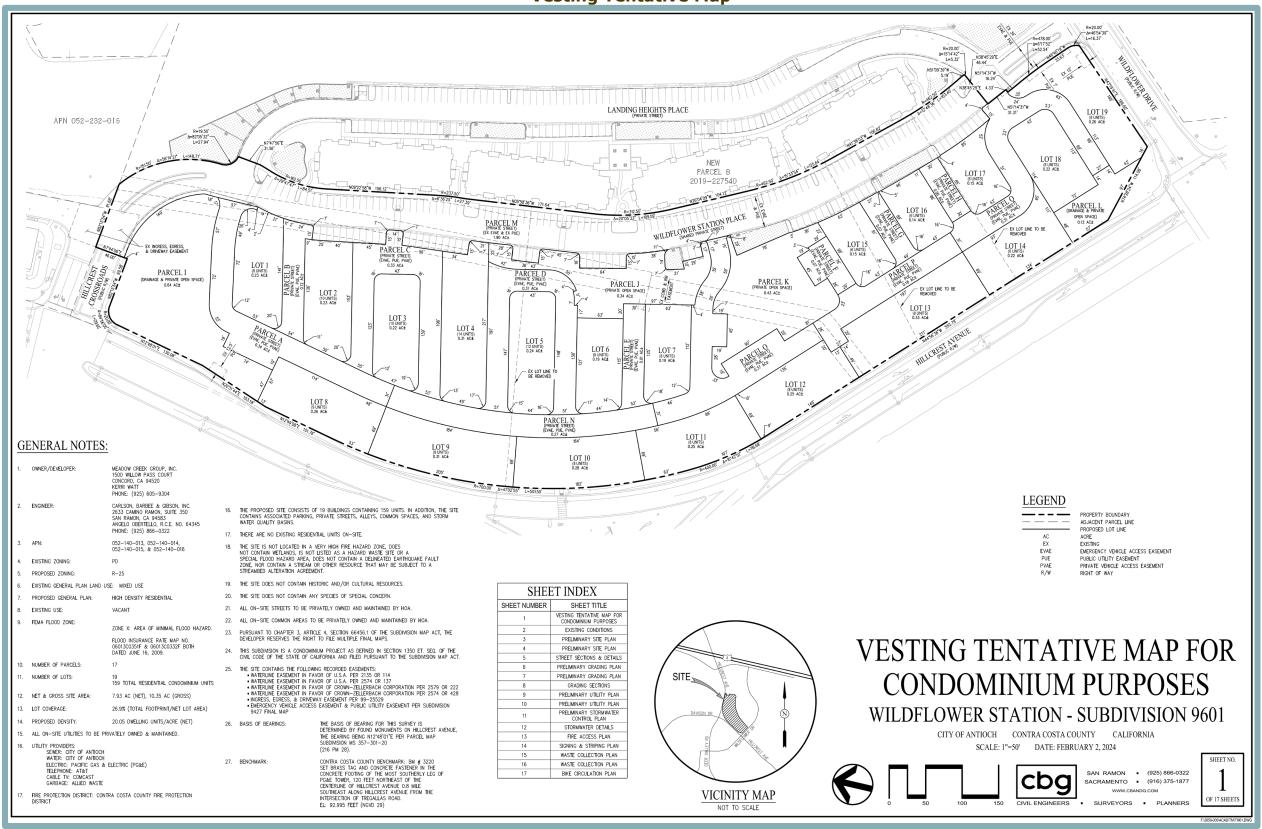


Figure 3 **Preliminary Utility Plan** WILDFLOWER STATION CONDOS WILDFLOWER STATION PLACE APN 052-232-016 PARCEL K D STREET C STREET PARCEL I HILLCREST AVENUE LEGEND **EXISTING** PROPOSED EX SD = === TREATED STORM DRAIN LINE STORM DRAIN FORCE MAIN LINE BOOK KEX ISD - BOOK -< SDFM --PRELIMINARY UTILITY PLAN WATER LINE ----EXW]----FIRE SERVICE LINE - FW JOINT TRENCH WILDFLOWER STATION - SUBDIVISION 9601 GAS PIPE MANHOLE CATCH BASIN CITY OF ANTIOCH CONTRA COSTA COUNTY CALIFORNIA FIELD INLET SCALE: 1"=30' DATE: FEBRUARY 2, 2024 cbg NOTES:

1. ALL ON-SITE UTILITIES TO BE PRIVATE.

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Figure 4
Vesting Tentative Map



Automatic gates are proposed as an option at both entrances, pending approval from the current homeowners on Wildflower Station Place, and their homeowner's association (HOA). Similarly, the internal roadway network would be privately owned and maintained by the HOA. The entire site would be fenced with tubular steel, non-climb fencing located at the top of slope along Hillcrest Avenue and Wildflower Drive. A pedestrian/resident-access-only gate in the fencing would be provided between Buildings 10 and 11, with stairs and an accessible ramp to lead to the public sidewalk and the crosswalk on Hillcrest Avenue.

Existing utilities located in Hillcrest Avenue, Wildflower Station Place, and Wildflower Drive are adequately sized to serve the proposed development. As required by the City, all in-tract utilities (domestic water, water for fire service, sanitary sewer, storm drain, and bio-retention facilities) would be privately owned and maintained by the HOA. Eight-inch water and fire water lines would extend westward into the project site from Wildflower Station Place and eastward from Hillcrest Avenue. Similarly, eight-inch sanitary sewer lines would extend from the same connections to existing utility lines in the Wildflower Station Place and Hillcrest Avenue roadways. Finally, eight-inch stormwater connections would be extended into the project site from the surrounding roadways and would lead to the bio-retention facilities located at the northern area of the project site (see Figure 3).

Design Review

Pursuant to the Antioch Municipal Code Section 9-5.2607(A)(1), proposed development of any new building or construction in the R-25 zoning district is subject to Design Review.

Each proposed townhome building would be three stories (approximately 37 to 40 feet tall), as measured to the roof ridge, consisting of "Row Townhomes" (63 units) and "Back to Back" (B2B) (96 units). All units would have at least one private deck, a storage area of at least 250 cubic feet, and an attached garage. Both styles would have living areas primarily on the second and third levels above parking.

The Row townhome buildings are designed with garages at the rear of the building and entry doors on the front façade of the building. Each building would have between six to nine units. Five floorplans are offered, ranging in size from 1,135 square feet (sf) to 1,238 sf. All five floorplans feature two bedrooms (en suite) and 2.5 bathrooms.

The B2B townhome buildings are designed with garages at the front and back of the building and front doors adjacent to the garages, in addition to front doors and covered porches on the short sides of each building. Each building would have between six to 14 units. Two floorplan types are offered: a two-bedroom (en suite) plan that is 1,293 sf, and a three-bedroom plan that is 1,381 sf. Both floorplans include 2.5 bathrooms.

The architectural style of the proposed residential buildings would be contemporary in design and would make use of stucco and siding finishes in several different colors on each building. The front façades of all buildings would be articulated to emphasize front entries and decks, while the sides and rears would include varying vertical and horizontal planes, and different finishes to provide articulation and interest.

Common open space of 0.43-acre is located at the center of the proposed development, at the main entry from Wildflower Station Place. Two buildings face the common area (Buildings 7 and 15) and portions of Buildings 12 and 13 have windows facing the common area. The central common area would include amenities with seating, picnic tables, a large shade structure, a play area for children, and a multi-purpose turf area. Such amenities would serve as recreation areas

for future residents, while making use of the otherwise unbuildable areas within the CCWD pipelines easement. Mailboxes and areas for bicycle parking would be located to the west of the common open space.

Street trees in the parkway strips would be located along all streets in addition to shrubs for privacy. All totaled, including the bio-retention area in the northern portion of the site, the private and common open space exceed the 25 percent landscaping requirement.

Requested/Required Entitlements

The proposed project would require the following approvals from the City of Antioch:

- Vesting Tentative Subdivision Map; and
- Design Review.

D. DISCUSSION

Pursuant to Public Resources Code (PRC) Section 21083.3 and Section 15183(b) of the CEQA Guidelines, a project that is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except when it is necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies. More specifically, Section 15183(b) states the following:

- (b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
 - (1) Are peculiar to the project or the parcel on which the project would be located,
 - (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,
 - (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
 - (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

It should be noted that, according to Section 15183(f), an effect of a project on the environment shall not be considered peculiar to the project or the parcel if uniformly applied development policies or standards have been previously adopted by the City or County with a finding that the development policies or standards would substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards would not substantially mitigate the environmental effect.

As set forth by Sections 15168 and 15183 of the CEQA Guidelines, the program EIR, in this case the City's Housing Element EIR, serves as a basis for this 15183 Consistency Memorandum to determine if project-specific impacts would occur that are not adequately covered in the previously certified EIR. To the extent that the Housing Element policies and/or actions substantially mitigate

a particular project impact, the impact shall not be considered peculiar, pursuant to 15183(f), thus, eliminating the requirement for further environmental review.

This 15183 Consistency Memorandum indicates whether the proposed project would result in a significant impact that: (1) is peculiar to the project or the project site; (2) was not identified as a significant effect in the Housing Element EIR; or (3) are previously identified significant effects, which as a result of substantial new information that was not known at the time that the Housing Element EIR was certified, are determined to have a more severe adverse impact than discussed in the Housing Element EIR.

The Housing Element EIR anticipated the project site would be developed in accordance with the standards established for the R-25 zoning district, which allows for a density of 20 to 25 dwelling units per acre (du/ac). The proposed project would result in a density of approximately 20.05 du/ac, and therefore, would be consistent with the development anticipated for the project site within the Housing Element EIR.

The applicability of the Section 15183(b) criteria to the proposed project is described in the following sections.

Criterion 15183(b)(1)

The proposed project would include approval of a Vesting Tentative Subdivision Map that would subdivide the project site into 19 lots for residential uses and condominium air space. The area proposed for development and the land uses proposed in the Vesting Tentative Subdivision Map are consistent with the City's updated Housing Element, and therefore consistent with what was analyzed in the Housing Element EIR. Design Review is also required in order to authorize the proposed building architecture, landscaping, and site design, which would ensure consistency with the City of Antioch General Plan, Zoning Ordinance, and Citywide Design Guidelines. The Design Review process would not alter the analysis or conclusions of the previously approved Housing Element EIR.

Additionally, the project site is comprised of ruderal grasses that are regularly mowed. Trees are not located on-site. Pursuant to the California Department of Conservation (DOC) California Important Farmland Finder, the project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Pursuant to the Federal Emergency Management Agency (FEMA), the project site is located in Zone X, designated as an Area of Minimal Flood Hazard. Based on the above, the project site does not contain any peculiar characteristics that could result in environmental effects through development of the proposed project. Thus, the proposed project would not result in any environmental effects peculiar to the project or the project site, and therefore would not result in environmental impacts beyond what was previously anticipated, analyzed, and mitigated by the Housing Element EIR.

Criterion 15183(b)(2)

As discussed above, an EIR that assessed the full buildout of the City's updated Housing Element, including residential development of the project site, was certified in 2023. Because significant updates to local, State, and federal regulations have not been adopted since the certification of the previous EIR, and, as demonstrated in further detail in the Environmental Impact Analysis

California Department of Conservation. California Important Farmland Finder. Available at: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed October 2023.

Federal Emergency Management Agency. *FEMA's National Flood Hazard Layer (NFHL) Viewer*. Available at: https://www.fema.gov/flood-maps/national-flood-hazard-layer. Accessed October 2023.

section below, the proposed project would not result in any new environmental effects that were not analyzed as significant effects in the Housing Element EIR. As such, substantial changes would not occur with respect to the circumstances under which the project is undertaken.

Criterion 15183(b)(3)

The proposed project does not include off-site improvements, and, therefore, would not result in any impacts associated with off-site construction or operational activities. In addition, the proposed project is consistent with the City's updated Housing Element, and, therefore, development of the project site with the proposed uses was generally evaluated as part of the associated Housing Element EIR. Furthermore, given that the Housing Element EIR serves as a cumulative analysis, cumulative impacts related to development of the site with residential uses have already been anticipated and analyzed in the Housing Element EIR. Thus, the proposed project would not result in any off-site and/or cumulative impacts that were not evaluated in the prior EIR.

Criterion 15183(b)(4)

The question of "substantial new information" relates to the current CEQA requirements to assess impacts that were not required at the time the Housing Element EIR was certified. Because the Housing Element EIR was completed in accordance with the most recent version of the CEQA Appendix G Checklist, all required environmental impact areas were addressed in the Housing Element EIR. As previously discussed, changes would not occur with respect to development of the project site as a result of the proposed project, relative to what was anticipated for the site by the Housing Element EIR. Thus, the proposed project would not result in new significant impacts or substantially more severe significant impacts beyond what was anticipated in the Housing Element EIR. Therefore, the proposed project would not result in any more severe impacts than what was discussed in the prior EIR.

E. ENVIRONMENTAL IMPACT ANALYSIS

The following discussion briefly evaluates each CEQA Appendix G environmental resource area. As noted above, the analysis below indicates whether the proposed project would result in a significant impact that: (1) is peculiar to the project or the project site; (2) was not identified as a significant effect in the Housing Element EIR; or (3) are previously identified significant effects, which as a result of substantial new information that was not known at the time that the Housing Element EIR was certified, are determined to have a more severe adverse impact than discussed in the Housing Element EIR.

Air Quality

The proposed project would be consistent with the Housing Element and, thus, was anticipated by the City and considered under the Housing Element EIR analysis. Accordingly, the proposed project would not result in any new significant effects related to air quality. However, the Housing Element EIR requires mitigation measures related to construction emissions of criteria air pollutant emissions from future housing developments (AIR-1), operational emissions of criteria air pollutant emissions from future housing developments (AIR-2), and health risks related to the generation of toxic air contaminants (TACs) and particulate matter (PM) 2.5 microns in diameter (PM_{2.5}) during construction and operation of future housing developments (AIR-3a and AIR-3b).

Pursuant to Mitigation Measure AIR-1, construction of residential projects involving more than 114 single-family units or 240 multi-family units requires a quantitative air quality analysis to be conducted and measures identified to reduce the project's construction-related criteria air pollutant emission to below the applicable BAAQMD thresholds of significance. Given that the

proposed project consists of 159 multi-family residential units, Mitigation Measure AIR-1 as set forth in the Housing Element EIR is not applicable to the proposed project. Similarly, because the proposed project would not involve more than 325 single-family units or 451 multi-family units and would not include emergency generators, Mitigation Measures AIR-2 and AIR-3b would not apply to the project. In addition, the proposed project would be subject to the same regulations governing criteria air pollutants and emissions as identified for the projects evaluated in the Housing Element EIR.

However, a portion of the project site is located within a Bay Area Air Quality Management District (BAAQMD) Planning Healthy Place Map area defined as needing "Best Practices." Because project construction is anticipated to take longer than six months, the proposed project would be subject to Mitigation Measure AIR-3a. Given that the mitigation measure is structured so that development projects choose one option or the other, only part of the mitigation measure is applicable to the proposed project. Pursuant to Mitigation Measure AIR-3a, the proposed project shall equip all off-road diesel equipment with the most effective engine type as certified by the California Air Resources Board (CARB). Tier 4 engines would automatically meet the requirement. In addition, the project applicant shall prepare a Construction Emissions Minimization Plan (Emissions Plan) for all identified reduction measures. The Emissions Plan shall be submitted to the City (and BAAQMD upon request) for review and approval prior to the issuance of building permits. The City shall require compliance with mitigation measure AIR-3a as a Condition of Approval. Implementation of Mitigation Measure AIR-3a would ensure the proposed project would not result in a significant impact that is peculiar to the project or the project site, would not be identified as a significant effect in the Housing Element EIR, and would not result in a more severe adverse impact than the significant effects previously identified within the Housing Element EIR.

Overall, based on the above, the proposed project would not result in a significant impact that is peculiar to the project or the project site, was not identified as a significant effect in the Housing Element EIR, and would not result in a more severe adverse impact than the significant effects previously identified within the Housing Element EIR.

Greenhouse Gas Emissions

Pursuant to the Housing Element EIR, the BAAQMD's recommended plan-level thresholds of significance for GHG emissions include two options: Option A, to meet the State's emission reduction goals, and Option B, to be consistent with a local GHG reduction strategy that meets the State criteria under CEQA Guidelines Section 15183.5(b). To demonstrate compliance with Option A of the plan-level thresholds, BAAQMD recommends implementing various design elements for typical residential, commercial, and retail land use projects. Such design elements would include, but are not limited to, a lack of natural gas appliances or plumbing, and a demonstrated reduction in project-generated vehicle miles traveled (VMT).

According to the Housing Element EIR, implementation of General Plan policies, such as Policy 11.7.2(c) and 11.7.2(d) (which were updated as part of the Housing Element Update), would comply with Options A and B of the BAAQMD's recommend plan-level thresholds of significance and ensure that future development would not result in a cumulatively considerable contribution to global climate change. Furthermore, implementation of existing General Plan Policies 7.4.2, 10.6.2, 10.7.2, 10.8.2, and Housing Element Policy 4.1 would help to reduce GHG emissions from transportation, energy use, and water use.

Bay Area Air Quality Management District. *Planning Healthy Places*. Available at: https://www.baaqmd.gov/plans-and-climate/planning-healthy-places. Accessed October 2023.

Overall, the Housing Element EIR concluded that implementation of the existing and updated General Plan Policies related to GHG emissions would comply with the BAAQMD's recommended thresholds, and future development under the updated Housing Element would have a less-than-significant impact related to GHG emissions. Given that the project site was considered for residential development in the Housing Element, the proposed project would be consistent with the Housing Element and therefore evaluated within the Housing Element EIR. Thus, the proposed project would be required to comply with all of the applicable General Plan policies, and would not result in a significant impact that is peculiar to the project or project site, a significant effect that was not previously identified in the Housing Element EIR, or a substantially more severe significant effect related to GHG emissions during construction or operation.

Transportation

Pursuant to Mitigation Measure TRANS-1 as set forth in the Housing Element EIR, individual housing project development proposals that do not screen out from a VMT impact analysis are required to provide a quantitative VMT analysis; however, the Housing Element EIR provides that any project that is exempt from CEQA is not required to conduct a VMT analysis. As demonstrated through this 15183 Consistency Memorandum, the proposed project would not result in a significant impact that is peculiar to the project or project site, a significant effect that was not previously identified in the Housing Element EIR, or a substantially more severe significant effect related to transportation beyond what was identified in the Housing Element EIR. Therefore, pursuant to Section 15183 of the CEQA Guidelines, the proposed project qualifies for exemption from further environmental review under CEQA. Because the proposed project would be considered exempt, Mitigation Measure TRANS-1 is not applicable. Thus, the proposed project would not result in a significant impact that is peculiar to the project or the project site, was not identified as a significant effect in the Housing Element EIR, and would not result in a more severe adverse impact than the significant effects previously identified within the Housing Element EIR.

Remaining Impact Areas

In addition to the CEQA topics discussed in the previous sections of this 15183 Consistency Memorandum, the Housing Element EIR included analysis of the following issue areas:

- Aesthetics:
- Agriculture and Forestry Resources;
- Biological Resources;
- Cultural Resources;
- Energy;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services:
- Recreation:
- Tribal Cultural Resources:
- Utilities and Service Systems; and
- Wildfire.

As discussed previously, construction and operation activities associated with the proposed project would occur within a site previously analyzed as part of the Housing Element EIR and would not result in any increase to the area of disturbance previously anticipated by the Housing Element EIR. For these reasons, and given that site conditions, as well as conditions in the project vicinity, have remained the same since adoption of the Housing Element EIR, the proposed project would not result in new significant impacts or substantially more significant impacts related to the following environmental issue areas: aesthetics, agriculture and forestry resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, public services, recreation, tribal cultural resources, and wildfire. For example, new scenic vistas have not appeared within the project vicinity subsequent to the adoption of the Housing Element EIR, and project design would be required to comply with applicable General Plan policies and City of Antioch regulations related to building height, setback, and neighborhood character. Similarly, the project site has not undergone changes related to farmland, subsurface conditions, or hydrology since adoption of the Housing Element EIR. The existing uses within the project vicinity are the same or similar to those that existed during preparation of the Housing Element EIR. As such, project construction would not be anticipated to result in substantial increases in impacts to existing sensitive receptors beyond the levels anticipated by the Housing Element EIR. Therefore, the proposed project would not result in new or substantially more significant impacts beyond what was identified in the Housing Element EIR.

Similarly, the biological resources in the project vicinity and at the project site have remained the same since adoption of the Housing Element EIR. The Housing Element EIR identified the project site as a Housing Site outside of any occurrences of special-status species protected under State and/or federal regulations. As such, the potential for adverse impacts to biological resources as part of the proposed project is low. Consistency with the General Plan policies identified in the Housing Element EIR would ensure that new or substantially more significant impacts beyond what was identified in the Housing Element EIR would not occur.

With respect to energy, the proposed project would be subject to the currently adopted 2022 California Green Building Standards Code (CALGreen Code) and the Building Energy Efficiency Standards (Title 24, Part 6 of the California Code of Regulations), which include more stringent requirements related to energy efficiency than previous iterations of the aforementioned regulations to move the State closer to its net-zero energy goals. The 2022 Building Energy Efficiency Standards are designed to move the State closer to its net-zero energy goals for new residential development by requiring all new residences to install enough renewable energy to offset all the electricity needs of each residential unit, as well as battery storage to maximize onsite use of solar energy and avoid electricity demand during peak consumption periods on the grid. Energy reductions relative to previous Building Energy Efficiency Standards are achieved through various regulations, including requirements for the use of high-efficacy lighting, improved water heating system efficiency, and high-performance attics and walls. Additionally, all construction equipment and operation thereof would be regulated per the CARB In-Use Off-Road Diesel Vehicle Regulation. The In-Use Off-Road Diesel Vehicle Regulation is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. The In-Use Off-Road Diesel Vehicle Regulation would subsequently help to improve fuel efficiency and reduce GHG emissions. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction. Thus, the proposed project would not result in new significant impacts or

A17

substantially more significant impacts related to energy beyond what were identified in the Housing Element EIR. Thus, the proposed project would not result in new significant impacts or substantially more significant impacts related to energy beyond what were identified in the Housing Element EIR.

Finally, with respect to land use and planning and population and housing, the proposed project would not physically divide an established community, and would be consistent with the uses anticipated in the updated Housing Element. New utility lines installed as part of the proposed project would be extended from existing lines in the adjacent roadway network and would be constructed consistent with the City's applicable engineering design standards. Additionally, any new utility lines associated with the proposed project would be sized to accommodate only the project, thereby ensuring the project does not induce substantial unplanned population growth. Furthermore, the proposed project would be subject to applicable development impact fees, ensuring the project's fair-share contribution for any improvements to various public services and utilities. Thus, the proposed project would not result in new significant impacts or substantially more significant impacts related to the aforementioned environmental issue areas beyond what were identified in the Housing Element EIR.

It should be noted that the Housing Element EIR did not identify any significant impacts and associated mitigation measures beyond those discussed above related to air quality and transportation. Therefore, the Housing Element EIR does not include any additional mitigation measures that would be applicable to the proposed project.

Thus, with respect to the foregoing issue areas, the proposed project would result in similar impacts as those identified within the Housing Element EIR. Compliance with applicable federal, State, and local policies, regulations, and standards would ensure impacts related to the aforementioned issue areas would be reduced to a less-than-significant level.

F. CONCLUSION

As demonstrated by the discussions above, pursuant to CEQA Guidelines Section 15183, additional environmental review under CEQA would not be required for the proposed project.

G. APPLICABLE MITIGATION MEASURES

The mitigation measures from the Housing Element EIR, as presented below, would be required to be implemented with approval of the proposed project.

Mitigation Measure AIR-3a: Residential Construction Controls for Diesel Particulate Matter. For construction of residential projects with a construction duration greater than 6 months that are located in an area defined as needing "Best Practices" or "Further Study" on the BAAQMD's Planning Healthy Places Map (https://www.baaqmd.gov/plans-and-climate/planning-healthy-places), the project applicant shall apply one of the following two measures:

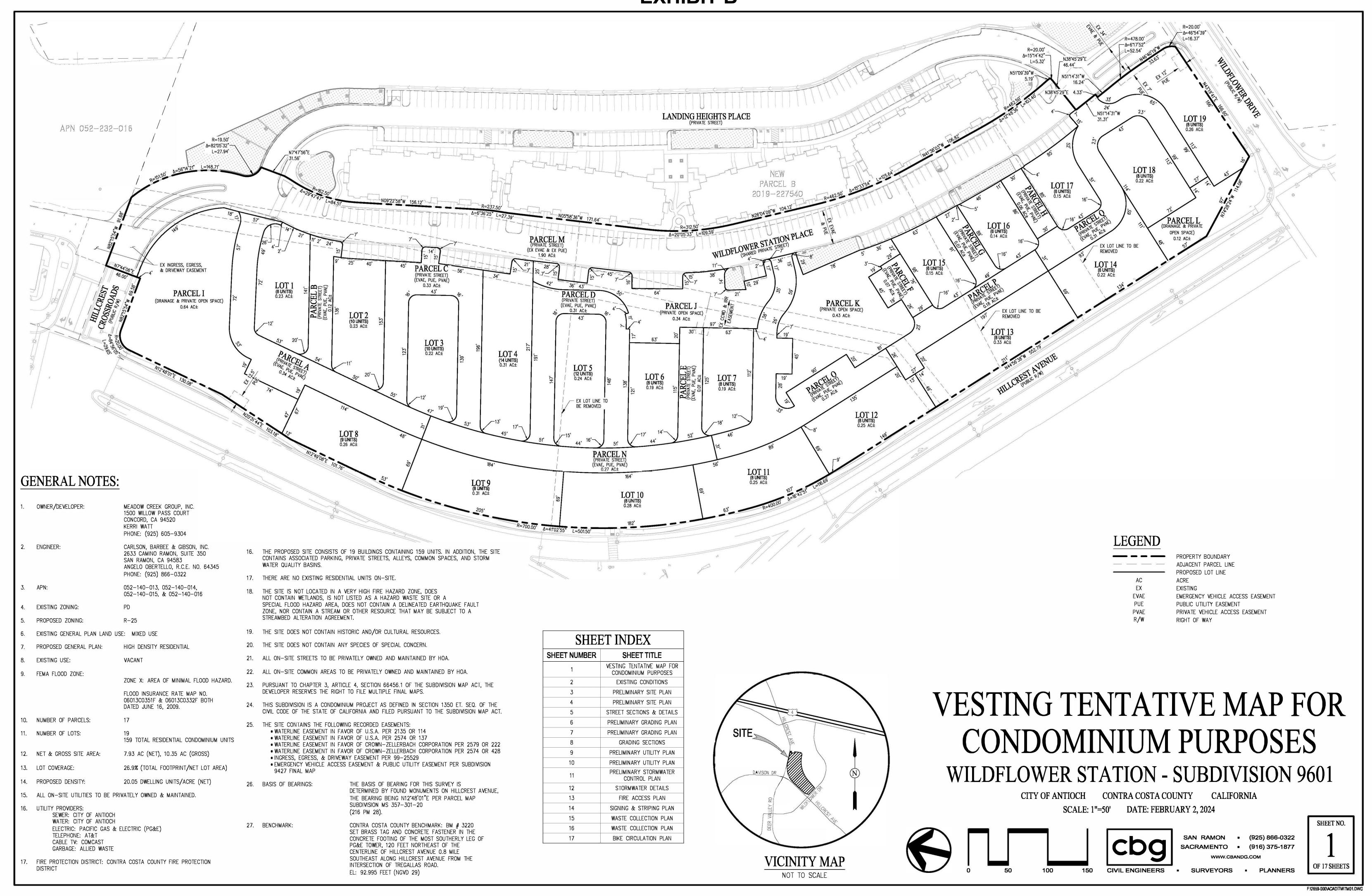
1. The project applicant shall retain a qualified air quality consultant to prepare a Health Risk Assessment (HRA) in accordance with current guidance from the Office of Environmental Health Hazard Assessment to determine the health risks to sensitive receptors exposed to diesel particulate matter (DPM) from project construction emissions. The HRA shall be submitted to the City (and BAAQMD if specifically requested) for review and approval. If the HRA concludes that the health risks are at or below acceptable levels, then DPM reduction measures are not required. If the HRA concludes that the health risks exceed acceptable levels, DPM reduction measures shall be identified to reduce the health risks to acceptable

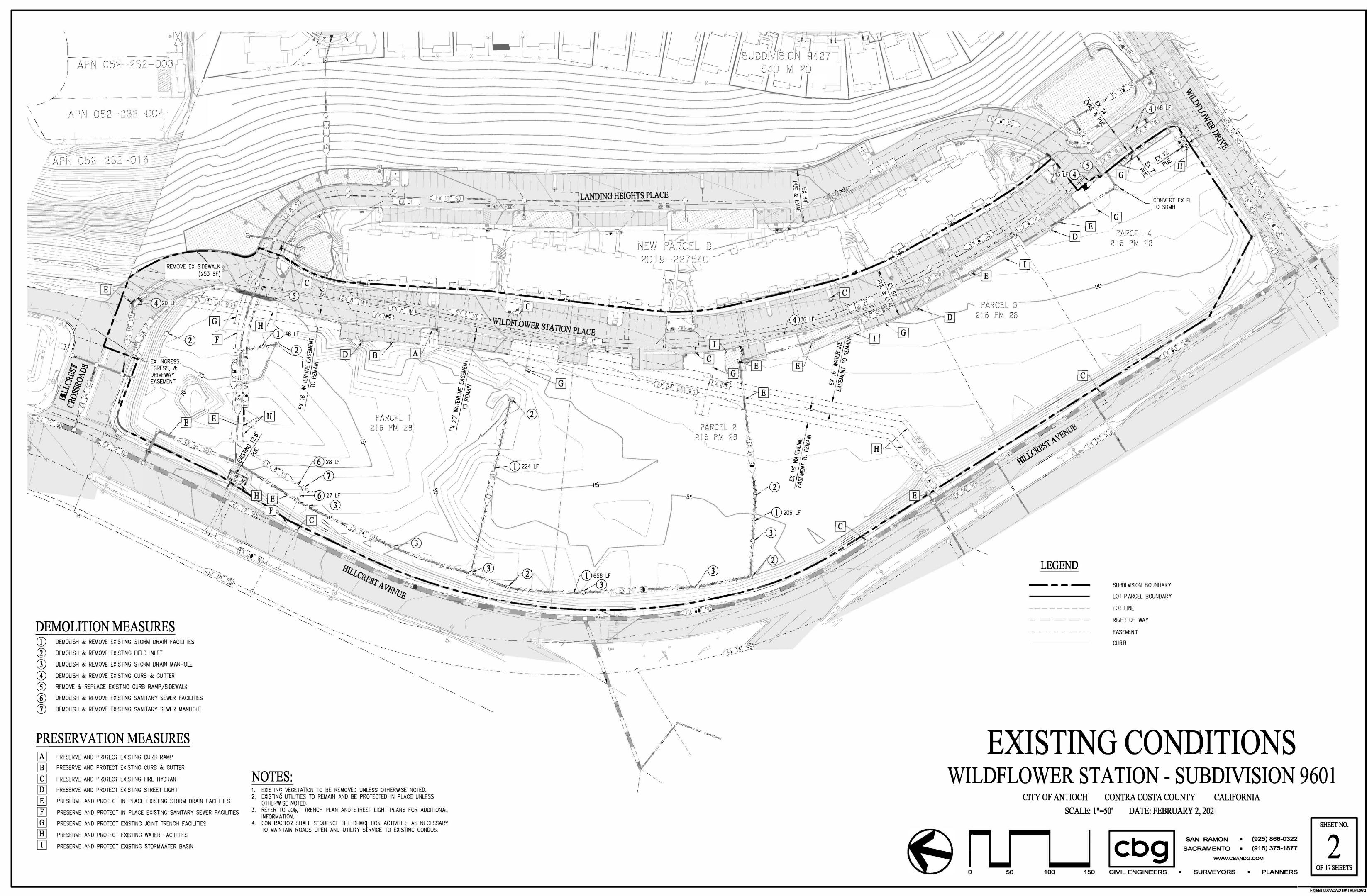
levels. Identified DPM reduction measures shall be submitted to the City for review and approval prior to the issuance of building permits and the approved DPM reduction measures shall be implemented during construction.

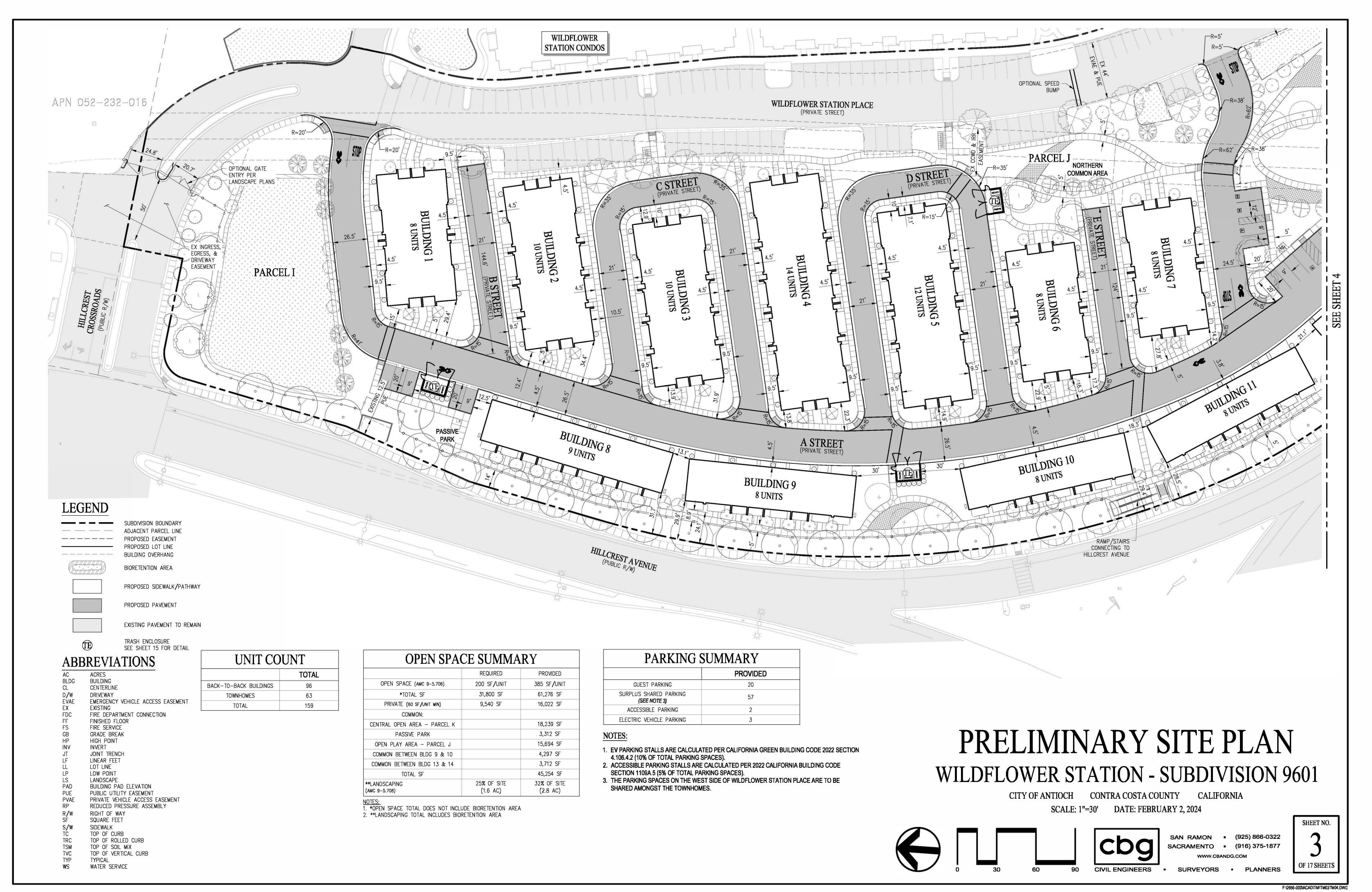
OR

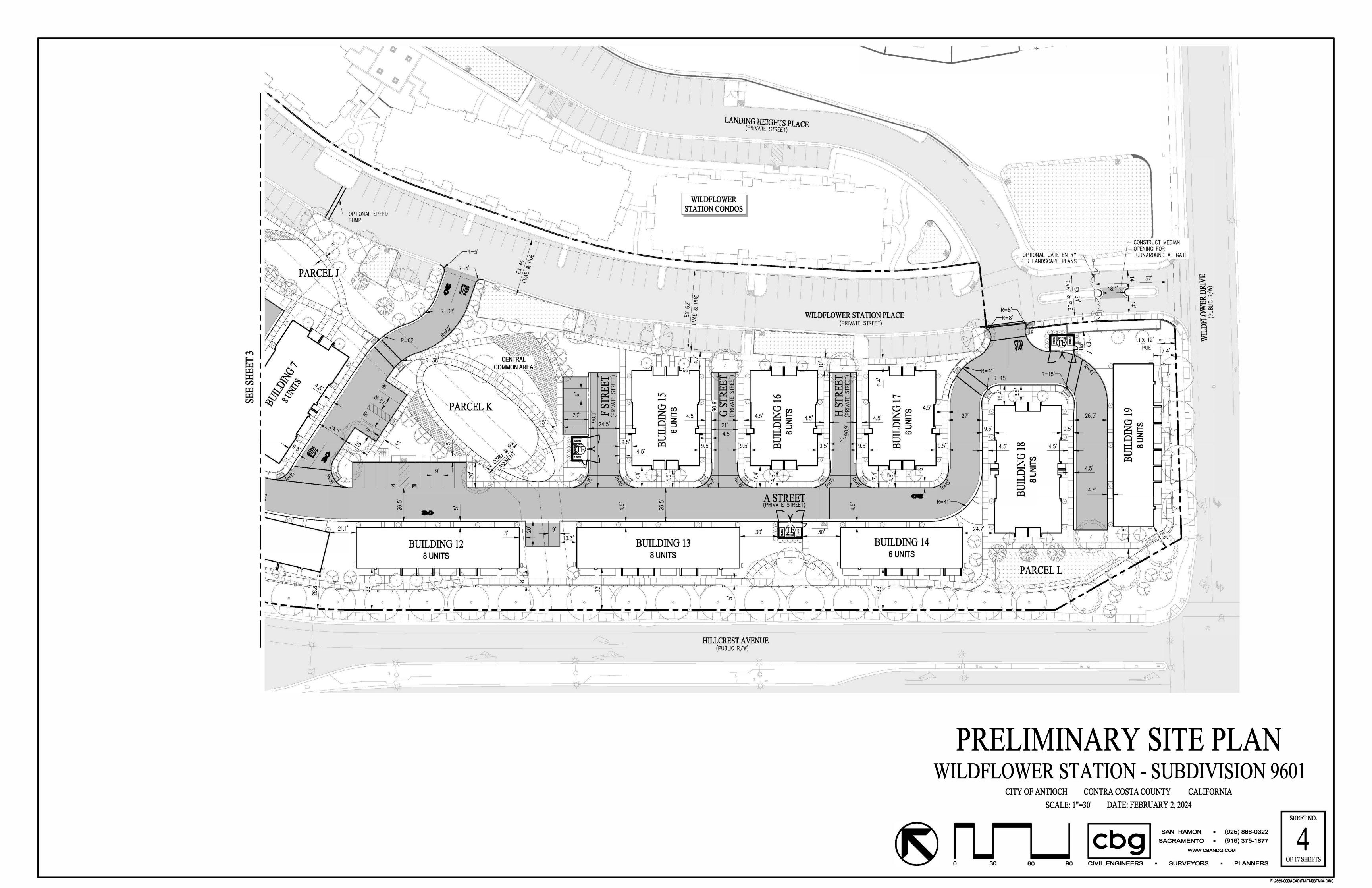
- 2. All off-road diesel equipment shall be equipped with the most effective VDECS available for the engine type (Tier 4 engines automatically meet this requirement) as certified by CARB. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications. In addition, the project applicant shall prepare a Construction Emissions Minimization Plan (Emissions Plan) for all identified DPM reduction measures (if any). The Emissions Plan shall be submitted to the City (and BAAQMD if specifically requested) for review and approval prior to the issuance of building permits. The Emissions Plan shall include the following:
 - An equipment inventory summarizing the type of off-road equipment required for each phase of construction, including the equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, and engine serial number. For all VDECS, the equipment inventory shall also include the technology type, serial number, make, model, manufacturer, CARB verification number level, and installation date.
 - A Certification Statement that the Contractor agrees to comply fully with the Emissions
 Plan and acknowledges that a significant violation of the Emissions Plan shall
 constitute a material breach of contract.

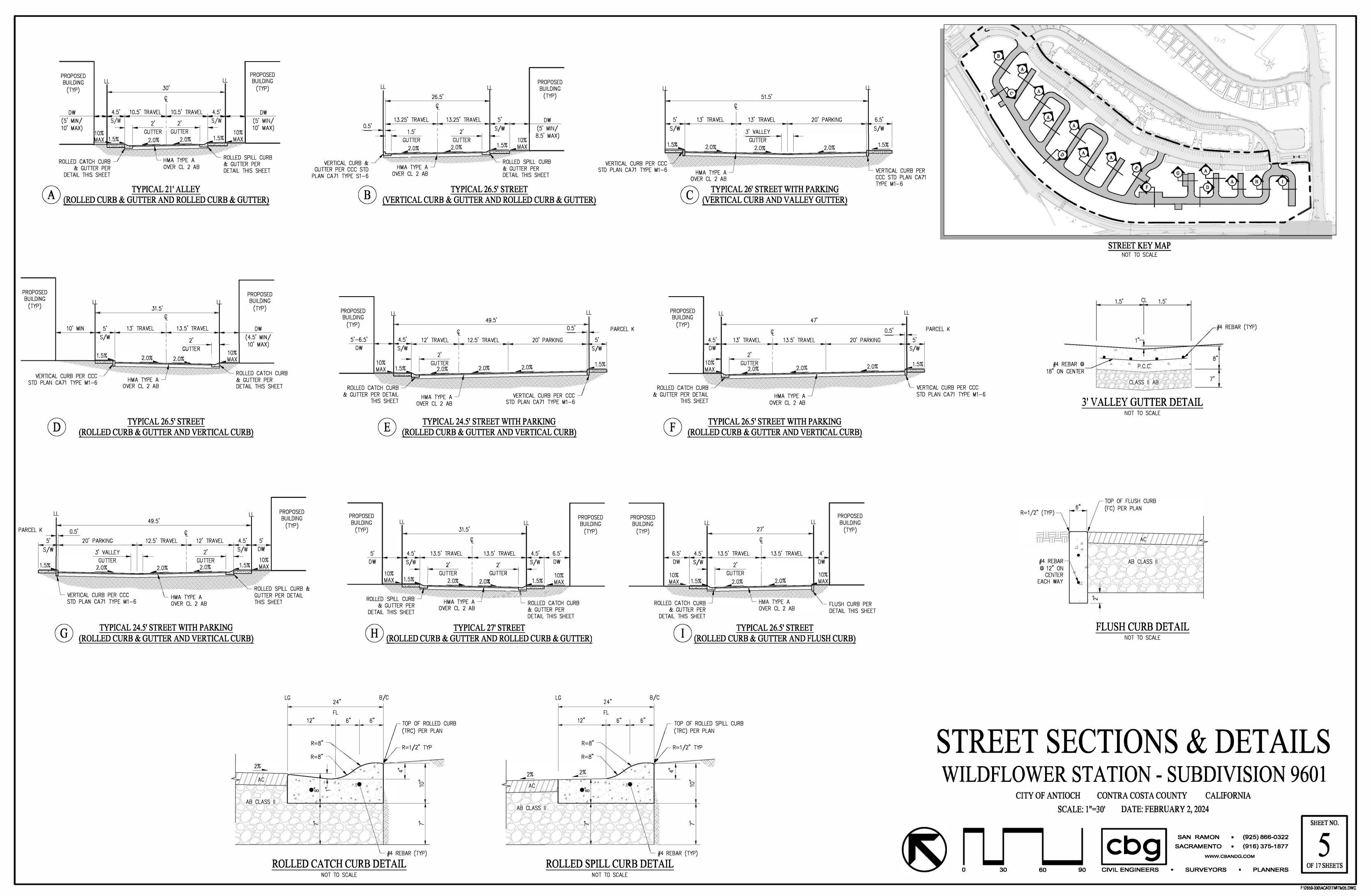
EXHIBIT B

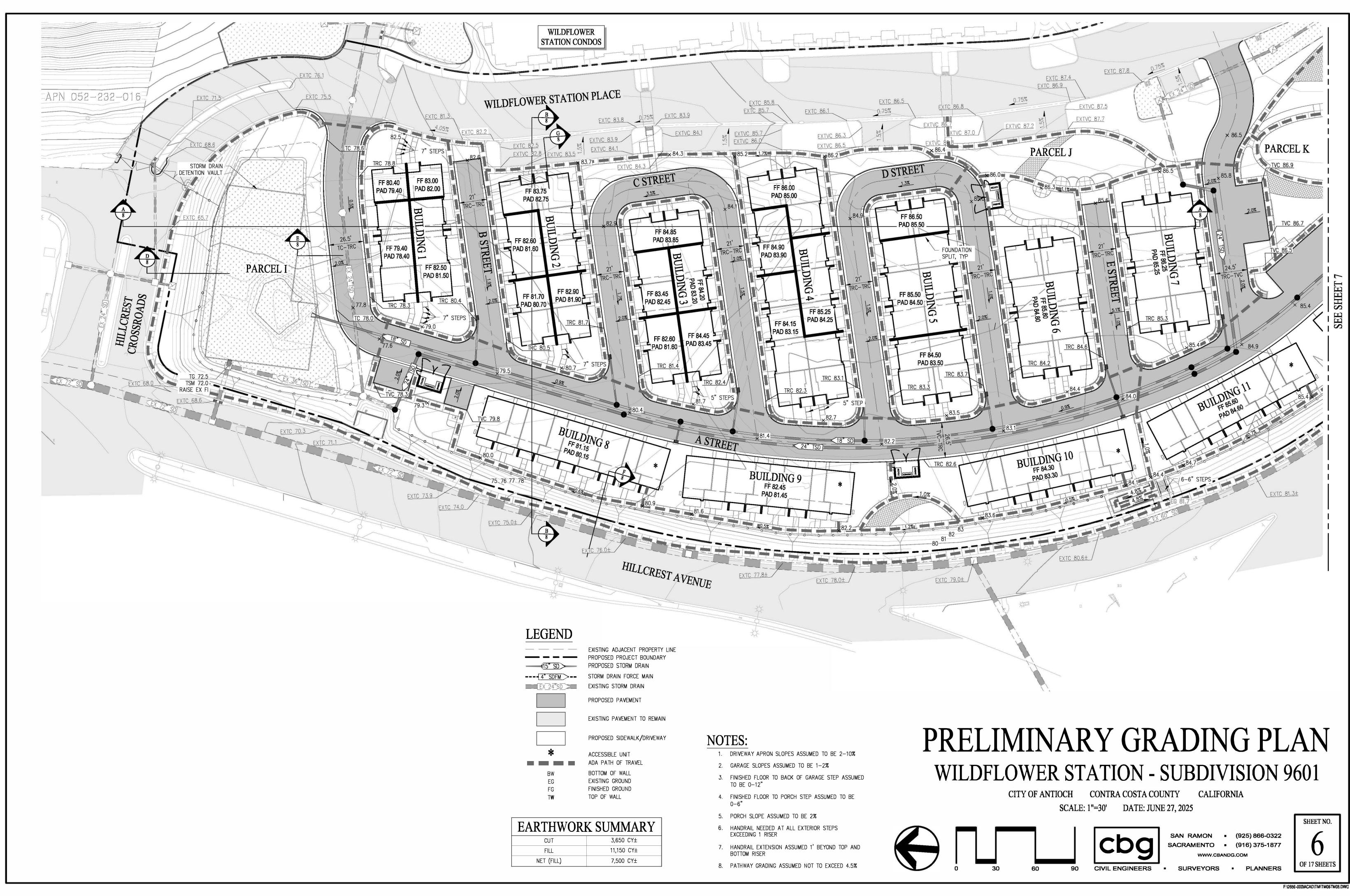


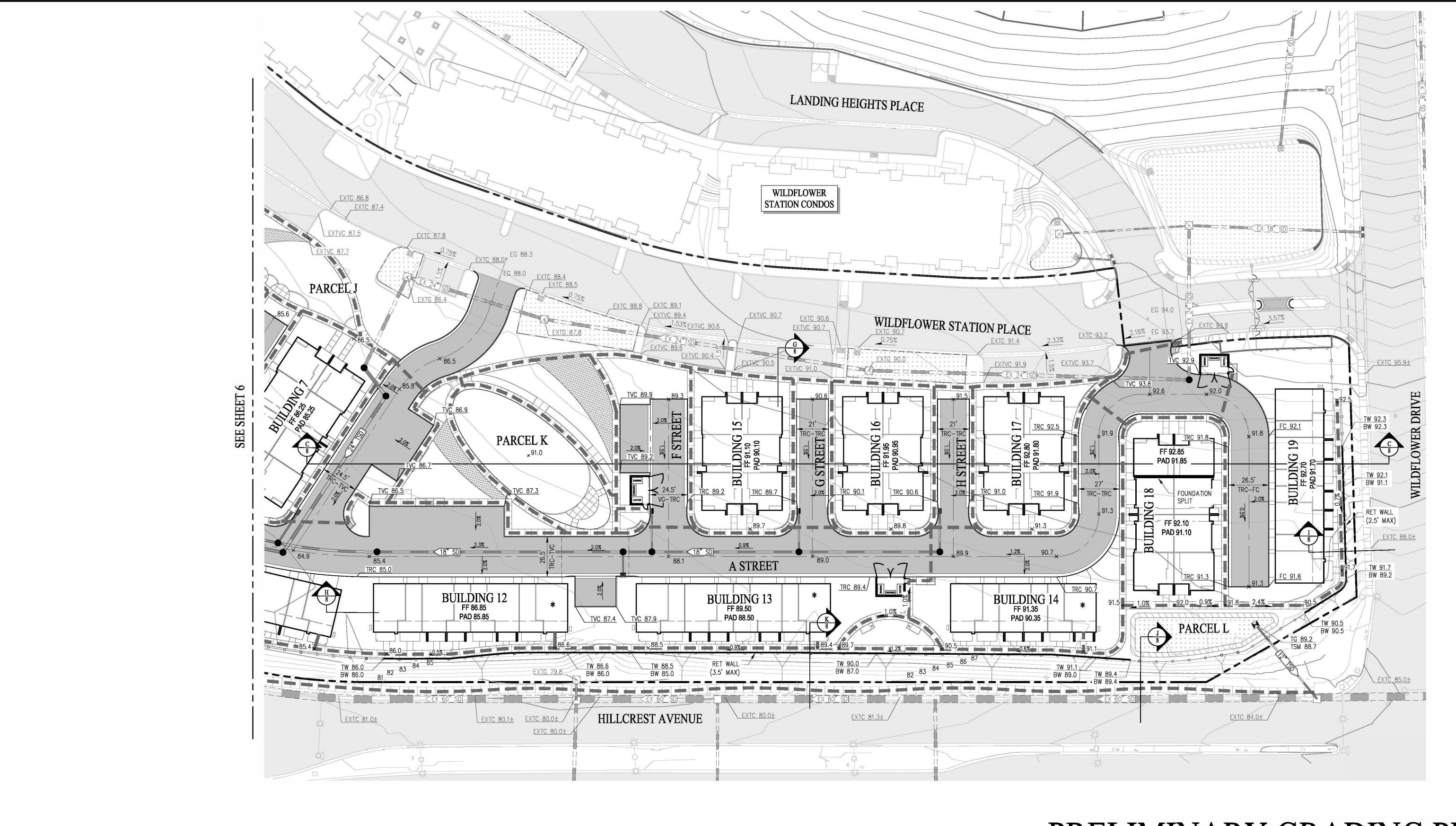








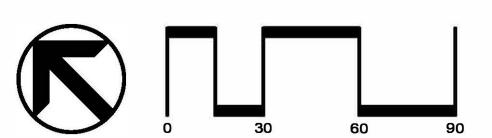




PRELIMINARY GRADING PLAN

WILDFLOWER STATION - SUBDIVISION 9601

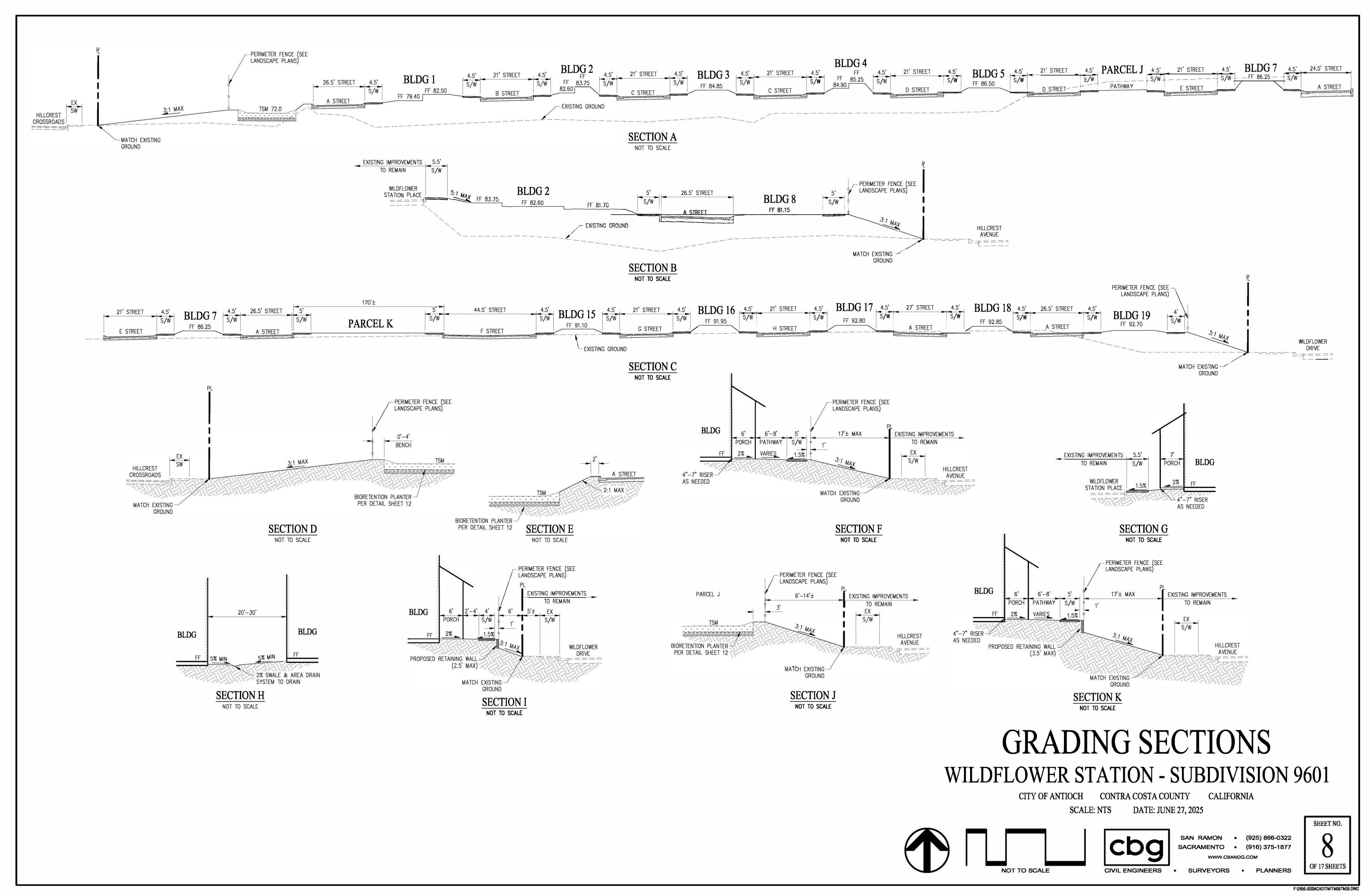
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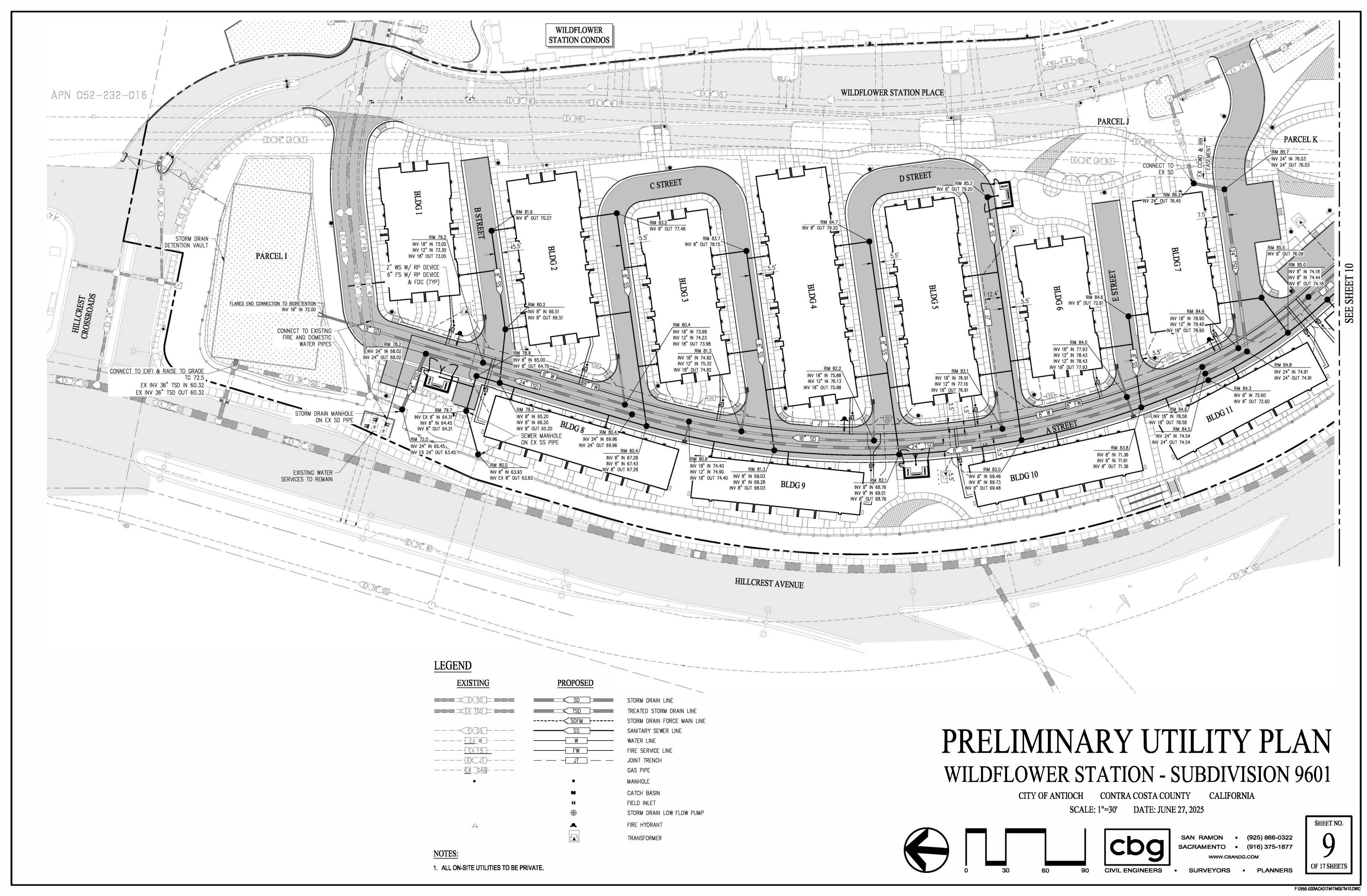


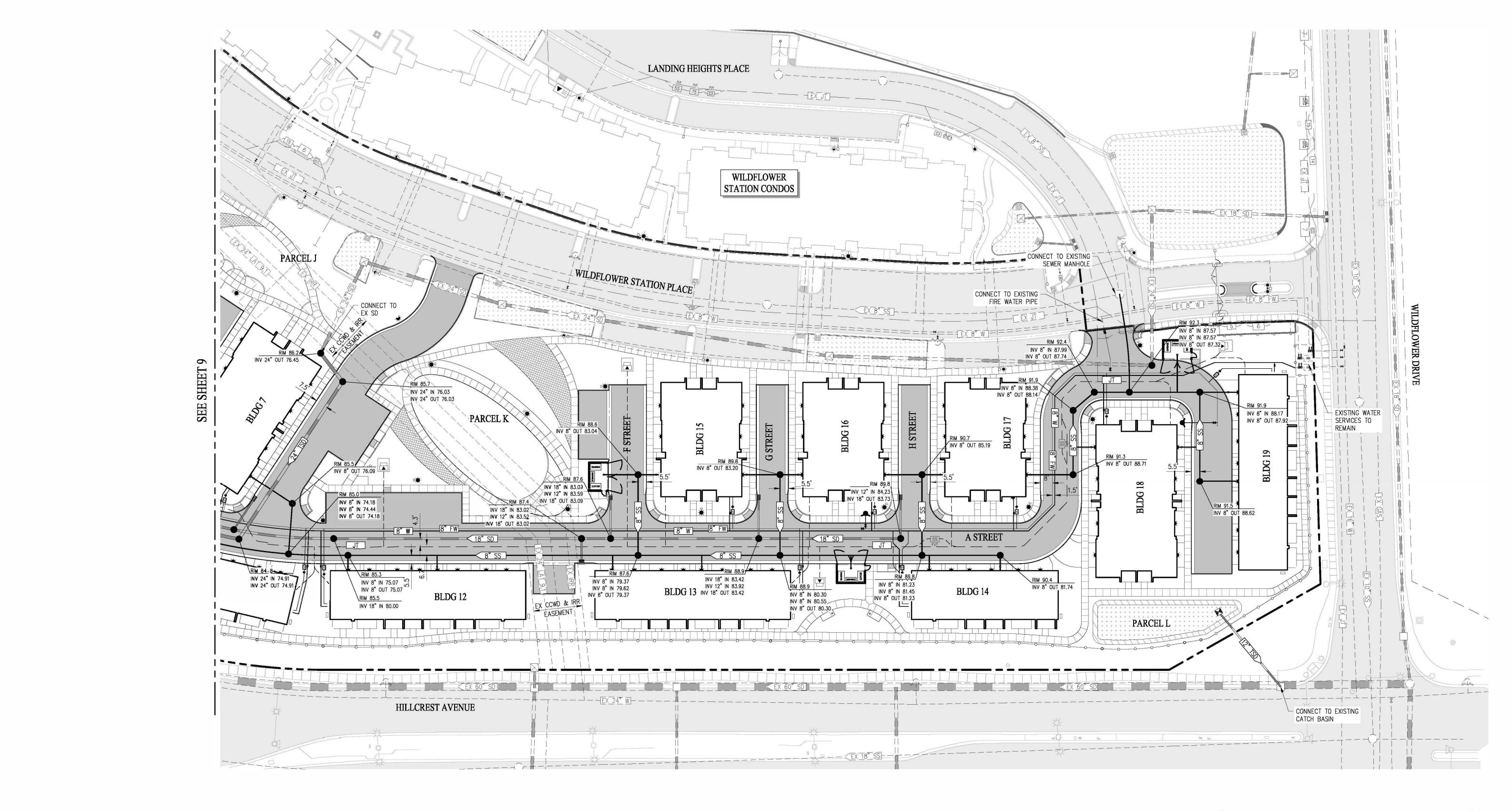


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OF 17 SHEETS



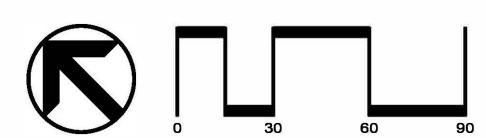




PRELIMINARY UTILITY PLAN

WILDFLOWER STATION - SUBDIVISION 9601

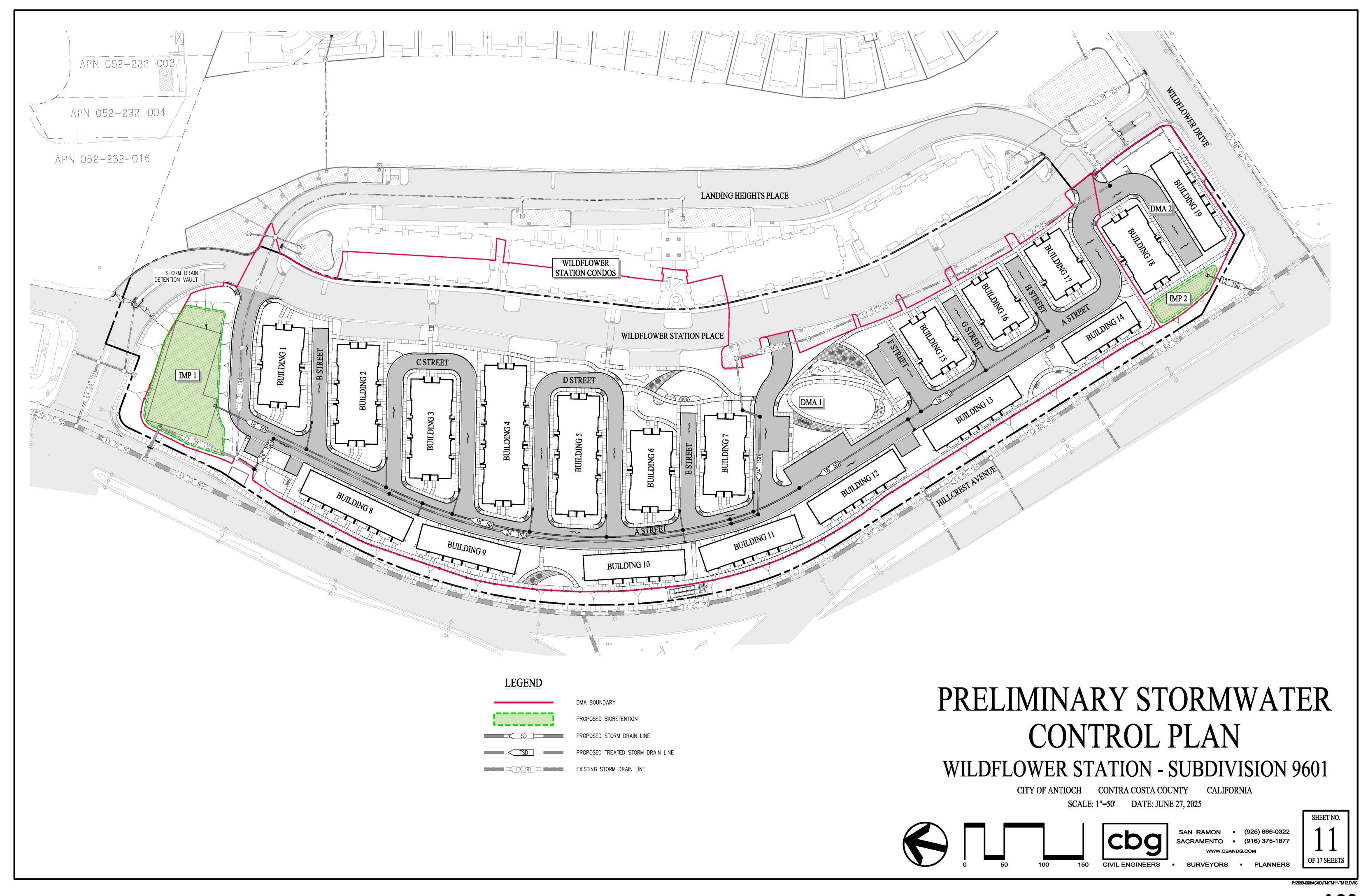
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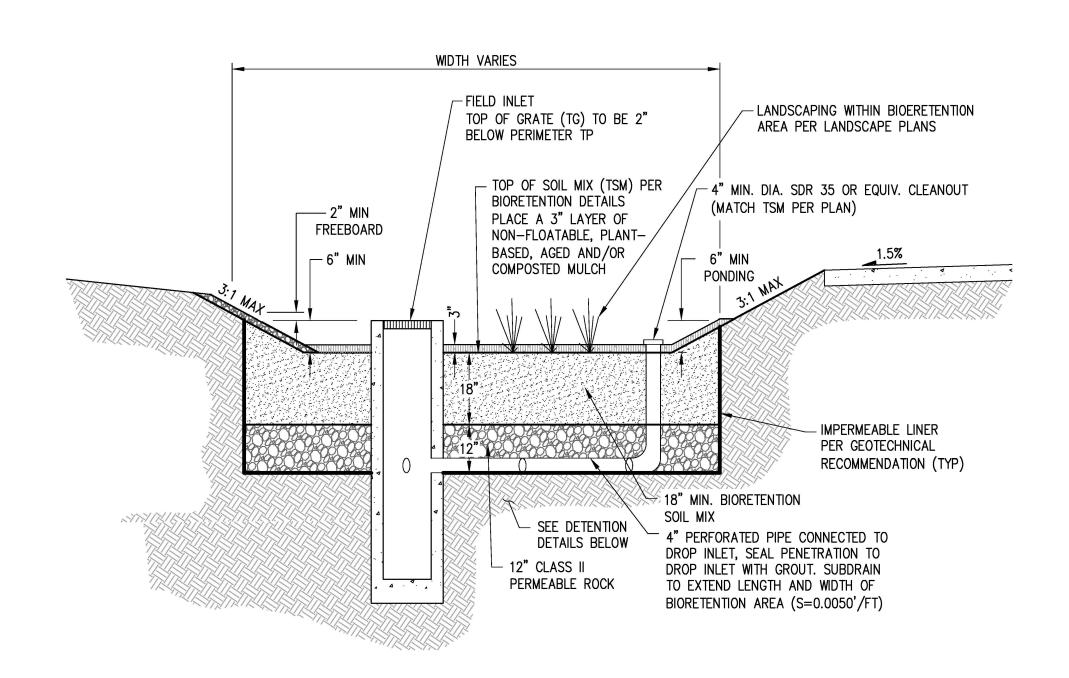




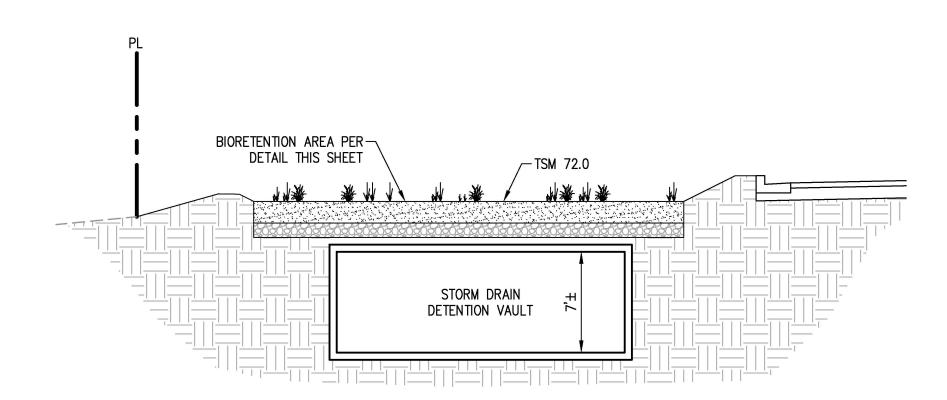
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OF 17 SHEETS SURVEYORS • PLANNERS

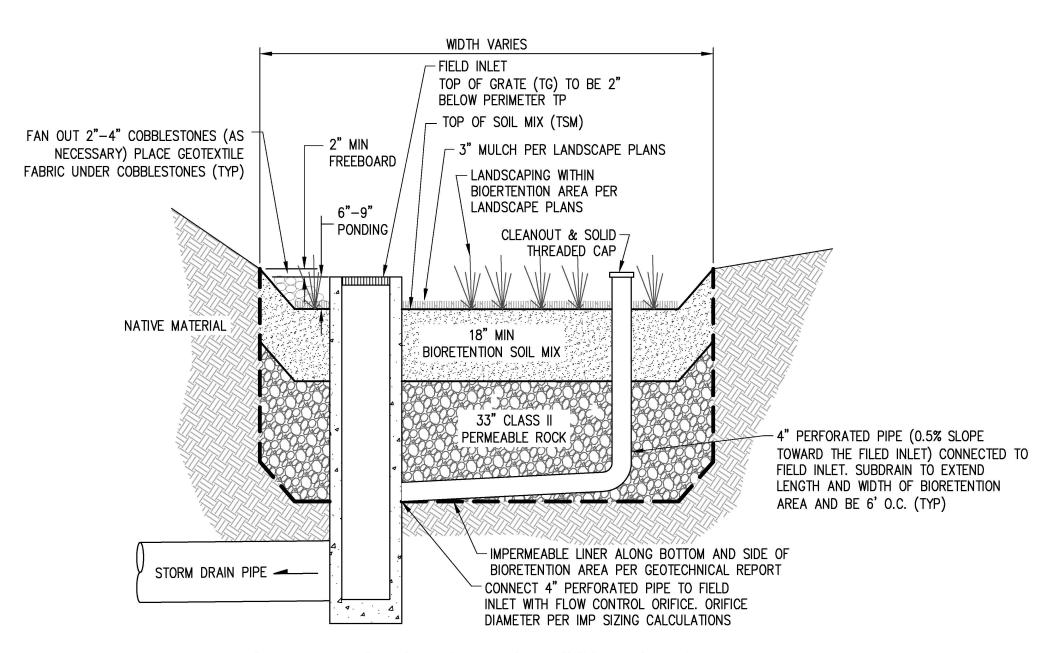




BIORETENTION AREA (IMP 1) NOT TO SCALE



DETENTION BELOW BIORETENTION AREA (IMP 1) NOT TO SCALE



BIORETENTION AREA IN LANDSCAPE AREA

NOT TO SCALE

Project Name: Wildflower Townhomes Project Type: Treatment and Flow Control APN: 052-0140-013 Thru 16 Drainage Area: 398,146 **Mean Annual Precipitation: 13.6**

IV. Areas Draining to IMPs

IMP Name: IMP1

IMP Type: Bioretention + Vault

Soil Group: IN	IP1							
DMA Name	Area (sq ft)	Post Project	DMA Runoff	DMA Area x				
		Surface Type	Factor	Runoff Factor	IMP Sizing			
DMA 1A	112,910	Conventional Roof	1.00	112,910	IMP Sizing Factor	Rain Adjustment	Minimum Area or	Proposed Area or
DMA 1B	168,268	Concrete or Asphalt	1.00	168,268	1 40101	Factor	Volume	Volume
DMA 1C	76,168	Landscape	0.50	38,084				
			Total	319,262				
				Area	0.040	1.000	12,770	12,826
				Volume	0.152	1.242	60,272	60,868
							Maximum	0.29
							Underdrein	

IMP Name: IMP2

IMP Type: Bioretention Facility

DMA Name	Area (sq ft)	Post Project	DMA Runoff	DMA Area x				
		Surface Type	Factor	Runoff Factor	IMP Sizing			
DMA 2A	10,950	Conventional Roof	1.00	10,950	IMP Sizing Factor	Rain Adjustment	Minimum Area or	Proposed Area or
DMA 2B	8,100	Concrete or Asphalt	1.00	8,100	radior	Factor	Volume	Volume
DMA 2C	7,233	Landscape	0.50	3,617				
			Total	22,667				
				Area	0.060	1.242	1,689	1,691
			Su	ırface Volume	0.050	1.242	1,408	1,410
			Subsu	ırface Volume	0.066	1.242	1,858	1,86
							Maximum	0.02
							Underdrain	
							Flow (cfs)	
							Orifice	0.94
							Diameter (in)	

IMP CALCULATOR OUTPUT NOT TO SCALE

STORMWATER DETAILS

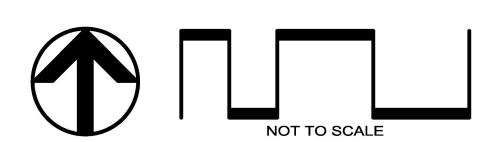
WILDFLOWER STATION - SUBDIVISION 9601

CITY OF ANTIOCH CONTRA COSTA COUNTY CALIFORNIA

Flow (cfs)

Diameter (in)

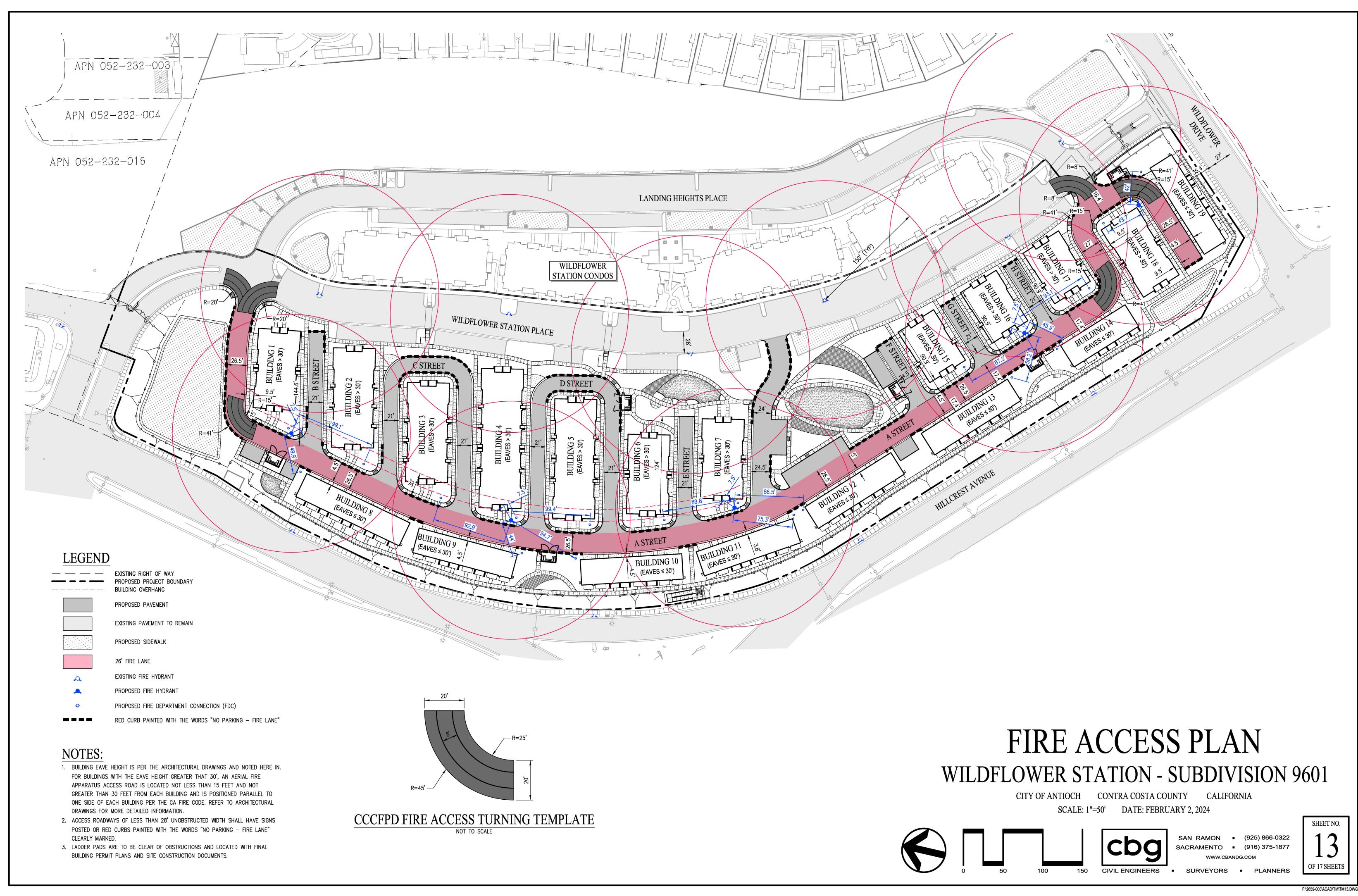
DATE: JUNE 27, 2025 SCALE: NTS

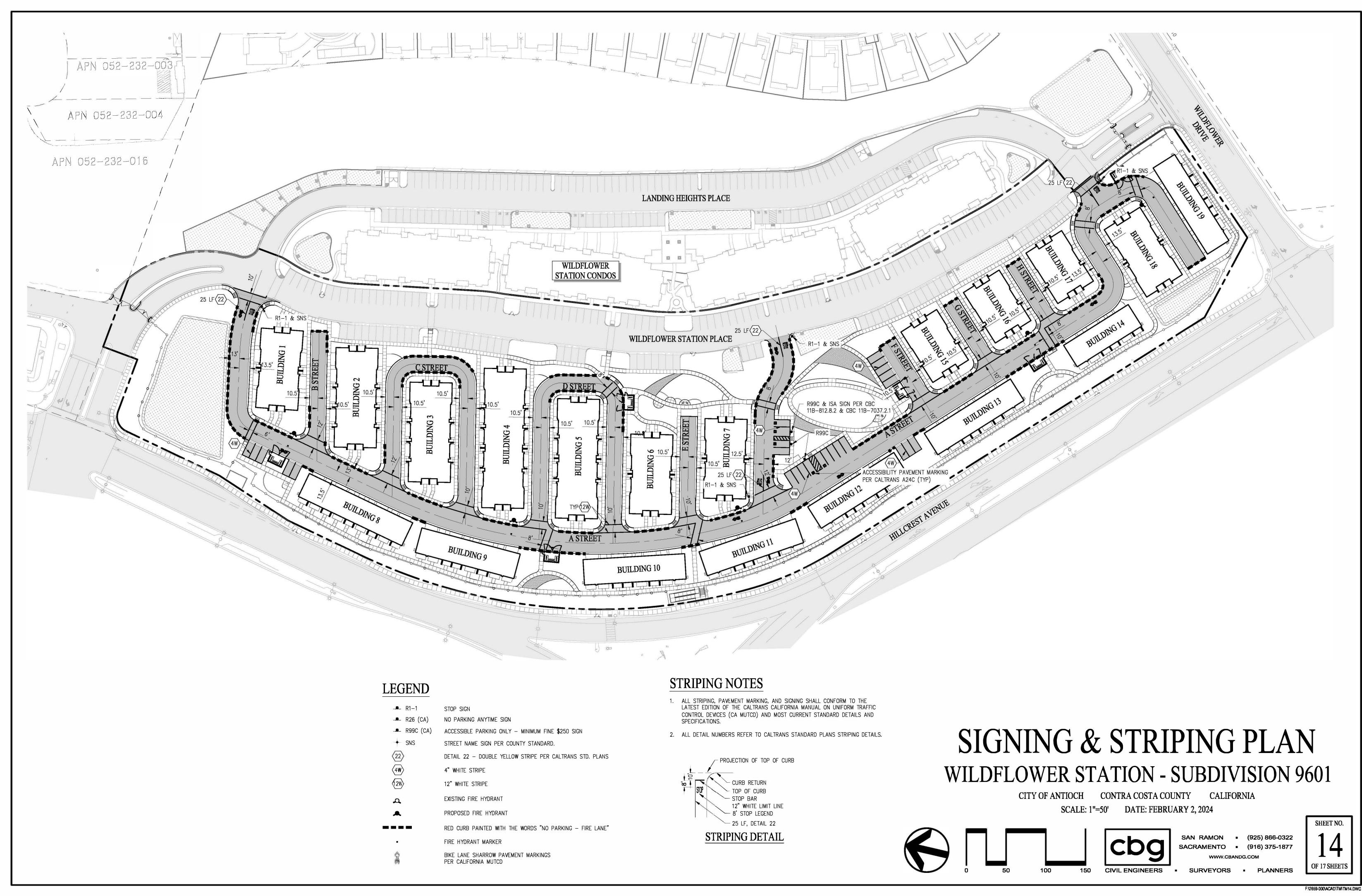


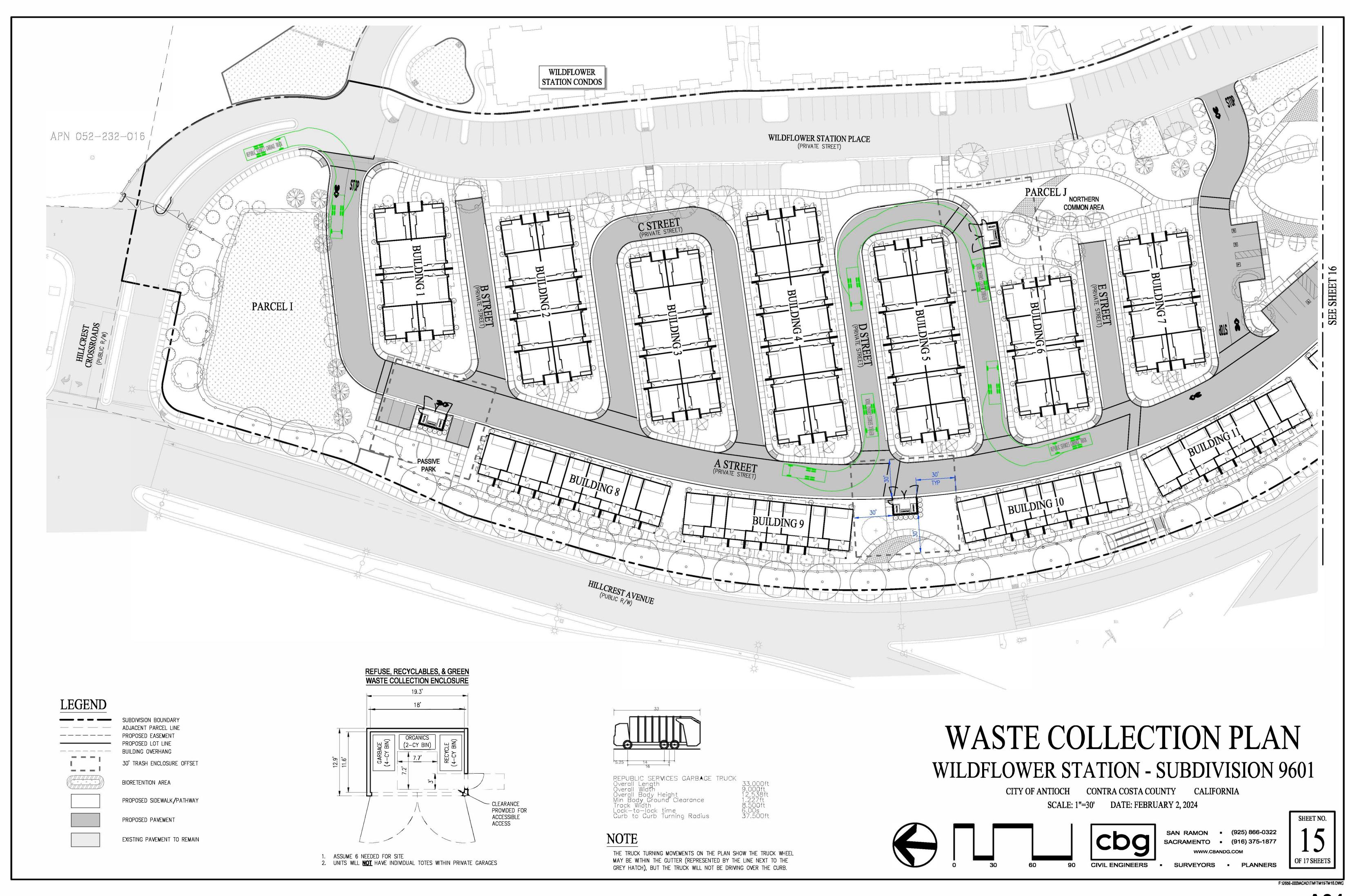


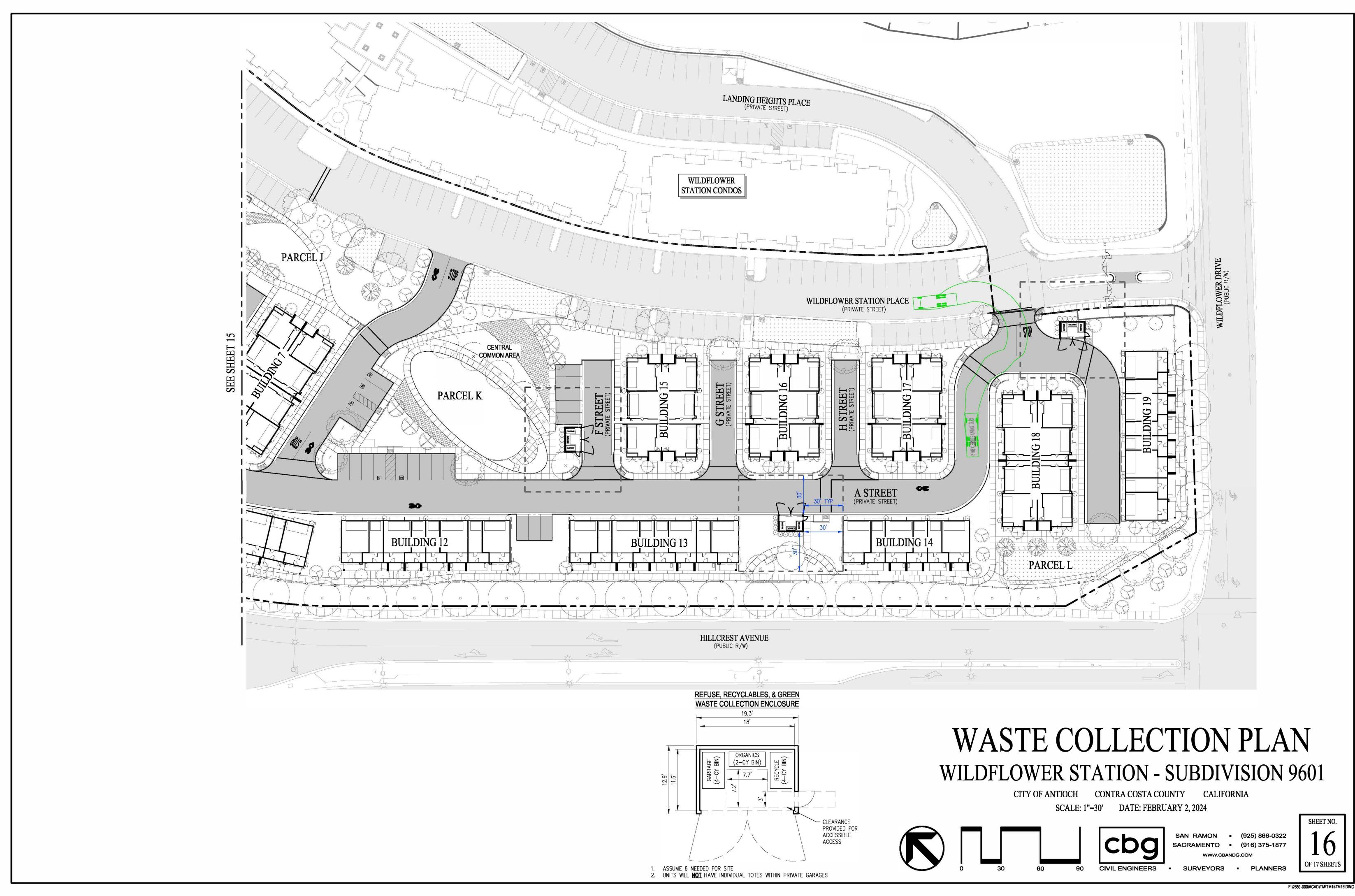
SAN RAMON • (925) 866-0322 WWW.CBANDG.COM

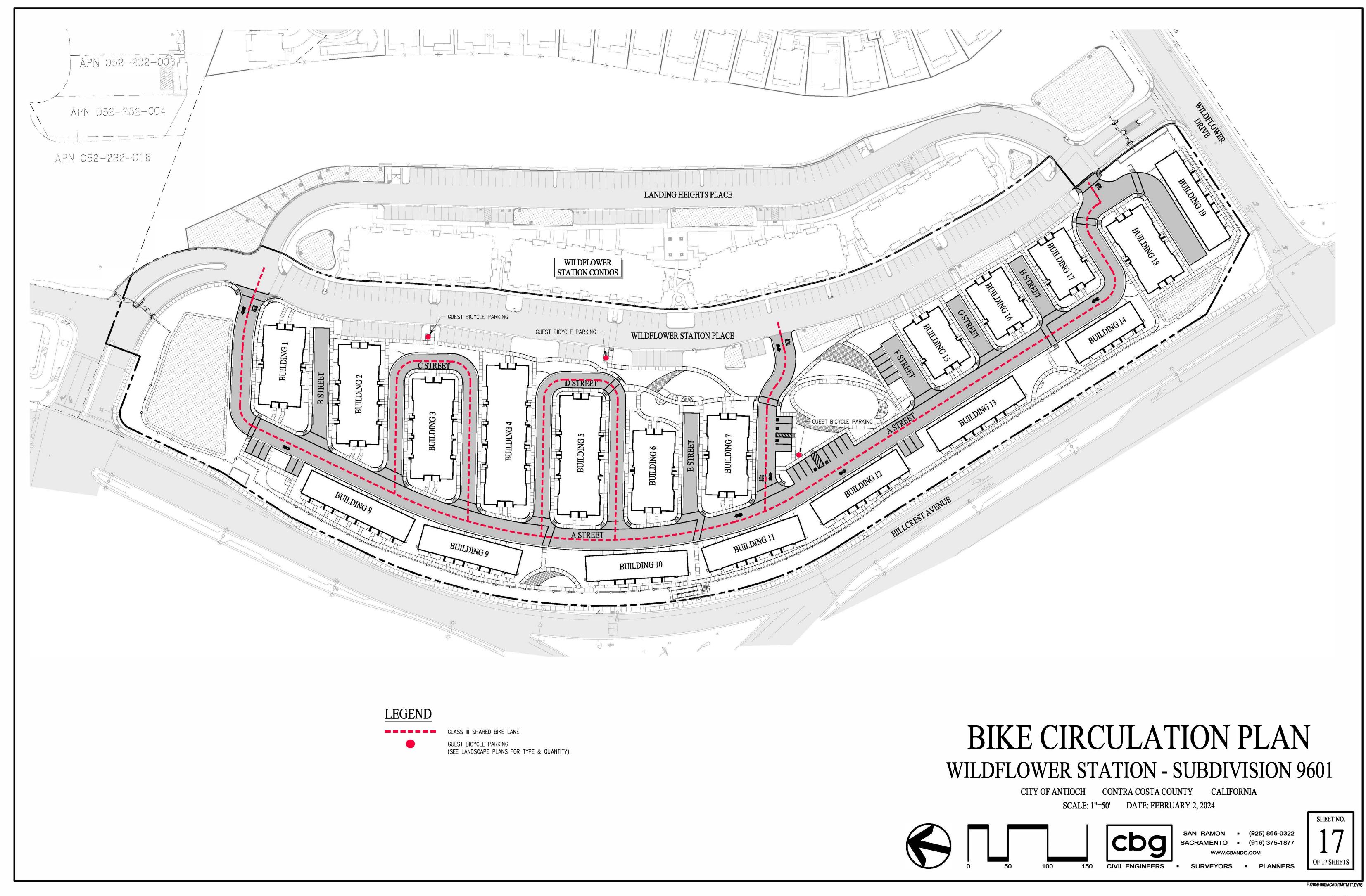
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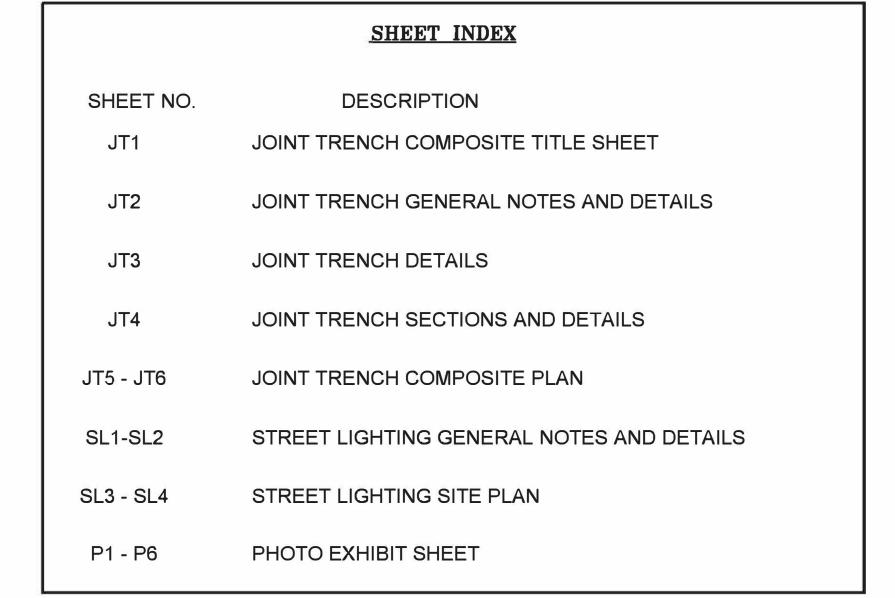








VICINITY MAP NOT TO SCALE

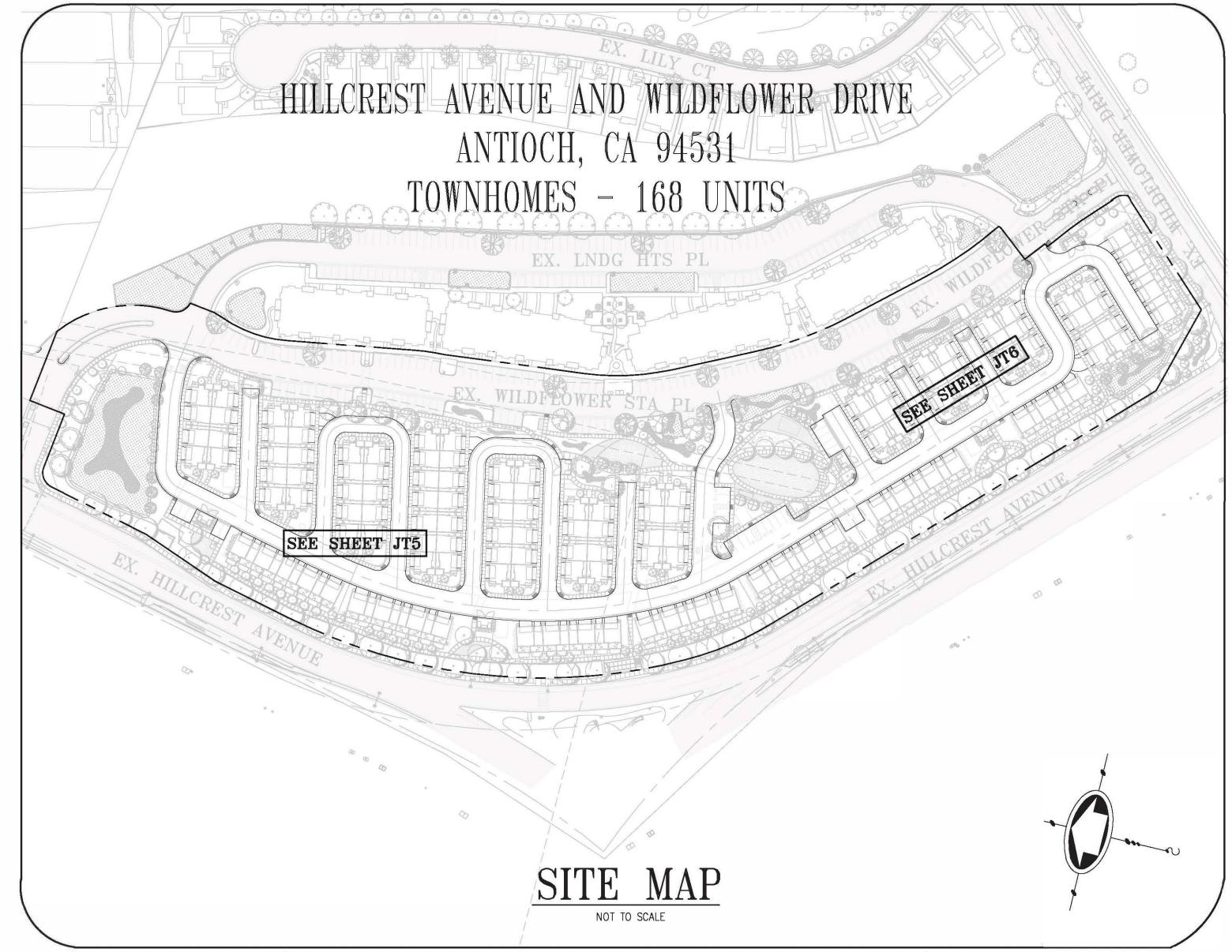


X L.F. OF JOINT TRENCH AND X STREET LIGHTS SHALL BE INSTALLED WITH THIS JOINT TRENCH PLAN SET

19 NEW TOWNHOME BUILDINGS (168 UNITS)

NEW SERVICE COMPLETION (ELECTRIC, TELEPHONE, AND CATV)

DENOVA HOMES WILDFLOWER TOWNHOMES 2 ANTIOCH CONTRA COSTA COUNTY CALIFORNIA



	NOT	Γ TO SCALE		
TARRAR UTILITY REP.:	KARA PEDERSEN	JOB NO.	223027	PHONE NO(925) 240-2
DEVELOPER:DEN	OVA HOMES	_ JOB NO	223027	PHONE NO(925) 605-9
PG&E ELECTRIC COORDINATOR:	JASON BARRETT	_ JOB NO	á	PHONE NO(925)459-2
PG&E GAS COORDINATOR:	语 名	JOB NO		PHONE NO.
TELEPHONE REP.:	KEVIN BLUTH	_ JOB NO	5th	PHONE NO. (925) 271-1
CABLE T.V. REP.:	KURTIS FAULTNER	JOB NO.	-	PHONE NO. (925) 337-2

DESCRIPTION:	BY:	DATE:	STATUS
CIVIL PLANS (ELECTRONIC FILE)	CBG	02-08-2023	R
ARCHITECTURAL PLANS (ELECTRONIC FILE)	SDG	02-08-2023	R
LANDSCAPE PLANS (ELECTRONIC FILE)	VANDERTOOLEN ASSOCIATES	02-08-2023	R
GAS DESIGN		-	-
ELECTRIC DESIGN	BROWN ELECTRIC ESTIMATING	XX-XXXXX	XXXX
TELEPHONE INTENT REPLY	AT&T	XX-XX-XXXX	XXXX
CATV INTENT REPLY	COMCAST	XX-XXXXX	XXXX
STREET LIGHT PLANS - PUBLIC	-	-	-
STREET LIGHT PLANS - PRIVATE	TARRAR UTILITY CONSULTANT	-	-
SOILS REPORT	XXXX	XX-XX-XXXX	XXXX

TARRAR UTILITY CONSULTANTS APPROVED FOR SUBMITTAL KARA PEDERSEN QUALIFIED APPLICANT DESIGN ENGINEER

LEGEND

PROPOSED JOINT TRENCH

SVC —— PROPOSED JOINT TRENCH SERVICE

—— EX JT —— EXISTING JOINT TRENCH

— EX FO — EXISTING FIBER OPTIC

---- ESL ---- EXISTING STREET LIGHT CONDUIT

—— ECUG —— EXISTING UNDERGROUND CATY LINES

—— EEUG —— EXISTING UNDERGROUND ELECTRIC LINES

—— EUUG —— EXISTING UNDERGROUND UTILITY LINES

—— EUOH —— EXISTING OVERHEAD UTILITY LINES

—— ECOH —— EXISTING OVERHEAD CATV LINES

—— ETOH —— EXISTING OVERHEAD TELEPHONE LINES

—— cug—— PROPOSED UNDERGROUND CATV LINES

PROPOSED UNDERGROUND ELECTRIC LINES

TUG PROPOSED UNDERGROUND TELEPHONE LINES

EXISTING PRIMARY SPLICE BOX

EXISTING SECONDARY SPLICE BOX

PG&E 30, PAD MOUNT TRANSFORMER CONCRETE PAD SIZE: 90" x 106"

EXISTING ELECTROLIER, SINGLE ARM

EXISTING ELECTROLIER, DOUBLE ARM

PG&E SECONDARY SPLICE BOX, 3' x 5' x 3'6"

EEOH — EXISTING OVERHEAD ELECTRIC LINES

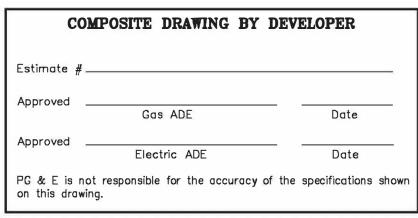
—— ETUG —— EXISTING UNDERGROUND TELEPHONE LINES

--- EX GAS --- EXISTING GAS

____ JTX _____ PROPOSED JOINT TRENCH CROSSING

DESIGN CHANGE COMPONENT ANY CHANGES TO THIS DESIGN MUST BE APPROVED BY PG&E GAS ADE

SUBSTRUCTURE VERIFICATION STAMP DEVELOPER NOTE AND SIGN ALL PG&E ENCLOSURES AND BOXES HAVE BEEN SET TO GRADE ACCORDING TO GRADE STAKES PROVIDED BY DEVELOPERS ENGINEER. ALL COSTS TO RELOCATE OR READJUST BOXES AT A LATER DATE WILL BE BILLED TO THE DEVELOPER. PLEASE HAVE YOUR JOB SUPT. VERIFY THE CORRECT GRADE OF ALL ENCLOSURES AND BOXES, AND SIGN AND DATE DRAWING.



COMPOSITE DRAWING BY DEVELOPER Telephone representative Approved CATV representative

Brentwood, CA 94513 (925) 240-2595 (925) 240-7013 fax www.tarrar.com

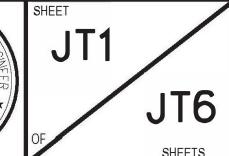


JOINT TRENCH COMPOSITE TITLE SHEET DENOVA HOMES WILDFLOWER TOWNHOMES 2 ANTIOCH **CALIFORNIA**

ATE: FEBRUARY 2024 DATE LAST WORKED ON: 2/5/2024 CHECKED: SCALE: NOT TO SCALE PRELIMINARY NOT FOR CONSTRUCTION INTENT TO CONSTRUCT







PROJECT NOTES:

- 1. FIELD ADJUST SERVICES TO MINIMIZE INTERFERENCE WITH EXISTING FACILITIES (TYPICAL).
- CONTRACTOR SHALL PERFORM ALL TRENCHING, EXCAVATING, BACKFILLING AND OTHER WORK AS SHOWN OR NOTED ON PLANS, AND AS SPECIFIED ON UTILITY BID DOCUMENTS.
- 3. FIELD ADJUST SPLICE BOXES TO KEEP CLEAR OF SIDEWALK, DRIVEWAYS AND EXISTING FACILITIES (TYPICAL).
- 4. A 3 FOOT LEVEL WORKING AREA MUST BE MAINTAINED AROUND ALL ELECTRIC ENCLOSURES. PRIOR TO ENERGIZING THE SYSTEM, THE ELECTRIC UTILITY COMPANY INSPECTOR WILL DETERMINE IF RETAINING WALLS ARE REQUIRED TO MEET MINIMUM CLEARANCE BETWEEN ENCLOSURES AND THE TOPS OR TOES OF SLOPES. IF RETAINING WALLS ARE REQUIRED, THE DEVELOPER AND/OR CONTRACTOR SHALL OBTAIN THE NECESSARY PERMITS FROM THE CITY/COUNTY BUILDING DEPARTMENT PRIOR TO WALL CONSTRUCTION.
- 5. TRANSITION TO VAULTS FROM TRENCH NOT SHOWN, SEE TRANSITION DETAIL SHEET JT3 (TYPICAL).
- 6. CONTRACTOR SHALL PLACE ALL UTILITY SPLICE BOXES, ENCLOSURES & CONDUIT IN PROPER RELATIONSHIP TO FINAL GRADE (SHOWN SCHEMATICALLY).
- 7. ALL PG&E, TELEPHONE, CABLE T.V. AND FIBER OPTIC BOXES AND JOINT TRENCH FACILITIES ARE TO MAINTAIN A MINIMUM OF 3' SEPARATION FROM SEWER, WATER LATERALS AND DRIVEWAYS.
- 8. CONTRACTOR SHALL COORDINATE ALL CONNECTIONS BETWEEN PROPOSED AND EXISTING FACILITIES AS DIRECTED BY THE RESPECTIVE UTILITY COMPANY INSPECTOR. UTILITY COMPANY PERSONNEL SHALL MAKE ALL "HOT TIE-INS"; THE CONTRACTOR IS PROHIBITED FROM WORKING IN ANY ENERGIZED FACILITIES.
- 9. THE CONTRACTOR SHALL OBTAIN THE APPROPRIATE STREET EXCAVATION AND ENCROACHMENT PERMIT(S) FROM THE CITY/COUNTY PRIOR TO STARTING WORK IN THE PUBLIC STREET AREA.
- 10. FIELD LOCATE JOINT TRENCH FACILITIES TO KEEP CLEAR OF SERVICE LATERALS. SERVICE LATERALS TO BE ROUTED TO AVOID SPLICE BOX (ADDITIONAL P.U.E MAY BE REQUIRED).
- 11. RESPECTIVE UTILITY COMPANY TO OBTAIN CITY APPROVAL OF ALL ABOVE GROUND EQUIPMENT.
- 12. UNLESS OTHERWISE SHOWN ON THE PLANS, NATURAL BENDS SHALL BE USED FOR ALL CONDUIT EXCEPT STREET LIGHT CONDUIT.
- 13. INCIDENTAL TRENCHING TO SPLICE BOXES NOT SHOWN (TYPICAL). CONTRACTOR TO PROVIDE ADDITIONAL TRENCHING AS REQUIRED FOR CONDUIT ROUTING TO SPLICE BOXES AND CABINETS (TYPICAL).
- 14. ALL CONDUITS SHALL ENTER OR EXIT PERPENDICULAR TO BOX WALLS.
- 15. ALL CONDUITS MUST BE MANDREL TESTED AND APPROVED.
- 16. OFFSET SPLICE BOXES TO ROUTE TELEPHONE/FIBER OPTIC CONDUIT AS NEEDED (TYPICAL).
- 17. PULL ROPES SHALL BE PLACED IN ALL EMPTY CONDUITS AS REQUIRED BY EACH UTILITY COMPANY.
- 18. ALL PG&E SPLICE BOXES ADJACENT TO TRANSFORMER SHALL BE 26" IN DEPTH (TYPICAL).
- 19. ALL CONDUITS NOT ENTERING SPLICE BOXES OR ENCLOSURES SHALL BE CAPPED.
- 20. COORDINATE TIE-IN WITH UTILITY COMPANY AS REQUIRED.
- 21. THE STREET LIGHT SYSTEM SHALL BE INSTALLED IN ACCORDANCE WITH THE "MATERIAL AND LABOR RECAP" AND LIGHT SCHEDULE AS SHOWN ON THESE PLANS.
- 22. ALL EXISTING DUCTS TO BE USED IN THESE PLANS SHALL BE "VERIFIED" BY PULLING A MANDREL THROUGH THE ENTIRE EXISTING LENGTH PRIOR TO CONNECTION.
- 23. EDGE OF SPLICE BOXES & PEDESTALS SHALL BE 5' FROM EDGE OF FIRE HYDRANT AND 3' FROM STREET LIGHT (TYPICAL). CONTRACTOR TO AVOID DISTURBING FIRE HYDRANT THRUST BLOCK.
- 24. ALL UTILITY SUBSTRUCTURES SHALL BE INSTALLED IN ACCORDANCE WITH THE "MATERIAL AND LABOR RECAP"
- 25. MAINTAIN 3' CLEARANCE AND LEVEL AREA AROUND PRIMARY SPLICE BOXES & XFMRS.
- 26. DUE TO UNCERTAINTIES OF THE EXACT LOCATION OF EXISTING FACILITIES, FIELD LOCATION OF PROPOSED FACILITIES MAY BE REQUIRED. CONFIRM WITH VARIOUS UTILITIES FOR EXACT PLACEMENT.
- 27. FOR CLARITY BOXES/PEDESTALS ARE SHOWN AT LARGER SIZE THAN ACTUAL. FIELD ADJUST TO KEEP CLEAR OF DRIVEWAYS (TYPICAL).
- 28. ALL SERVICE FACILITIES SHALL BE EXTENDED TO EITHER THE PROPERTY LINE OR TO POSITION SHOWN ON THE PLANS, AND THEN CAPPED, BURIED AND LOCATION STAKED.
- 29. THESE PLANS WERE PREPARED UTILIZING PLANS RECEIVED FROM R-PN1 (R-PN2).

THIS AREA RESERVED FOR STREET SECTION TO BE PLACED AT A LATER TIME

JOINT TRENCH AND UTILITY BOX LOCATION

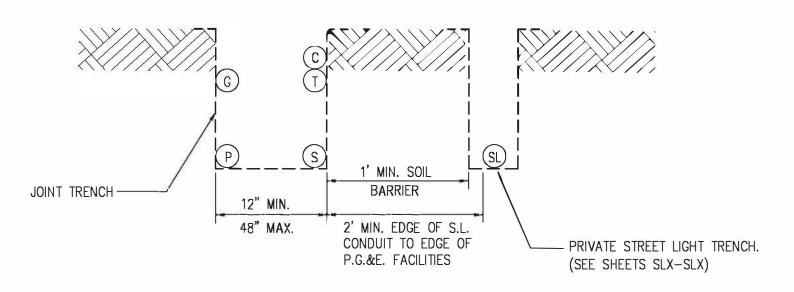
<u>JOINT TRENCH STREET SECTIONS</u>

NOT TO SCALE NOTE: SEE PLANS FOR CONFIGURATIONS AND ARRANGEMENTS. * UNLESS OTHERWISE SHOWN

WITHIN ROADWAY SECTION (95% RELATIVE COMPACTION FOR THE TOP 6" BELOW ROAD SUBGRADE AND 90% BELOW THAT)

ABBREVIATION LIST H.P.S. HIGH PRESSURE SODIUM BACK OF CURB RT RETAINING WALL BACK OF WALK IRRIGATION CONTROLLER RIGHT OF WAY J.T. JOINT TRENCH BRITISH TERM UNITS SCHEDULE CB CATCH BASIN KV KILO-VOLTS STORM DRAIN LANDSCAPE EASEMENT CENTERLINE CAT. LINEAR FODT/FEET SIDE WALK CATALOG C OR CATV CABLE TELEVISION SANITARY SEWER SANITARY SEWER EASEMENT CUBIC FEET PER HOUR ST. LT.-S/L STREET LIGHT CAPITOL IMPROVEMENT PROJECT MPOE MINIMUM POINT OF ENTRY N.T.S. NOT TO SCALE CENTER LIN SUBDIMSION OUTER DIAMETER SQUARE FOOTAGE COPPER **ELECTRIC** OVER HEAD TELEPHONE EDGE OF PAVEMENT PRIVATE INGRESS, EGRESS. TUC TARRAR UTILITY CONSULTANTS AND UTILITY EASEMENT **TYPICAL** EMERGENCY VEHICLE ACCESS EASEMENT PROPERTY LINE TRAFFIC SIGNAL **EXISTING** P.S. POWER SUPPLY UNDERGROUND FACE OF CURB U.O.N. UNLESS OTHERWISE NOTED FIRE HYDRANT PRIVATE STORM DRAIN EASEMENT FUT. PSE PUBLIC SERVICE EASEMENT F.O. FIBER OPTIC PRIVATE VEHICLE ACCESS WAY POLY MNYL CHLORIDE GALV. **GALVANIZE** PUBLIC WATER LINE EASEMENT W/O WITHOUT G.E. GENERAL ELECTRIC WATER LINE EASEMENT GRD. GROUND PUBLIC UTILITY EASEMENT XFMR TRANSFORMER

PRIVATE STREET LIGHT TRENCH LOCATION ADJACENT TO JOINT TRENCH



PRIVATE STREET LIGHT TRENCH N.T.S. JTX LOCATION ADJACENT TO JOINT TRENCH NOT TO SCALE

GENERAL NOTES:

- 1. ALL JOINT TRENCH CONSTRUCTION WORK SHALL BE IN ACCORDANCE WITH PG&E UTILITY OPERATIONS UD STANDARD S5453.
- 2. ALL WORK SHALL BE SUBJECT TO THE INSPECTION AND SATISFACTION OF ALL PARTICIPATING UTILITIES AND CITY INSPECTORS.
- 3. BACKFILL SELECTION SHALL BE SUBJECT TO THE APPROVAL OF THE RESPECTIVE UTILITY COMPANIES, THE SOILS ENGINEER AND THE CITY AND/OR COUNTY WHERE THE PROJECT IS LOCATED. CONSULT PARTICIPATING UTILITIES, SOILS ENGINEER, AND THE CITY FOR APPROVED BACKFILL MATERIAL. COMPACTION TO MEET LOCAL AGENCIES REQUIREMENTS.
- 4. THE BOTTOM OF THE TRENCH SHALL BE CLEARED OF ROCKS AND OTHER HARD SURFACES. DISTRIBUTION TRENCHES WITHOUT TELEPHONE CONDUIT DO NOT REQUIRE BEDDING MATERIAL. SERVICE TRENCHES WITHOUT TELEPHONE CONDUIT REQUIRE 2" SAND BEDDING AS A PAD ON WHICH UTILITY FACILITIES CAN REST. SERVICE TRENCHES CONTAINING TELEPHONE CONDUIT ONLY REQUIRE A 1" SAND BEDDING. ALL OTHER TRENCHES CONTAINING TELEPHONE CONDUIT REQUIRE A 3" SAND BEDDING, REFER TO PG&F GREEN BOOK PUBLICATION \$5453, EXHIBIT B AND AT&T SPEC95 "AT&T SPECIFICATIONS" TRENCHING AND CONDUIT GUIDE FOR FURTHER
- 5. THE CONTRACTOR SHALL BE RESPONSIBLE TO REPLACE PAVEMENT AND/OR SIDEWALK WHERE REMOVED OR DAMAGED AS A RESULT OF ITS OPERATION (UNLESS OTHERWISE NOTED). REPLACEMENT OF PAVEMENT AND/OR SIDEWALK TO BE PER CITY SPECIFICATIONS.
- 6. THE CONTRACTOR SHALL BE RESPONSIBLE TO COORDINATE AND NOTIFY ALL PARTICIPATING UTILITY INSTALLATIONS.
- 7. THE CONTRACTOR SHALL BE HELD RESPONSIBLE FOR ANY FIELD CHANGES MADE WITHOUT FIRST NOTIFYING TARRAR UTILITY CONSULTANTS.
- 8. IT IS THE CONTRACTOR'S RESPONSIBILITY TO VERIFY THE EXISTENCE AND/OR PRECISE LOCATION OF ALL UNDERGROUND FACILITIES PRIOR TO THE START OF CONSTRUCTION. TARRAR UTILITY CONSULTANTS MAKES NO WARRANTY WHATSOEVER THAT THE EXISTING UNDERGROUND UTILITIES AND/OR STRUCTURES DEPICTED ON THE PLANS HAVE BEEN ACCURATELY LOCATED OR THAT THERE ARE NO OTHER UNDERGROUND UTILITIES AND STRUCTURES IN ADDITION TO WHAT HAS BEEN SHOWN. CALL U.S.A. A MINIMUM OF 48 HOURS PRIOR TO STARTING CONSTRUCTION. FOR CALIFORNIA NORTH, (KERN COUNTY AND NORTHERLY, AND NEVADA) CALL (800)227-2600. FOR CALIFORNIA SOUTH, (SAN BERNARDINO COUNTY AND SOUTHERLY) CALL (800)422-4133.
- 9. CONTRACTOR SHALL COMPLY WITH ALL STATE, COUNTY AND CITY LAWS AND ORDINANCES AND WITH THE REGULATIONS OF THE DEPARTMENT OF INDUSTRIAL RELATIONS, O.S.H.A. AND ANY OTHER GOVERNMENTAL AGENCY RELATING TO THE SAFETY AND CHARACTER OF WORK, EQUIPMENT AND LABOR PERSONNEL.
- 10. THE DRAWINGS AND SPECIFICATIONS SHALL BE CONSIDERED TO BE COMPLEMENTARY TO EACH OTHER. ANYTHING SHOWN ON THE DRAWINGS AND NOT MENTIONED IN THE SPECIFICATIONS, OR MENTIONED IN THE SPECIFICATIONS AND NOT SHOWN ON THE DRAWNGS, SHALL BE OF LIKE EFFECT AS IF SHOWN ON OR MENTIONED IN BOTH. IF DISCREPANCY IS FOUND, NOTIFY TARRAR UTILITY CONSULTANTS PRIOR TO STARTING WORK.
- 11. TRENCH AND CONDUIT LAYOUTS ARE SHOWN SCHEMATICALLY.
- 12. TRENCHING OR SUBSTRUCTURE EXCAVATION MAY NECESSITATE OPERATION OVER, UNDER, OR ADJACENT TO OTHER UNDERGROUND UTILITIES (STORM, SEWER, WATER, ETC...). THE CONTRACTOR IS RESPONSIBLE TO LOCATE, PROSPECT, EXPOSE AND PROTECT ALL ADJACENT OR CROSSING UNDERGROUND UTILITIES. THIS WORK TO PROTECT THOSE UTILITIES IS NOT CONSIDERED AS EXTRA WORK. IT IS THE CONTRACTOR'S RESPONSIBILITY TO REVIEW IMPROVEMENT PLANS, IN CONJUNCTION WITH THIS PLAN, AND BID THE WORK ACCORDINGLY.
- 13. THE QUANTITIES SHOWN ON THESE PLANS ARE ONLY ESTIMATES OF WHAT WILL ACTUALLY BE REQUIRED FOR THE CONSTRUCTION OF THE OVERALL PROJECT. FINAL QUANTITIES MAY VARY ACCORDING TO CHANGES, ADDITIONS, DELETIONS OR OMISSIONS ON THE ORIGINAL PLAN.
- 14. VERIFY ALL SUBSTRUCTURE EXCAVATION DIMENSIONS WITH SUPPLIER(S) BEFORE BIDDING.
- 15. TARRAR UTILITY CONSULTANTS ASSUMES NO RESPONSIBILITY FOR ANY VARIANCE BETWEEN THESE PLANS AND THE ACTUAL FIELD CONDITIONS. THE CONTRACTOR SHOULD REVIEW THE PROJECT SITE PRIOR TO SUBMITTING ITS BID.
- 16. THE CONTRACTOR IS REQUIRED TO EXCAVATE BELL HOLE(S) AT TIE-IN LOCATIONS AS DIRECTED BY PARTICIPATING UTILITY.
- 17. CONTRACTOR WILL COMPLY WITH ALL LAWS, ORDINANCES AND REGULATIONS. CONTRACTOR SHALL BE FAMILIAR WITH O.S.H.A. INDUSTRIAL ORDERS AND SHALL CONDUCT HIS WORK ACCORDINGLY. WHEN WORKING ENERGIZED EQUIPMENT, THE UTILITY OWNER SHALL BE NOTIFIED TO SUPPLY THE APPROPRIATE MAN POWER AND SAFETY PRECAUTIONS AS NEEDED. THE CONTRACTOR IS RESPONSIBLE FOR PUBLIC SAFETY AND TRAFFIC CONTROL MEASURES.
- 18. THE CONTRACTOR IS RESPONSIBLE TO PROVIDE AS-BUILT DRAWINGS AFTER INSTALLATION OF PG&E'S GAS AND ELECTRIC SYSTEMS (PRIOR TO "HOT TIE-INS").
- 19. THE CITY INSPECTOR SHALL BE NOTIFIED TWO WORKING DAYS PRIOR TO COMMENCEMENT OF WORK. COORDINATE WITH THE INSPECTOR ANY SERVICES TO BE
- 20. THE CONTRACTOR IS TO VERIFY THE RIGHT OF WAY, PUBLIC UTILITY EASEMENT AND/OR PUBLIC SERVICE EASEMENT ACQUISITION WITH THE APPLICANT PRIOR TO CONSTRUCTION WITHIN AREAS OF QUESTION.
- 21. PG&E'S GENERAL TERM AND CONDITIONS FOR GAS AND ELECTRIC EXTENSION AND SERVICE CONSTRUCTION BY "APPLICANT" (EFFECTIVE 07/1/95) TO BE UTILIZED FOR ALL TRENCHING, BACKFILLING, AND INSTALLATION WORK.
- 22. IN THE EVENT OF DISPUTES OR DISAGREEMENT OVER ANY INSTALLATIONS, DESIGNS, PLANS OR DRAWINGS, THE SPECIFICATIONS AND REQUIREMENTS OF THE INDIVIDUAL UTILITY COMPANIES AND THEIR INSPECTORS SHALL TAKE PRECEDENCE. IN CASE OF DISCREPANCIES WITHIN THE DRAWINGS AND SPECIFICATIONS HEREIN, THE CONTRACTOR SHALL CONSULT TARRAR UTILITY CONSULTANTS FOR INTERPRETATION BEFORE WORK IS STARTED.
- 23. TARRAR UTILITY CONSULTANTS HEREIN, ASSUMES NO RESPONSIBILITY WHATSOEVER FOR THE QUALITY, QUANTITY OR TIMING OF WORK TO BE PERFORMED BY THE CONTRACTOR, UTILITY COMPANY CONSTRUCTION CREWS, OR OTHER SUB-CONTRACTOR OF DEVELOPER.
- 24. ALL TRENCHING, BACKFILLING AND INSTALLATION WORK IS TO BE IN ACCORDANCE WITH THE STANDARD PRACTICES AND SPECIFICATIONS OF EACH UTILITY COMPANY PARTICIPATING IN THE UTILITY TRENCHES WITHIN THE PROJECT.
- 25. THE CONTRACTOR IS RESPONSIBLE FOR MAINTAINING POINTS OF ACCESS THAT ARE AGREEABLE TO ADJACENT LAND USES AND TENANTS AT ALL TIMES.
- 26. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ASCERTAINING WHAT INSPECTIONS WILL BE REQUIRED FOR APPROVAL OF THE WORK AND FOR COORDINATING ALL SUCH INSPECTIONS. THE CONTRACTOR SHALL GIVE AT LEAST 48 HOURS PRIOR NOTICE TO THE CITY, SOILS ENGINEER, UTILITY COMPANIES OR ANY OTHER INDIVIDUALS OR PUBLIC AGENCIES. THAT THE WORK IS READY FOR INSPECTION.
- 27. THE CONTRACTOR SHALL NOTIFY DEVELOPER 48 HOURS PRIOR TO THE NEED FOR SURVEY STAKING. THE CONTRACTOR IS RESPONSIBLE FOR THE PRESERVATION OF ALL CONSTRUCTION STAKING SET BY THE DEVELOPER'S SURVEYORS AND WILL BE BACK CHARGED FOR ANY RE-STAKING THAT IS REQUIRED. ANY EXTRA CONSTRUCTION STAKING NECESSITATED SOLELY BY THE CONTRACTOR'S NEGLIGENCE WILL BE CHARGED TO AND PAID FOR BY THE CONTRACTOR.
- 28. ALL TRANSFORMERS AND TRANSFORMER PADS ARE TO BE INSTALLED PER PG&E SPECIFICATIONS. PROTECTIVE BOLLARDS ARE TO BE PLACED WHERE NEEDED.
- 29. THE CONTRACTOR SHALL MAKE HIMSELF FAMILIAR WITH THE PROJECT IMPROVEMENT PLANS AND CONDUCT HIS WORK ACCORDINGLY
- 30. KEEP ALL BOXES AND PEDESTALS WITHIN PUBLIC UTILITY EASEMENTS OR RIGHT OF WAY. AS SHOWN.
- 31. ALL SAND BACKFILL MUST HAVE TESTING OF PH LEVEL AS WELL AS SAND EQUIVALENT. SEE CITY OF ANTIOCH REQUIREMENTS.
- 32. THE PROPOSED CONSTRUCTION OPERATION MAY TAKE PLACE AT OR NEAR FENCE LINES, PROPERTY LINES AND PROPERTY IMPROVEMENTS PRIOR TO CONSTRUCTION, CONTRACTOR SHALL BE RESPONSIBLE FOR IDENTIFYING THESE AREAS AND FOR MAINTAINING THESE AREAS AND FACILITIES AT ALL TIMES DURING THE
- 33. THE CONTRACTOR ASSUMES SOLE AND COMPLETE RESPONSIBILITY FOR THE SITE CONDITION AND SHALL DEFEND AND HOLD THE DEVELOPER AND TARRAR UTILITY CONSULTANTS HARMLESS FROM ANY ALLEGED CLAIMS OR LIABILITIES, EXCEPT THOSE ARISING FROM SOLE NEGLIGENCE OF THE DEVELOPER OR TARRAR UTILITY
- 34. THE APPROXIMATE LOCATIONS OF ALL EXISTING UTILITY COMPANY UNDERGROUND LINES, POLES BOXES, ETC., WERE OBTAINED FROM A REVIEW OF AVAILABLE UTILITY COMPANY RECORDS, REPRESENTATIONS OF UTILITY COMPANY PERSONAL, OR FIELD OBSERVATIONS. NEITHER THE DEVELOPER NOR TARRAR UTILITY CONSULTANTS ASSUME ANY RESPONSIBILITY FOR VARIANCES BETWEEN THESE PLANS AND THE ACTUAL FIELD CONDITIONS. NO EXTRA PAYMENT WILL BE MADE TO THE CONTRACTOR FOR ANY ADDITIONAL TRENCHING, BOX EXCAVATIONS, MATERIALS, ETC., THAT MAY BE REQUIRED TO COMPLETE THIS PROJECT IN THE EVENT AN EXISTING TIE-IN POINT SUBSTRUCTURE IS EITHER NON-EXISTING OR IS NOT SHOWN ON THE PLANS IN ITS ACTUAL FIELD POSITION. IT IS THE CONTRACTOR'S OBLIGATION AND RESPONSIBILITY TO SAFELY LOCATE ALL EXISTING UNDERGROUND FACILITIES BY SURFACE MARKING AND/OR HAND EXCAVATION PRIOR TO STARTING CONSTRUCTION.
- 35. "DEVELOPER AND/OR CONTRACTOR IS RESPONSIBLE TO OBTAIN A CITY OF ANTIOCH ENCROACHMENT PERMIT FOR ALL WORK DONE IN THE PUBLIC RIGHT OF WAY. DEVELOPER AND/OR CONTRACTOR IS ALSO RESPONSIBLE TO PROVIDE JOINT TRENCH PLANS TO THE CITY OF ANTIOCH AT THE TIME OF APPLICATION FOR THE ENCROACHMENT PERMIT."

813 First Street Brentwood, CA 94513 (925) 240-2595 (925) 240-7013 fax www.tarrar.com

H.O.A. HOME OWNERS ASSOCIATION



• Estimating • PG&E Elec Design ■ Joint TrenchM. E. P. Design

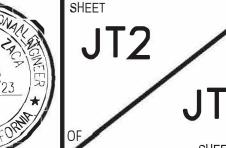
PlanningT-24 PGEE Gas Design

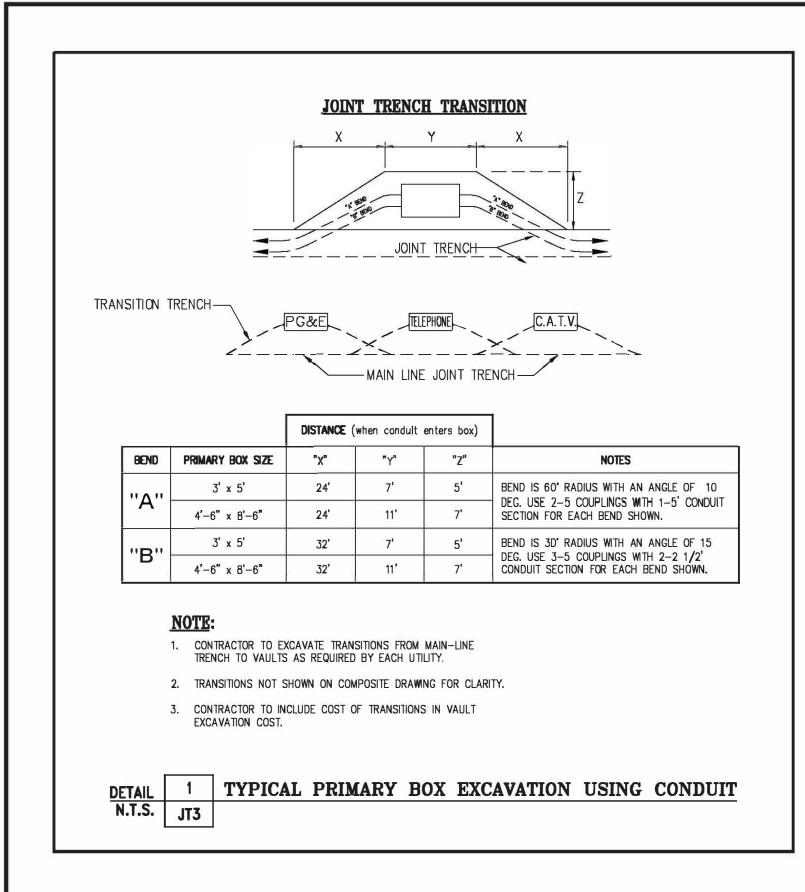
JOINT TRENCH GENERAL NOTES AND DETAILS DENOVA HOMES WILDFLOWER TOWNHOMES 2 ANTIOCH CALIFORNIA

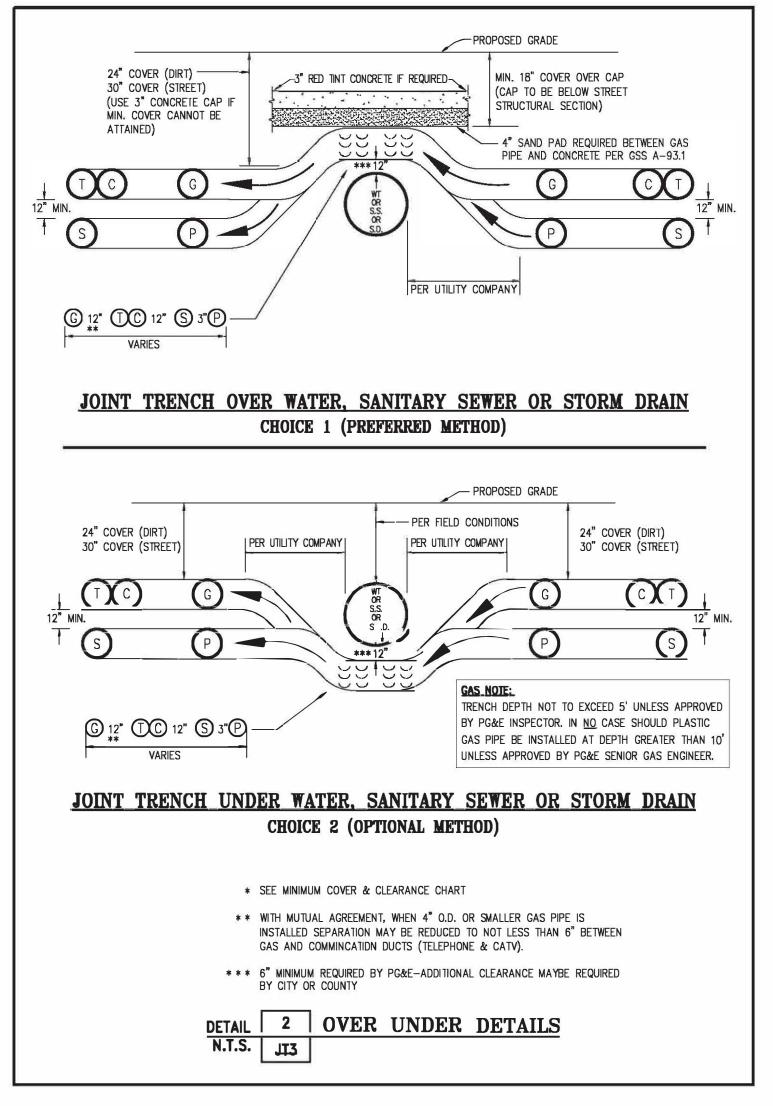
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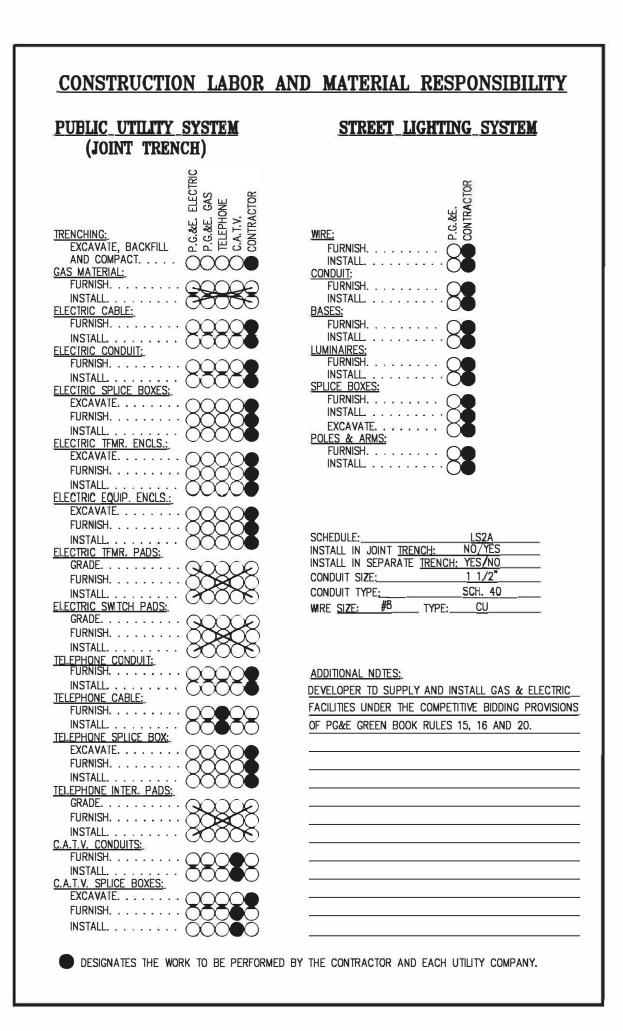


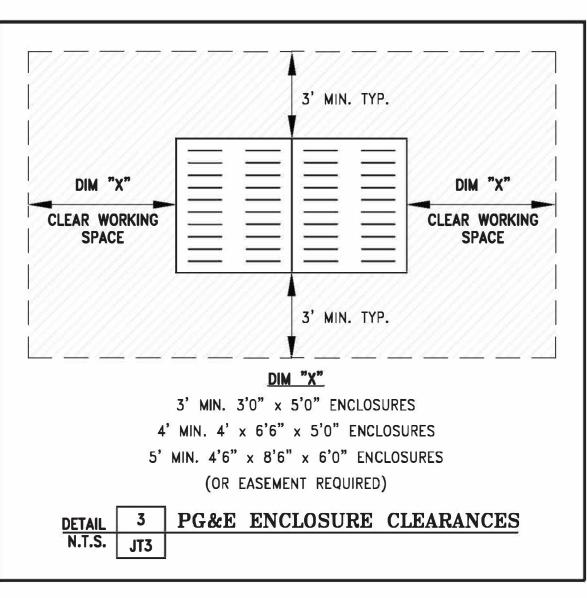


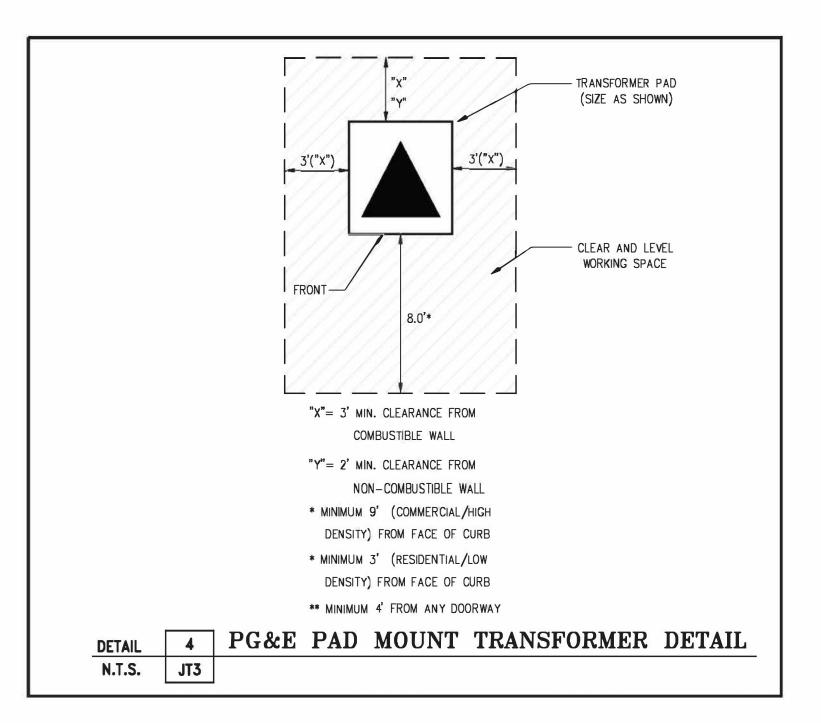














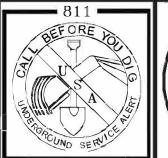
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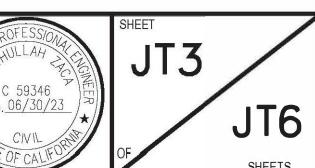
◆Planning◆ T-24 PGEE Gas Design ▶ PG&E Elec Design

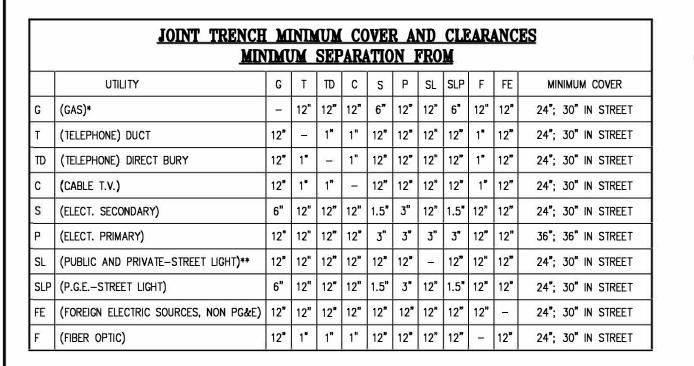
JOINT TRENCH DETAILS DENOVA HOMES WILDFLOWER TOWNHOMES 2 **CALIFORNIA** ANTIOCH

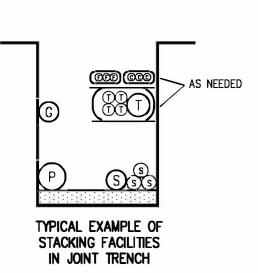
DATE: FEBRUARY 2024 DATE LAST WORKED ON: 2/5/2024 CHECKED: KT SCALE: NOT TO SCALE RAWN: KK PRELIMINARY NOT FOR CONSTRUCTION INTENT TO CONSTRUCT

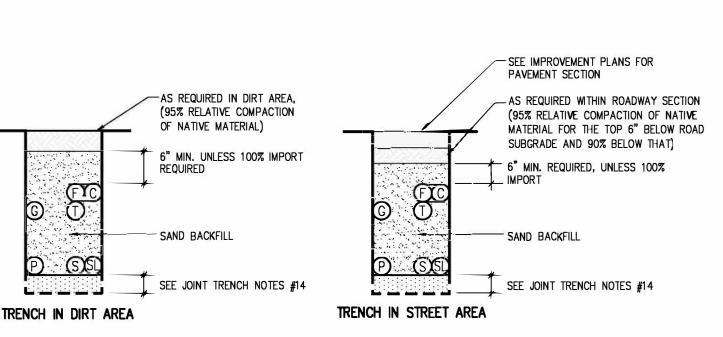


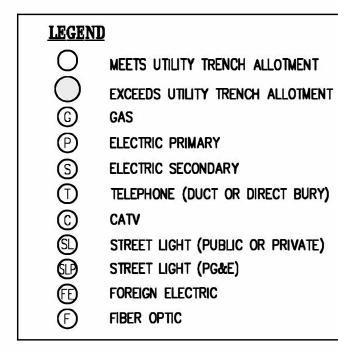










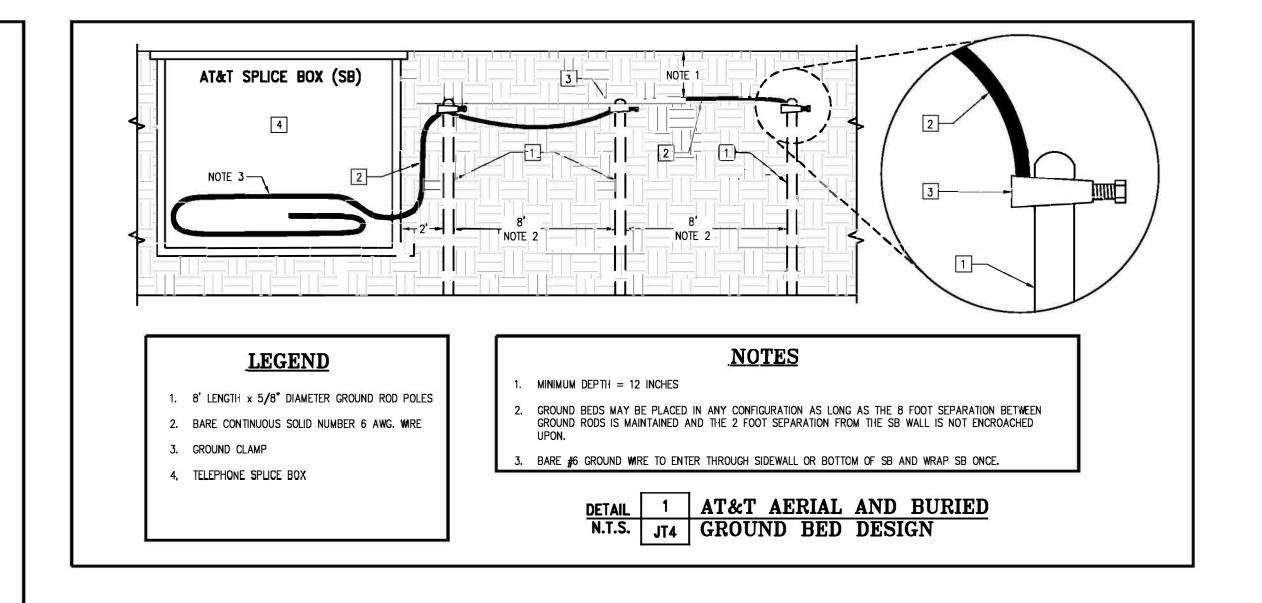


JOINT TRENCH NOTES:

- TRENCH COVER & CLEARANCES SHOWN ARE MINIMUMS ONLY AND MAY REQUIRE ALTERATIONS TO SUIT FIELD CONDITIONS.
- 2. IT IS RECOMMENDED THAT ALL FACILITIES ARE TO BE A MINIMUM OF 12" BELOW SUB-BASE DISTURBANCE.
- 3. * WITH MUTUAL AGREEMENT FROM PARTICIPATING UTILITIES, WHEN 4" O.D. OR SMALLER GAS PIPE IS INSTALLED, SEPARATION MAY BE REDUCED TO NOT LESS THAN 6" BETWEEN GAS AND COMMUNICATION DUCTS (TELEPHONE, C.A.T.V. & FIBER OPTIC).
- 4. * WHERE 6" GAS MAIN IS LOCATED IN THE JOINT TRENCH A 18" MINIMUM SEPARATION FROM GAS MAIN TO ALL UTILITIES WILL BE REQUIRED.
- . ** WITH MUTUAL AGREEMENT FROM PARTICIPATING UTILITIES, STREET LIGHT SEPARATION MAY BE REDUCED TO 0" BETWEEN STREET LIGHT AND COMMUNICATION DUCTS (TELEPHONE, C.A.T.V. & FIBER OPTIC).
- 6. TRENCH CONFIGURATIONS SHOWN ARE FOR INSTALLATION WHERE EACH OCCUPANT IS UTILIZING HIS ENTIRE SPACE ALLOCATION. OTHER CONFIGURATIONS OR REDUCED
- 7. THE CONTRACTOR IS TO ADJUST TRENCH DEPTHS AT ALL JOINT TRENCH LATERAL CROSSINGS TO MAINTAIN REQUIRED CLEARANCES BETWEEN ALL PARTICIPATING UTILITIES.
- 8. TRENCH SECTIONS ARE SHOWN SCHEMATICALLY AND INDICATE AREAS OF OCCUPANCY ONLY; THEY DO NOT REFLECT SIZE OR QUANTITY OF FACILITIES TO BE INSTALLED.
- 9. TRENCH FOOTAGES PER SECTION ARE APPROXIMATE. SECTIONS ARE DESIGNED TO ACCOMMODATE ALL REQUIRED FACILITIES AS INDICATED ON EACH TRENCH PARTICIPANT'S CONSTRUCTION DRAWINGS.
- 10. THE CONTRACTOR SHALL VERIFY TRENCH FOOTAGES FOR ACCURACY PRIOR TO EXCAVATION AND TAKE NECESSARY PRECAUTION CROSSING WATER AND SEWER FACILITIES.
- 11. THE CONTRACTOR SHALL REFER TO THE COMPOSITE, CONDUIT, AND/OR EACH RESPECTIVE UTILITY INSTALLATION PLAN FOR THE NECESSARY CONDUIT CABLE AND/OR PIPE TO BE INSTALLED IN THIS PROJECT.
- 12. TYPE "M2" TRENCH SHALL BE INSTALLED AFTER CURB AND GUTTER INSTALLATION. CONTRACTOR SHALL COORDINATE ADDITIONAL MOVE-INS NECESSARY TO COMPLETE THE SERVICES TO THE DWELLING UNITS WITH THE DEVELOPER, ALL AGENCIES AND THE UTILITY COMPANIES. THE COST OF THESE MOVE-INS SHALL BE INCLUDED IN THE CONTRACTOR'S UNIT PRICE FOR TRENCHING.
- 13. THE AVERAGE TRENCH DEPTHS SHOWN ARE BASED ON THE MINIMUM UTILITY COMPANY REQUIREMENTS FOR DEPTH AND SEPARATION. CONTRACTOR SHALL ADJUST TRENCH WIDTH & DEPTH AS REQUIRED TO ADEQUATELY CLEAR EXISTING UNDERGROUND FACILITIES AND MAINTAIN MINIMUM UTILITY CLEARANCES. ALL TRENCHES OVER 60" DEEP MUST COMPLY WITH OSHA REQUIREMENTS. (SEE THE JOINT TRENCH MINIMUM COVER AND CLEARANCE TABLE)
- 14. CONTRACTOR SHALL USE SAND BEDDING AND SHADING AS REQUIRED BY THE UTILITY COMPANIES. THE BOTTOM OF THE TRENCH SHALL BE CLEARED OF ROCKS AND OTHER HARD SURFACES. DISTRIBUTION TRENCHES WITHOUT TELEPHONE CONDUIT DO NOT REQUIRE BEDDING MATERIAL. SERVICE TRENCHES WITHOUT TELEPHONE CONDUIT REQUIRE 2" SAND BEDDING AS A PAD ON WHICH UTILITY FACILITIES CAN REST. SERVICE TRENCHES CONTAINING TELEPHONE CONDUIT ONLY REQUIRE A 1" SAND BEDDING. ALL OTHER TRENCHES CONTAINING TELEPHONE CONDUIT REQUIRE A 3" SAND BEDDING. REFER TO PG&E GREEN BOOK PUBLICATION S5453, EXHIBIT B AND AT&T SPEC95 "AT&T SPECIFICATIONS" TRENCHING AND CONDUIT GUIDE FOR FURTHER INFORMATION.
- 15. ALL TRENCHING AND BACKFILLING TO BE DONE IN ACCORDANCE WITH THE CITY OF ANTIOCH ENGINEERING STANDARDS AND SPECIFICATIONS.
- 16. ALL PG&E, TELEPHONE, CABLE, AND FIBER OPTIC BOXES AND JOINT TRENCH FACILITIES ARE TO MAINTAIN A MINIMUM OF 3' SEPARATION FROM SEWER AND WATER LATERALS AND DRIVEWAYS. ALL UTILITY VAULTS, BOXES, PEDESTALS, ETC. MUST MAINTAIN A 5' MINIMUM CLEARANCE FROM FIRE HYDRANTS, AND 3' MINIMUM FROM STREETLIGHTS.

1 7,			J)IN	T	TR	EN	CH	0	CC	UP	AN	CY	G	UII	DE							
TRENCH SECTION	A *	B*	C	D*	E*	F*	G*	H*	ı	J	K	L	M	N	0	Р	Q	R	S	T	U	٧	W
GAS	Х	Х	X		Х				Х	Х	Х		Х	Х	Х		Х			X			
TELEPHONE	X	Х		Х		Х			X	Х		Х	Х	Х		Х		X			X		
CABLE T.V.	X		X	Х			Х		X		Х	Х	X		Х	Х			X			X	
ELECTRIC SEC.	Х	Х	Х	Х	Х	Х	Х	Х					Х	Х	Х	Х	Х	Х	Х				Х
ELECTRIC PRI.	Х	Х	Х	Х	Х	Х	Х	Х															
FIBER OPTCS	Х	Х	Х	Х	Χ	Х	Х	Х	Χ	Χ	Х	Х	Χ	Χ	Х	Х	Х	Χ	Х	Χ	Х	Χ	

*THESE SECTIONS MAY OR MAY NOT CONTAIN SECONDARY



THIS AREA RESERVED FOR JOINT TRENCH SECTIONS TO BE PLACED AT A LATER TIME

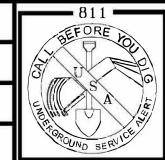




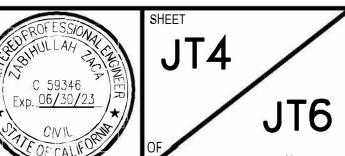
JOINT TRENCH SECTIONS AND DETAILS

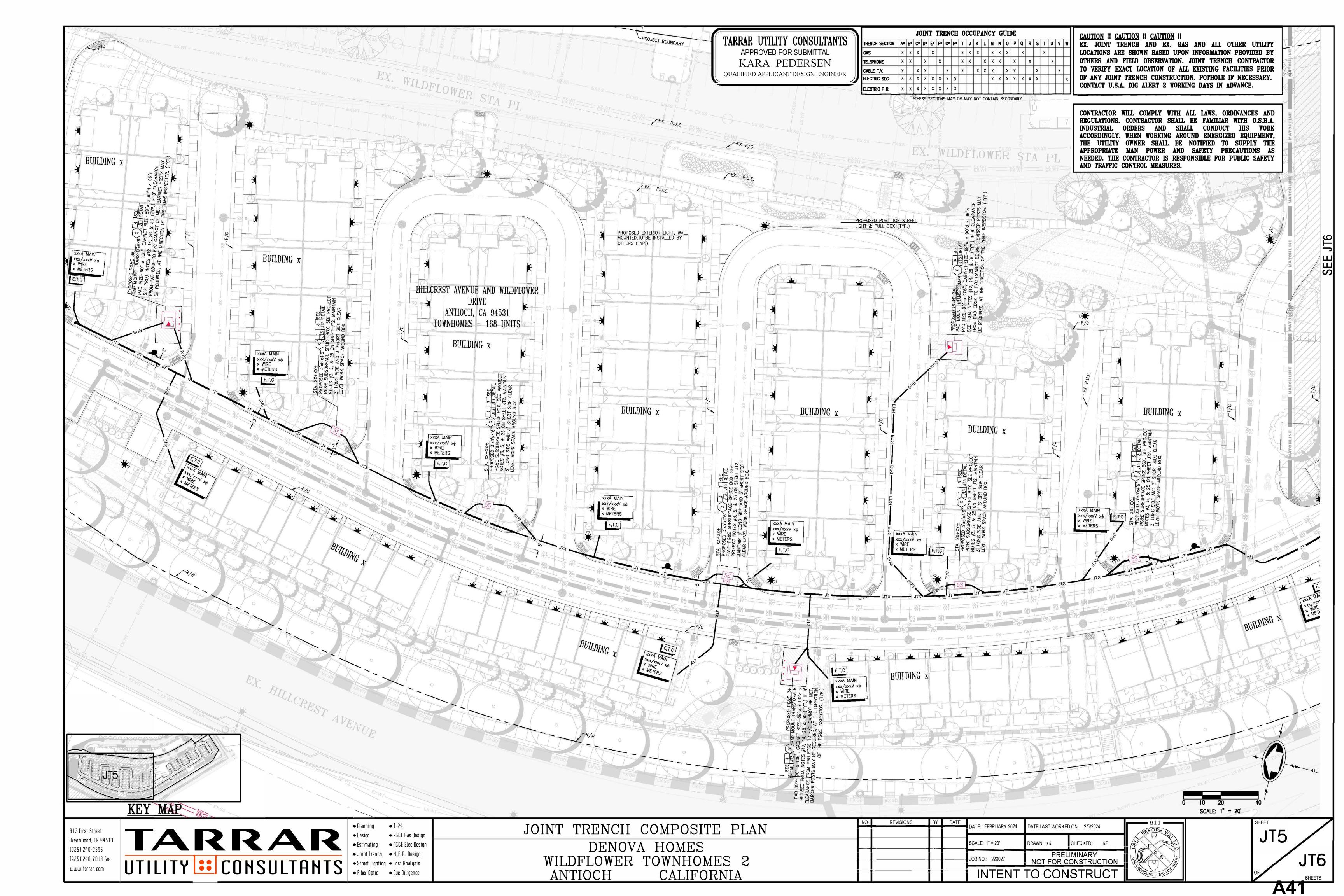
DENOVA HOMES WILDFLOWER TOWNHOMES 2 ANTIOCH CALIFORNIA

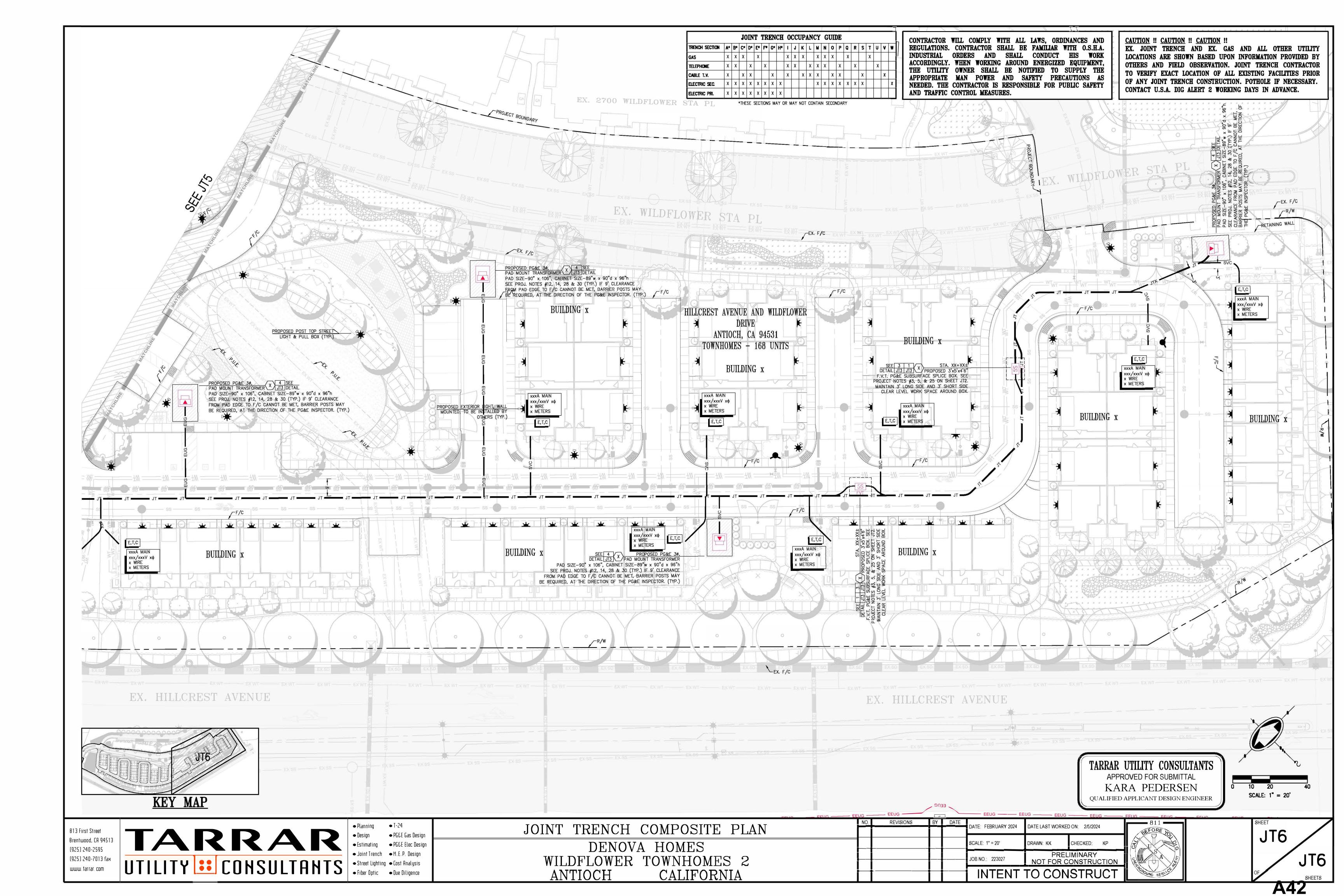
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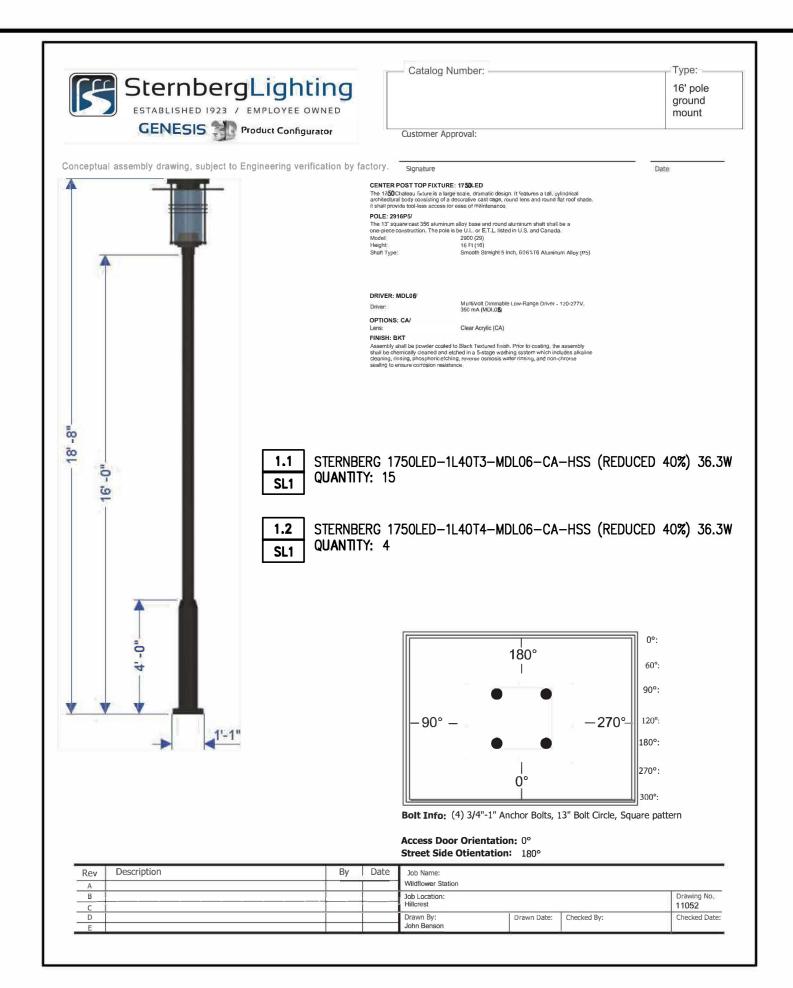




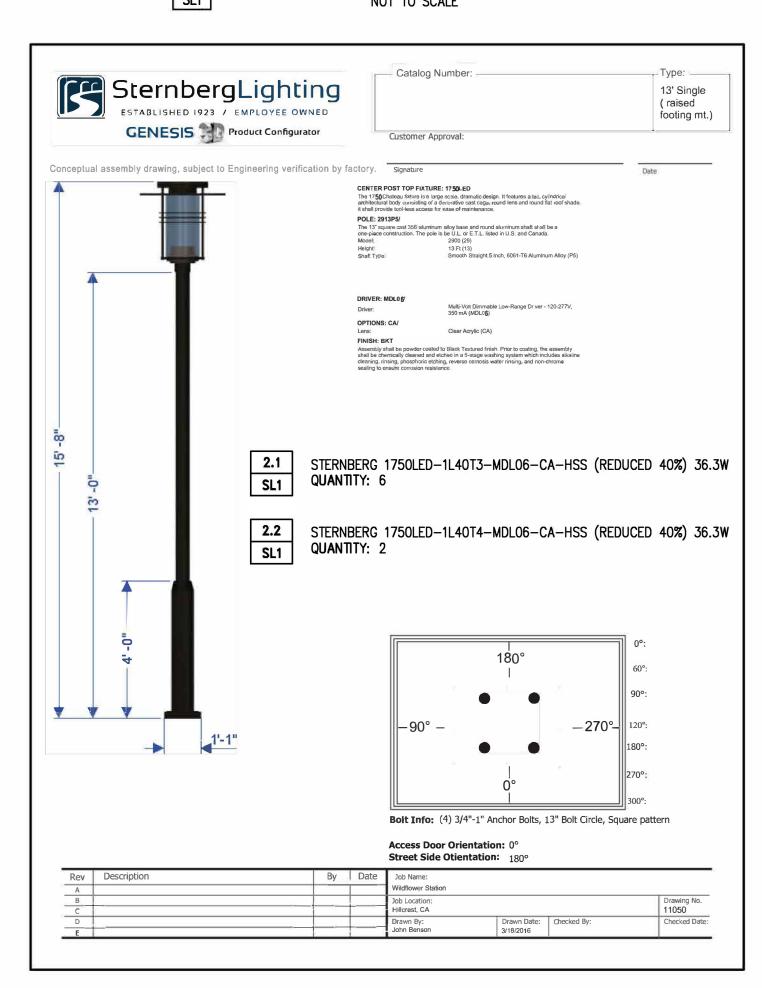




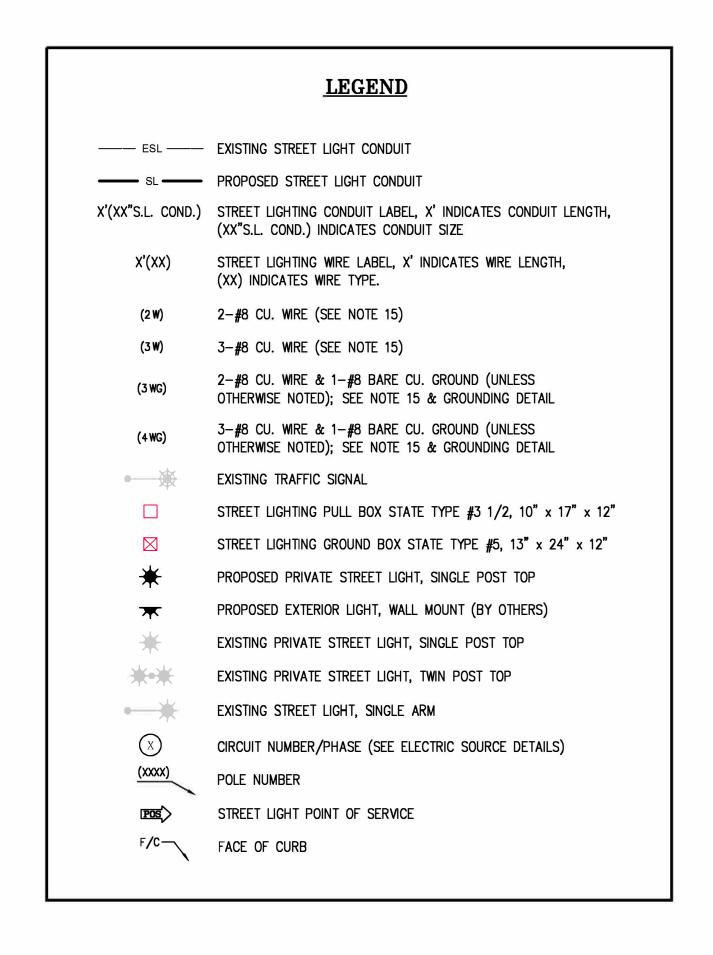


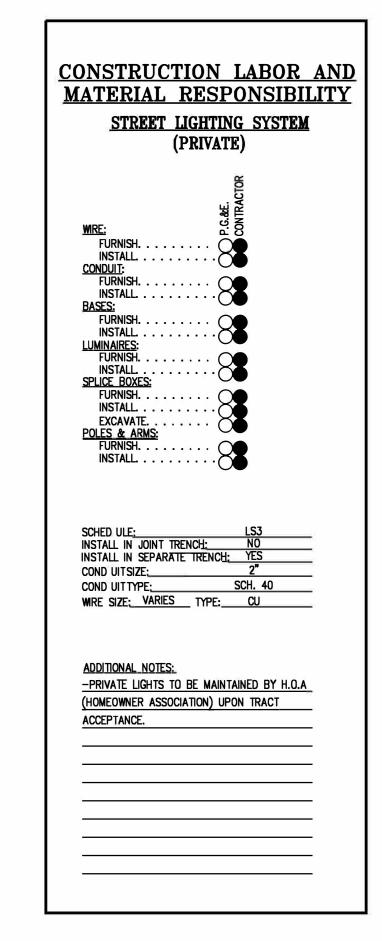


PRIVATE POST TOP ELECTROLIER DETAIL SL1 NOT TO SCALE



DENOVA HOMES WILDFLOWER TOWNHOMES 2 CONTRA COSTA COUNTY CALIFORNIA ANTIOCH





VOLTAGE DROP CALCULATIONS

2							
LOCATION	DISTANCE	LO	AD	VOLTAGE 120/240	WIRE SIZE	WIRE SIZE % VOLTAGE DROP	
LOCATION	DISTANCE	WATT	VOLT/AMP	120/240	WINE SIZE		
3.							
j							

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PRIVATE POST TOP ELECTROLIER DETAIL NOT TO SCALE

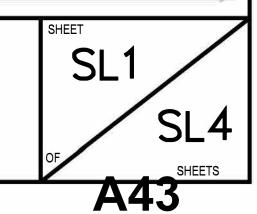
PGEE Gas Design

STREET LIGHTING GENERAL NOTES AND DETAILS DENOVA HOMES WILDFLOWER TOWNHOMES 2

ANTIOCH

DATE LAST WORKED ON: 4/11/2023 DATE: FEBRUARY 2024 SCALE: NOT TO SCALE CHECKED: KT **PRELIMINARY** NOT FOR CONSTRUCTION INTENT TO CONSTRUCT





LOCATION	DISTANCE	LO. WATT	AD VOLT/AMP	VOLTAGE 120/240	WIRE SIZE	% VOLTAGE DROP	CIRCUIT #
			VOL., / W.				
		, , ,				· ·	
		ì					

CALIFORNIA

2. THE ELECTRICAL CONTRACTOR SHALL INSTALL THE UNDERGROUND SERVICE FROM THE LUMINAIRE TO

STANDARD SPECIFICATIONS AND DETAILS OF THE CITY OF ANTIOCH.

STREET LIGHTING NOTES

H.O.A. SERVICE POINT AND TERMINATE CONDUIT AND WIRES AT BOX AS DIRECTED BY THE CITY.

1. ALL MATERIAL AND WORKMANSHIP SHALL FULLY CONFORM WITH THE NATIONAL ELECTRIC CODE AND

- 3. KEEP STREET LIGHTS A MINIMUM OF 3 FEET AWAY FROM THE EDGE OF DRIVEWAYS. SEWER AND WATER LATERALS AND 5 FEET AWAY FROM FIRE HYDRANTS & CATCH BASINS.
- 4. TWO OR MORE STREET LIGHTS ON THE SAME CIRCUIT SHALL BE WIRED TO BALANCE THE LOAD. (SEE WIRING DIAGRAM), UNLESS OTHERWISE NOTED.
- 5. CONDUIT AND FITTINGS: ALL CONDUIT AND FITTINGS SHALL BE U.L. APPROVED SCHEDULE 40 P.V.C., USE MINIMUM 2" SCH. 40 P.V.C. CONDUIT AND FITTINGS BELOW GRADE, UNLESS OTHERWISE NOTED OR REQUIRED. MINIMUM RADIUS BENDS SHALL BE 18". FOR ABOVE GROUND INSTALLATION USE METALLIC RIGID STEEL CONDUIT. PROVIDE PULL WIRE IN EMPTY CONDUITS. ALL CROSSINGS TO BE PERPENDICULAR TO STREET.
- 6. <u>CONDUIT DEPTH:</u> 24" UNDER SIDEWALK: 24" UNDER PLANTER STRIP: 30" UNDER PAVEMENT.
- 7. CABLE: CABLE SHALL BE U.L. A.W.G. NO. 8, 7-STRAND SOFT COPPER, TYPE THW OR THWN WITH MINIMUM OF 3/64" (40 MIL) POLYVINYL CHLORIDE INSULATION, UNLESS OTHERWISE NOTED. U.L. LISTED 600 VOLT, NO. 10 IN POLE MAY BE USED (40 MIL INSULATION).
- 8. SPLICE BOXES: SPLICE BOXES SHALL BE NO. 3-1/2 STATE TYPE WITH LID AND BRASS HOLD DOWN BOLTS. UNLESS OTHERWISE NOTED. LIDS TO BE INSCRIBED 'STREET LIGHTING'. SPLICE BOXES SHALL NOT BE MORE THAN 200 FEET APART ON LONG RUNS. SPLICE BOXES TO BE SET ON A CONCRETE FOOTING WHEN SUBJECT TO TRAFFIC LOAD.
- 9. FUSES: EACH POLE SHALL BE FUSED WITH WATERPROOF IN-LINE FUSE HOLDERS AT EACH ADJACENT BOX WITH 5 AMP FUSE. FOR DUPLEX LIGHTS, EACH LUMINAIRE SHALL BE FUSED SEPARATELY.
- 10. SPLICING: ALL SPLICES SHALL BE MADE IN HAND HOLES OR SPLICE BOXES ONLY. SPLICES SHALL BE MADE WITH "STACK -ON" CRIMP JOINTS, "SCOTCH LOCK" FASTENERS, OR APPROVED EQUAL. ON SPLICES MADE BELOW GRADE, WRAP WITH MOISTURE PROOF INSULATION THICKNESS.
- 11. POLE NUMBERS: OBTAIN AND PLACE POLE NUMBERS ON ALL STREET LIGHT STANDARDS AS REQUIRED. COORDINATE WITH PG&E AND/OR CITY FOR THEIR REQUIREMENTS.
- 12. TRENCH: CONDUIT CANNOT BE PLACED IN JOINT TRENCH. THE CONDUIT LAYOUT IS SHOWN SCHEMATICALLY. SEE COMPOSITE DRAWING FOR TRENCH AND BOX LOCATIONS. ANY INCIDENTAL TRENCHING NOT PROVIDED BY TRENCHING AGENT IS CONTRACTOR'S RESPONSIBILITY.
- 13. THE CONTRACTOR SHALL BE HELD RESPONSIBLE FOR ANY FIELD CHANGES MADE WITHOUT FIRST NOTIFYING TARRAR UTILITY CONSULTANTS.
- 14. TARRAR UTILITY CONSULTANTS ASSUMES NO RESPONSIBILITY FOR ANY VARIANCE BETWEEN THESE PLANS AND THE ACTUAL FIELD CONDITIONS. CONTRACTOR SHOULD REVIEW PROJECT SITE PRIOR TO SUBMITTING
- 15. CONTRACTOR TO CONSULT WITH LOCAL AGENCIES FOR THEIR CIRCUIT GROUNDING REQUIREMENTS. IF GROUND WIRE IS REQUIRED IN CONDUIT, INSTALL ACCORDINGLY.
- 16. LEGEND SYMBOLS ARE SHOWN IN STREET AREA FOR CLARITY. INSTALL BEHIND CURB AND/OR SIDEWALK PER THE CITY SPECIFICATIONS KEEP CLEAR OF DRIVEWAYS AND PATHWAYS (TYPICAL).
- 17. CENTERLINE OF STREET LIGHTS SHALL BE LOCATED ON THE LOT LINE UNLESS OTHERWISE NOTED ON THESE PLANS.
- 18. ANY CHANGES OR MODIFICATIONS TO PROPOSED STREET LIGHT LOCATIONS SHALL BE APPROVED, IN WRITING, BY THE CITY PRIOR TO INSTALLATION.
- 19. SET ALL STREET LIGHTS TO ULTIMATE FINISHED GRADE. CONSULT WITH CITY FOR PROPER PHYSICAL PROTECTION AND/OR SIGNING AND STRIPING ADJACENT TO ANY STREET LIGHTS INSTALLED IN THEIR ULTIMATE LOCATIONS THAT ARE NOT PROTECTED BY A VERTICAL CURB. BERM AND COMPACT EARTH TO FINISHED GRADE A MINIMUM OF 5' AROUND STREET LIGHT BASES AT THESE LOCATIONS.
- 20. CONTACT U.S.A. (2) FULL WORKING DAYS PRIOR TO STARTING WORK IF EXISTING UTILITIES CONFLICT WITH POLE LOCATION, FIELD ADJUST TO CLEAR EXISTING UTILITIES A MINIMUM OF 3'-0".
- 21. STREET LIGHT CONDUIT BENDS SHALL HAVE A MINIMUM 18" RADIUS. UNLESS OTHERWISE SHOWN ON THE PLANS, NO BEND SHALL BE INSTALLED IN THE STREET LIGHT SYSTEM WITHOUT PRIOR APPROVAL OF

120/240 VOLT WIRING DIAGRAM SEE GENERAL NOTE # NOT TO SCALE

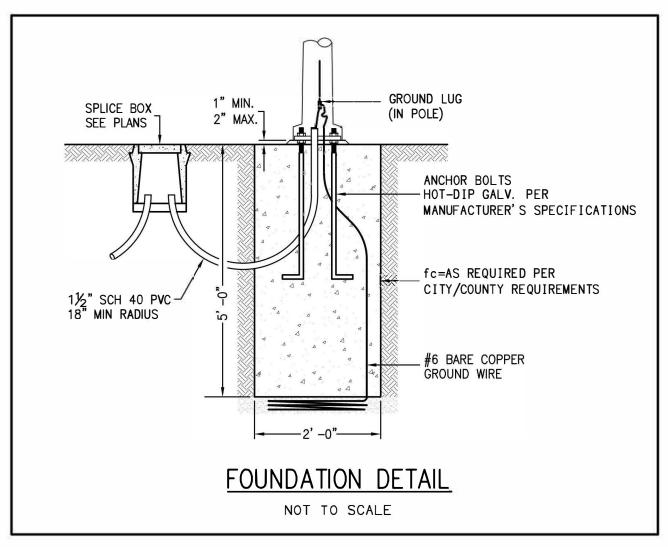
22. ALL BOXES ARE TO BE INSTALLED WITHIN THE R/W AND/OR P.U.E. AREA.

BLACK (HL)

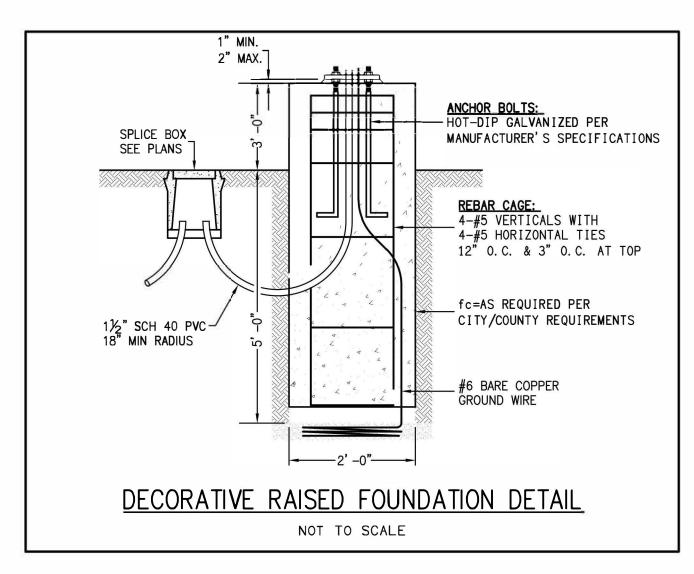
WHITE (N)

RED (HL)

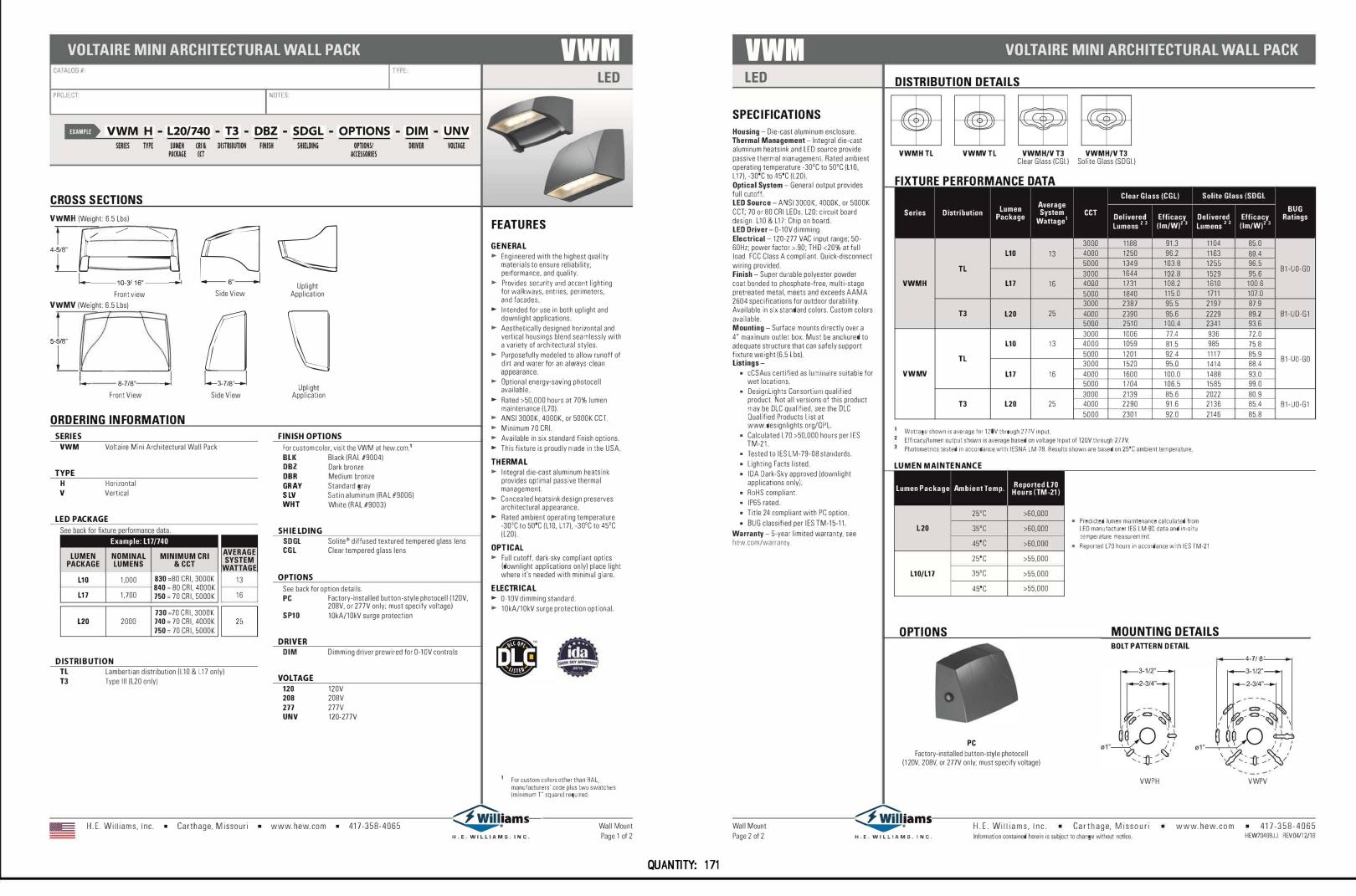
BARE CU.



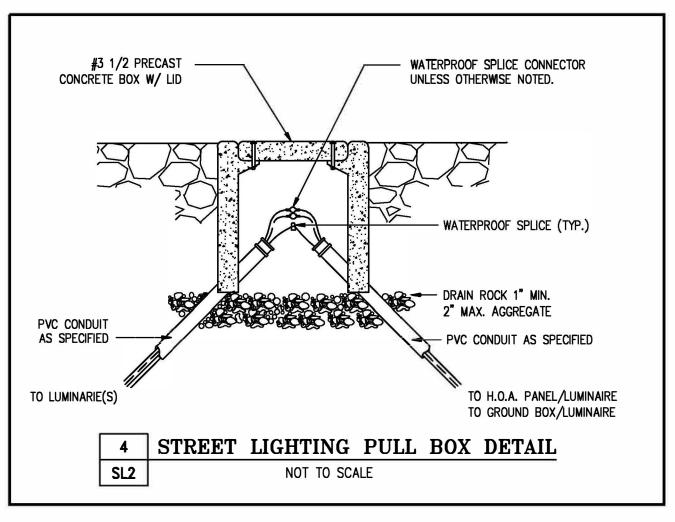
1 FOUNDATION DETAIL NOT TO SCALE

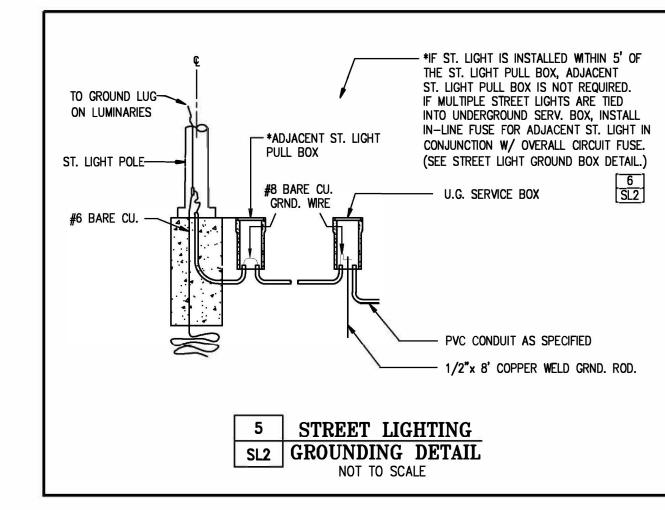


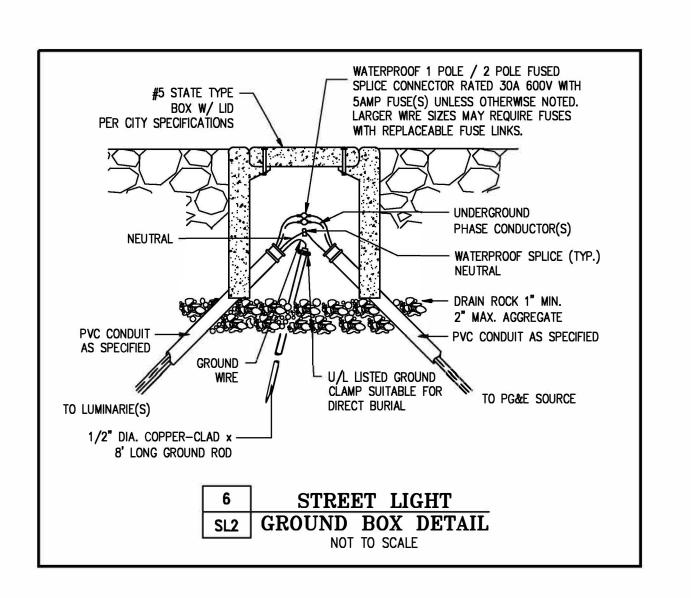
DECORATIVE RAISED FOUNDATION DETAIL SL2 NOT TO SCALE



EXTERIOR LIGHT, WALL MOUNT DETAIL NOT TO SCALE







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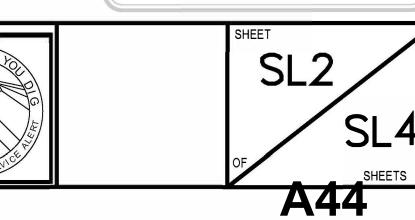
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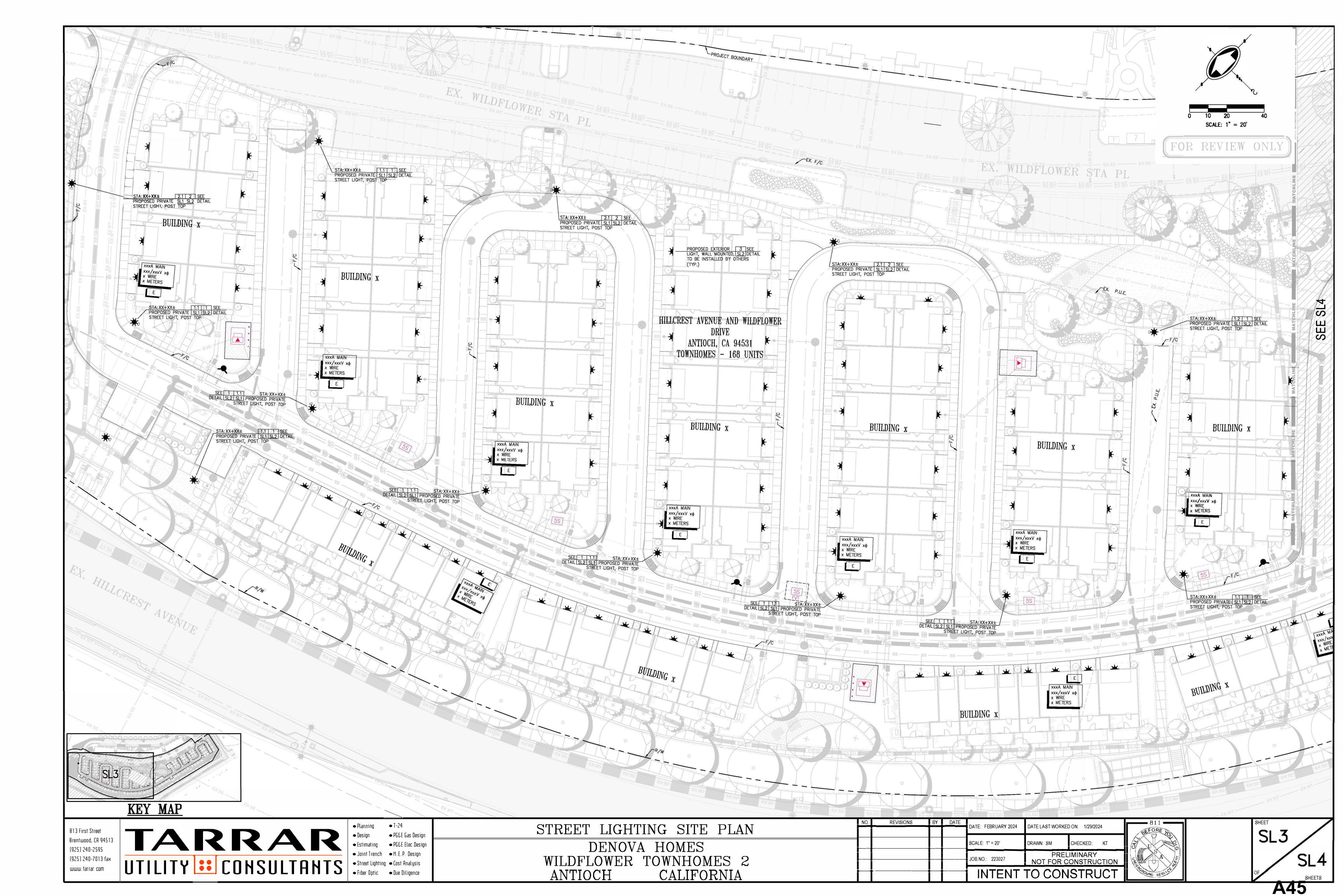
(925) 240-7013 fax

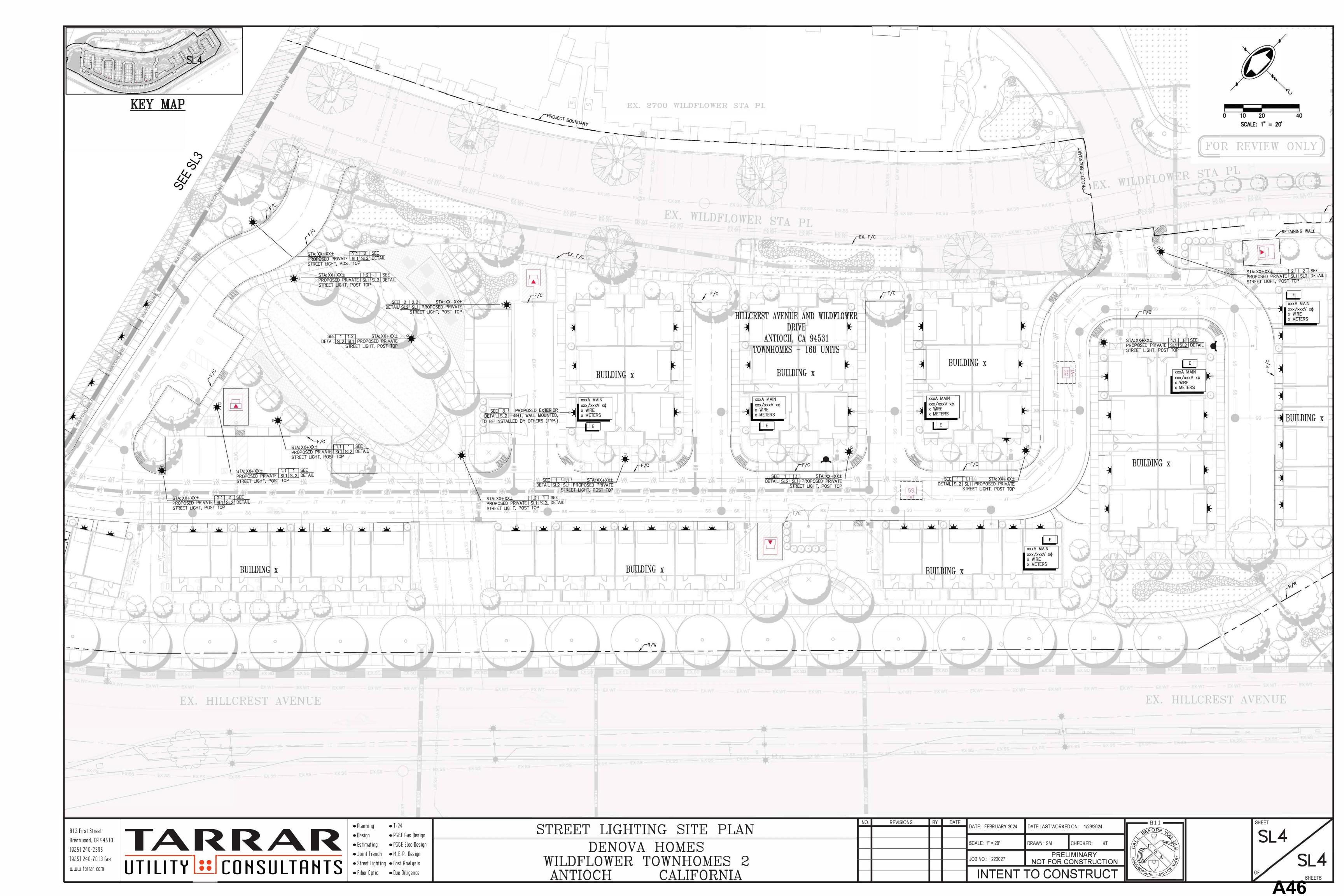
PGEE Gas Design

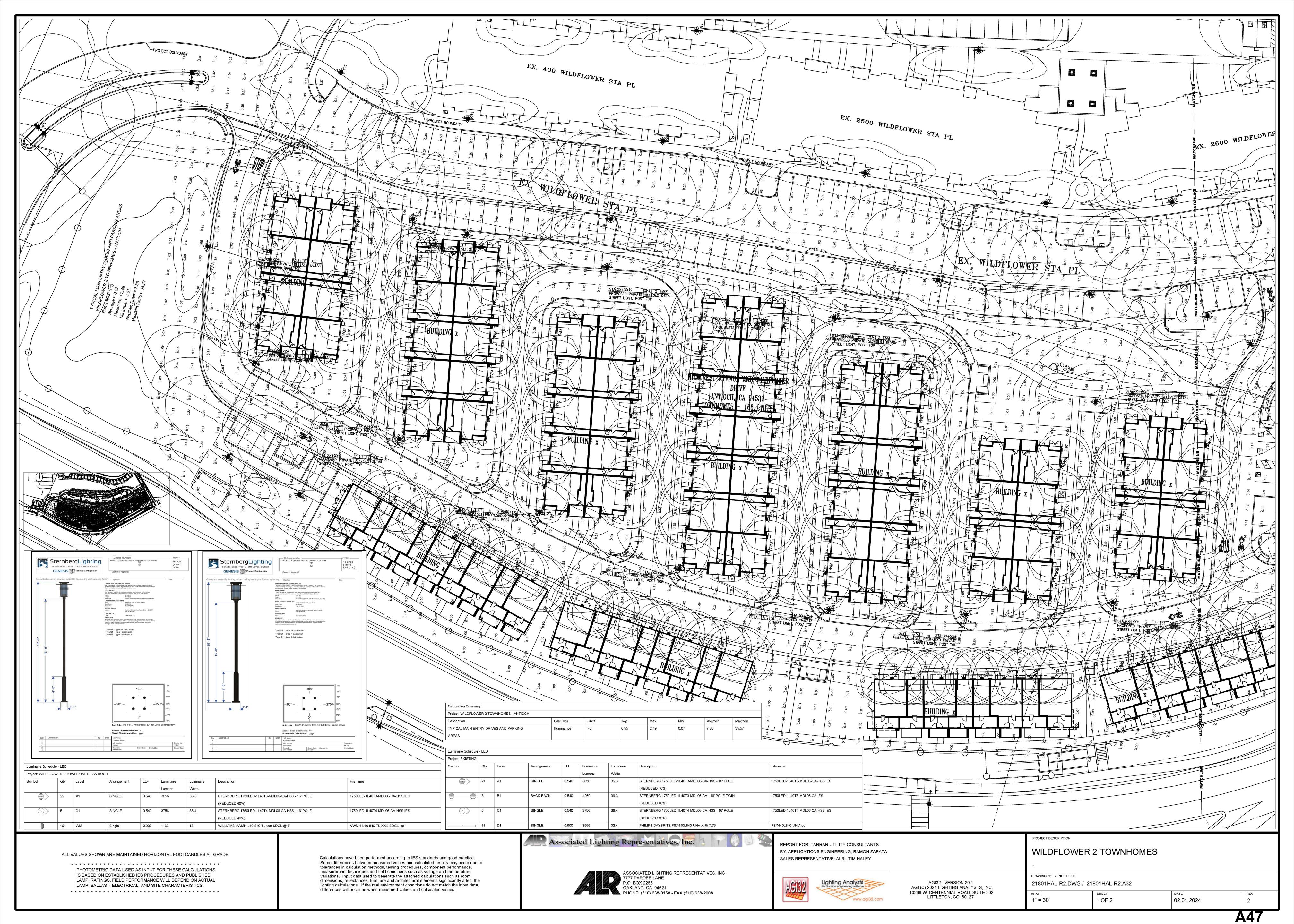
STREET LIGHTING GENERAL NOTES AND DETAILS DENOVA HOMES WILDFLOWER TOWNHOMES 2 CALIFORNIA ANTIOCH

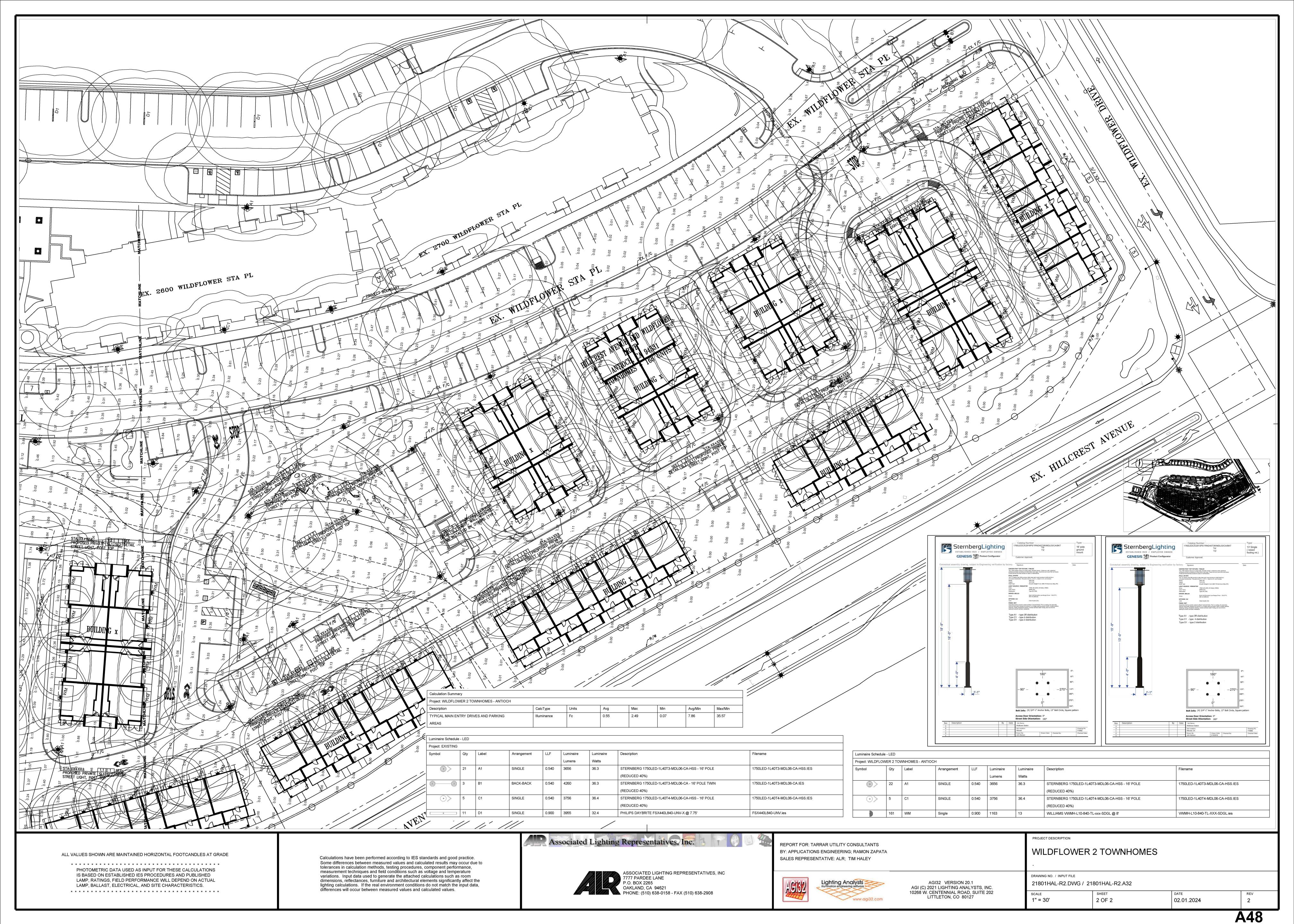
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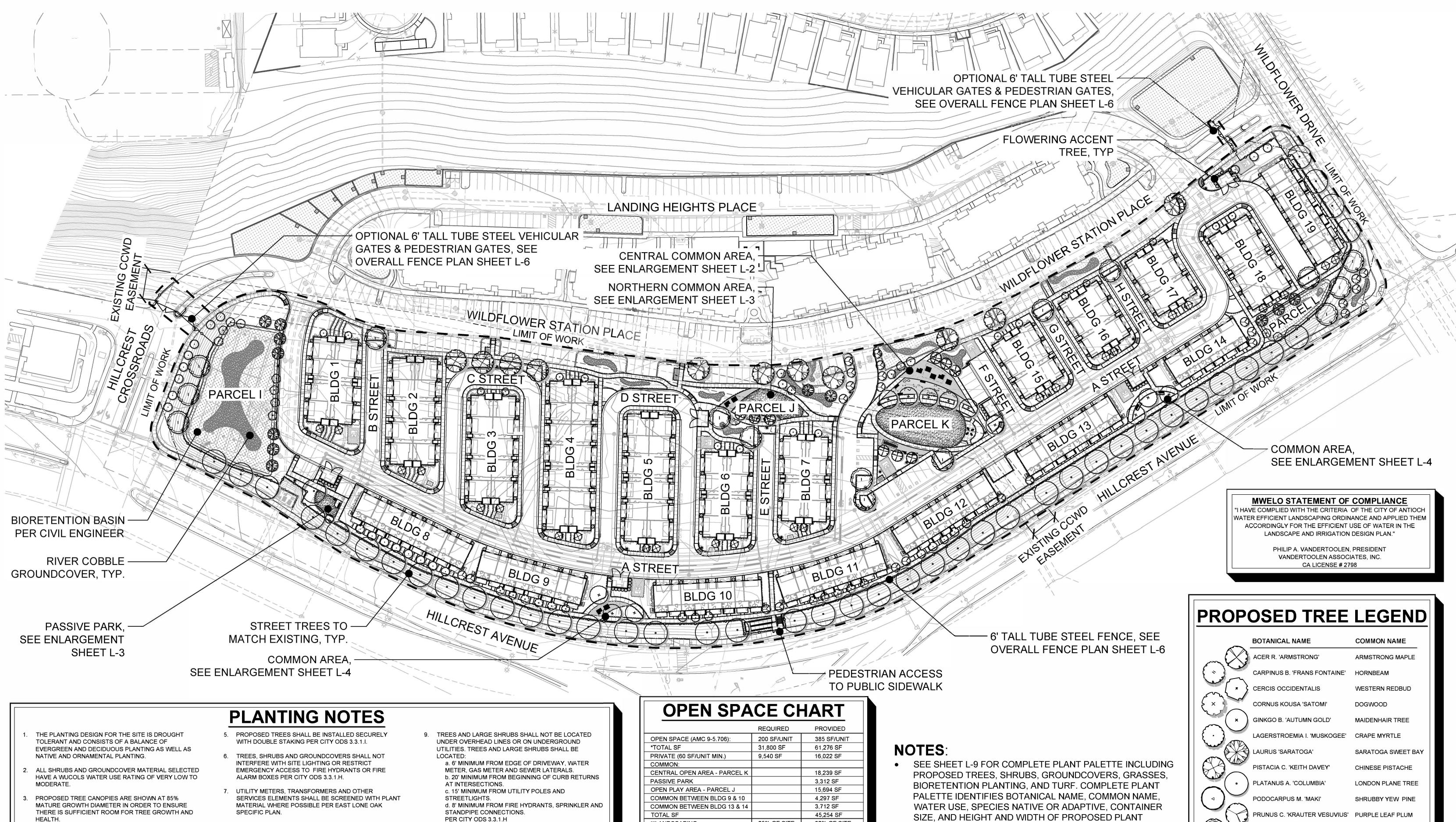


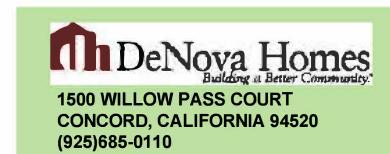












CURBS PER CITY ODS 3.3.1.G.

TREES, SHRUBS AND GROUNDCOVERS SHALL BE

PROTECTED FROM VEHICULAR ENCROACHMENT BY

WILDFLOWER STATION

8. PROPOSED TREE LOCATIONS ARE BASED ON STANDARD

JOINT TRENCH LOCATIONS. FINAL TREE LOCATIONS TO

BE DETERMINED WHEN FINAL UTILITY LOCATIONS ARE

PROVIDED. TREE PLACEMENT MAY BE ADJUSTED AND

Antioch, California

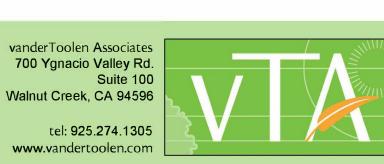
FINAL TREE COUNT MAY CHANGE.

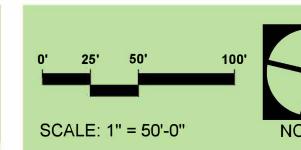
10. TREES PLANTED WITHIN 10' OF PAVEMENT SHALL HAVE ROOT BARRIER INSTALLED PER CITY ODS 3.3.1.I.

	TEGOTIED	TROVIDED
OPEN SPACE (AMC 9-5.706):	200 SF/UNIT	385 SF/UNIT
*TOTAL SF	31,800 SF	61,276 SF
PRIVATE (60 SF/UNIT MIN.)	9,540 SF	16,022 SF
COMMON:		
CENTRAL OPEN AREA - PARCEL K		18,239 SF
PASSIVE PARK		3,312 SF
OPEN PLAY AREA - PARCEL J		15,694 SF
COMMON BETWEEN BLDG 9 & 10		4,297 SF
COMMON BETWEEN BLDG 13 & 14		3,712 SF
TOTAL SF		45,254 SF
**LANDSCAPING	25% OF SITE	32% OF SITE
(AMC 9-5.708):	(1.6 AC)	(2.8 AC)

*OPEN SPACE TOTAL DOES NOT INCLUDE BIORETENTION AREA. **LANDSCAPING TOTAL INCLUDES BIORETENTION AREA.

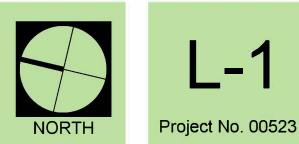
- **MATERIAL**
- LANDSCAPED AREAS SHALL INCORPORATE PLANTINGS UTILIZING THREE-TIER SYSTEM: (1) GRASSES AND GROUNDCOVERS, (2) SHRUBS AND VINES, AND (3) TREES PER CITY OF ANTIOCH ODS 3.3.1.C.





QUERCUS ILEX

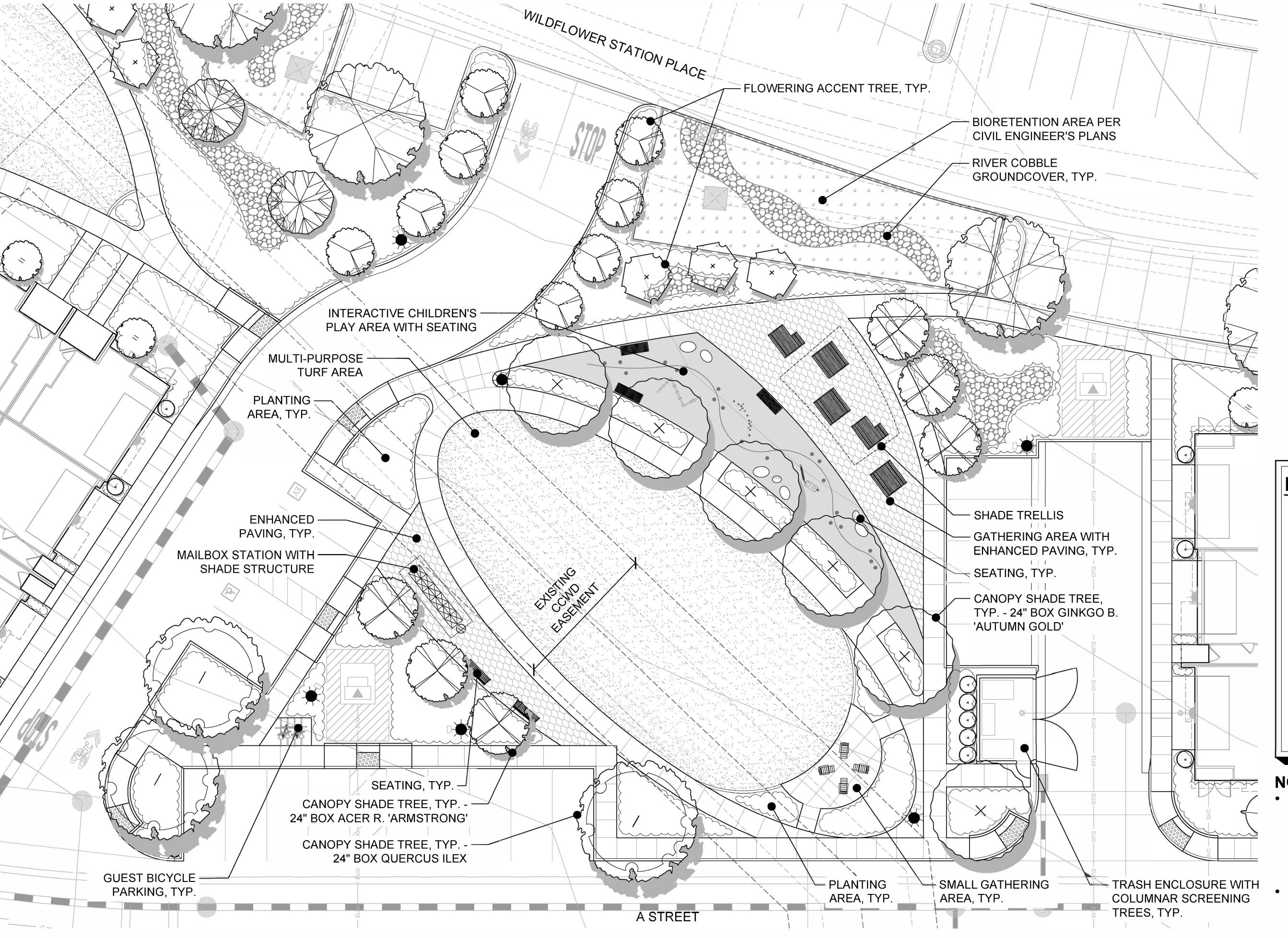
ZELKOVA S. 'MUSASHINO'

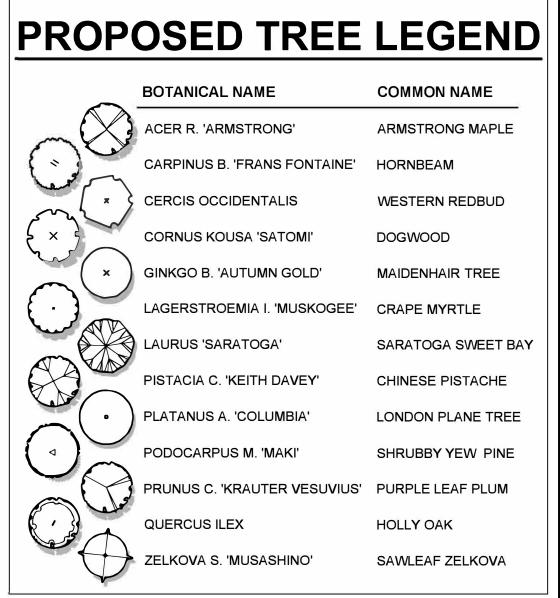


HOLLY OAK

SAWLEAF ZELKOVA

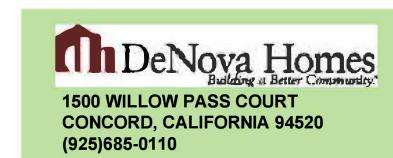
OVERALL LANDSCAPE PLAN CONCEPTUAL LANDSCAPE PLAN FEBRUARY 2024





NOTES:

- SEE SHEET L-9 FOR COMPLETE PLANT PALETTE INCLUDING PROPOSED TREES, SHRUBS, GROUNDCOVERS, GRASSES, BIORETENTION PLANTING, AND TURF. COMPLETE PLANT PALETTE IDENTIFIES BOTANICAL NAME, COMMON NAME, WATER USE, SPECIES NATIVE OR ADAPTIVE, CONTAINER SIZE, AND HEIGHT AND WIDTH OF PROPOSED PLANT MATERIAL.
- LANDSCAPED AREAS SHALL INCORPORATE PLANTINGS UTILIZING THREE-TIER SYSTEM: (1) GRASSES AND GROUNDCOVERS, (2) SHRUBS AND VINES, AND (3) TREES PER CITY OF ANTIOCH ODS 3.3.1.C.



WILDFLOWER STATION

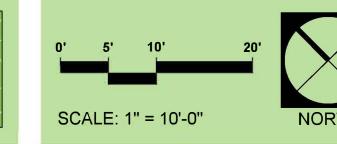
Antioch, California

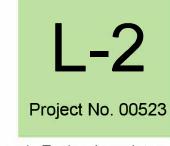
ENLARGEMENT - CENTRAL COMMON AREA (PARCEL K)

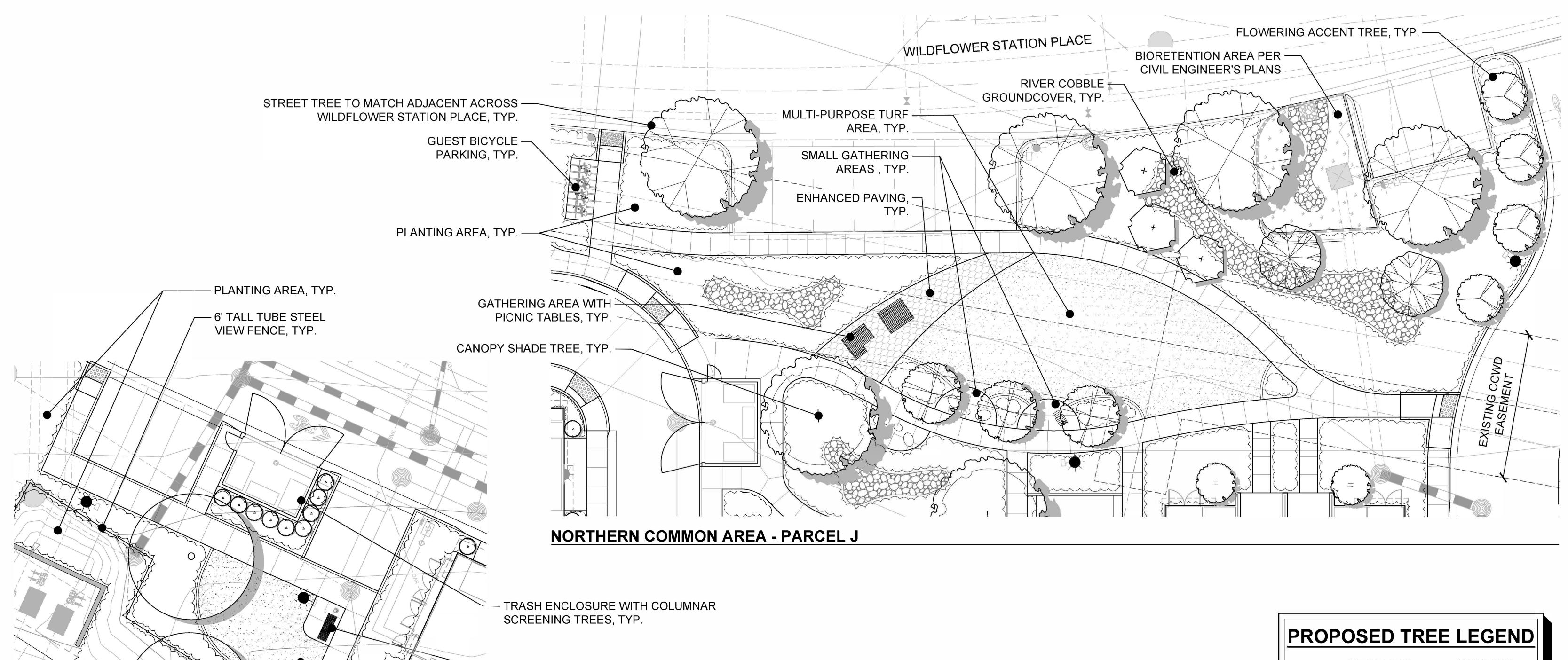
CONCEPTUAL LANDSCAPE PLAN

ONCEPTUAL LANDSCAPE PLAN FEBRUARY 2024









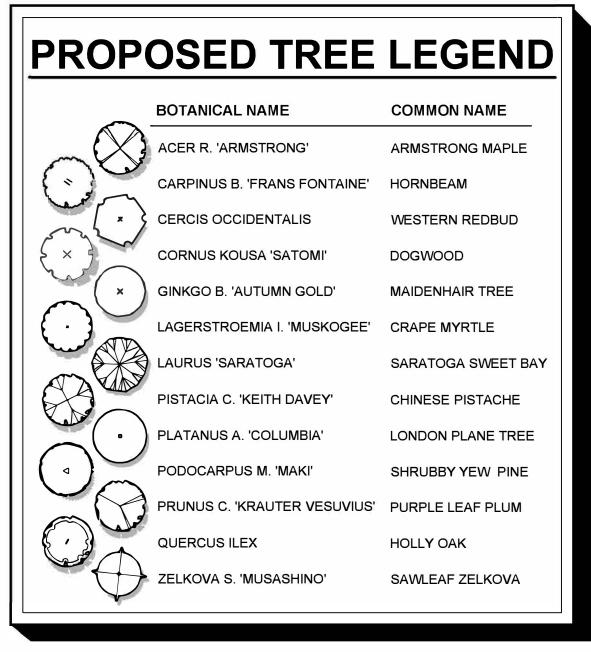
- BACKLESS BENCH SEATING, TYP.

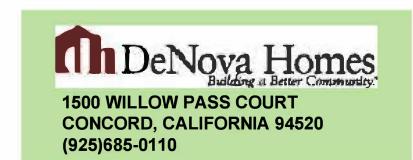
MULTI-PURPOSE TURF AREA, TYP.

STREET TREE TO MATCH EXISTING ACROSS HILLCREST AVE, TYP.

NOTES:

- SEE SHEET L-9 FOR COMPLETE PLANT PALETTE INCLUDING PROPOSED TREES, SHRUBS, GROUNDCOVERS, GRASSES, BIORETENTION PLANTING, AND TURF. COMPLETE PLANT PALETTE IDENTIFIES BOTANICAL NAME, COMMON NAME, WATER USE, SPECIES NATIVE OR ADAPTIVE, CONTAINER SIZE, AND HEIGHT AND WIDTH OF PROPOSED PLANT MATERIAL.
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PASSIVE PARK

HILLCRESTAVENUE

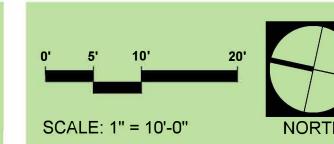
WILDFLOWER STATION

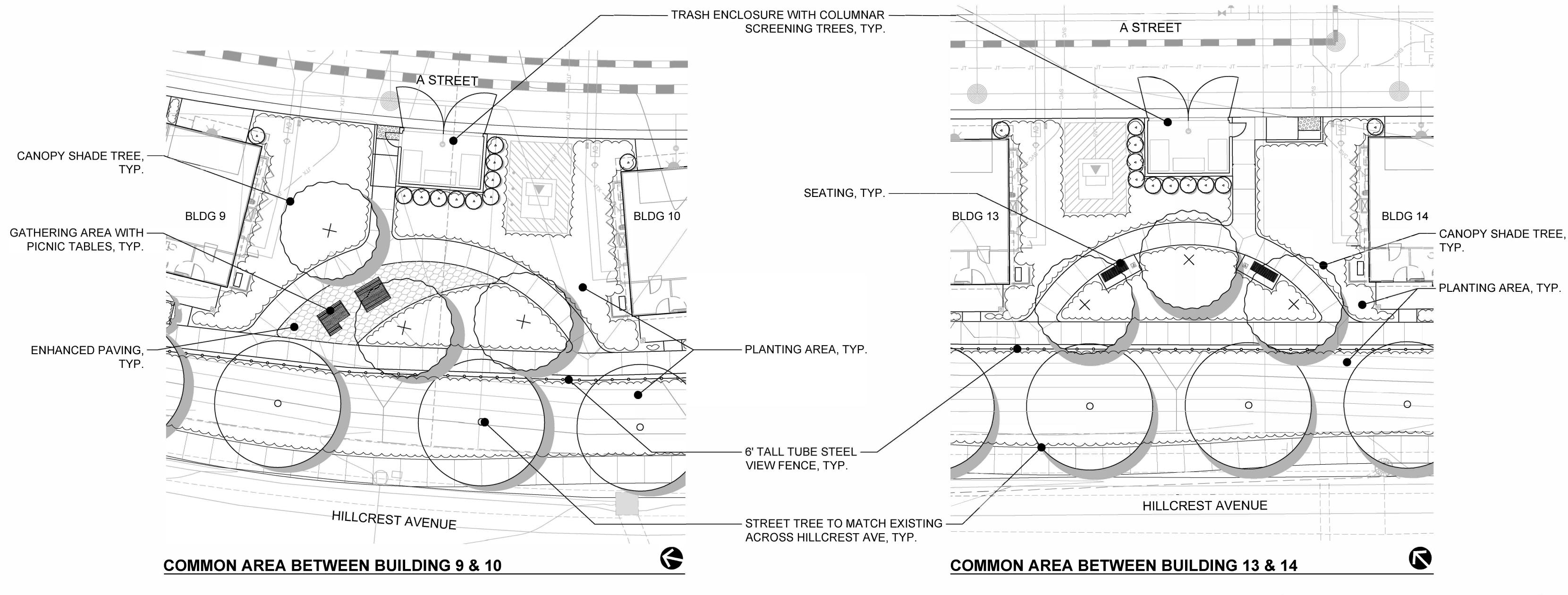
Antioch, California

ENLARGEMENT - COMMON AREAS

CONCEPTUAL LANDSCAPE PLAN
FEBRUARY 2024

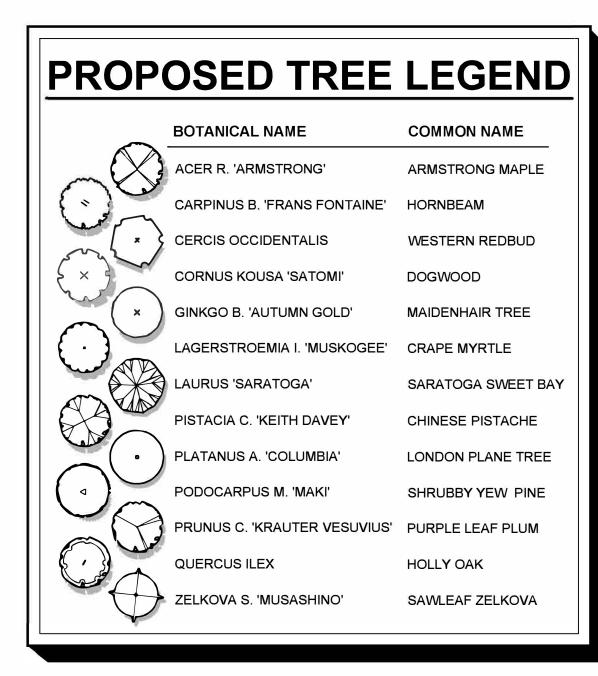


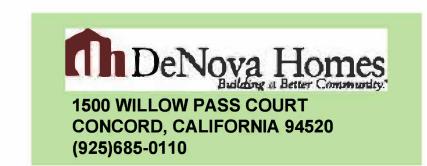




NOTES:

- SEE SHEET L-9 FOR COMPLETE PLANT PALETTE INCLUDING PROPOSED TREES, SHRUBS, GROUNDCOVERS, GRASSES, BIORETENTION PLANTING, AND TURF. COMPLETE PLANT PALETTE IDENTIFIES BOTANICAL NAME, COMMON NAME, WATER USE, SPECIES NATIVE OR ADAPTIVE, CONTAINER SIZE, AND HEIGHT AND WIDTH OF PROPOSED PLANT MATERIAL.
- LANDSCAPED AREAS SHALL INCORPORATE PLANTINGS UTILIZING THREE-TIER SYSTEM: (1) GRASSES AND GROUNDCOVERS, (2) SHRUBS AND VINES, AND (3) TREES PER CITY OF ANTIOCH ODS 3.3.1.C.



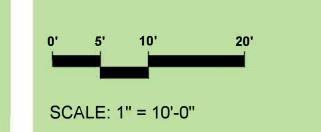


WILDFLOWER STATION

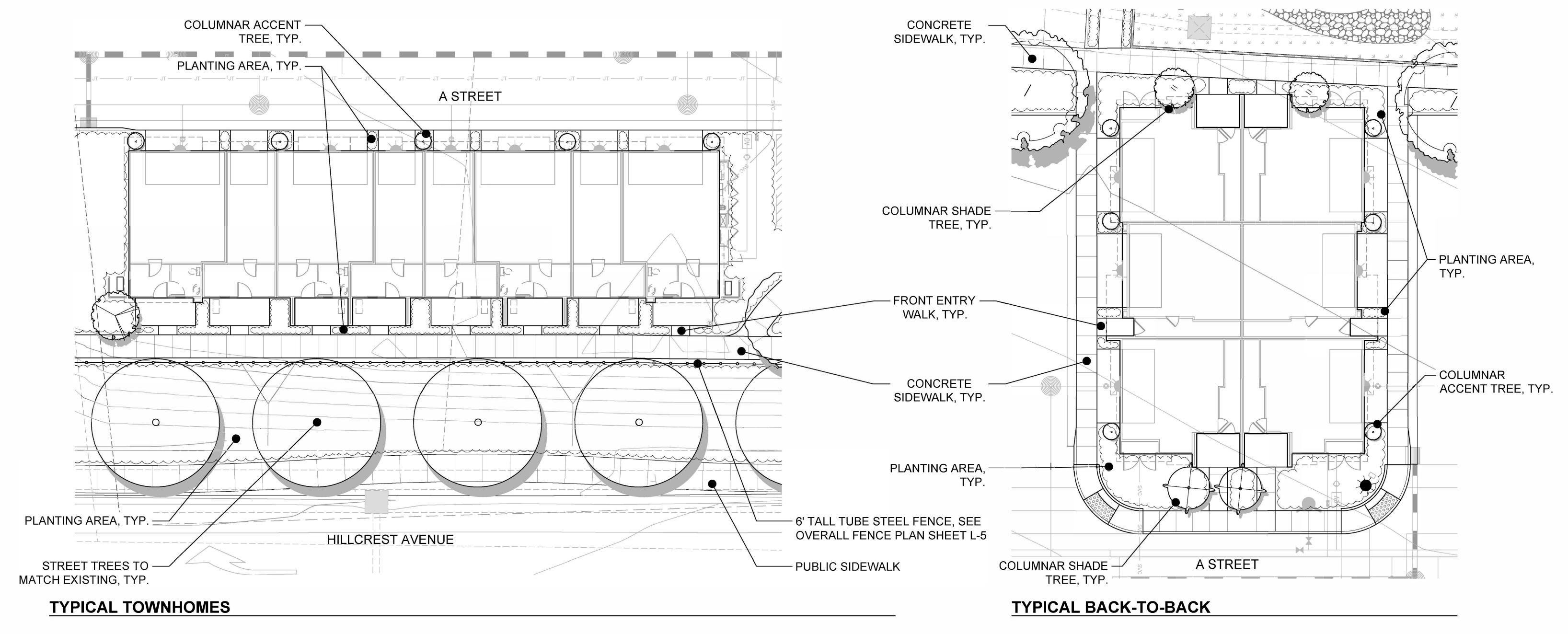
Antioch, California





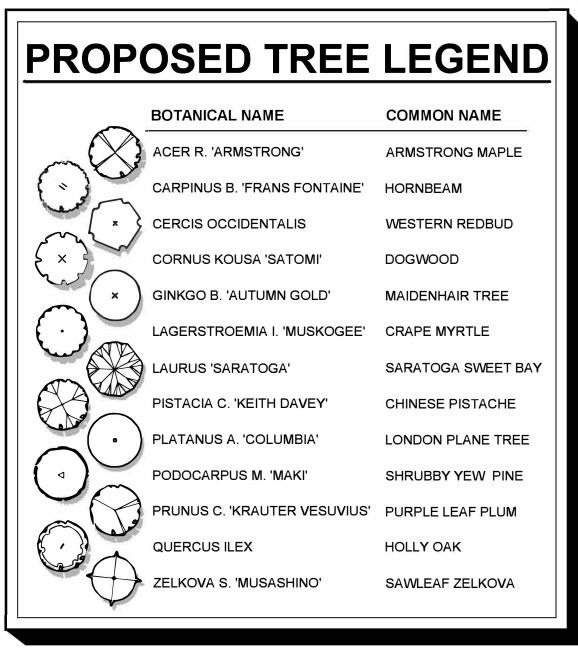


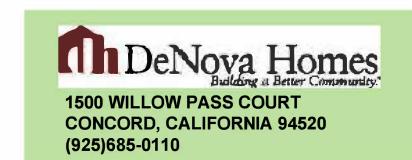




NOTES:

- SEE SHEET L-9 FOR COMPLETE PLANT PALETTE INCLUDING PROPOSED TREES, SHRUBS, GROUNDCOVERS, GRASSES, BIORETENTION PLANTING, AND TURF. COMPLETE PLANT PALETTE IDENTIFIES BOTANICAL NAME, COMMON NAME, WATER USE, SPECIES NATIVE OR ADAPTIVE, CONTAINER SIZE, AND HEIGHT AND WIDTH OF PROPOSED PLANT MATERIAL.
- LANDSCAPED AREAS SHALL INCORPORATE PLANTINGS UTILIZING THREE-TIER SYSTEM: (1) GRASSES AND GROUNDCOVERS, (2) SHRUBS AND VINES, AND (3) TREES PER CITY OF ANTIOCH ODS 3.3.1.C.



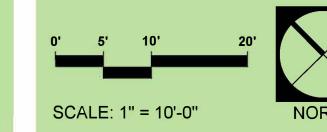


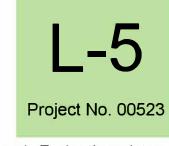
WILDFLOWER STATION

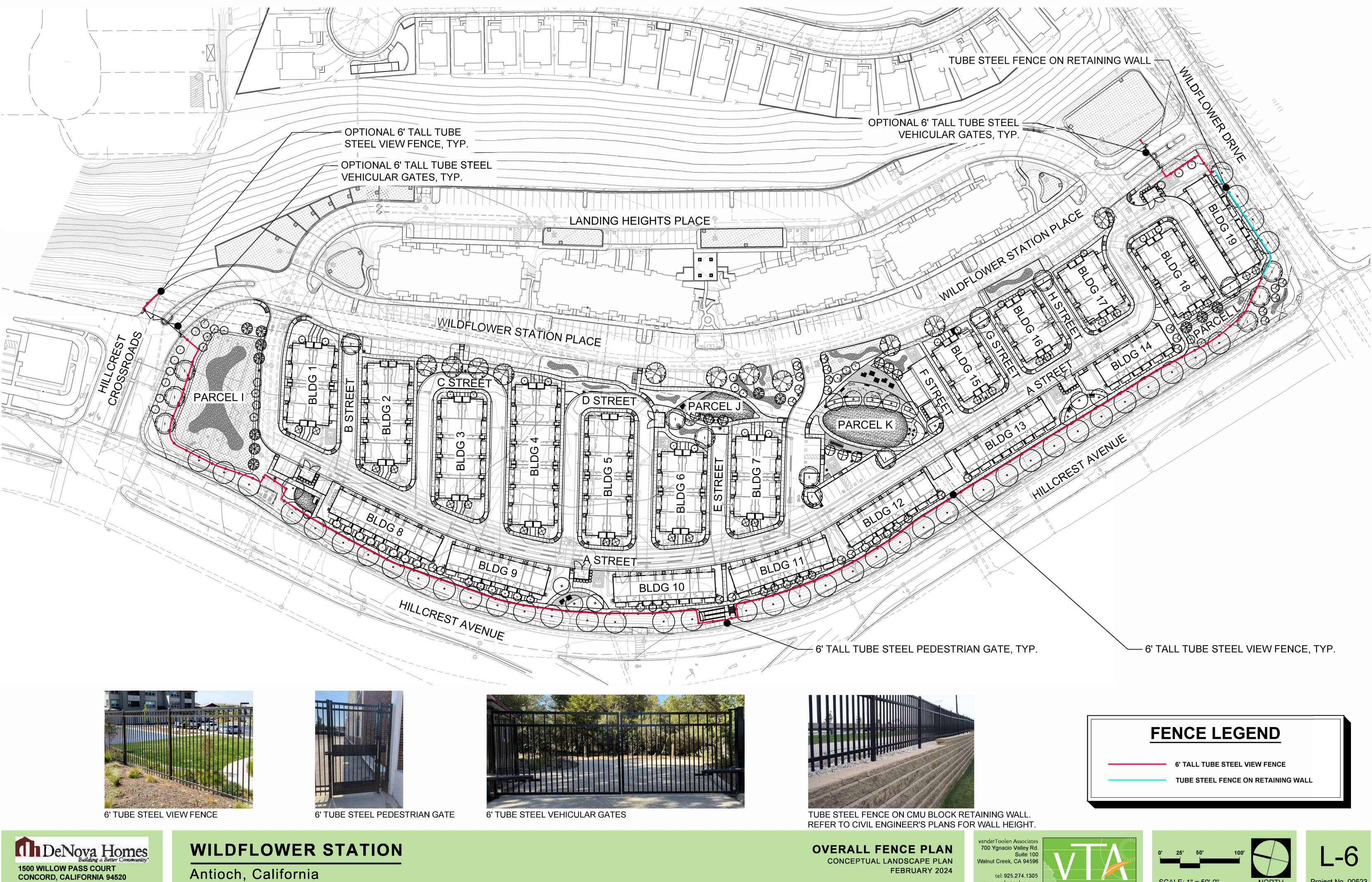
Antioch, California





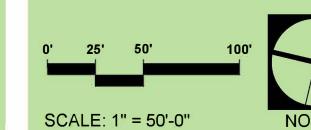




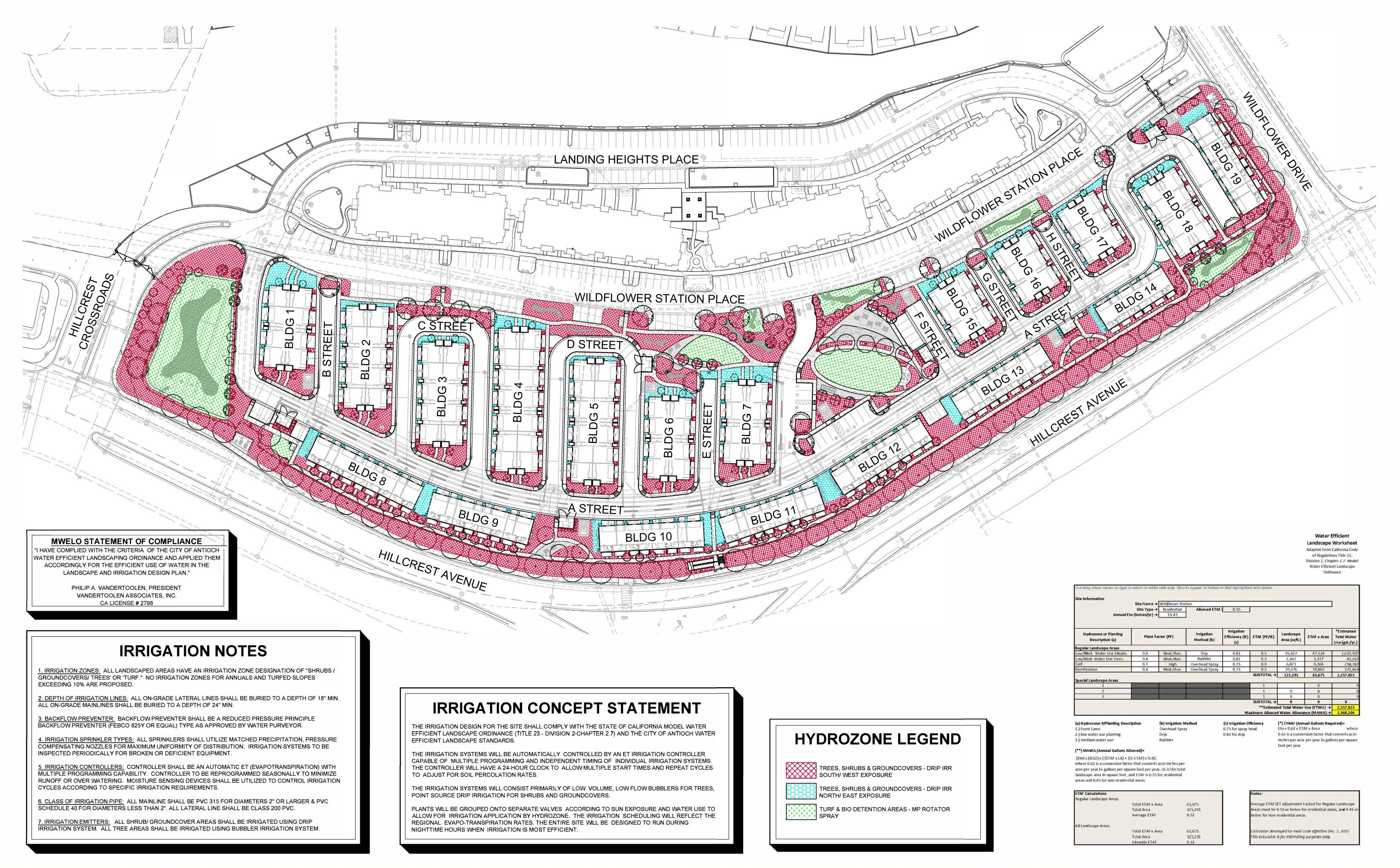


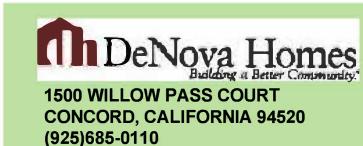
CONCORD, CALIFORNIA 94520 (925)685-0110









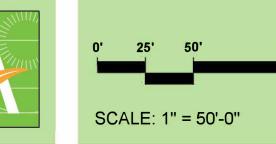


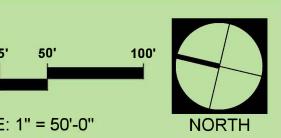
WILDFLOWER STATION

Antioch, California

HYDROZONE PLAN
CONCEPTUAL LANDSCAPE PLAN
FEBRUARY 2024















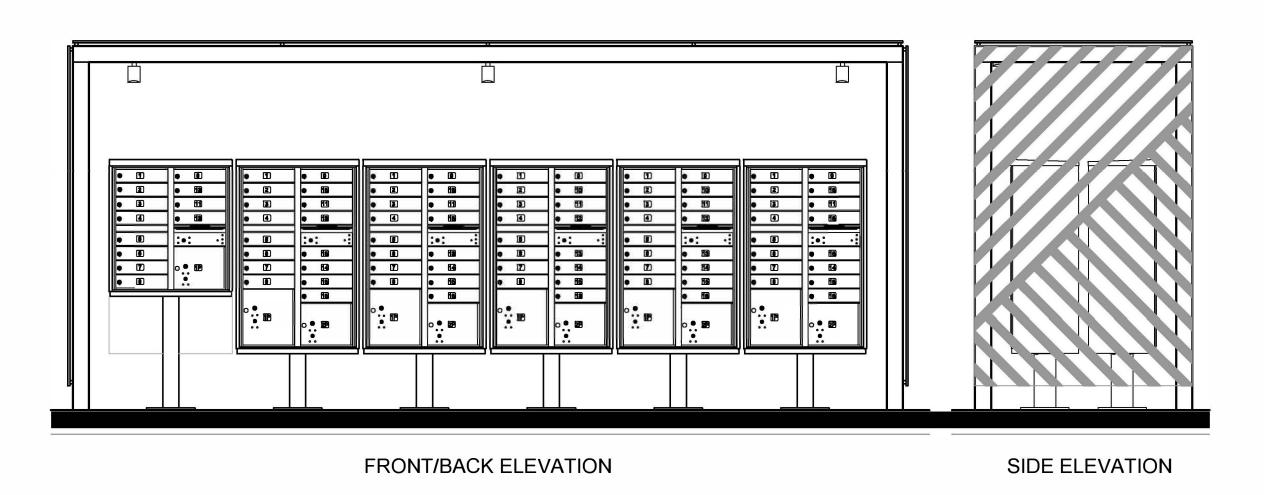














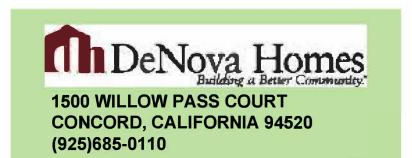






TRASH & RECYCLING RECEPTACLE

NOTE: THE PROPOSED SITE AMENITY DESIGNS ARE CONCEPTUAL. SIMILARLY THEMED DESIGN, COLORS & MATERIALS MAY BE SELECTED BASED UPON PRODUCT AVAILABILITY AT TIME OF INSTALLATION.



BIKE RACK

WILDFLOWER STATION

Antioch, California

HARDSCAPE AND SITE FURNISHINGS IMAGERY

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TREES



ACER R. 'ARMSTRONG'



CARPINUS B. 'FRANS FONTAINE'



CERCIS OCCIDENTALIS



CORNUS KOUSA 'SATOMI'



GINKGO B. 'AUTUMN GOLD'



LAGERSTROEMIA I. 'MUSKOGEE'





PISTACIA C. 'KEITH DAVEY'



PLATANUS A. 'COLUMBIA'



PRUNUS C. 'KRAUTER VESUVIUS'



QUERCUS ILEX



ZELKOVA S. 'MUSASHINO'





CALLISTEMON V. 'LITTLE JOHN'



CISTUS SPP.



DIETES SPP.



DODONAEA V. 'PURPUREA'



GALVEZIA S. 'FIRECRACKER'



LOROPETALUM C. 'RAZZLEBERRI'



NANDINA DOMESTICA



PHORMIUM SPP.





PITTOSPORUM TOBIRA



RHAPHIOLEPIS INDICA



SALVIA SPP.



TEUCRIUM F. 'COMPACTUM'

ACCENT SHRUBS & GROUNDCOVERS



ACHILLEA SPP



GRASSES/BIORETENTION

BOUTELOUA G. 'BLONDE AMBITION' CALAMAGROSTIS X A. 'KARL

FOERSTER'

Antioch, California



ERIGERON KARVINSKIANUS

CHONDROPETALUM TECTORUM



ELYMUS C. 'CANYON PRINCE'

LIRIOPE SPICATA





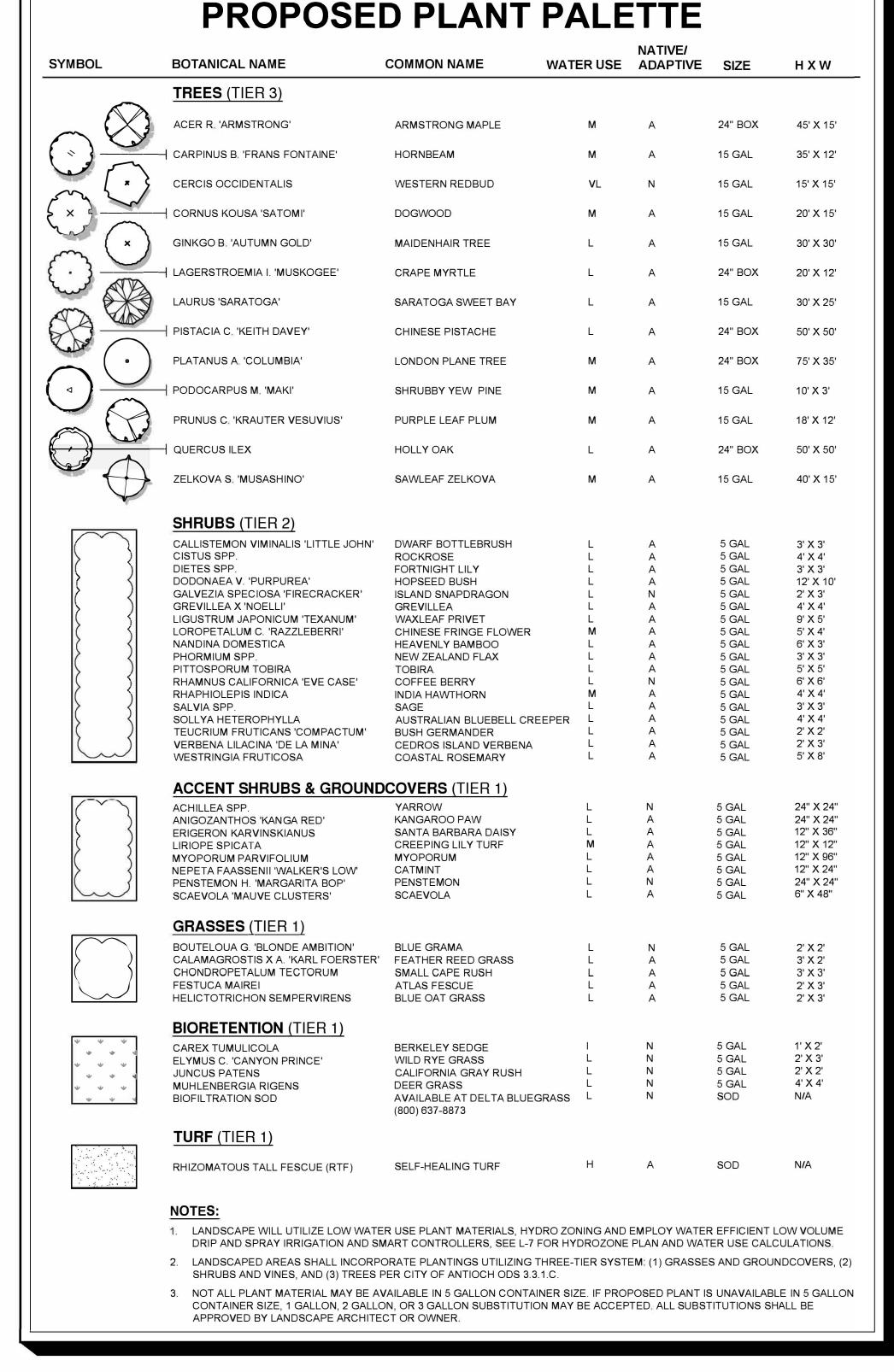
MYOPORUM PARVIFOLIUM

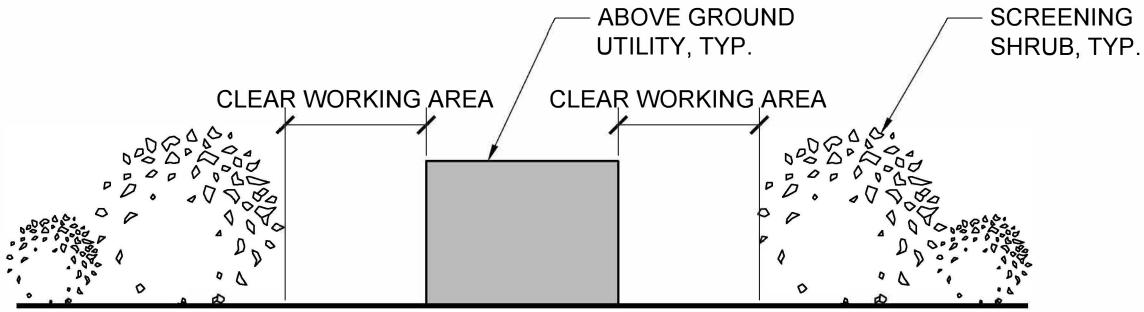




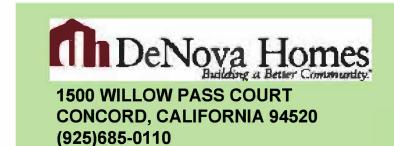
PENSTEMON H. 'MARGARITA BOP'

MUHLENBERGIA RIGENS BIORETENTION SOD





SCREEN PLANTING FOR UTILITIES



WILDFLOWER STATION

PLANT IMAGERY AND PROPOSED PLANT PALETTE

FEBRUARY 2024





WILDFLOWER TOWNHOMES

ANTIOCH, CA | FEBRUARY 2, 2024



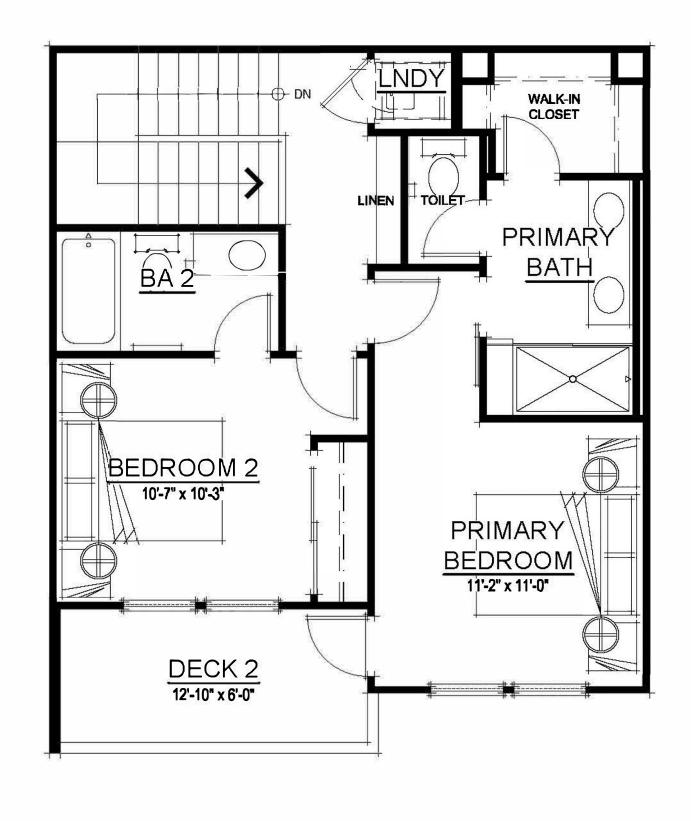


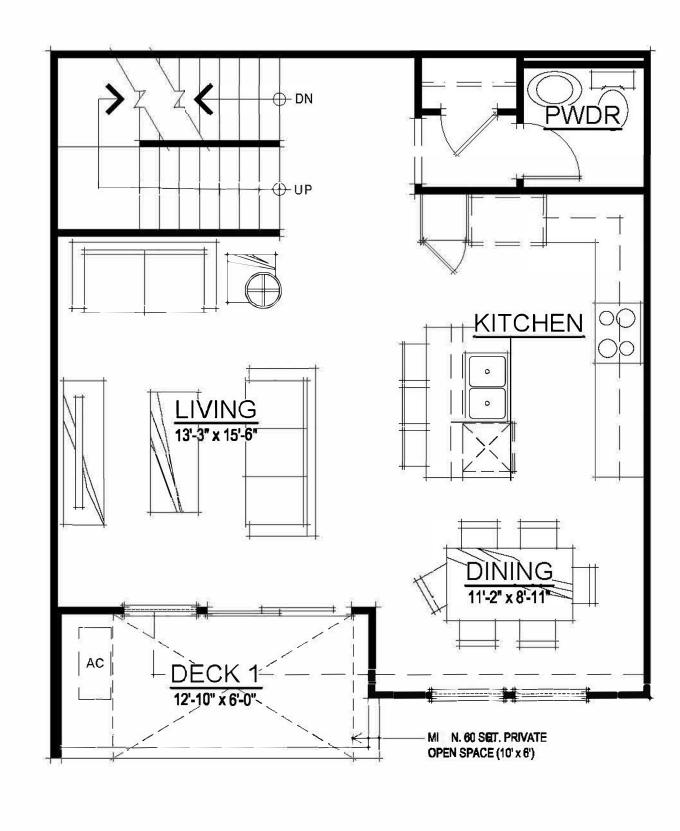
Wildflower Townhomes
Antioch, CA
February 02, 2024

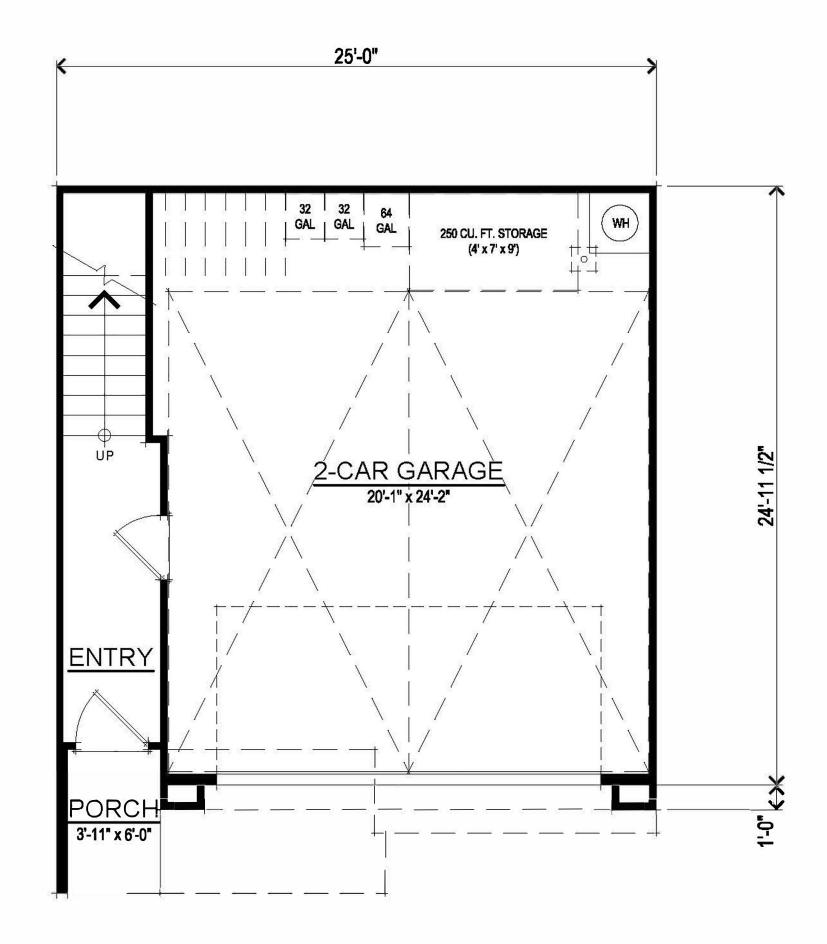
DENOVA HOMES
1500 Willow Pass Ct., Concord, CA 94520
925.685.0110

COVER SHEET A000









THIRD FLOOR PLAN

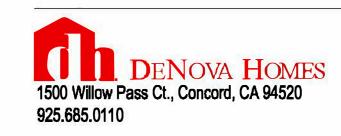
SECOND FLOOR PLAN

FIRST FLOOR PLAN

SQUARE FOO	TAGES
FIRST FLOOR	103 SQ. FT.
SECOND FLOOR	631 SQ, FT.
THIRD FLOOR	559 SQ. FT.
TOTAL LIVING	1293 SQ. FT.
2-CAR GARAGE	517 SQ. FT.
DECK 1	81 SQ. FT.
DECK 2	81 SQ. FT.

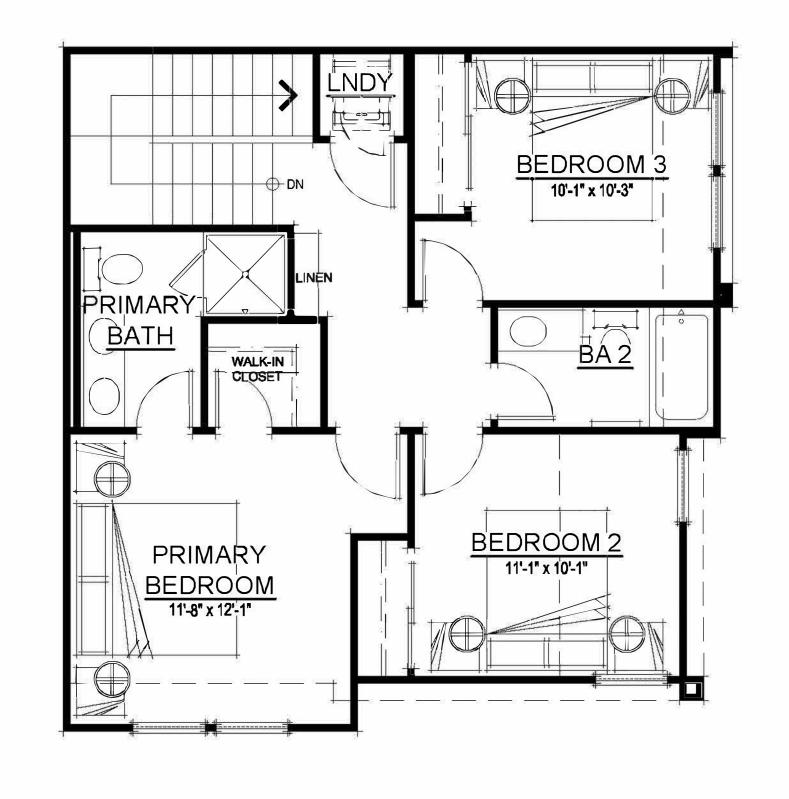
BACK TO BACK TOWNHOMES

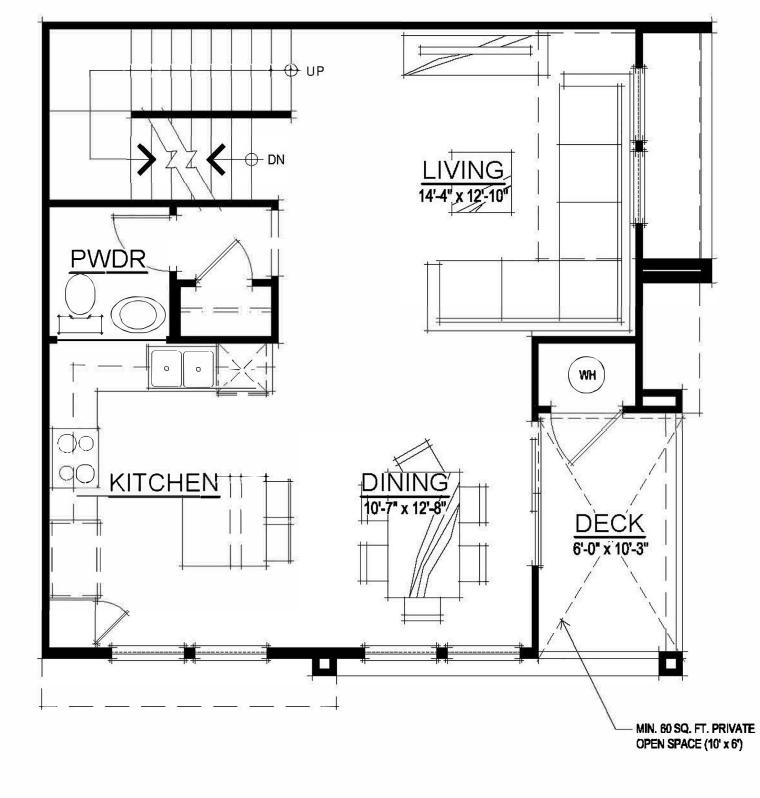
Wildflower Townhomes
Antioch, CA
February 02, 2024

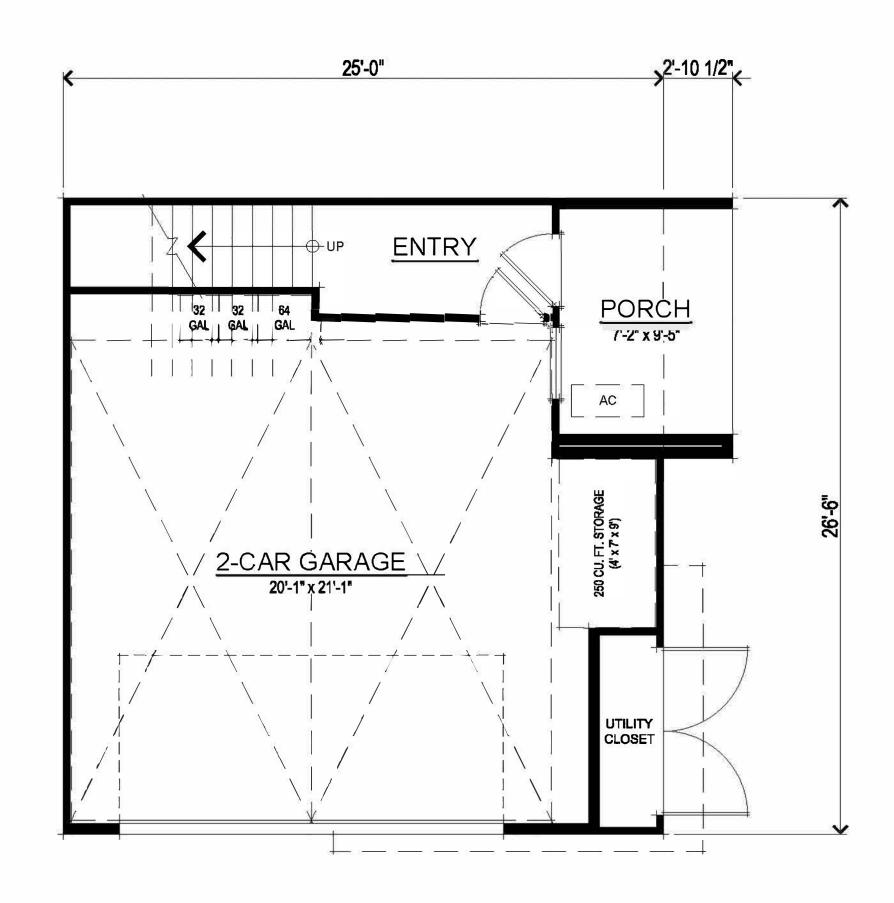




UNIT BB1 FLOOR PLANS







THIRD FLOOR PLAN

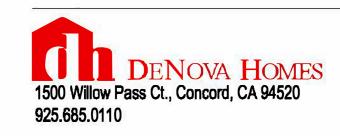
SECOND FLOOR PLAN

FIRST FLOOR PLAN

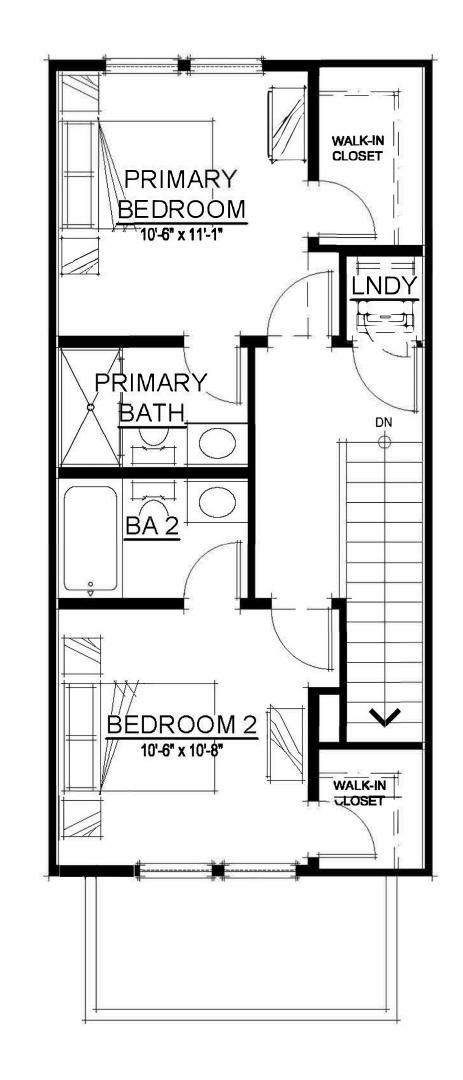
SQUARE FO	OTAGES
FIRST FLOOR	95 SQ. FT
SECOND FLOOR	620 SQ, FT
THIRD FLOOR	666 SQ. FT
TOTAL LIVING	1381 SQ. FT
2-CAR GARAGE	502 SQ, FT
DECK	61 SQ, FT

BACK TO BACK TOWNHOMES

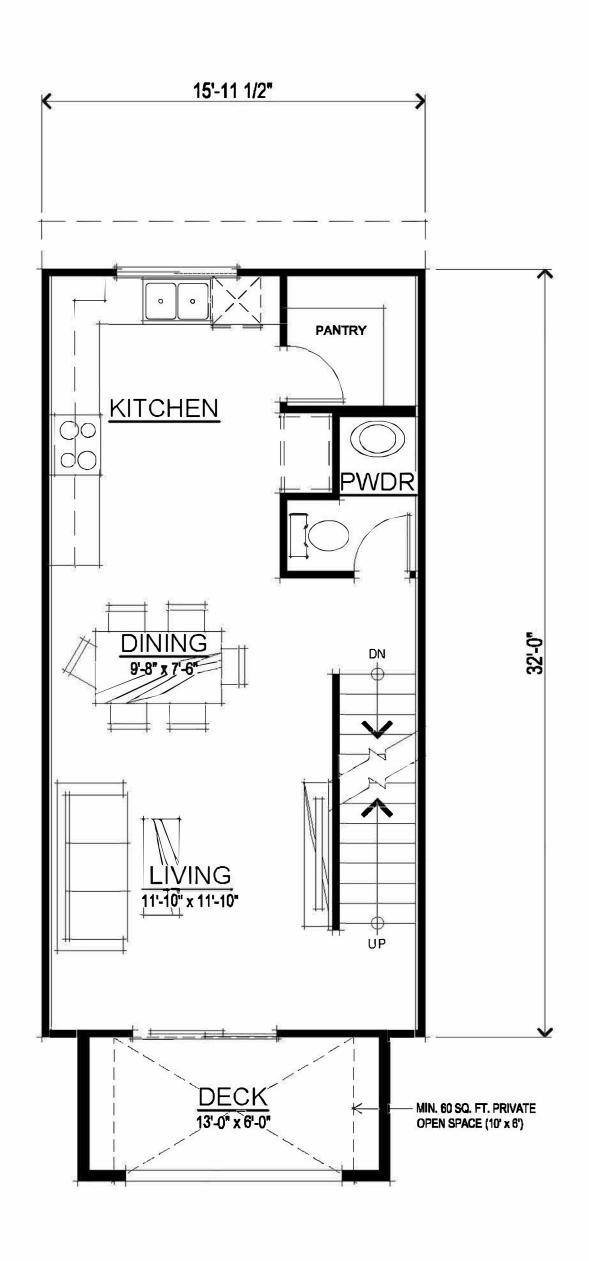
Wildflower Townhomes
Antioch, CA
February 02, 2024



UNIT BB2 FLOOR PLANS







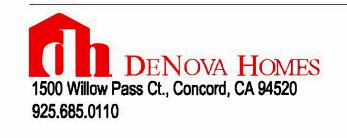
K 4'-10 1/2" × 1-CAR GARAGE ENTRY PORCH 13'-0" x 6'-0"

SECOND FLOOR PLAN

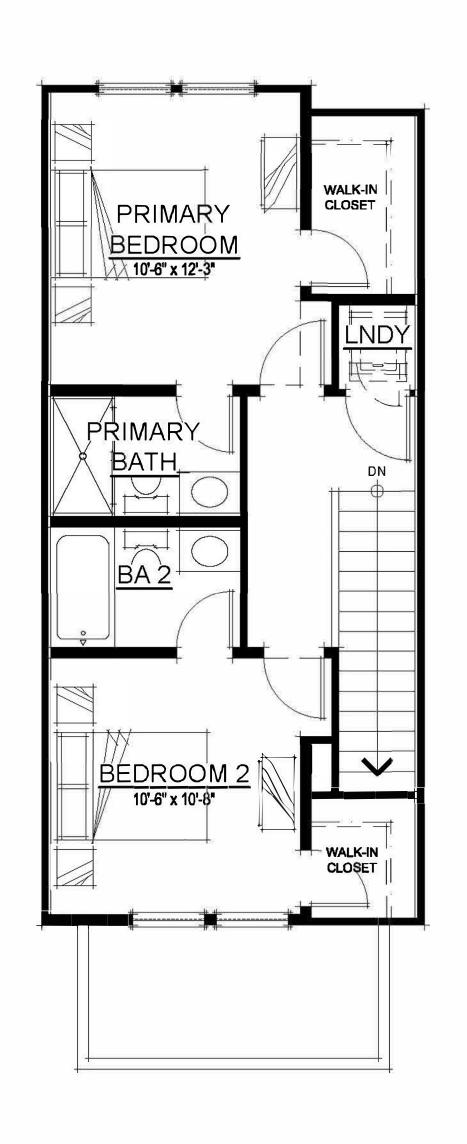
FIRST FLOOR PLAN w/ 1-CAR GARAGE

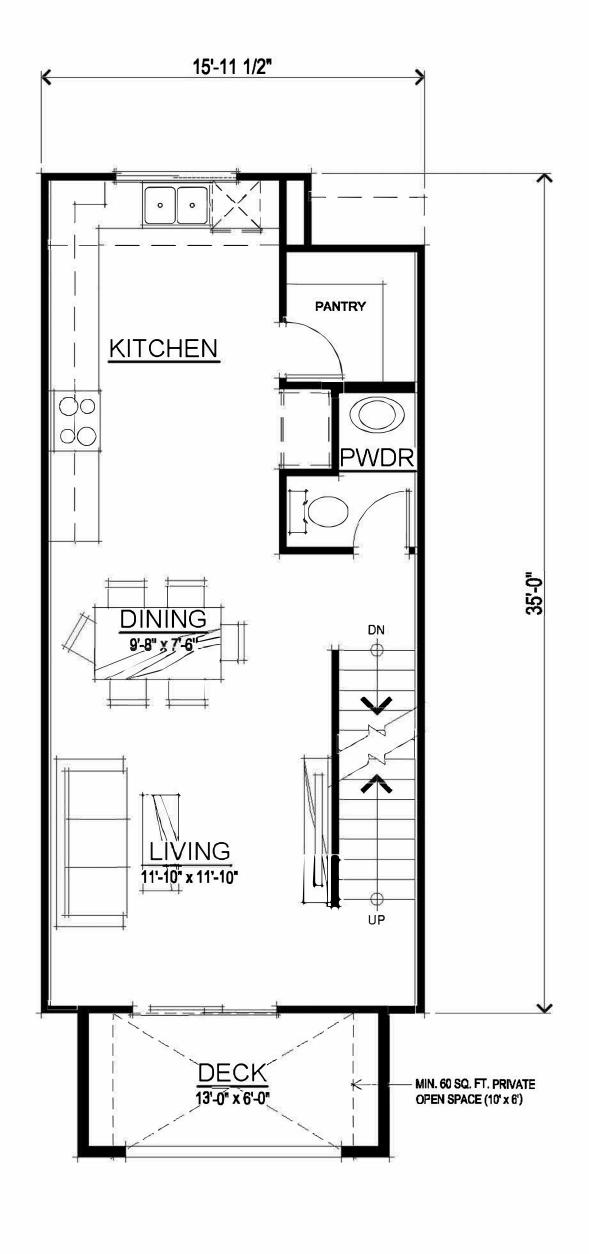
SQUARE FOO	OTAGES	GARAGE SQUARE FOOTAGES				
FIDST FLOOD	122.80 FT	1 CAD CADACE	272.00 ET			
FIRST FLOOR		1-CAR GARAGE	273 SQ. FT.			
SECOND FLOOR	513 SQ. FT.					
THIRD FLOOR	500 SQ, FT.					
TOTAL LIVING	1135 SQ. FT.					
DECK	78 SQ. FT.					

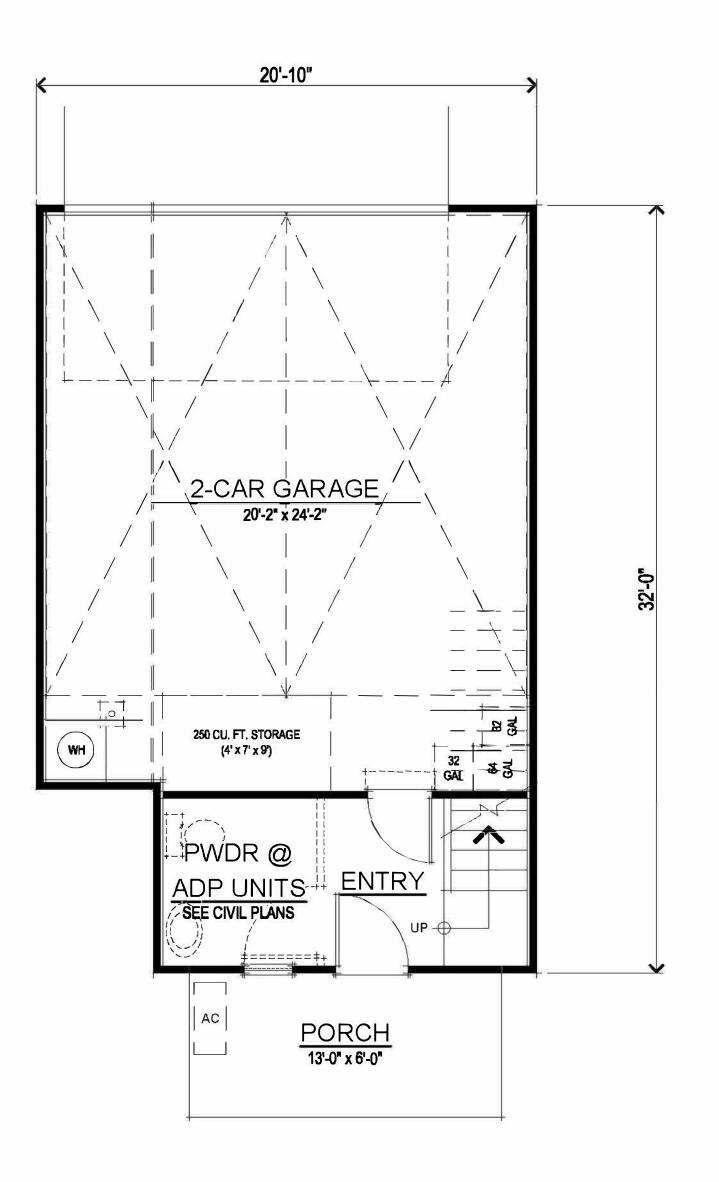


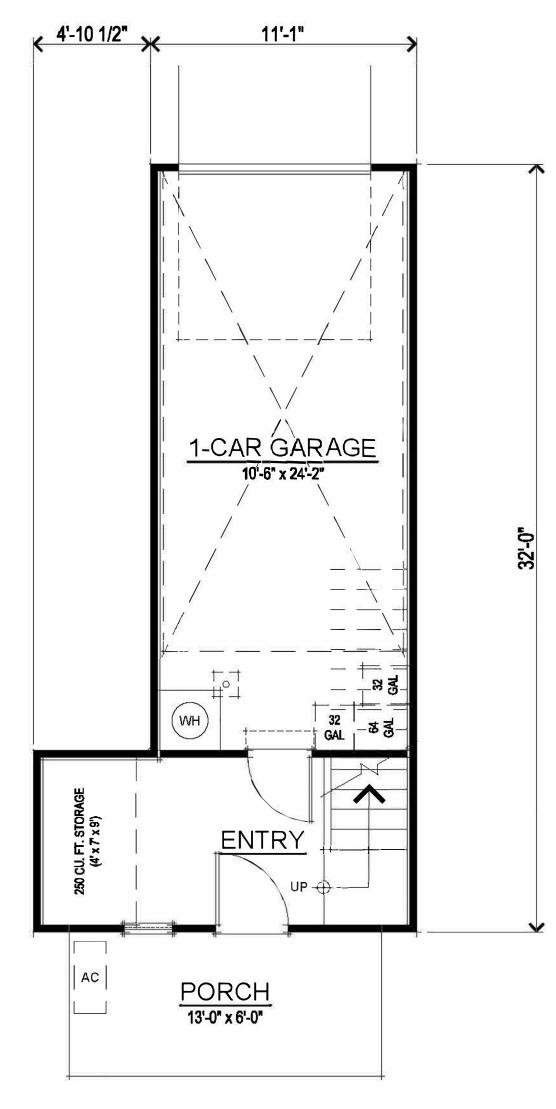


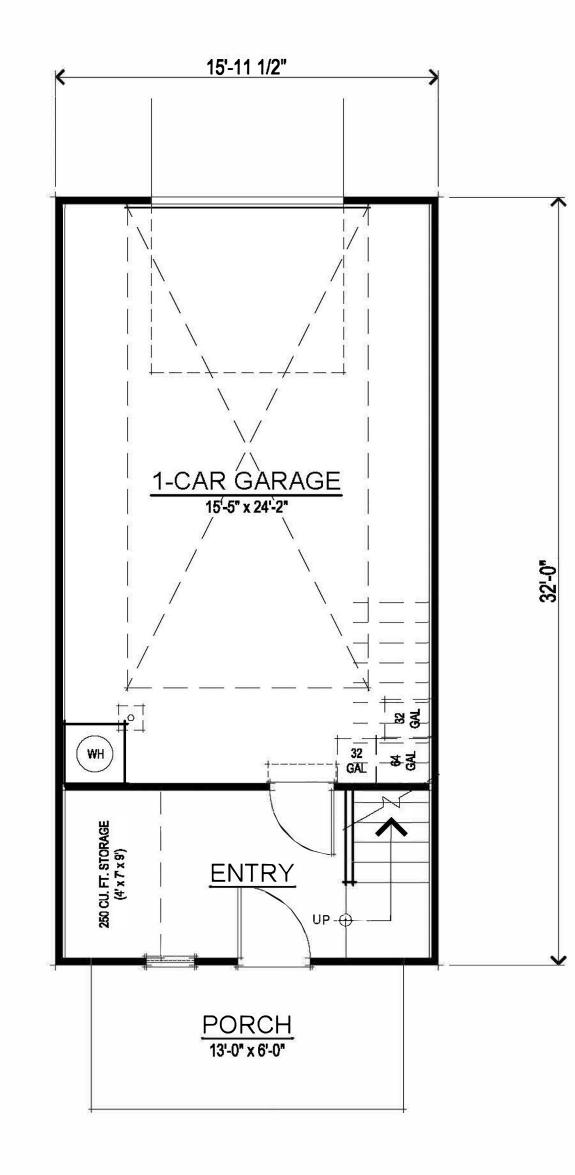
UNIT RT1 FLOOR PLANS











THIRD FLOOR PLAN

SECOND FLOOR PLAN

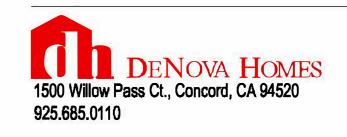
FIRST FLOOR PLAN w/ 2-CAR GARAGE

FIRST FLOOR PLAN w/ 1-CAR GARAGE

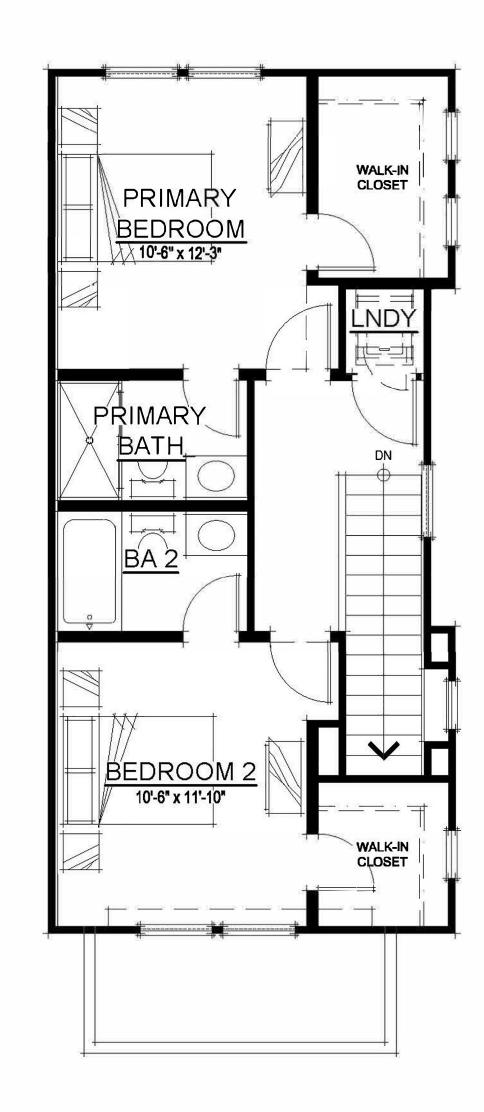
FIRST FLOOR PLAN w/ 1-CAR PLUS GARAGE

SQUARE FOOTAGES		GARAGE SQUARE FOOTAGES	
FIRST FLOOR	122 SQ. FT.	1-CAR PLUS GARAGE	392 SQ. FT.
SECOND FLOOR	544 SQ. FT.	1-CAR GARAGE	273 SQ. FT.
THIRD FLOOR	512 SQ, FT.	2-CAR GARAGE	511 SQ. FT.
TOTAL LIVING	1178 SQ. FT.		
DECK	78 SQ. FT.		

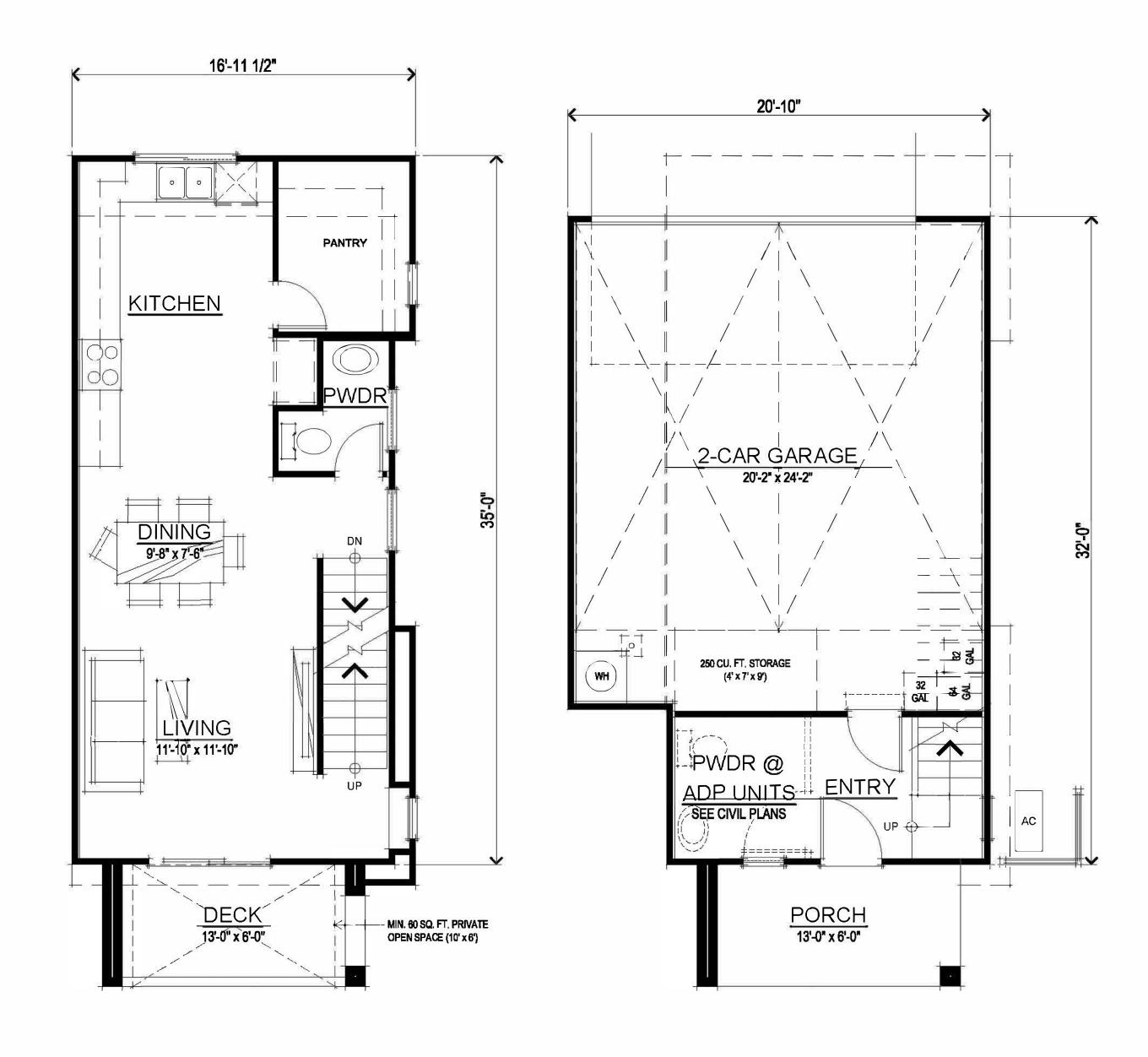
Wildflower Townhomes
Antioch, CA
February 02, 2024



UNIT RT2 FLOOR PLANS A004



THIRD FLOOR PLAN

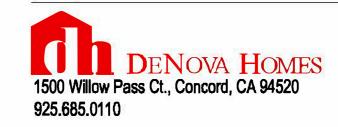


SECOND FLOOR PLAN

FIRST FLOOR PLAN

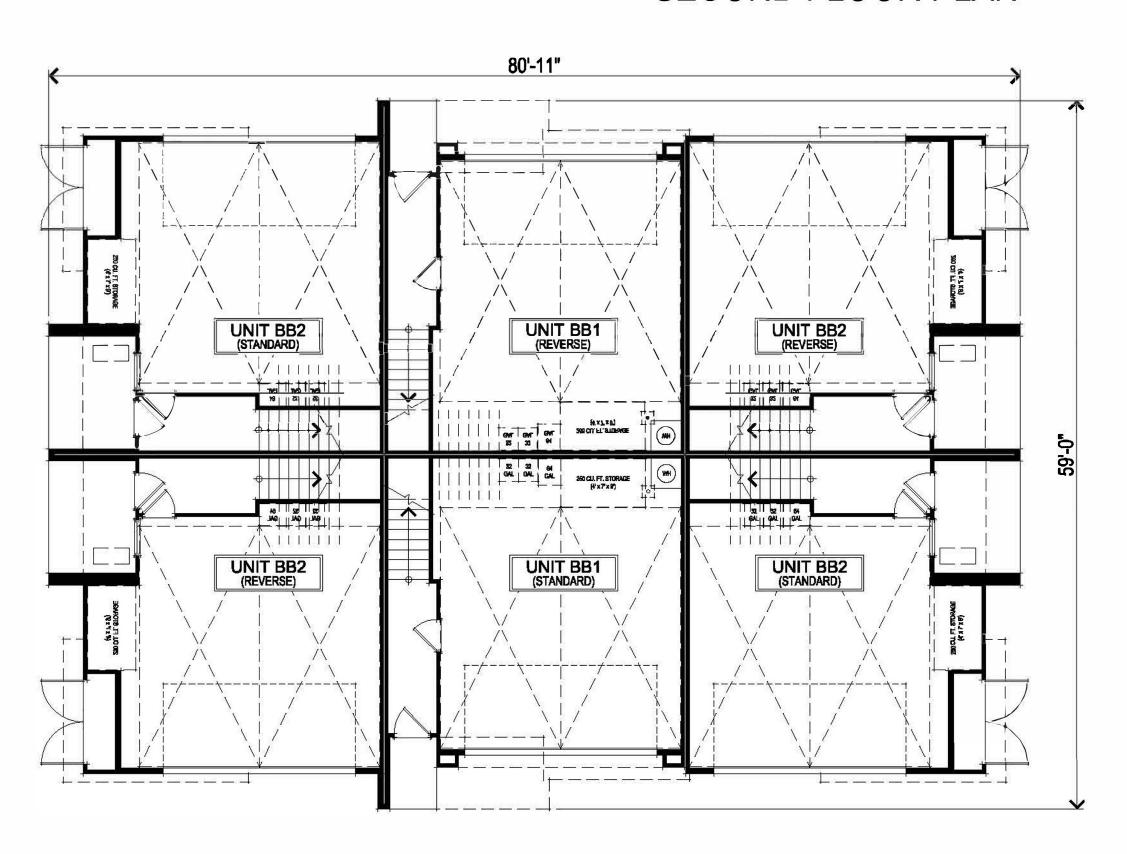
SQUARE FOOTAGES		GARAGE SQUARE FOOTAGES	
FIRST FLOOR	122 SQ. FT.	1-CAR PLUS GARAGE	392 SQ. FT.
SECOND FLOOR	569 SQ, FT.	2-CAR GARAGE	511 SQ, FT.
THIRD FLOOR	547 SQ. FT.		
TOTAL LIVING	1238 SQ. FT.		
DECK	78 SQ. FT.		

Wildflower Townhomes
Antioch, CA
February 02, 2024



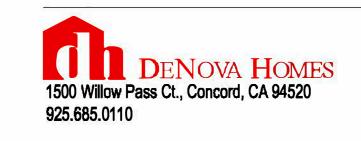






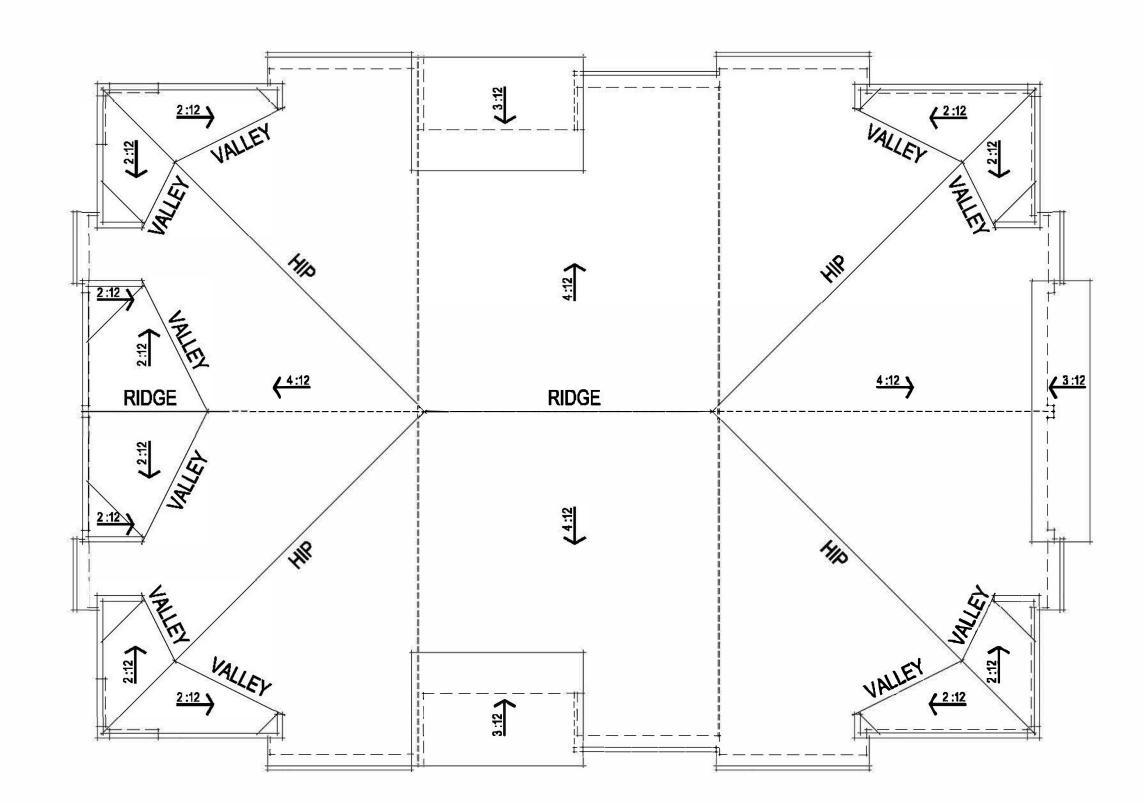
FIRST FLOOR PLAN

6 UNIT B2B BLDG FIRST & SECOND FLOOR PLANS

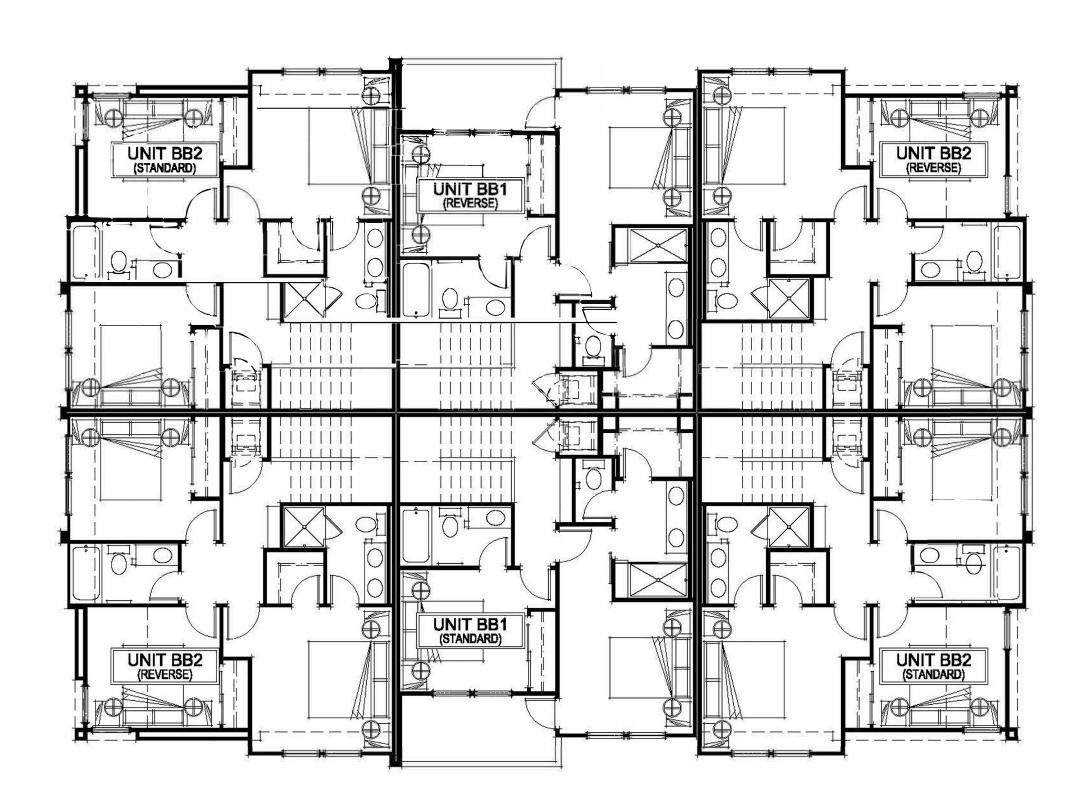


Wildflower Townhomes
Antioch, CA
February 02, 2024





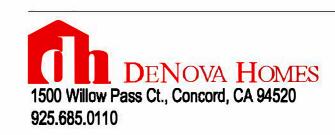
ROOF PLAN



THIRD FLOOR PLAN









REAR ELEVATION





LEFT ELEVATION

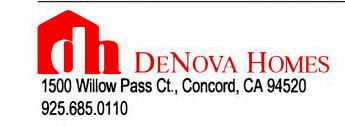
RIGHT ELEVATION

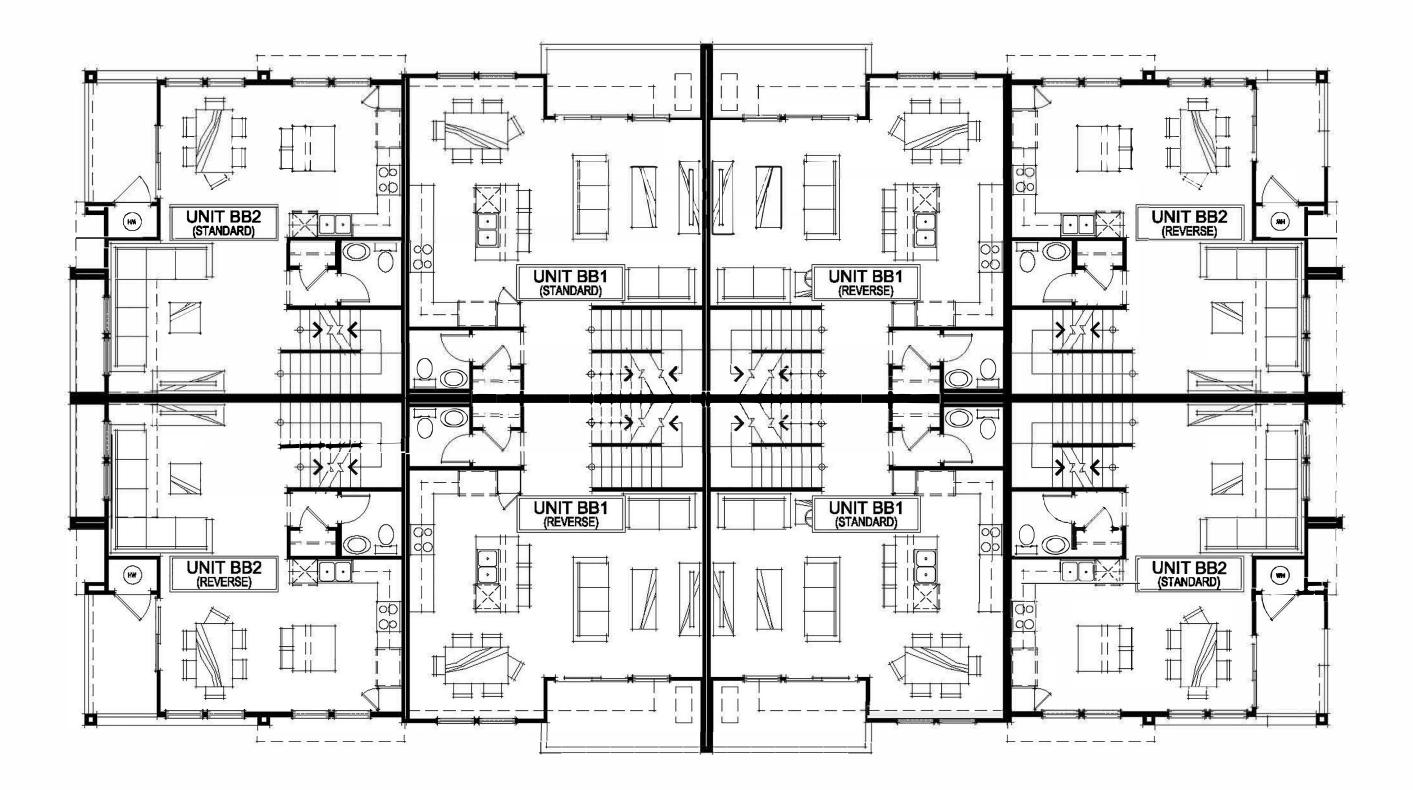


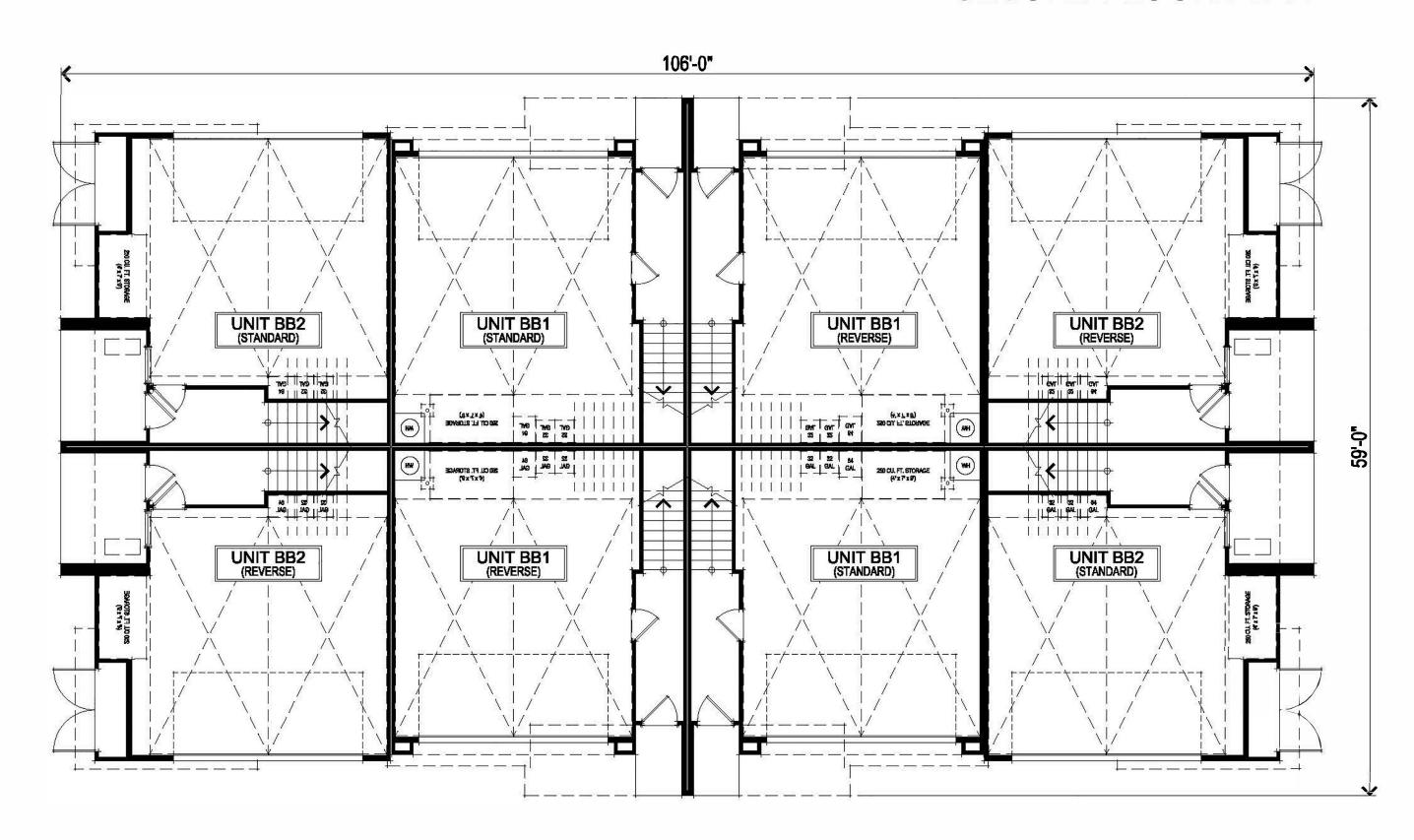
FRONT ELEVATION

6 UNIT B2B BLDG ELEVATIONS







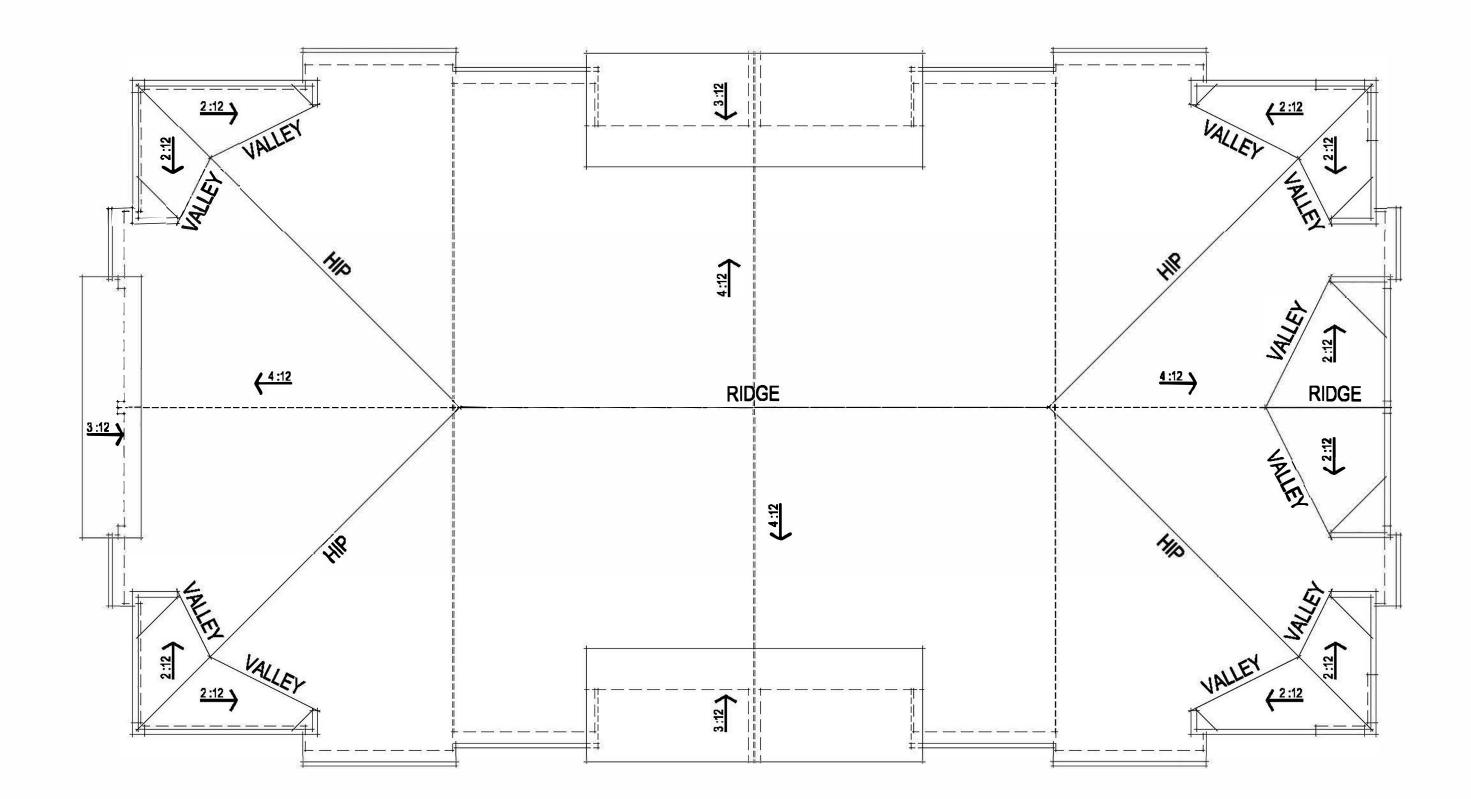


FIRST FLOOR PLAN

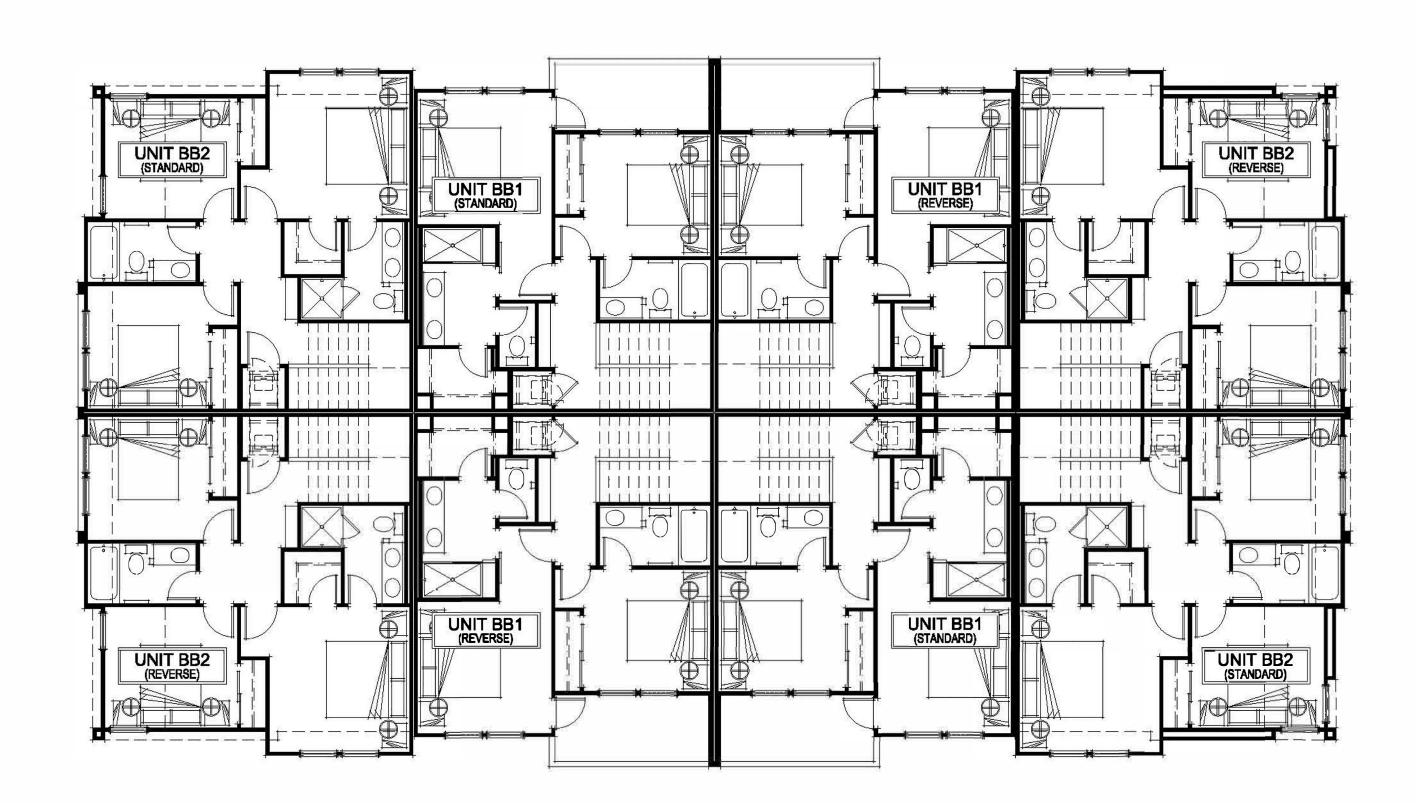








ROOF PLAN



THIRD FLOOR PLAN



8 UNIT B2B BLDG THIRD FLOOR & ROOF PLANS

Wildflower Townhomes
Antioch, CA
February 02, 2024





REAR ELEVATION



LEFT ELEVATION

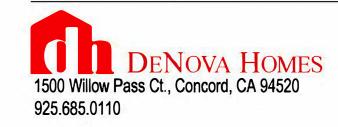




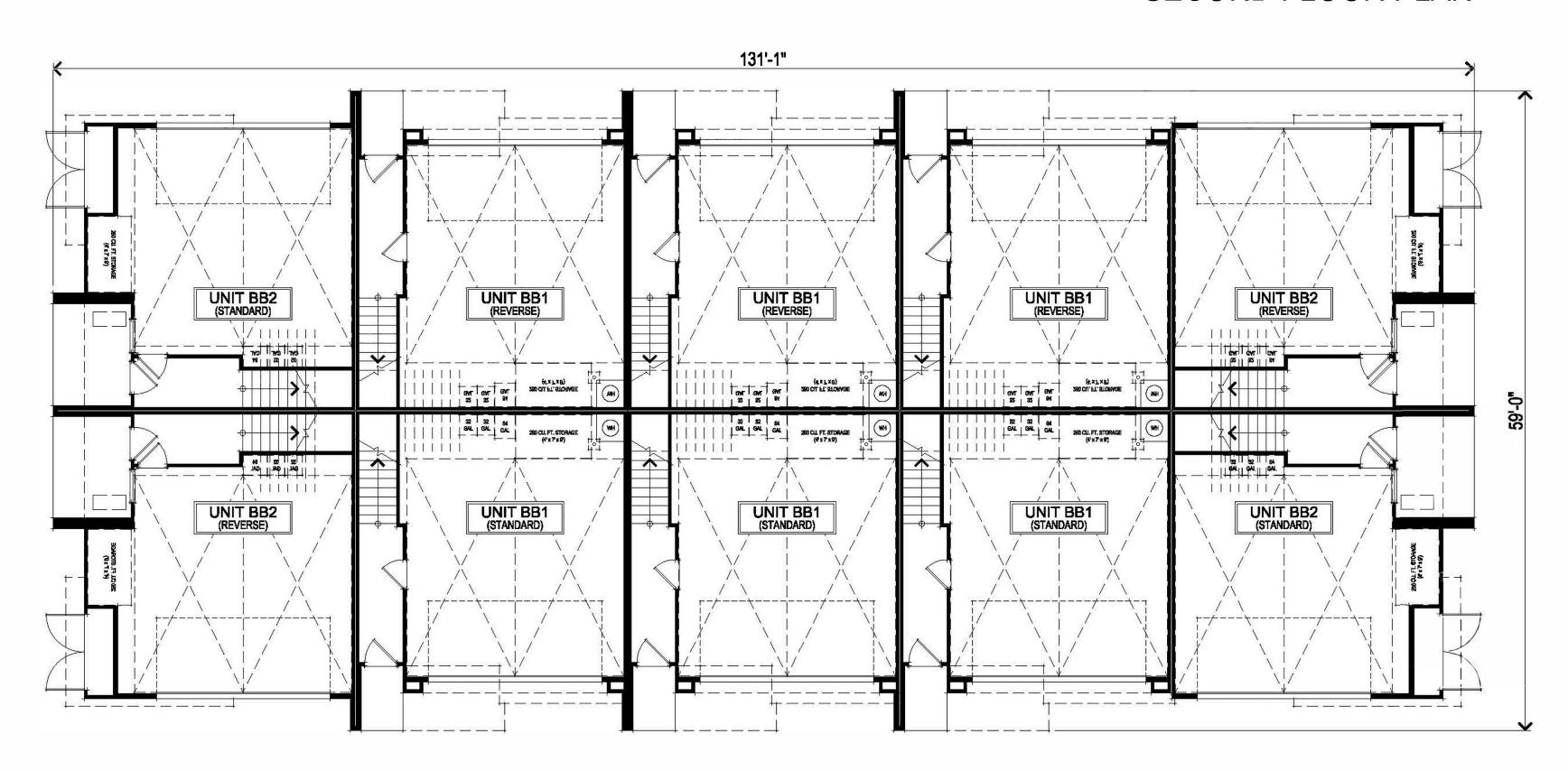
FRONT ELEVATION



Wildflower Townhomes
Antioch, CA
February 02, 2024







FIRST FLOOR PLAN

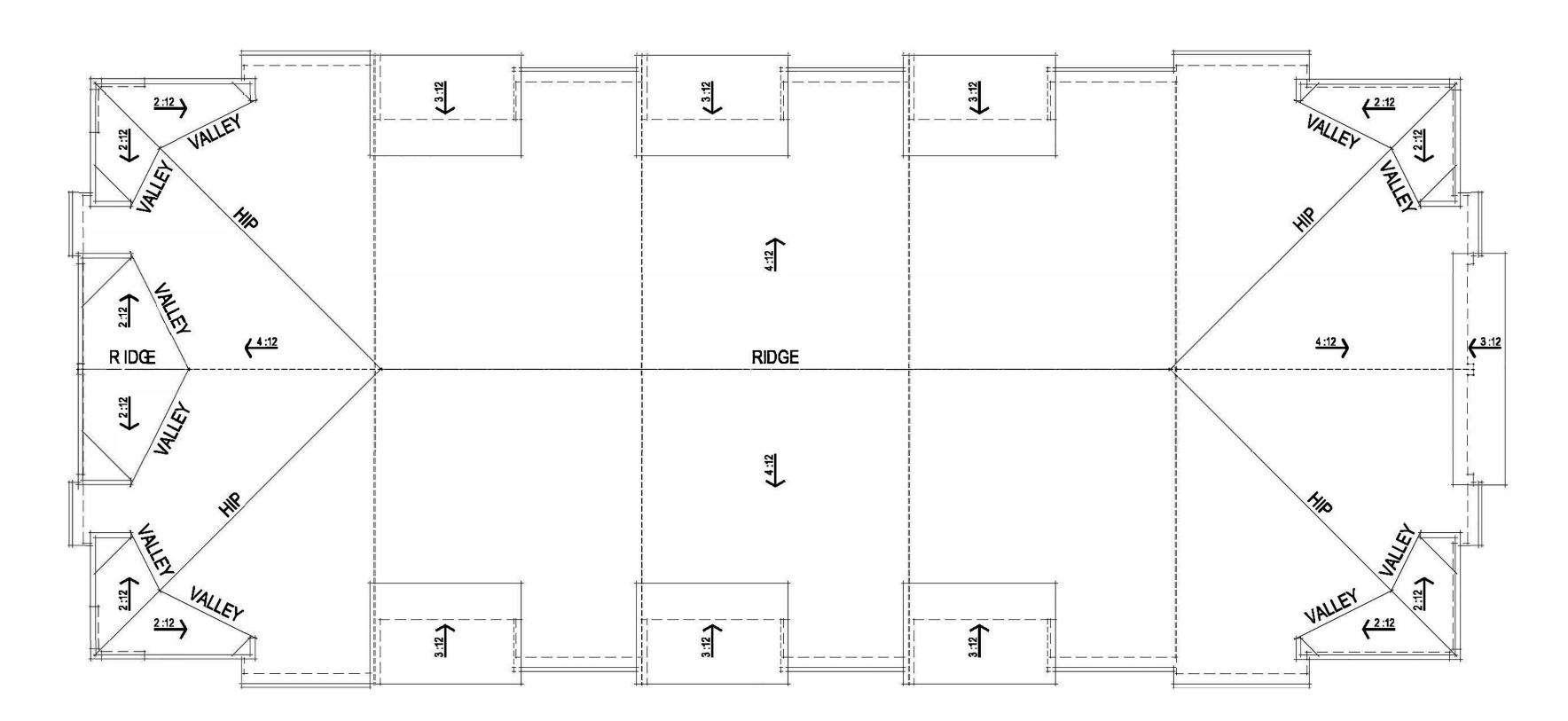


10 UNIT B2B BLDG FIRST & SECOND FLOOR PLANS

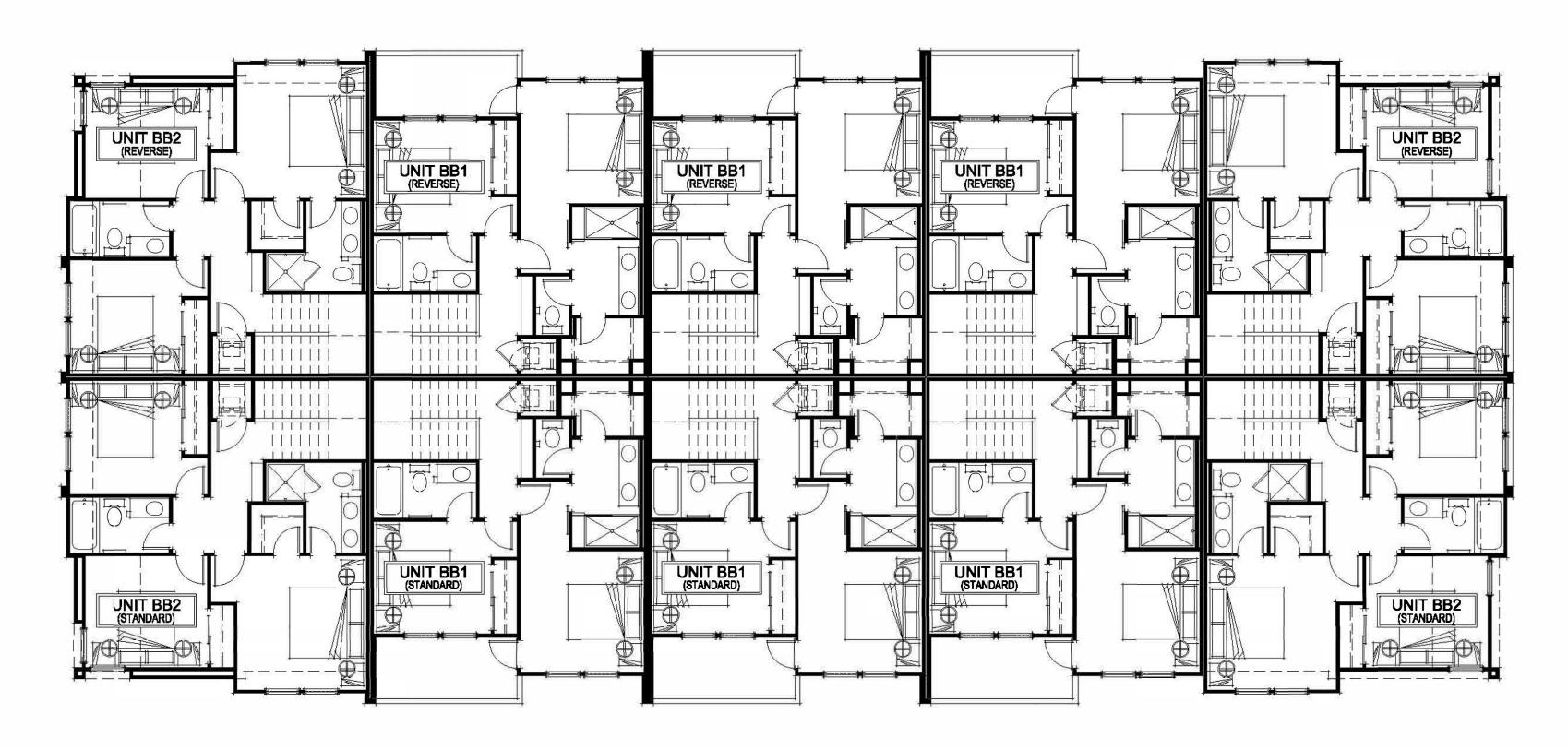
Wildflower Townhomes
Antioch, CA
February 02, 2024







ROOF PLAN

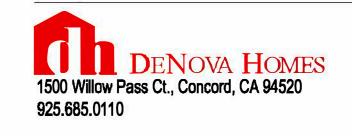


THIRD FLOOR PLAN



10 UNIT B2B BLDG THIRD FLOOR & ROOF PLANS

Wildflower Townhomes
Antioch, CA
February 02, 2024





REAR ELEVATION



LEFT ELEVATION

RIGHT ELEVATION



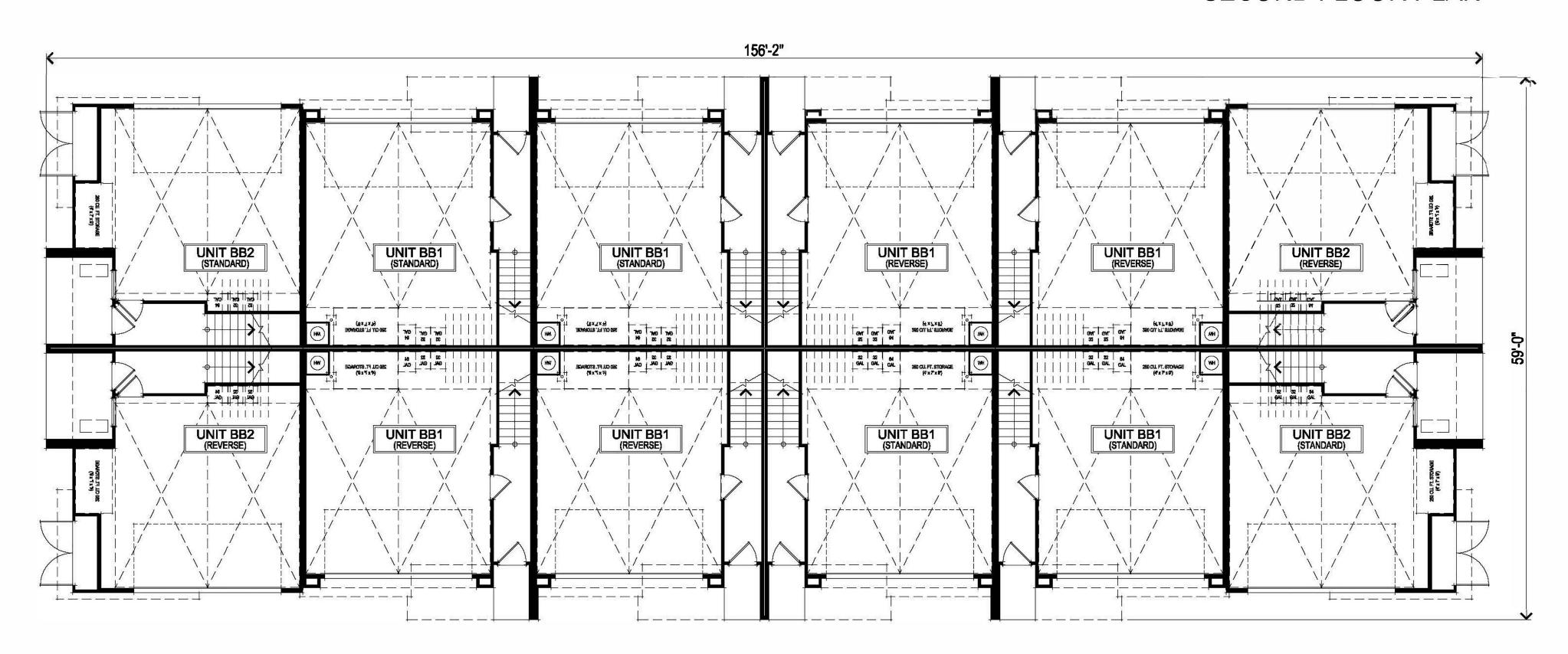
Wildflower Townhomes
Antioch, CA
February 02, 2024

FRONT ELEVATION

10 UNIT B2B BLDG ELEVATIONS







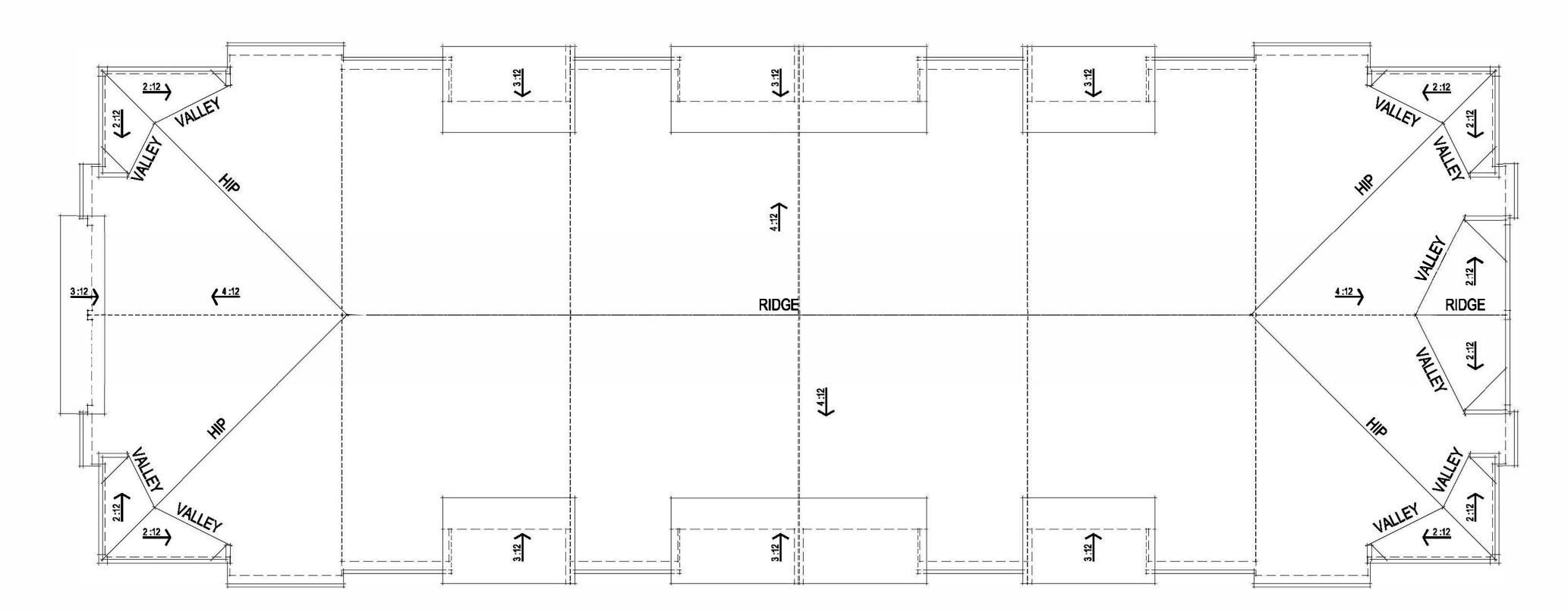
FIRST FLOOR PLAN

0 2' 4' 6 8' 16'

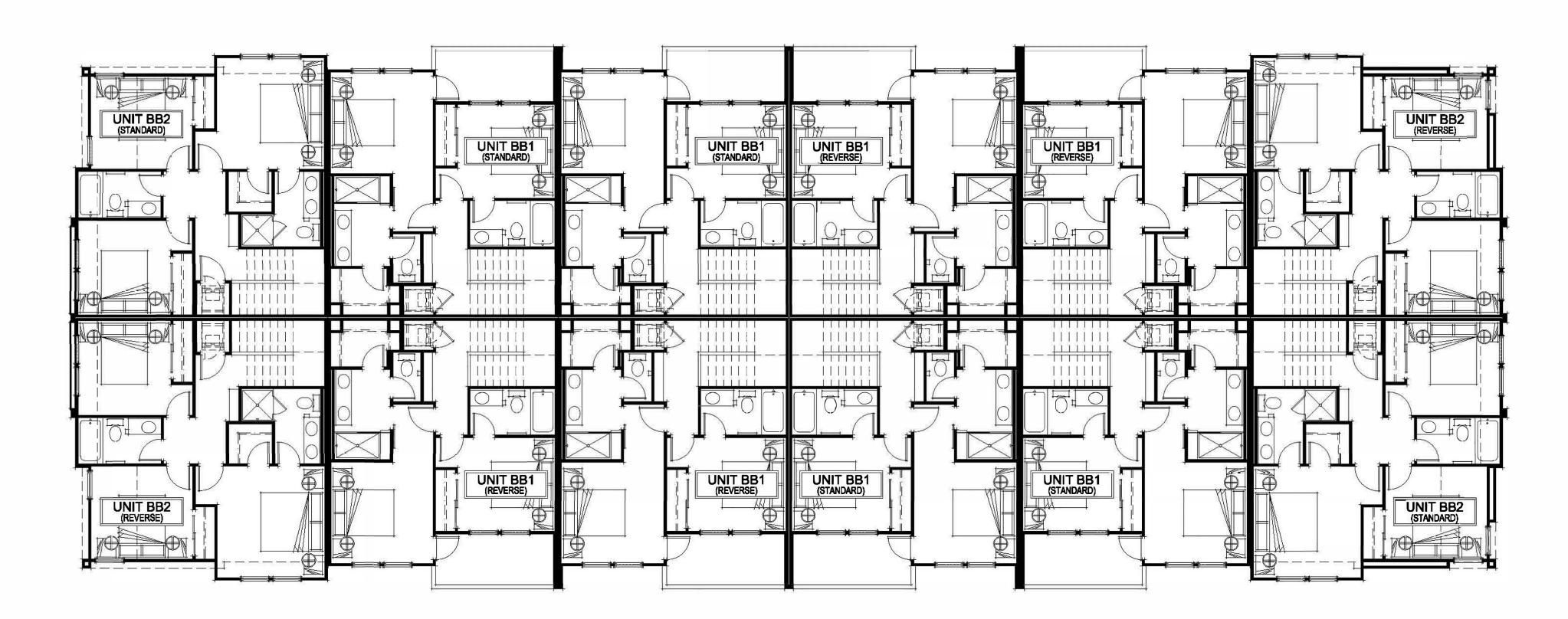
Wildflower Townhomes
Antioch, CA
February 02, 2024

12 UNIT B2B BLDG FIRST & SECOND FLOOR PLANS





ROOF PLAN



THIRD FLOOR PLAN



Wildflower Townhomes
Antioch, CA
February 02, 2024

12 UNIT B2B BLDG THIRD FLOOR & ROOF PLANS





REAR ELEVATION



LEFT ELEVATION

RIGHT ELEVATION



Wildflower Townhomes
Antioch, CA
February 02, 2024

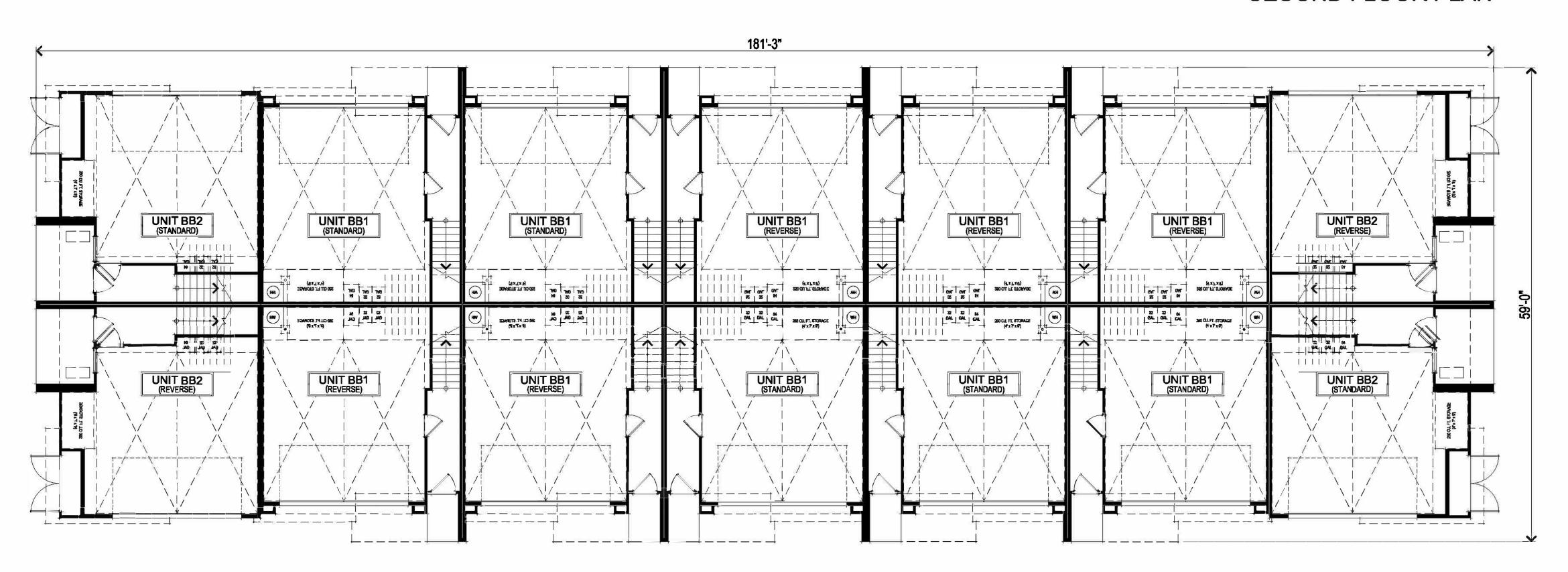
FRONT ELEVATION









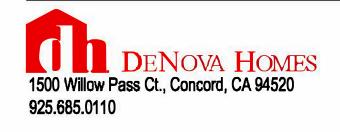


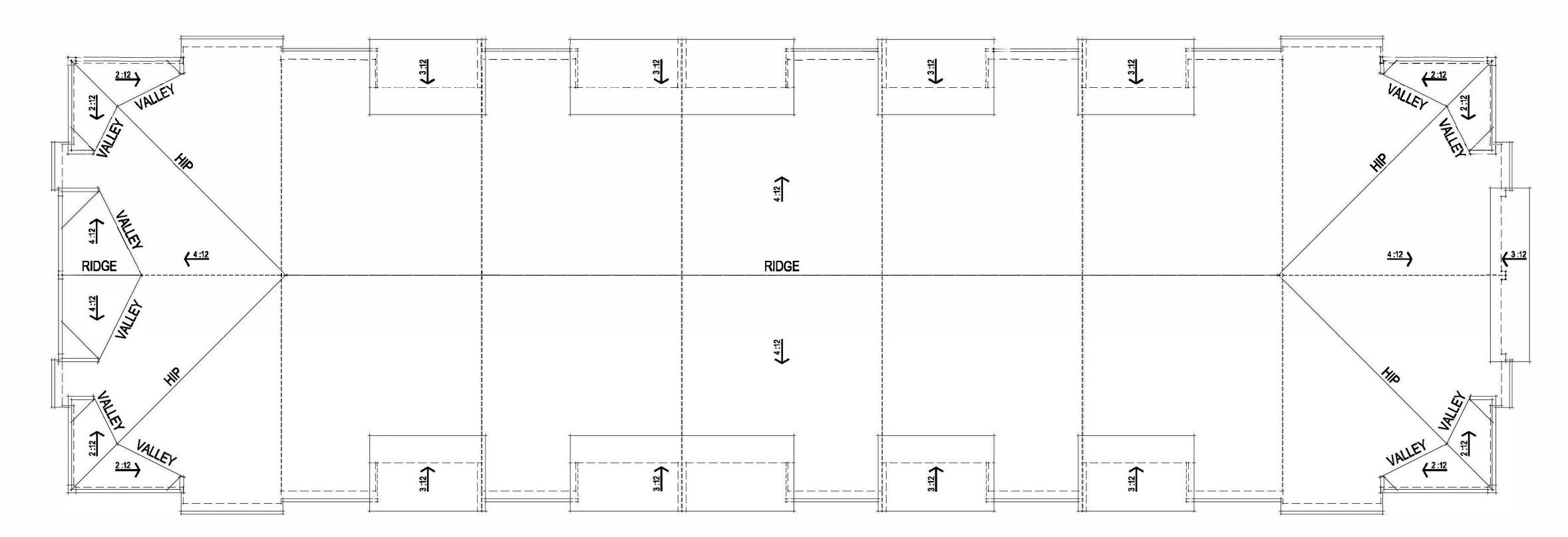
FIRST FLOOR PLAN

0 2' 4' 6 8' 10

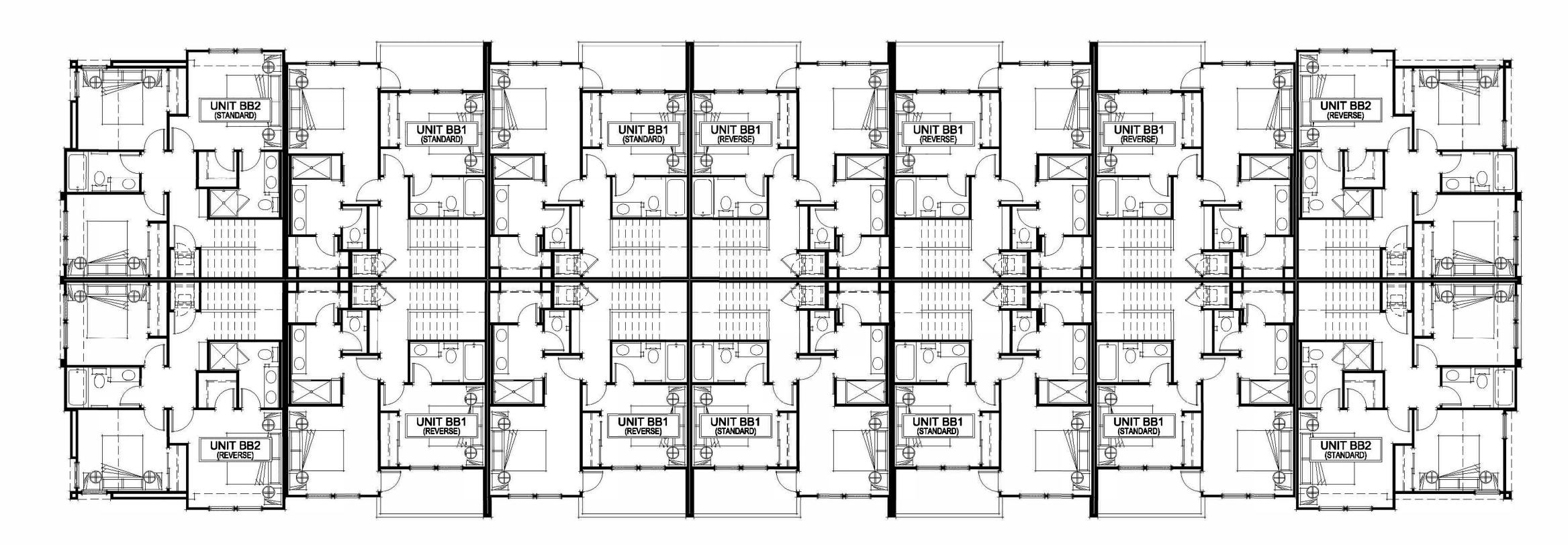
14 UNIT B2B BLDG FIRST & SECOND FLOOR PLANS







ROOF PLAN

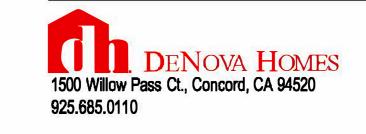


THIRD FLOOR PLAN



Wildflower Townhomes
Antioch, CA
February 02, 2024

14 UNIT B2B BLDG THIRD FLOOR & ROOF PLANS





REAR ELEVATION







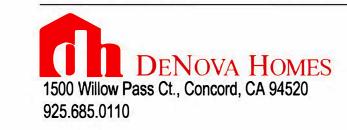
RIGHT ELEVATION

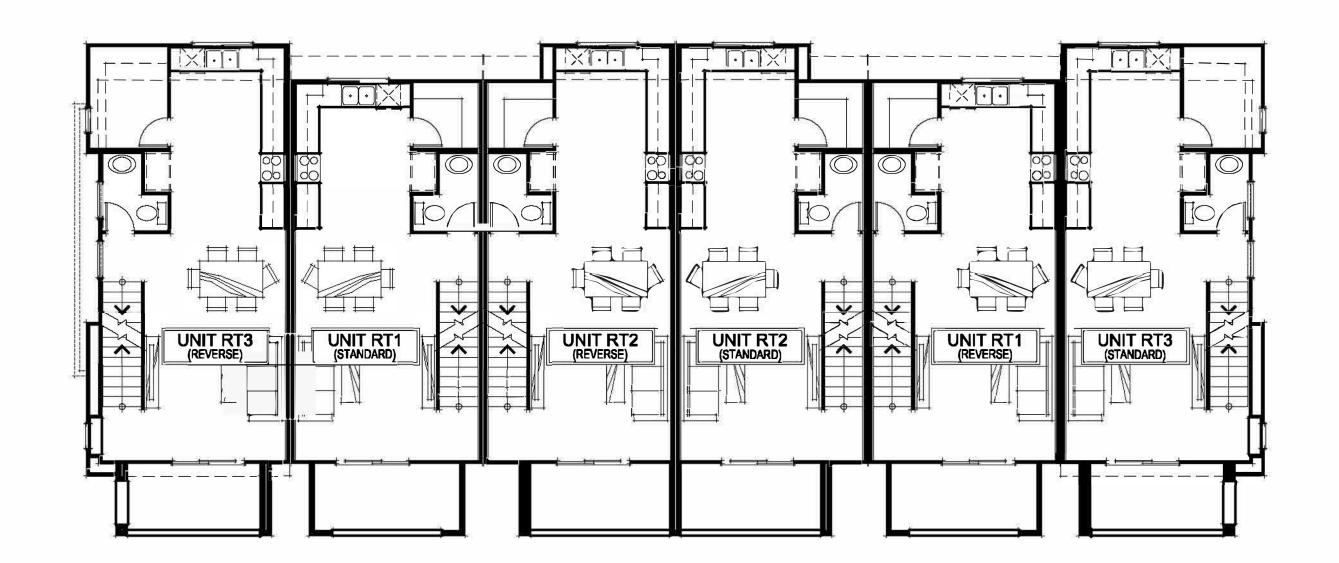


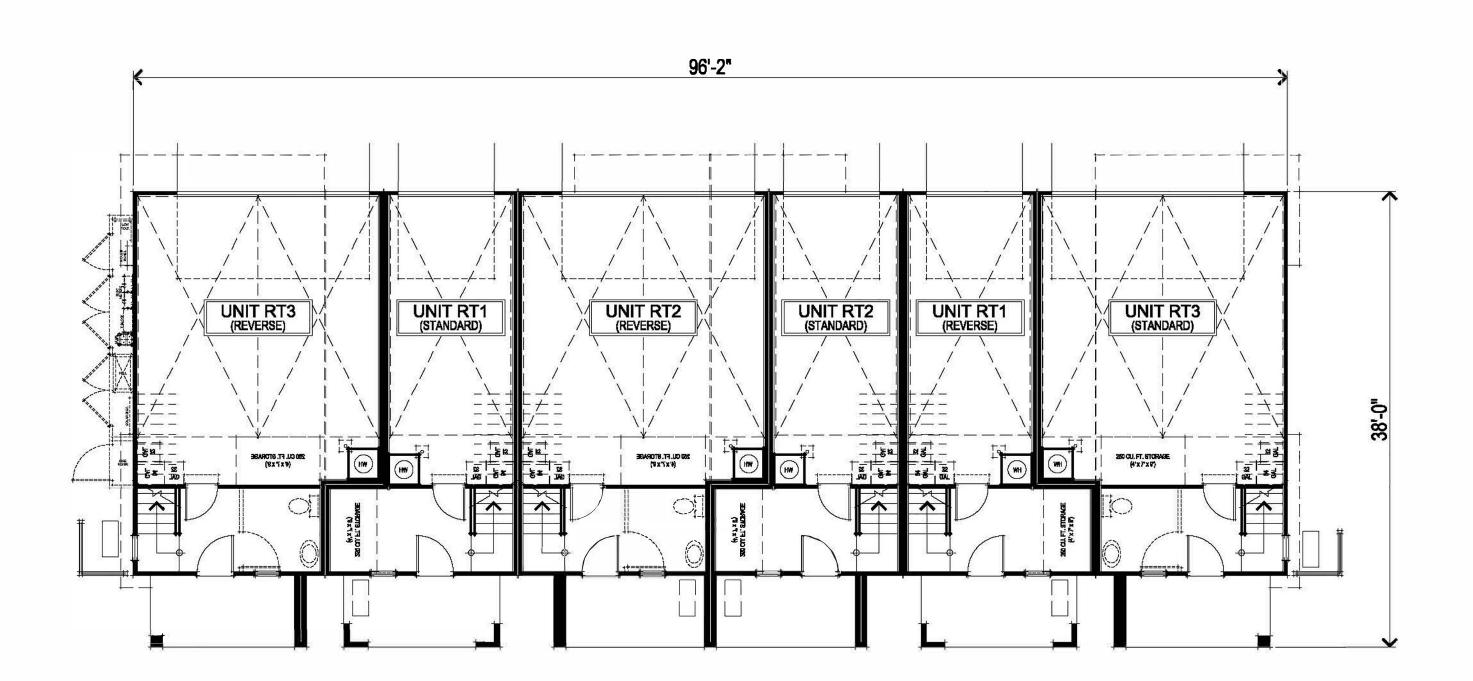
Wildflower Townhomes
Antioch, CA
February 02, 2024

FRONT ELEVATION

14 UNIT B2B BLDG ELEVATIONS

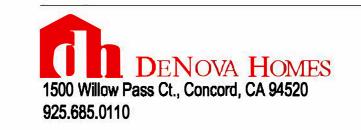






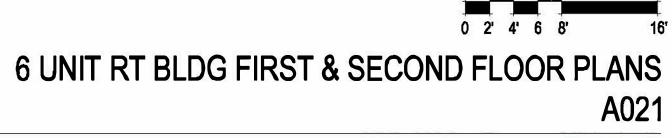
FIRST FLOOR PLAN



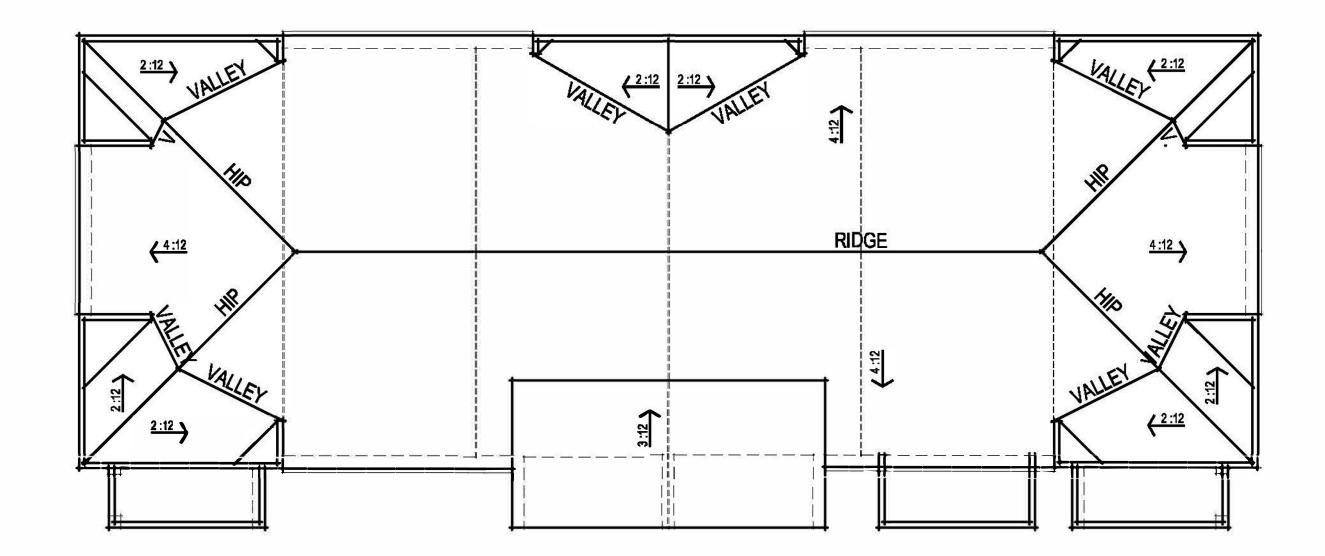


Wildflower Townhomes
Antioch, CA
February 02, 2024

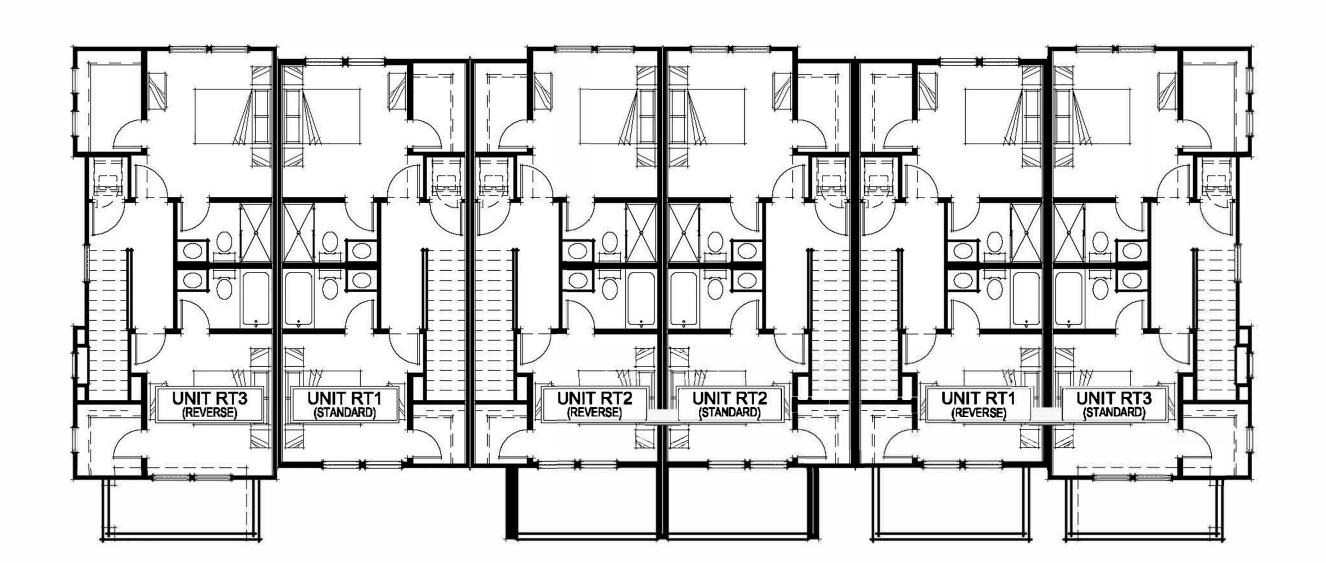
ROW TOWNHOMES



SDG Architects, Inc.
3361 Walnut Blvd. Suite 120
Brentwood, CA 94513
925.634.7000 | sdgarchitectsinc.com

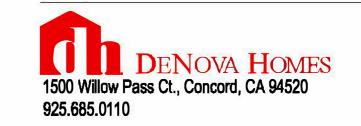


ROOF PLAN



THIRD FLOOR PLAN





Wildflower Townhomes
Antioch, CA
February 02, 2024





REAR ELEVATION

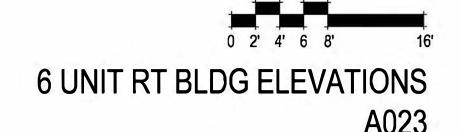


LEFT ELEVATION

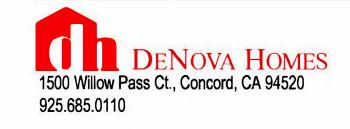
RIGHT ELEVATION



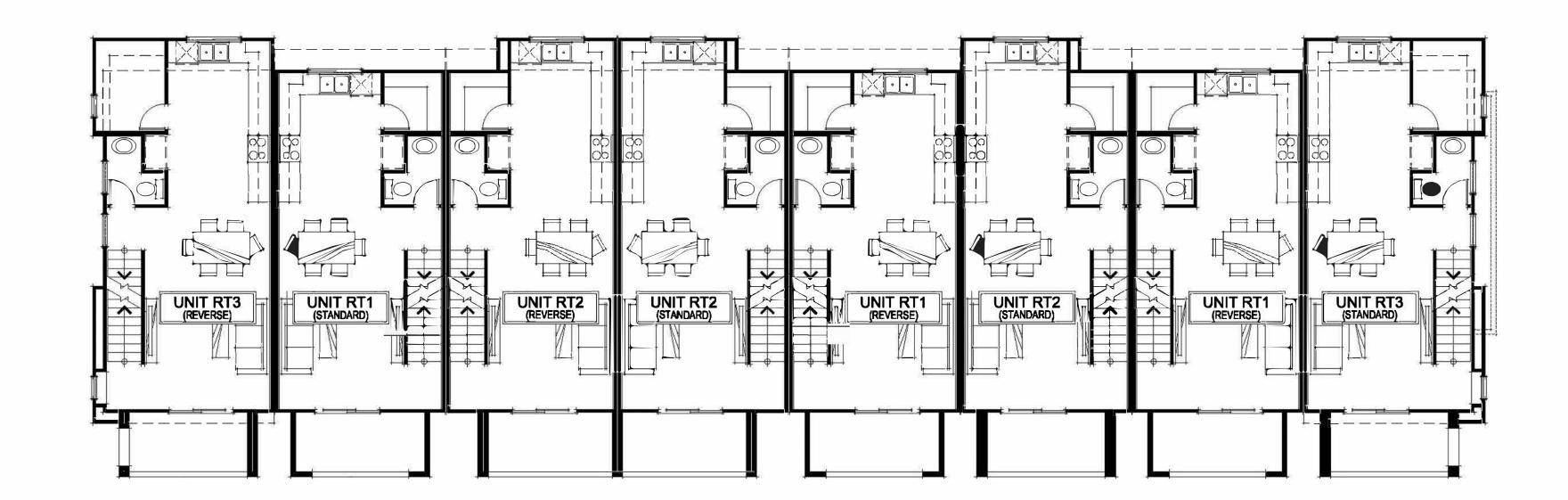
FRONT ELEVATION

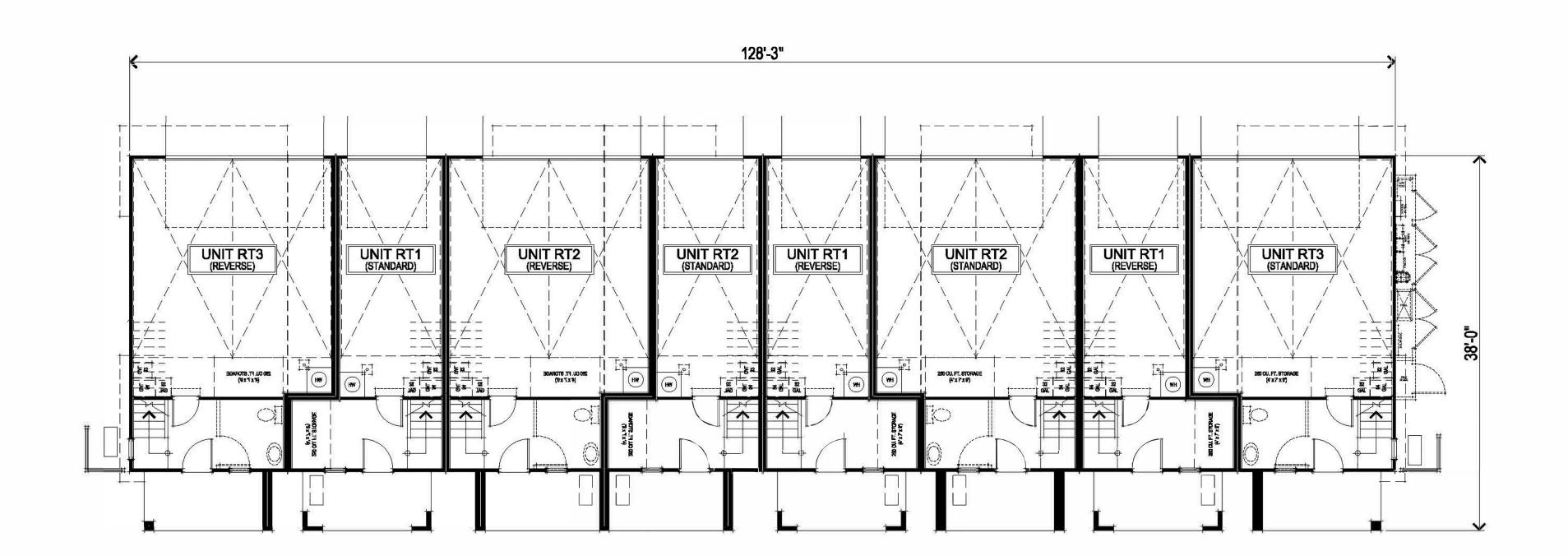


ROW TOWNHOMES



Wildflower Townhomes
Antioch, CA
February 02, 2024



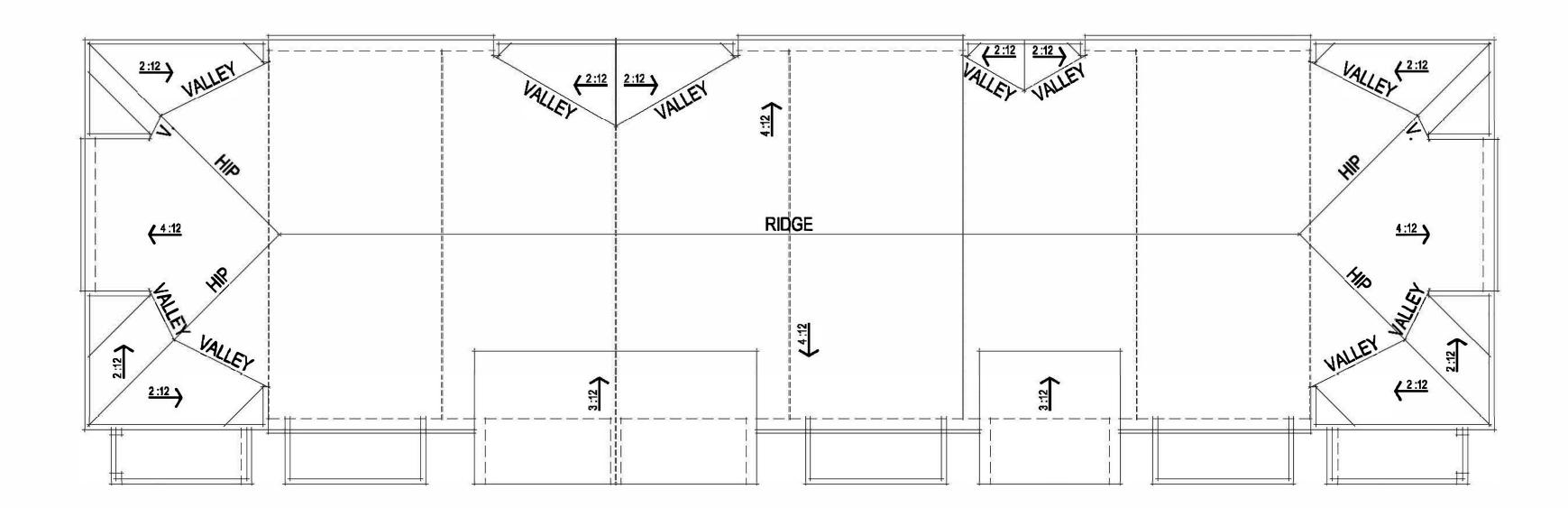


FIRST FLOOR PLAN

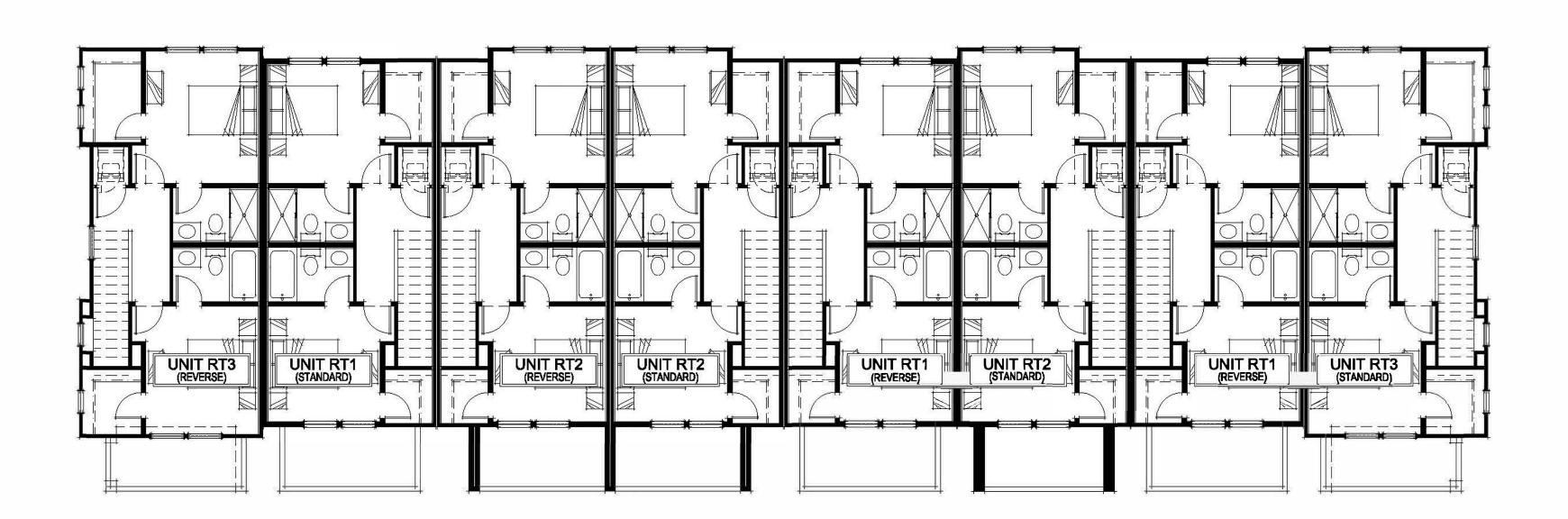






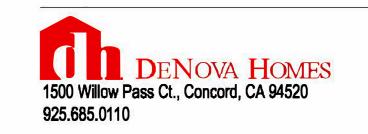


ROOF PLAN



THIRD FLOOR PLAN





Wildflower Townhomes
Antioch, CA
February 02, 2024





REAR ELEVATION

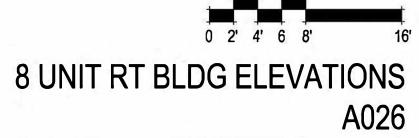


LEFT ELEVATION

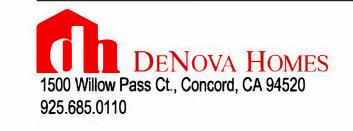
RIGHT ELEVATION



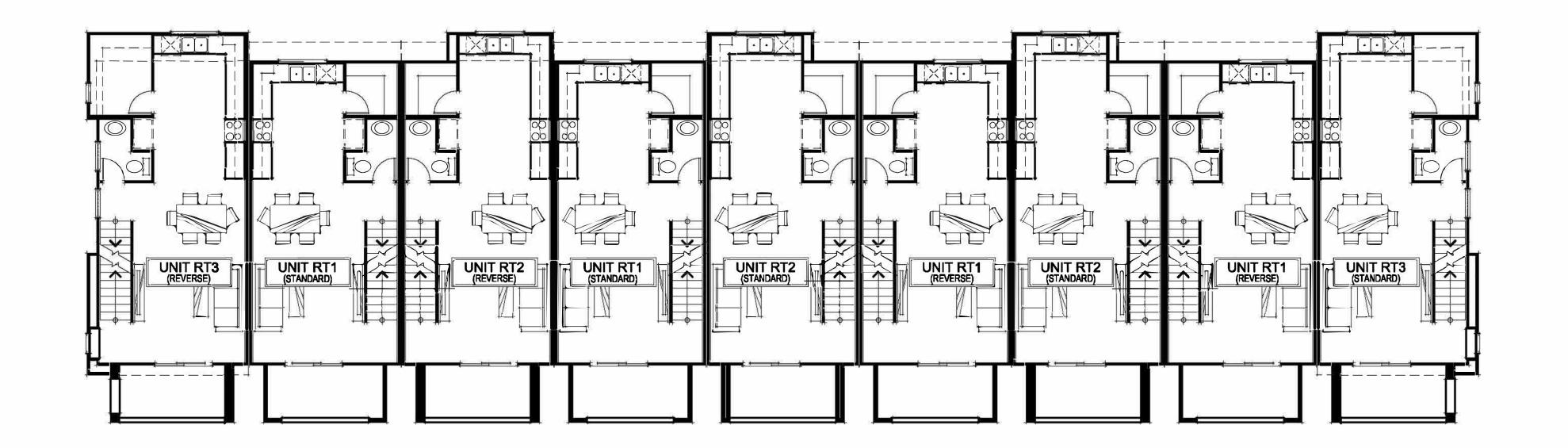
FRONT ELEVATION

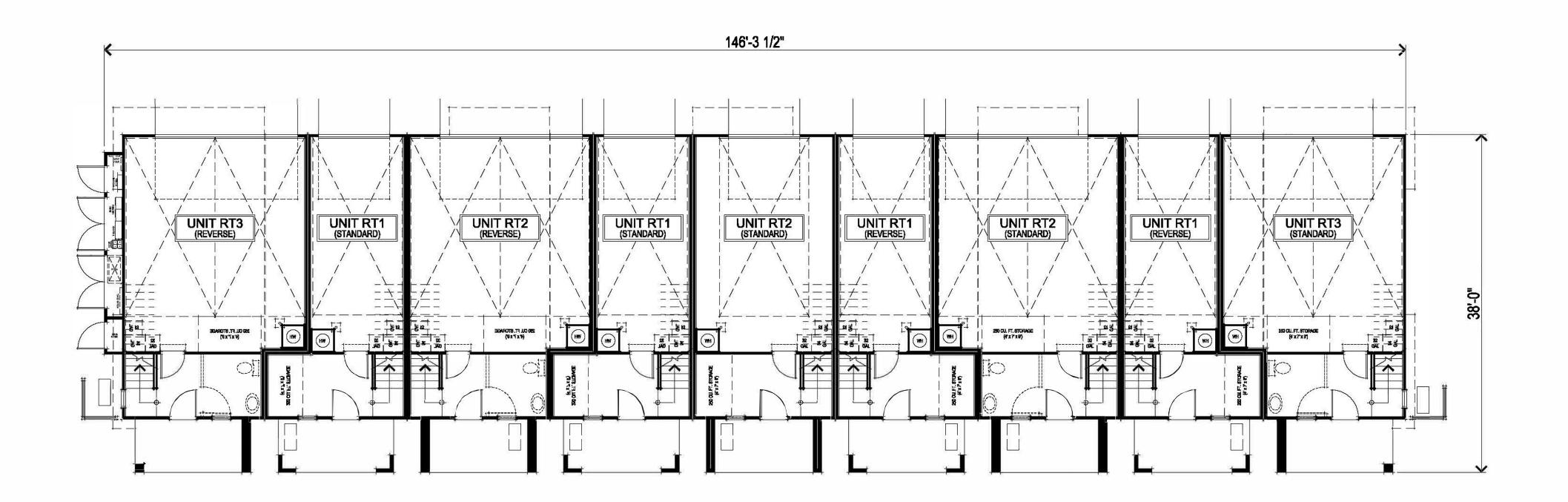










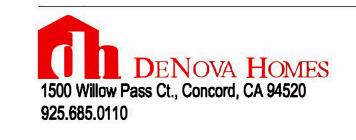


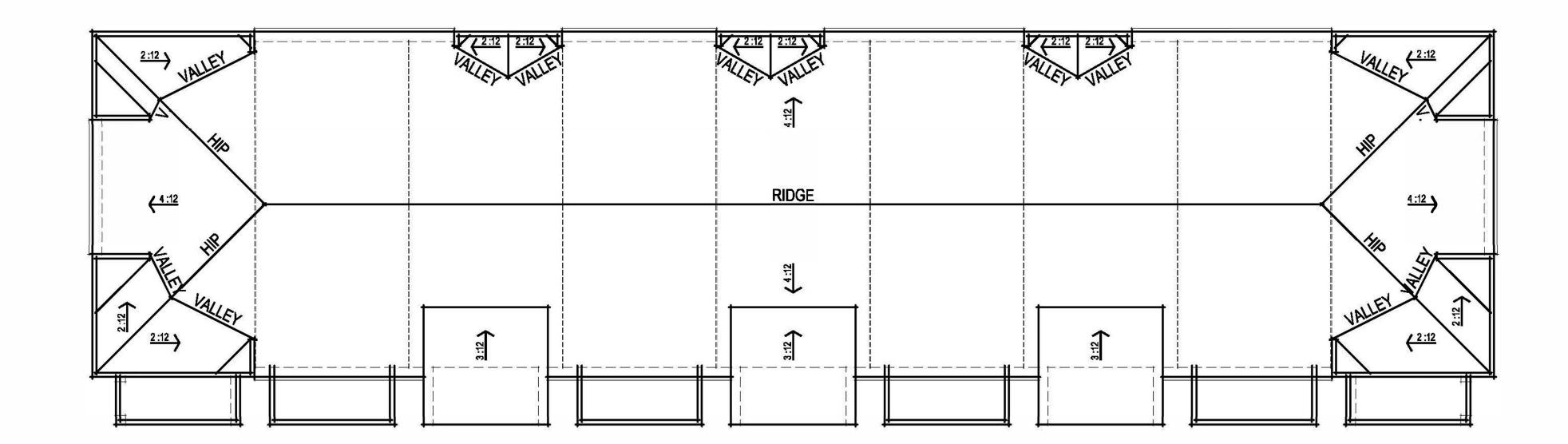
FIRST FLOOR PLAN

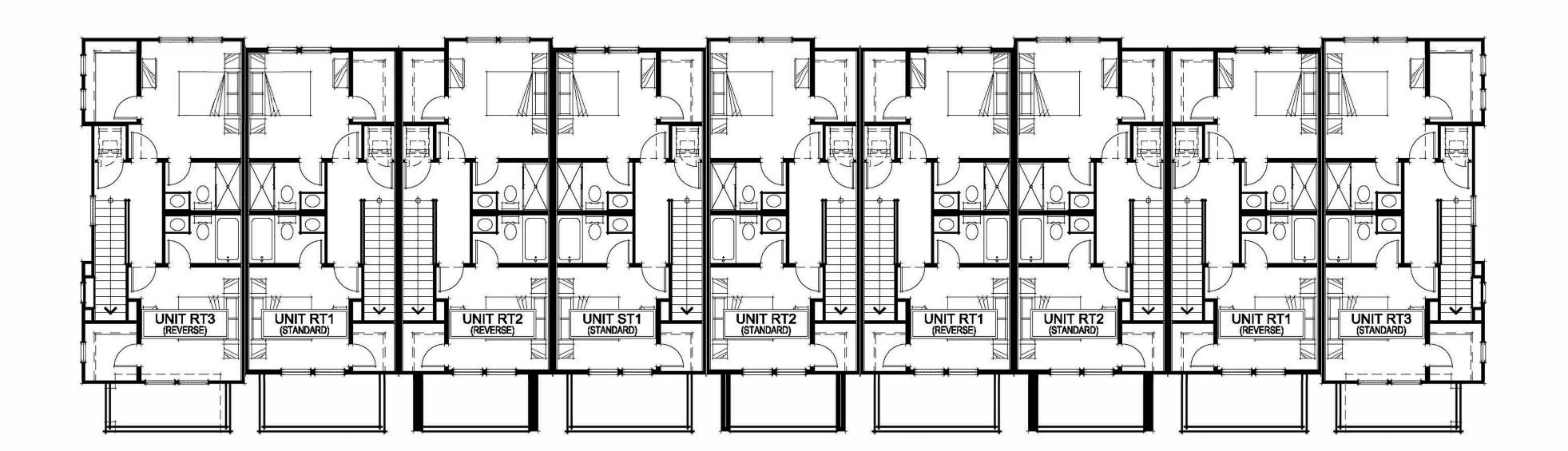


9 UNIT RT BLDG FIRST & SECOND FLOOR PLANS

Wildflower Townhomes
Antioch, CA
February 02, 2024







FIRST FLOOR PLAN



9 UNIT RT BLDG THIRD FLOOR & ROOF PLANS



Wildflower Townhomes
Antioch, CA
February 02, 2024





REAR ELEVATION







RIGHT ELEVATION



Wildflower Townhomes
Antioch, CA
February 02, 2024

FRONT ELEVATION







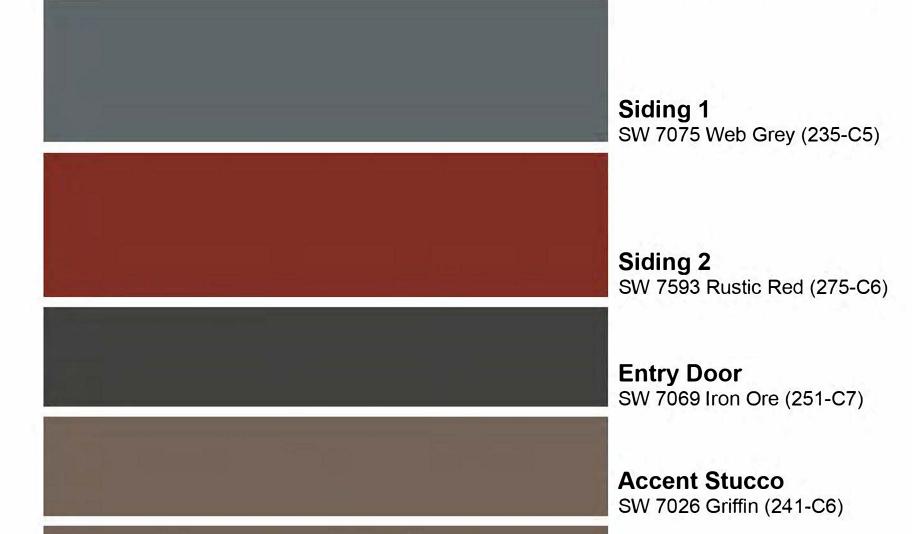
COLOR SCHEME 1





SW 7008 Alabaster (255-C2)

Garage Door SW 7026 Griffin (241-C6)



Note: All colors and textures are representative samples only, pending verification

COLOR SCHEME 2



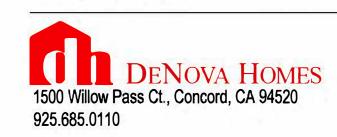
Roofing
CertainTeed - Weathered Wood



Garage Door SW 7026 Griffin (241-C6)

of actual material suppliers and manufacturers for this particular project.

Wildflower Townhomes
Antioch, CA
February 02, 2024



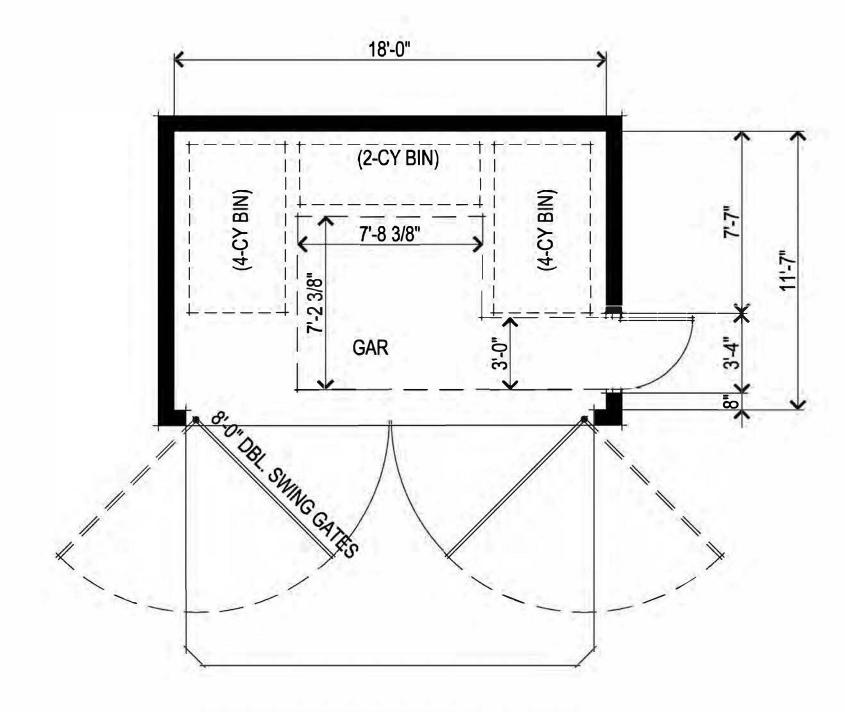
COLOR SCHEMES



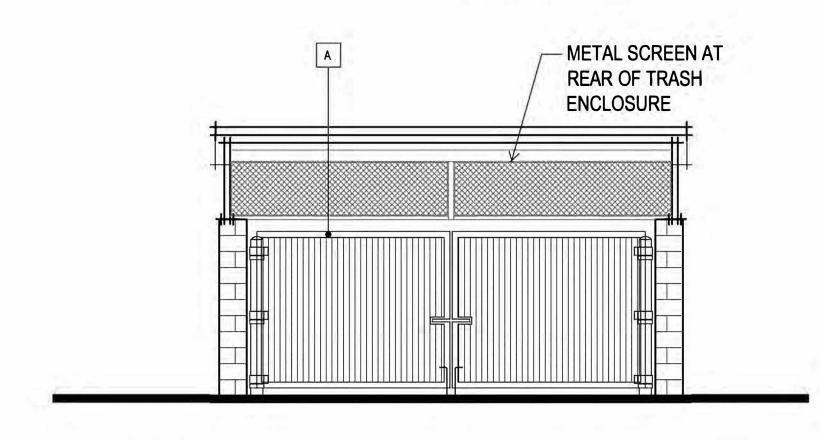


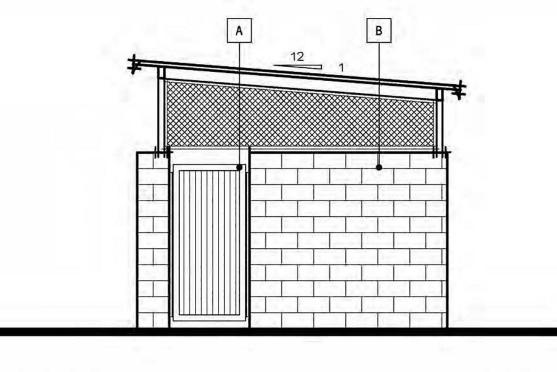
EXTERIOR FINISH KEY NOTES A SHERWIN-WILLIAMS: 7048 URBANE BRONZE

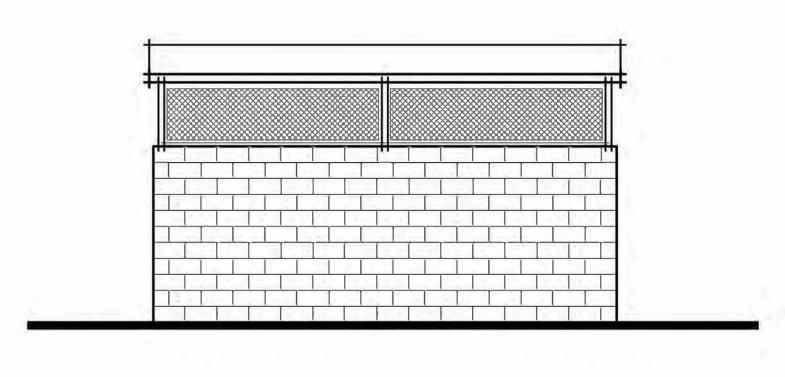
B CALSTONE-AB CLASSIC STONE: TAN

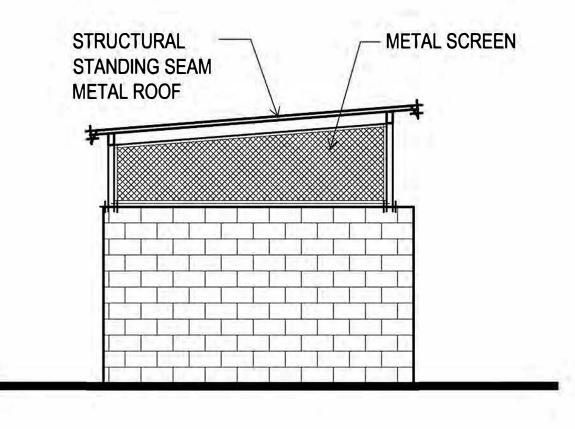


TRASH ENCLOSURE FLOOR PLAN







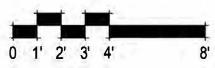


TYPICAL FRONT ELEVATION

TYPICAL RIGHT ELEVATION

TYPICAL REAR ELEVATION

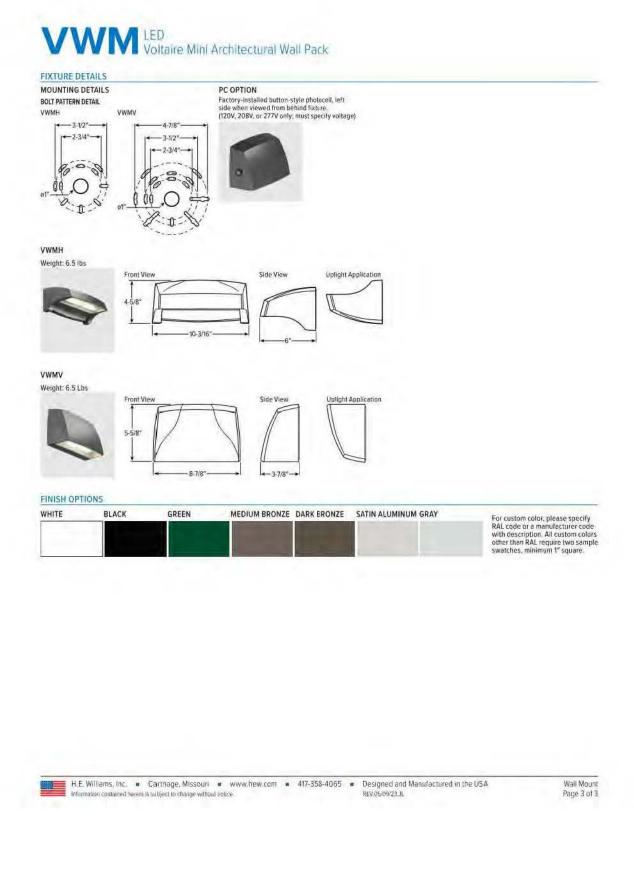
TYPICAL LEFT ELEVATION



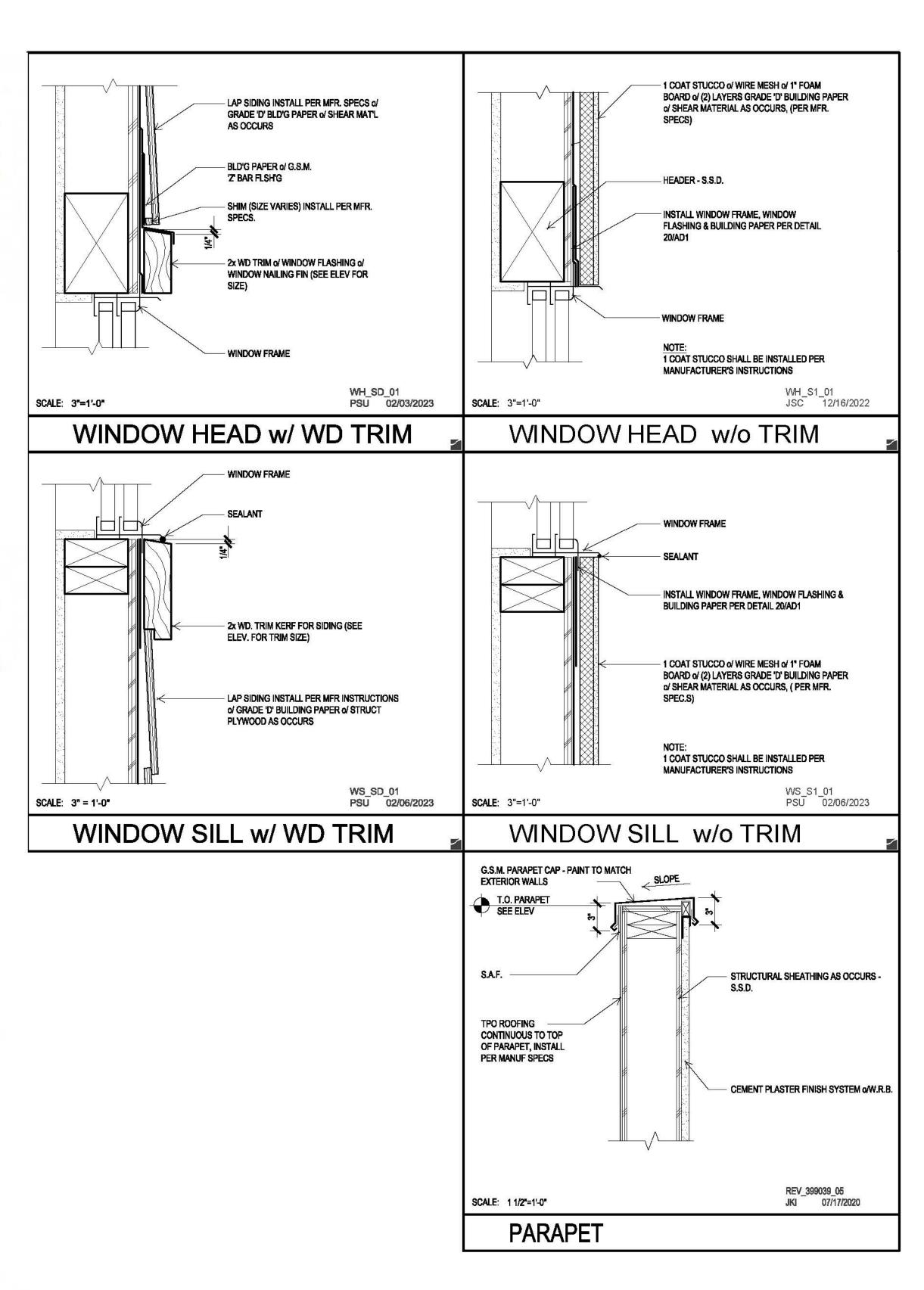
Wildflower Townhomes
Antioch, CA
February 02, 2024

TRASH ENCLOSURE PLAN & ELEVATIONS

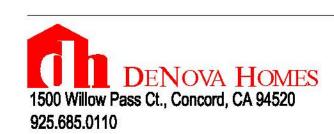
SDG Architects, Inc.
3361 Walnut Blvd. Suite 120
Brentwood, CA 94513
925.634.7000 | sdgarchitectsinc.com







Wildflower Townhomes
Antioch, CA
February 02, 2024



TYPICAL DETAILS



EXHIBIT C CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 - TM-02 | AR-23-05

GENERAL CONDITIONS

- 1. Project Approval. This Vesting Tentative Subdivision Map and Design Review approval is for the Wildflower Station 2 Townhome Subdivision 9601 Project located south of Hillcrest Crossroads and directly east of Hillcrest Avenue (APN: 052-140-013, 052-140-014, 052-140-015, 052-140-016), as substantially shown and described on the project plans, except as required to be modified by conditions. Plans date received February 5, 2024, and Civil plans dated received June 20, 2025 as presented to the Planning Commission on July 16, 2025 ("Approval Date."). For any condition herein that requires preparation of a Final Plan where the project applicant has submitted a conceptual plan, the project applicant shall submit final plan(s) in substantial conformance with the conceptual plan, but incorporate the modifications required by the conditions herein for approval by the City.
- 2. Project Approval Expiration. This approval expires on July 16, 2027 (two years from the date on which this approval becomes effective) or at an alternate time specified as a condition of approval unless a building permit has been issued and construction diligently pursued. All approval extensions shall be processed as stated in the Antioch Municipal Code.
- 3. Appeals. Pursuant to Antioch Municipal Code Section 9-5.2509, any decision made by the Planning Commission which would otherwise constitute final approval or denial may be appealed to the City Council. Such appeal shall be in writing and shall be filed with the City Clerk within five (5) working days after the decision. All appeals to the City Council from the Planning Commission shall be accompanied by a filing fee established by a resolution of the City Clerk.
- 4. Requirement for Building Permit. Approval granted by the Planning Commission does not constitute a building permit or authorization to begin any construction or demolition of an existing structure. An appropriate permit issued by the Community Development Department must be obtained before constructing, enlarging, moving, converting, or demolishing any building or structure within the city.
- 5. Modification of Approved Plans. The project shall be constructed as approved and with any additional changes required pursuant to the Zoning Administrator, Planning Commission, or City Council's Conditions of Approval. Planning staff may approve minor modifications in the project design as outlined in Antioch Municipal Code Section 9-5.2708.
- **6. Hold Harmless Agreement/Indemnification**. The applicant (including any agent thereof) shall defend, indemnify, and hold harmless, the City of Antioch and its agents, and employees, from any claim, action, or proceeding against the City or its agents, officers or employees to attack, set aside, void, or annul

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 2 | P a g e

the City's approvalconcerning this application. The city will promptly notify the applicant of any such claim action or proceeding and cooperate fully in the defense.

- **7. Final Approval.** A final and unchallenged approval of this project supersedes previous approvals that have been granted for this site.
- 8. Compliance Matrix. With the submittal of all grading plans, improvement plans, and building permit plans, the applicant shall submit to the Community Development Department a Conditions and Mitigation Measures Compliance Matrix that lists: each Condition of Approval and Mitigation Measure, the City division responsible for review, and how the applicant meets the Condition of Approval or Mitigation Measure. The applicant shall update the compliance matrix and provide it with each submittal.

FEES

9. City Fees. The applicant shall pay all City and other related fees applicable to the property, as may be modified by the conditions herein. Fees shall be limited to those applicable when the related SB 330 application was submitted and shall be based on the current fee structure in effect at the time provided that any increase since submittal of the project's SB 330 application reflects only the annual adjustments based on a published cost index. Fees shall be paid before issuance of said permit. Notice shall be taken specifically of Plan Check, Engineering, Fire, and Inspection Fees. The project applicant shall also reimburse the City for direct costs of planning; building and engineering plan check and inspection, as mutually agreed between the City and applicant.

Neither discretionary nor ministerial permits/approvals will be considered if the developer is not current on fees, balances, and reimbursement that are outstanding and owed to the City.

- **10. Pass-Through Fees.** The developer shall pay all pass-through fees. Fees include but are not limited to:
 - **a.** East Contra Costa Regional Fee and Financing Authority (ECCRFFA) Fee in effect at the time of building permit issuance.
 - **b.** Contra Costa County Fire Protection District Fire Development Fee in place at the time of building permit issuance.
 - **c.** Contra Costa County Map Maintenance Fee in affect at the time of recordation of the final map(s).
 - **d.** Contra Costa County Flood Control District Drainage Area fee.
 - e. School Impact Fees.
 - f. Delta Diablo Sanitation Sewer Fees.
 - g. Contra Costa Water District Fees.

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 3 | P a g e

- **11. Proof of CFD Annexation.** Concurrent with, or prior to, submittal of the Final Map, the developer shall submit evidence of annexation into all required districts, including:
 - **a.** The applicant shall annex into the existing Community Facilities District (CFD) 2018-02 (Police Protection).
 - **b.** Public Services District (Public Services) CFD 2018-01 and accept a level of annual assessments sufficient to maintain public facilities in the vicinity of the project area at no cost to the City. The annual assessment shall cover the actual annual cost of public services as described in the Engineer's Report.
 - c. Fire Services CFD. The applicant shall annex into CFD 2022-1 (Antioch Fire Protection and Emergency Response Services). This CFD is administered by the Contra Costa County Fire Protection District. To comply with this condition, the applicant must provide the City proof of annexation by furnishing a copy of the resolution passed by the County Board of Supervisors.

VESTING TENTATIVE MAP

- **12. Subdivision Map Act Compliance.** The Vesting Tentative Map approval is subject to the timelines established in the State of California Subdivision Map Act or as extended by a Development Agreement.
- **13. Map Approval.** Map approval is granted based on substantial conformance with the Vesting Tentative Map prepared on February 2, 2024 and June 27, 2025, and received by the Community Development Department on June 30, 2025

Approval of the Vesting Tentative Map shall not constitute the approval of any improvements on the Vesting Tentative Map and shall not be construed as a guarantee of future extension or reapprovals of this or similar maps.

PUBLIC WORKS' STANDARD CONDITIONS

- 14. City Standards. All proposed public improvements shall be designed and constructed to City standards or as otherwise approved by the City Engineer in writing or on approved plans. The developer shall file for a City Encroachment permit for all improvements within the public right of way, a grading permit for grading of the site, and a building permit for all buildings and utilities to be installed on the site.
- **15.** Required Easements and Rights-of-Way. If necessary, all required easements or rights-of-way for improvements shall be obtained by the

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 4 | P a g e

developer at no cost to the City of Antioch prior to or concurrently with the recordation of the final map or subsequent final maps or separate recorded documents as approved by the City Engineer. Advance permission shall be obtained from any property or, if required from easement holders, for any work done within such property or easements.

- **Removal of Vacated Easements.** If necessary, all existing easements of record that are no longer required and will affect parcels within this project shall be removed prior to or concurrently with the recordation of the final map or subsequent final maps or separate recorded documents as approved by the City Engineer.
- 17. Utility Construction. Relocation of Public utilities and construction of new private utilities shall be constructed to their ultimate size and configuration, as shown on the preliminary entitlement plan documents submitted to the City and improvement plans approved by the City Engineer and constructed prior to occupancy of the first building;
- 18. Utility Undergrounding. To the extent possible all existing and proposed utilities shall be undergrounded (e.g., transformers and PMH boxes) and subsurface pursuant to Section 7-3 "Underground Utility Districts" of the Antioch Municipal Code prior to the final occupancy permit. Where utilities cannot be installed underground, they should be screened with landscaping, per City standards.
- 19. Utility Mapping. Prior to acceptance of public utilities, the developer shall provide GPS coordinates of all below ground and above ground utilities. This includes all Water Distribution Utility features, sewer collection Utility features, Storm Water Utility features, and inverts, locations of pipes, manholes, cleanouts and utility meters associated with these features. Developer shall include GPS coordinates of water meters, irrigation meters, sewer cleanouts, sewer manholes, subdivision entryway signs, street signs, light poles, storm drain manholes, drainage inlets and transformers and gas meters needed for recording the location of all proposed utilities in the project as defined by the City Engineer. These GPS coordinates must be taken on a survey-grade GPS data receiver/collector and provided in GIS shapefile format using the NAVD 88 (with conversion information). Submittal of as-built drawings in AutoCAD drawing format in NAVD 88 coordinates shall satisfy this condition prior to the final occupancy permit.
- **20. Sewer**. All sewage shall flow by gravity to the sewer main located in the closest public street. The sewer connection shall comply with City standard plans and specifications. All sewer lines and utility connections to the City sewer system shall be in accordance with city and local sewer district

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 **5** | P a g e

specifications. Proper backfill, compaction and road repair shall also be in accordance with City specifications and standard plans. The Developer shall install all sewage laterals from the lot to flow by gravity to the public sewer main which will drain by gravity to existing City sewer trunk mains located close to the project per City standards.

- 21. Requirement for Looped System. Water systems shall be designed as a looped distribution system. The developer shall be responsible for installing any off-site water mains to create a looped system in accordance with City and Fire District requirements at no cost to the City.
- **22. Water Pressure**. The developer shall provide adequate water pressure and volume for fire flow and domestic use to serve this development. This will include a minimum residual pressure of 20 psi with all losses included at the highest sprinkler unit point in the building and at water service and a minimum static pressure of 20 psi at the water service or as approved by the City Engineer. See Fire Requirements for additional water flow conditions.

23. Retaining Walls

- **a.** Public Right of Way. Retaining walls shall not be constructed in City right-of-way or other City maintained parcels, unless otherwise approved by the City Engineer.
- **b. Materials.** All retaining walls shall be of concrete or masonry unit construction.
- **c. Height**. All retaining walls shall be reduced in height to the maximum extent practicable and the walls shall meet the height requirements in the frontage setback and sight distance triangles as required by the City Engineer.
- **d. Slope.** The 2:1 maximum slope above the retaining wall shall be landscaped with trees, ground cover, grass or erosion control vegetation as shown on the preliminary landscape plans to control erosion.
- **24. Fences**. All perimeter fences shall be located in substantial conformance with the preliminary landscape plan approved by the Planning Commission / City Council as shown on the landscape improvement plans approved by the City Engineer.
 - a. In cases where a fence is to be built in conjunction with a retaining wall, and the wall face is exposed to a side street, the fence shall be setback a minimum of three feet (3') behind the retaining wall per Antioch Municipal Code Section 9-5.1603, or as otherwise approved by the City Engineer in writing.
 - **b.** All fencing shall be in substantial conformance with the fencing shown in the preliminary landscape plan approved by the Planning Commission/City Council or as shown on the landscape improvement

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 6 | P a g e

plans approved by the City Engineer or as otherwise proposed by Applicant and approved by the City Engineer in writing at the time of improvement plan approval.

- **25. Storm Drain Design/Construction**. The developer shall design and construct all needed storm drain facilities to adequately collect and convey stormwater entering or originating within the development to the nearest adequate man-made drainage facility or natural watercourse, without diversion of the watershed.
 - a. All public utilities, including storm drainpipes and ditches, shall be installed in all streets avoiding one lot draining over or between other lots. All proposed drainage facilities, including open ditches and detention basins shall be constructed of Portland Concrete Cement or as approved by the City Engineer. These public utilities shall be designed prior to building permit and constructed prior to occupancy.
 - **b.** Storm drains system shall flow to the Detention Basins shown within the project drainage study and as shown on the project grading and improvement plans with no diversion out of existing watershed(s).
 - **c.** The detention basin(s) and associated improvements shall be constructed and operational prior to occupancy of the first residential building permit.
 - d. Detention basins shall be designed in substantial conformance with the Planning Commission/City Council-approved Preliminary Stormwater Control Plan within the Vesting Tentative Map for Condominium Purposes. All storm drain and storm water improvements are subject to final review and approval. An Operations and Maintenance Manual shall be submitted for basins prior to the issuance of the first building permit.
- **26. Hydrology Analysis**. The developer shall submit hydrology and hydraulic analyses as part of the storm water control plan. The analysis shall demonstrate adequacy of the in-tract drainage system and downstream drainage system. The analysis shall be reviewed and approved by Contra Costa County Flood Control.

CONSERVATION / NPDES

- **27. C.3 Compliance**. Per State Regulations, all onsite and offsite impervious surfaces including off-site roadways to be designed and constructed as part of the project are subject to State C.3 requirements. The design shall be approved prior to the first building permit and construction of the various facilities completed prior to occupancy of the first residential unit.
- **28. NPDES.** The project shall comply with all Federal, State, and City regulations for the National Pollution Discharge Elimination System (NPDES) (AMC§6-9). (Note: Per State Regulations, NPDES Requirements are those in affect

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 7 | P a g e

at the time of the Final Discretional Approval.) Under NPDES regulations, the project is subject to provision C.3: "New development and redevelopment regulations for storm water treatment."

- a. Requirements. Provision C.3 requires that the project include storm water treatment and source control measures, as well as run-off flow controls so that post-project runoff does not exceed estimated preproject runoff.
- b. Storm Water Control Plan. C.3 regulations require the submittal of a Storm Water Control Plan (SWCP) that demonstrates plan compliance. The SWCP shall be submitted to the Building and City Engineering Department concurrently with site improvement plans.
- c. Operation and Maintenance Plan. For the treatment and flow-controls identified in the approved SWCP, a separate Operation and Maintenance Plan (O&M) shall be submitted to the Building Department at the time of permit submittal and approved by the City Engineer.
- d. CC&Rs. Both the approved SWCP and O&M plans shall be included in the project CC&Rs. The design shall be approved prior to the first building permit and construction of the various facilities completed prior to occupancy of the first residential unit. The developer shall execute any agreements identified in the Storm Water Control Plan that pertain to the transfer of ownership and/or long-term maintenance of storm water treatment or hydrograph modification BMPs.
- **29. NPDES Plan Submittal Requirements**. The following requirements of the federally mandated NPDES program (National Pollutant Discharge Elimination System) shall be complied with as appropriate, or as required by the City Engineer:
 - a. Application. Prior to issuance of permits for building, site improvements, and/or landscaping, the developer shall submit a permit application consistent with the developer's approved C3 Storm Water Control Plan, and include drawings and specifications necessary for construction of site design features, measures to limit directly connected impervious areas, pervious pavements, self-retaining areas, treatment BMPs, permanent source control BMPs, and other features that control storm water flow and potential storm water pollutants.
 - b. Certified Professional. The Storm Water Control Plan shall be stamped and signed by a registered civil engineer, or by a registered architect or landscape architect as applicable. Professionals certifying the Storm Water Control Plan shall be registered in the State of California on design of treatment measures for water quality, not more than three years prior to the signature date by an organization with storm water treatment measure design expertise (e.g., a university, American Society of Civil Engineers, American Society of Landscape Architects, American Public Works Association, or the California Water

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 8 | P a g e

- Environment Association), and verify understanding of groundwater protection principles applicable to the project site (see Provision C.3.i of Regional Water Quality Control Board Order R2 2003 0022).
- c. Final Operation & Maintenance Plan. Prior to building permit final and issuance of a Certificate of Occupancy, the Developer shall submit, for review and approval by the City, a final Storm Water BMP Operation and Maintenance Plan in accordance with City of Antioch guidelines. This O&M plan shall incorporate City comments on the draft O&M plan and any revisions resulting from changes made during construction. The O&M plan shall be incorporated into the CC&Rs for the Project if the project has CC&Rs.
- d. Long Term Management. Prior to building permit final and issuance of a Certificate of Occupancy, the Developer shall execute and record any agreements identified in the Storm Water Control Plan which pertain to the transfer of ownership and/or long-term maintenance of all storm water treatment facility and maintenance of the underground detention facility to the satisfaction of the City Engineer.
 - i. The project shall prevent site drainage from draining across public sidewalks and driveways in a concentrated manner by installing drainpipes within or under the sidewalks per city details.
- ii. Install on all catch basins "No Dumping, Drains to River" decal buttons in curb at all new site curb inlets and drainage inlets.
- e. C3 Hydrology Calculations. The developer shall prepare a C3 storm water report with calculations of anticipated conveyance all C3 storm water entering and originating from the site to an adequate downstream drainage facility without diversion of the watershed prior to building permit. The developer shall submit C3 hydrologic and hydraulic calculations with the Improvement Plans to the City Engineering Department for review and approval by the City Engineer and to Contra Costa County Flood Control District.
- f. Regional Water Quality Control. Prior to issuance of the grading permit, the developer shall submit proof of filing of a Notice of Intent (NOI) by providing the unique Waste Discharge Identification Number (WDID#) issued from the Regional Water Quality Control Board.
- g. SWPPP. The developer shall submit a copy of the Storm Water Pollution Prevention Plan (SWPPP) for review to the Engineering Department prior to issuance of a building and/or grading permit. The general contractor and all subcontractors and suppliers of materials and equipment shall implement these BMP's. Construction site cleanup and control of construction debris shall also be addressed in this program. Failure to comply with the approved construction BMP may result in the issuance of correction notices, citations, or a project stop work order.
- h. BMP. The developer shall install all appropriate clean water devices at all storm drain locations immediately prior to entering the public storm

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 9 | P a g e

- drain system and Implement Best Management Practices (BMP's) at all times to the project before, during and after construction.
- i. Erosion Control. Include erosion control/storm water quality measures in the grading plan that specifically address measures to prevent soil, dirt, and debris from entering the storm drain system. Such measures may include, but are not limited to, hydro seeding, gravel bags and siltation fences or other measures that are subject to review and approval of the City Engineer. A grading plan will be required with the necessary erosion control/storm water quality measures shall be shown on the site plan submitted for an on-site permit, subject to review and approval of the City Engineer. The developer shall be responsible for ensuring that all contractors and subcontractors are aware of and implement such measures.
 - i. The Developer or his assignee shall sweep and/or vacuum the paved parking lot(s) a minimum of once a month and prevent the accumulation of silt, litter, and debris on the site. Corners and hard to reach areas shall be swept manually.
 - ii. If any sidewalks are to be pressure washed, debris shall be trapped and collected to prevent entry into the storm drain system. No cleaning agent may be discharged into the storm drain. If any cleaning agent or degreaser is used, wash water shall be collected and discharged to the sanitary sewer, subject to the approval of the sanitary sewer District.
 - iii. Ensure that the area surrounding the project such as the streets stay free and clear of construction debris such as silt, dirt, dust, and tracked mud coming in from the project construction. Areas that are exposed for extended periods shall be watered regularly to reduce wind erosion. Paved areas and access roads shall be swept on a regular basis. All loads in dump trucks shall be covered per City requirements.
 - iv. Clean all on-site storm drain facilities a minimum of twice a year, once immediately prior to October 15 and once in January. Additional cleaning may be required if found necessary by City Inspectors and/or City Engineer.

OUTSIDE AGENCIES

30. Contra Costa County Fire Protection District. The applicant shall comply with the conditions provided by the Contra Costa County Fire Protection District in the letter dated March 20, 2024, and attached in the staff report.

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 **10** | P a g e

GRADING

- 31. Requirement for Grading Permit. Grading plans shall be submitted, processed, and issued prior to commencement of any grading operations within the project. The permit shall be obtained through the City's Engineering and Building Divisions, subject to review and approval by the City Engineer. The submitted plans shall incorporate any modifications required by the Conditions of Approval, and applicable building codes.
- **32. Grading Plans**. Locations of building exterior walls, fences and retaining walls, drainage swales, side slopes, top and bottom of slopes, parking lot drainage to catch basins with underground pipe drainage systems and pipe out falls shall be shown on the grading plans for review and approval. All the above features shall have proposed elevations shown on the grading plan and the grading of project will adequately drain to an above and underground drainage system in substantial conformance with the approved entitlement plans and improvement plans.
- **33. Elevations on Grading Plans.** All elevations shown on the grading plans and plot plans shall be based on actual surveyed NAVD 88 survey control vertical datum, and, if needed, with conversion information, as approved by the City Engineer.
- **34. Soils.** Prior to the approval of the grading plan(s), the City Engineer requires a registered soils engineer to review the grading plans, improvement plans, building permit plans, project specifications submitted for this project. The soil engineers field inspections will be required to verify compliance with the approved plans and soils reports prior to final occupancy permit. Costs for these consulting services shall be incurred by the developer.
- **35. Off-Site Grading**. All off-site grading is subject to the coordination and approval of the affected property owners and the City Engineer. The developer shall submit written authorization to "access, enter, and/or grade" adjacent properties prior to issuance of permit and shall have permission from the property owner to performing any and all work prior to issuance of the first building permit of each phase of the subdivision.
- **36. Grading Easements.** Any sale of a portion (or portions) of this project to another developer shall include the necessary CCR's, and/or grading and drainage easements, to assure that project-wide grading conforms to the approved development conditions of approval.

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 11 | P a g e

AT BUILDING PERMIT SUBMITTAL

- 37. Requirement for Phasing Plan. The Developer shall continuously build all improvements of this project in one phase. If the project becomes a phased project, then the developer shall provide a phasing plan to the Community Development Department and Engineering Department for review and approval..
- 38. Final Landscape Plans. The applicant shall submit final landscape plans that identify specific plant materials to be constructed, including all trees, shrubs and groundcover, and landscape features providing both common and botanical names, sizes, and quantities at the time of building permit submittal that are in substantial conformance with the Preliminary Landscape Plan approved by the Planning Commission/City Council and the approved improvement plans. See City approved plant list for installing approved plants in the public right of way.
- 39. Water Efficient Landscape Ordinance. Landscaping for the project shall be designed to comply with the applicable requirements of City of Antioch Ordinance No. 2162-C-S The State Model Water Efficient Landscape Ordinance (MWELO). The applicant shall demonstrate compliance with the applicable requirements of the MWELO in the landscape and irrigation plans submitted to the City.
- **40. Site Landscaping** All site landscaping within the project site, including on all slopes, medians, C.3 drainage basins, retaining walls, bioretention basins, common areas, open space and park landscape areas, and any other areas that are to be landscaped shall be installed prior to issuance of final certificate of occupancy.
- 41. Site Drainage. All buildings in the site shall contain rain gutters and downspouts that catch rainwater from the roof and direct water into the underground storm drainpipe system and away from the foundation towards the closest drainage inlet structure or detention facility of the site in accordance with the applicable codes and as approved by the City Engineer. A detailed site grading drainage plan shall be prepared to drain water away from all proposed buildings into an acceptable drainage system. Temporary and permanent soil erosion control measures shall be designed and installed to prevent control soil erosion on the site
- **42. Utility Location on Private Property**. All existing improvements (water meters, sewer cleanouts, etc.) that are disturbed shall be relocated as necessary within the immediate area of site as defined by the Planning Commission/City Council and approved by the City Engineer.

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 **12** | P a g e

- **43. Construction Traffic Control Plan.** A Construction Traffic Control Plan shall be submitted for review and approval with the improvement plans for approval by the City Engineer.
- **44. Noise Mitigation Plan.** Prior to the issuance of any grading permits, the applicant shall submit a noise mitigation plan in compliance with General Plan Policy 11.8.2(o).
- **45.** Residential Construction Controls for Diesel Particulate Matter. Pursuant to Housing Element EIR Mitigation Measure AIR-3a, prior to the issuance of building permits, the applicant shall submit for review and approval by the Community Development Director documentation detailing how the mitigation measure will be met.

AT BUILDING PERMIT ISSUANCE

46. Encroachment Permit. The applicant shall obtain an encroachment permit from the Engineering Division before commencing any construction activities within any existing or proposed public right- of-ways or easements.

MODEL HOMES AND SALES TRAILERS

- **47. Model Homes.** If the developer requests model homes or sales trailers be installed, prior to the placement of any sales trailers, the building and improvement plans shall be submitted to the Engineering Department for review and approval. All trailers shall be placed out of the public right-of-way, and shall have its own parking lot.
- **48. Parking Lot** The model home complex parking lot location and design shall be subject to the City Engineer's approval.

DURING CONSTRUCTION

- 49. Collection of Construction Debris. During construction, the Developer shall place onsite dumpsters or other containers to contain all construction debris. The dumpster or other container shall be emptied on a regular basis consistent with the Construction and Demolition Debris Ordinance. When appropriate, use tarps on the ground tocollect fallen debris or splatters that could contribute to stormwater pollution.
- **Construction Hours**. Construction activity shall be as outlined in the Antioch Municipal Code Section 5-17.04 and .05(B). Construction activity is limited to 7:00 AM to 6:00 PM Monday-Friday except that activity within 300 feet of occupied dwelling space is limited to the hours of 8:00 AM to 5:00 PM on

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 13 | P a g e

weekdays. On weekends and holidays, construction activity is allowed 9:00 AM to 5:00 PM, irrespective of the distance from an occupied dwelling. Extended hours may be approved in writing by the City Manager or designee. These hours also ensure compliance with General Plan policy 11.8.2(o).

- **51. Demolition, Debris, Recycling.** All debris, garbage spoils, unwanted materials and vegetation shall be removed from the project site in accordance with City requirements. All materials that can be recycled shall be taken to an approved recycling facility. The project shall be kept clean and in compliance with and supply all the necessary documentation for Antioch Municipal Code Section 6-3.2: Construction and Demolition Debris Recycling.
- **52. Filter Materials at Storm Drain Inlet.** The developer shall Install filter materials (such as sandbags, filter fabric, etc.) at each storm drain inlet nearest the downstream side of the project site prior to:
 - **a.** start of the rainy season (October 1).
 - **b.** site dewatering activities.
 - c. street washing activities.
 - **d.** saw cutting asphalt or concrete; and
 - **e.** order to retain any debris or dirt flowing into the city stormdrain system.

Filter materials shall be maintained and/or replaced as necessary to ensure effectiveness, prevent street flooding and further erosion of soil on City streets and draining into storm drain system. Dispose of used filter particles in the trash or at local approved landfill facility.

- 53. Archeological Remains. In the event subsurface archeological remains are discovered during any construction or preconstruction activities on the site, all construction work within 100 feet of the find shall be halted, the Community Development Department notified, and a professional archeologist, certified by the Society of California Archeology and/or the Society of Professional Archeology, shall be notified. Site work in this area shall not occur until the archeologist has had an opportunity to evaluate the significance of the find and to outline appropriate mitigation measures, if deemed necessary. If prehistoric archeological deposits are discovered during development of the site, local Native American organizations shall be consulted and involved in making resource management decisions.
- **54. Erosion Control Measures.** The grading operation of the development shall take place at one time, and in a manner, to prevent soil erosion and sedimentation. The slopes shall be landscaped and reseeded as soon as possible after the grading operation ceases. Erosion measures shall be implemented during all phases of construction in accordance with an approved erosion and sedimentation control plan.

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 **14** | P a g e

- **55. Dust Control.** Standard dust control methods and designs shall be used to stabilize the dust generated by construction activities. The developer shall post dust control signage with a contact number of the developer, City staff, and the air quality control board.
- **56. Debris Removal During Construction.** The site shall be kept clean of all debris (boxes, junk, garbage, etc.) at all times.

FINAL MAP

- **57. Requirements for Final Map.** The Final Subdivision Map submittal shall include all of the following required information described in Title 9, Chapter 4, Article 5: Final Maps, of the Antioch Municipal Code, including, but not limited to:
 - **a.** Improvement security in one of the following forms:
 - i. Bond or bonds issued by one or more duly authorized corporate securities in an amount equal to 100% of the total estimated costs of the improvements for faithful performance, and in an amount equal to 100% of the total estimated costs of the improvements for labor and materials.
 - ii. A deposit, in an amount equal to 100% of the total estimated costs of the improvements, either with the city or a responsible escrow agent or trust company, at the option of the City Engineer, of money or negotiable bonds of the kind approved for securing deposits of public moneys, in the amounts and for security as specified above, to be released in the same manner as described above for bonds.
 - b. An original, signed subdivision agreement, to be executed by the subdivider or his agent, guaranteeing the construction costs, completion of the construction of the improvements required by the governing body within a specified time and payment, satisfactory to the City Attorney and the City Engineer.
 - c. A letter from the Tax Collector showing that all payable taxes have been paid and a bond for the payment of taxes, a lien on the property but not yet payable, as required by the Subdivision Map Act.
 - d. A cash payment, or receipt therefore, of all the fees required for the checking and filing of the maps and the inspections of the construction; payment for the street signs to be furnished and installed by the city, if required by the subdivider; a cash deposit for the payment of such fire hydrant rental fees as may be established by the fire districts or water company or district having jurisdiction; and any other applicable fees or deposits.

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 **15** | P a g e

- **e.** Deeds for all right of way dedications, easements for access and utility purposes as shown on the tentative and final maps.
- f. Written evidence acceptable to the city, in the form of rights of entry or permanent easements across private property outside the subdivision, permitting or granting access to perform the necessary construction work and permitting the maintenance of the facility.
- g. Agreements acceptable to the city, executed by the owners of existing utility easements within the proposed roads rights-of-way, consenting to the dedication of roads or consenting to the joint use of the rights-of-way as may be required by the city for the purpose use and convenience of the roads.
- h. A surety bond acceptable to the city, guaranteeing the payment of the taxes and assessments which will be a lien on the property, as set forth in the Subdivision Map Act, when applicable.
- i. Payment of map maintenance fee.
- **j.** Payment of the assessment district apportionment fee, if applicable.
- **k.** Evidence of annexation into Police Services Fee CFD
- I. Evidence of payment of Contra Costa County Flood Control District fees.
- M. A final soil report, prepared by a civil engineer who is registered by the state, based upon adequate test borings or excavations of every subdivision, as defined in Cal. Gov't Code §§ 66490 and 66491. The final soil report may be waived if the City Engineer shall determine that, due to the knowledge of such department as to the soil qualities of the subdivision, no preliminary analysis is necessary.
- **58. Postal Service**. Provisions for mail delivery and locations of mailbox facilities shall be reviewed by the USPS and approved by the City Engineer prior to the first occupancy..

PRIOR TO ISSUANCE OF OCCUPANCY PERMIT

- **59. Planning Inspection**. Planning staff shall conduct a site visit to review exterior building elevations for architectural consistency with the approved plans and landscape installation (if required). All exterior finishing details including window trim, paint, gutters, downspouts, decking, guardrails, and driveway installation shall be in place prior to scheduling the final inspection.
- **60. Debris Removal.** All mud, dirt, and construction debris shall be removed from the construction site prior to scheduling the final Planning inspection. No materials shall be discharged onto a sidewalk, street, gutter, storm drain or creek.
- **61. Damage to Street Improvements**. Any damage occurring during construction to existing streets and site improvements or adjacent property improvements in the

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 **16** | P a g e

immediate area of the project, shall be repaired and/or rebuilt to the satisfaction of the City Engineer at the full expense of the developer. This shall include sidewalks, asphalt and concrete pavement, slurry seal existing AC pavements, parking lot curb and gutter, landscaping, street reconstruction along the project frontage, as may be required by the City Engineer to make the developed area to be looking like it is new.

- **62. Right-of-Way Construction Standards**. All improvements within the public right-of-way, including curb, gutter, sidewalks, driveways, paving and utilities, shall be constructed inaccordance with the City approved improvement plans, standard plans and/or city specifications as directed by the City Engineer.
- **63. Double Detector Check Valve Assembly.** The developer shall install the required sprinkler Double Detector Check Valve assemblies, and fire department connections in an enclosed area that is screened by landscaping or small 3.5' high masonry walls or placed within the building or in an underground vault so it is not visible from public view as approved by City Engineer and Fire Marshal prior to building permit and installed prior occupancy.
- **64. Trash Receptacles.** Trash receptacles located in common area trash enclosures shall use City Park type three-sort trash receptables. All Trash receptacles shall be in place prior to issuance of the first building certificate of occupancy.

SPECIAL CONDITIONS OF APPROVAL

- **65.** All bioretention basins for the site and associated storm drain improvements shall be designed per details shown on the preliminary plans and approved prior to building permit and constructed and operational prior to issuance of the first occupancy permit of the residential complex.
- **66. Open Space Construction.** The Central Common Area (Parcel K) shall be constructed prior to occupancy of the fourth (4th) residential building.
- **67. Open Space Construction.** Prior to the issuance of the building permit for the construction of the first multifamily unit show, the preliminary site plans, a Northern Common Area (Parcel J) shall be constructed prior to occupancy of the fourth (4th) residential building.
- **68. Private Park Construction.** The private park shall meet all the City's Park design standards current at the time of park construction and shall include a color scheme soothing for children with visual sensitivities.
- 69. Park In-Lieu Fee. As recommended by the Parks and Recreation Commission

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 17 | P a g e

on October 24, 2024, the following condition shall apply:

Prior to the issuance of the first building permit, the project shall pay the required in-lieu fee of \$151,050 as required in Antioch Municipal Code Section Title 9, Chapter 4, Article 10: Regulations for the Dedication of Land, the Payment of Fees, or Both, for Park and Recreation Lands.

- 70. The maximum backslopes, side slopes, natural grade transitions shall be a maximum grade slope of 3:1, and shall have proper drainage swales, benching and drainage ditches to adequately drain the residential site so no ponding occurs. All slopes shall be graded with proper erosion control measures in place so not cause slope failures or erosion of the soil as approved by the City Engineer and soil engineer. A 2:1 slope may be used for slopes less than 10' high if approved by the project soil engineer for small grading transitions, and the slope is vegetated with erosion control measures.
- **71.** The minimum longitudinal slope of concrete gutters and pavement slopes shall be 0.35% unless approved by the City Engineer. The minimum slope of asphalt pavement is 1.5% and the minimum slope of concrete surface is 0.5% unless approved by the City Engineer.
- **72.** The Developer shall implement project-specific geotechnical recommendations Prior to issuance of any grading permits, all recommendations and specifications set forth in the project specific Geotechnical Exploration Report prepared for the proposed project by the project Soils Engineers, shall be reflected on the project grading and foundation plans (inclusive of seismic design parameters), subject to review and approval by the City Engineer.
- 73. Grading and Foundation Plan Review and Construction inspection and Monitoring shall be provided by the Developer The Developer shall retain a geotechnical engineering firm to review the final grading and foundation plans and specifications to evaluate whether recommendations have been implemented from the project-specific Geotechnical Exploration Report, and to provide additional or modified recommendations, as needed. Construction monitoring shall be performed by a California Registered Geologist and/or Engineer to check the validity of the assumptions made in the geotechnical investigation. Earthwork operations shall be performed under the observation of a California Registered Geologist and/or Soils Engineer to check that the site is properly prepared, the selected fill materials are satisfactory, and that placement and compaction of the fills has been performed in accordance with recommendations and the project specifications.
- **74.** The Developer shall dedicate the following easements on the Final Map in substantial conformance with the approved Vesting Tentative Map Sheets 1 & 2:

EXHIBIT C: CONDITIONS OF APPROVAL WILDFLOWER STATION TOWNHOMES 2 TM-02 | AR-23-05 **18** | P a g e

- a) Public utility easements (PUE) shown on all private streets and accessways as shown on the vesting tentative map and preliminary site plan 13 and these conditions including all the locations of water meters, water services sanitary sewer cleanout to all buildings to the satisfaction of the City Engineer.
- **b)** Emergency vehicle access easements (EVAE) shall be over all private streets, alleys and walkways as shown on the preliminary site plan 3 and 4.
- **c)** All new bioretention basins and underground detention basins shall be in a PUE or a separate storm drain easement.
- **d)** Public utility easements all be over all roadways, alleys, and access for underground utilities.
- **e)** All easements shall be dedicated on the first final map of the proposed development prior to the first building permit for the first unit.
- 75. In substantial conformance with the City-approved Traffic Impact Analysis (Abrams, Dec 4, 2024) and the approved Preliminary Signing and Striping Plan (Sheet 14) the Developer shall install stop legends and stop bars at all intersections with street A, and at existing Wildflower Station Place submitted prior to occupancy of the first building unit.
- 76. As part of the project acceptance and prior to release of warranty bonds of the sewer and storm drain lines one year after installation of the project, the Developer shall video all sewer and storm drain lines installed to document the condition of pipe one year after construction to see if there has been any settlement of the pipe or if there anything that will restrict the flow or capacity of the pipes. Any settlement in the pipes shall be repaired and any restriction in the flow or pipe capacity shall be removed prior to acceptance to the satisfaction of the City Engineer.
- **77. Street Names**. The street names in the development shall be as follows. Changes to the street names shall require Planning Commission review and approval:
 - Parcels A, N-Q Meadowfoam Lane
 - Parcels B Clarkia Place
 - Parcels C Ceanothus Lane
 - Parcels D Lewisia Lane
 - Parcels E Fuchsia Place
 - Parcels F Yarrow Place
 - Parcels G Snowberry Place
 - Parcels H Artemesia Place
 - Between Lots 7 and K Salvia Lane



PARKS & RECREATION COMMISSION SPECIAL MEETING

Thursday October 24, 2024 7:00 p.m.

ANNOTTATED AGENDA/ MINUTES

I. CALL TO ORDER

Call to Order by Chair King at 7:02 pm

II. ROLL CALL

Commissioners Present: Ellis, Eubanks, Hunt, King Commissioners Absent: Del Castillo (arrived 7:05pm), Williams (arrived 7:09pm) Staff Present: Brad Helfenberger, Parks and Recreation Director Scott Buenting, Acting Public Works Director/ City Engineer Carlos Zepeda, Deputy Public Works Director

III. PLEDGE OF ALLEGIANCE

Chair King led the Pledge of Allegiance

VI. BUSINESS

 Bicycle and Pedestrian Advisory Committee Review of the Transportation Development Act Grant for School Zone Improvements at Marsh Elementary School and John Muir Elementary School; P.W. 124-3

> Commissioner Del Castillo arrived at 7:05 pm Commissioner Williams arrived at 7:09 pm

Acting Director Buenting introduced the project and presented the improvements and how grant funds would be used. Several clarifying questions were asked and answered. Commissioner Del Castillo asked about asking for increased funding for future projects. Director Buenting responded that the projects are more competitive at the current size. Commissioner Del Castillo requested a more thoughtful process for future projects, as he feels that this project is a band-aid fix.

Individuals may view the agenda and related writings on the City of Antioch website: www.antiochca.gov. In accordance with the Americans with Disabilities Act and California law, it is the policy of the City of Antioch to offer its public programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an appropriate alternative format; or if you require any other accommodation, please contact the ADA Coordinator at the number or address below at least 72 hours prior to the meeting or when you desire to receive services. Advance notification within this guideline will enable the City to make reasonable arrangements to ensure accessibility. The City's ADA Coordinator can be reached @ Phone: (925) 779-6950, and e-mail: publicworks@ci.antioch.ca.us.

B1

Motion to Recommend Approval of the Transportation Development Act Grant for School Zone Improvements at Marsh Elementary School and John Muir Elementary School.

Motion: Ellis Second: Hunt 4 Yes 1 No (Del Castillo) 1 Abstain (King) 0 Absent

2. Albers Property Subdivision 9515 Residential Project Determination of Dedication of Land or Payment of Park-In-Lieu Fees

Acting Director Buenting introduced the project. The development will result \$441,000 in Park in Lieu Fees. Commissioner Del Castillo asked about the role of the Commission in this process. Commissioner Ellis asked what happens to the funds. Director Helfenberger responded that they go into a fund for new parks or to renovate existing parks. A discussion was held on how the fees are determined and how the park-in-lieu program works.

Motion to recommend a determination that Albers Property Subdivision 9515 single family residential project is subject to a payment of \$441,000 of park land dedication park-in-lieu fees.

Motion: Del Castillo Second: Ellis 6 Yes/ 0 No 0 Absent

3. Slatten Ranch Subdivision 9645 Condominium Multi-family Project Determination of Dedication of Land or Payment of Park-In-Lieu Fees

Acting Director Buenting introduced the project and the developer. The development will result \$122,550 in Park in Lieu Fees. The developer, Trent Sanson with DeNova Homes provided some information on the project as well as further information about the Quimby Act, which governs how park-in-lieu fees are determined and how funds can be used. The Commission thanked Mr. Sanson for the explanation.

Motion to recommend a determination that Slatten Ranch Subdivision 9645 single family residential project is subject to a payment of \$122,550 of park land dedication park-in-lieu fees.

Motion: Del Castillo Second: Hunt 6 Yes/ 0 No 0 Absent

Individuals may view the agenda and related writings on the City of Antioch website: www.antiochca.gov. In accordance with the Americans with Disabilities Act and California law, it is the policy of the City of Antioch to offer its public programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an appropriate alternative format; or if you require any other accommodation, please contact the ADA Coordinator at the number or address below at least 72 hours prior to the meeting or when you desire to receive services. Advance notification within this guideline will enable the City to make reasonable arrangements to ensure accessibility. The City's ADA Coordinator can be reached @ Phone: (925) 779-6950, and e-mail: publicworks@ci.antioch.ca.us.

B2

 Wildflower Station Townhomes 2 Subdivision 9601 Determination of Dedication of Land or Payment of Park-In-Lieu Fees

Acting Director Buenting introduced the project and the developer, Trent Sanson with DeNova Homes. The development will result \$151,050 in Park in Lieu Fees.

Motion to recommend a determination that Wildflower Station Townhomes 2 Subdivision 9601 single family residential project is subject to a payment of \$151,050 of park land dedication park-in-lieu fees.

> Motion: Del Castillo Second: Ellis 6 Yes/ 0 No 0 Absent

5. Formation of Ad-Hoc Committee for Purposes of Reviewing 2024-25 Civic Enhancement Grant Applications and Award Recommendation

Director Helfenberger gave an overview of the program and reviewed how it was implemented for 2024. A new ad-hoc committee is needed to determine recommendations for the 2024-25 program. The committee will return to the Commission with a report and final recommendation, which will then be forwarded to the City Council for approval.

Motion to appoint Commissioners Del Castillo, Hunt, and Williams to the 2024-25 Civic Enhancement Grant Selection Committee

> Motion: Ellis Second: Eubanks 6 Yes/ 0 No 0 Absent

VIII. ADJOURNMENT

Motion to adjourn the meeting.

Motion: Hunt
Second: Del Castillo
6 Yes /0 No
0 Absent
Meeting Adjourned at 8:06pm

Individuals may view the agenda and related writings on the City of Antioch website: www.antiochca.gov. In accordance with the Americans with Disabilities Act and California law, it is the policy of the City of Antioch to offer its public programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an appropriate alternative format; or if you require any other accommodation, please contact the ADA Coordinator at the number or address below at least 72 hours prior to the meeting or when you desire to receive services. Advance notification within this guideline will enable the City to make reasonable arrangements to ensure accessibility. The City's ADA Coordinator can be reached @ Phone: (925) 779-6950, and e-mail: publicworks@ci.antioch.ca.us.

B3

ATTACHMENT "C"

 From:
 Ayon, Llisel@DOT

 To:
 Merideth, Zoe

Cc: <u>Valente, Kevin</u>; <u>Kerri Watt</u>

Subject: RE: Wildflower Town Homes (TM-02, AR-23-05)

Date: Wednesday, March 13, 2024 1:48:31 PM

Attachments: <u>image001.png</u>

image002.png

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thanks!

Llisel Ayon

Associate Transportation Planner
Caltrans, District 4 | Local Development Review
Cell: (510) 506-6184



From: Merideth, Zoe <zmerideth@antiochca.gov>

Sent: Thursday, March 7, 2024 11:09 AM

To: Ayon, Llisel@DOT <Llisel.Ayon@dot.ca.gov>

Cc: Valente, Kevin <kvalente@raneymanagement.com>; Kerri Watt <kwatt@denovahomes.com>

Subject: RE: Wildflower Town Homes (TM-02, AR-23-05)

EXTERNAL EMAIL. Links/attachments may not be safe.

Hello,

Thanks for your review. There was a TIA for this project, which found no significant impacts or off-site improvements will be required. It's attached. Thank you.

Zoe Merideth

Planning Manager

Direct: (925) 779-6122 Main: (925) 779-6159

City of Antioch | P.O. Box 5007, Antioch, CA 94531-5007



From: Ayon, Llisel@DOT <<u>Llisel.Ayon@dot.ca.gov</u>>

Sent: Thursday, March 7, 2024 10:51 AM

To: Merideth, Zoe <zmerideth@antiochca.gov>

Subject: Wildflower Town Homes (TM-02, AR-23-05)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Zoe,

Thank you for including Caltrans in the review process for the above referenced project. We have reviewed the provided documents and do not have any concerns regarding the materials provided. We were wondering if there was a traffic impact study for this project, given the size?

Thank you,

Llisel Ayon

Associate Transportation Planner Caltrans, District 4 | Local Development Review Cell: (510) 506-6184



From: Kelsey Gunter < KGunter@pittsburgca.gov>

Sent: Tuesday, March 5, 2024 11:11 AM

To: Villagrana, Monique

Subject: RE: City of Antioch Project Routing for Wildflower Town Homes (TM-02, AR-23-05)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

The City of Pittsburg does not have any comment on the project proposed. Thank you for including us on your referral.

Thank you,

Kelsey Gunter

Associate Planner



City of Pittsburg

Community & Economic Development Department - Planning Division

65 Civic Avenue, Pittsburg, CA 94565 Tel: 925.252.4824 | Fax: 925.252.4814

kgunter@pittsburgca.gov

https://www.pittsburgca.gov/services/community-development/planning



Please click <u>here</u> to access the City's Online Permitting Portal, Accela. Visit <u>pittsburg.opencounter.com</u> to find zoning and permit information.

From: Villagrana, Monique <mvillagrana@antiochca.gov>

Sent: Wednesday, February 28, 2024 2:17 PM

Subject: City of Antioch Project Routing for Wildflower Town Homes (TM-02, AR-23-05)

External Sender: Use caution before opening links or attachments

Good Afternoon,

The City of Antioch Planning Division is requesting your review of the project information and plans contained in the attached document.

Please provide feedback on availability of services, potential design or code conflicts, requirements for additional permits and draft conditions of project approval.

Responses are requested at your earliest availability, by or before <u>March 20, 2024</u>, to Zoe Merideth at <u>zmerideth@antiochca.gov</u>.

Thank you in advance for your time and collaboration.

Monique Villagrana

Community Development Technician | Planning Division

2: (925) 779-6163 (Direct) **:** (925) 779-6159 (Main) 昌: (925) 779-7034 (Fax)

⊠: mvillagrana@antiochca.gov

■: www.antiochca.gov

Community Development Department | 200 'H' Street, Antioch, CA 94509-1005





March 19, 2024

Monique Villagrana City of Antioch 200 H Street Antioch, CA 94509

Re: TM-02 AR-23-05 Wildflower Townhomes II 2500 Wildflower Station Place, Antioch, CA 94531

APN: 052-140-013, 052-140-014,052-140-015, 052-140-016

Dear Monique Villagrana,

Thank you for giving us the opportunity to review the proposed TM-02 AR-23-05. The installation of new gas and electric facilities and/or relocation of existing PG&E facilities will be performed in accordance with common law or Rules and Tariffs as authorized by the California Public Utilities Commission.

Following our review, PG&E recommends the following language be expressly stated for the offer to dedicate Public Utility Easements (PUE):

I/We the undersigned, as Owner(s) of the land shown hereon, do hereby state that I/we am/are the only person(s) whose consent is necessary to pass clear title to said land and do hereby consent to the preparation and recordation of this map and offer for dedication and do hereby dedicate for public uses the Public Utility Easements (PUEs) shown on this map for public utility purposes including electric, gas, communication facilities and all other public utility purposes; together with any and all appurtenances thereto, including the right from time to time to trim and to cut down and clear away or otherwise control any trees or brush. The PUEs hereby offered for dedication are to be kept open and free of buildings, structures and wells of any kind.

The final map must contain a statement setting forth dedications and offers to dedicate interests in real property for public utility purposes. If the offer of dedication has terminated, or the local agency declines to accept it, the applicant maybe required to provide an easement in gross satisfactory to PG&E. Please note that this is our preliminary review and PG&E reserves the right for future review as needed.

Please work with PG&E's Service Planning department at www.pge.com/cco for additional services you may require, or for any modification and/or relocation requests.

Sincerely,

Brian Callaghan Land Management 925-204-4074



March 4, 2024

Monique Villagrana City of Antioch 200 H Street Antioch, CA 94509

Ref: Gas and Electric Transmission and Distribution

Dear Monique Villagrana,

Thank you for submitting the TM-02 and AR-23-05 plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

- 1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.
- 2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
- 3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team Land Management



Attachment 1 - Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

- 1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
- 2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
- 3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

- 4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
- 5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch



wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

- 8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.
- 9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.
- 10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.



- 11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.
- 12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.
- 13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.



Attachment 2 - Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

- 1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "RESTRICTED USE AREA NO BUILDING."
- 2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
- 3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
- 4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
- 5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
- 6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
- 7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.



- 8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.
- 9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.
- 10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.
- 11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.
- 12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.



CONTRA COSTA COUNTY FIRE PROTECTION DISTRICT

4005 PORT CHICAGO HWY, STE 250, CONCORD, CA 94520 • (925) 941-3300 • CCCFPD.ORG

March 20, 2024

Ms. Zoe Merideth City of Antioch Planning Division

Subject:

Wildflower Townhomes II 2500 Wildflower Station Place Project # TM-02, AR-23-05

CCCFPD Project No.: P-2024-000721

Dear Ms. Merideth:

We have reviewed the design review application to establish 19 three-story buildings containing 159 new condominium units at the subject location. The following is required for Fire District approval in accordance with the 2022 California Fire Code (CFC), the 2022 California Building Code (CBC), the 2022 California Residential Code (CRC), and Local and County Ordinances and adopted standards:

1. Access as shown on plans complies with Fire District requirements.

Provide emergency apparatus access roadways with all-weather (paved) driving surfaces of not less than 20-feet unobstructed width, and not less than 13 feet 6 inches of vertical clearance, to within 150 feet of travel distance to all portions of the exterior walls of every building. Access shall have a minimum outside turning radius of 45 feet, and must be capable of supporting the imposed fire apparatus loading of 37 tons. (503) CFC

Aerial Fire Apparatus Access is required where the vertical distance between grade plane and the highest roof surface exceeds 30 feet as measured in accordance with Appendix D, Section 105 of the 2022 CFC. Aerial access roads shall have a minimum unobstructed width of 26 feet, exclusive of shoulders, in the immediate vicinity of the building or portion thereof. At least one of the required routes shall be located within a minimum of 15 feet and a maximum of 30 feet from the building, and shall be positioned parallel to one entire side of the building. Overhead utility and power lines shall not be located over the aerial fire apparatus access road or between the aerial fire apparatus road and building.

2. Access roadways of **less than 28-feet** unobstructed width shall have signs posted or curbs painted red with the words: **NO PARKING – FIRE LANE** clearly marked. (22500.1) CVC, (503.3) CFC

Access roadways of **28 feet or greater, but less than 36-feet** unobstructed width shall have **NO PARKING – FIRE LANE** signs posted, allowing for parking on one side only or curbs painted red with the words **NO PARKING – FIRE LANE** clearly marked. (22500.1) CVC, (503.3) CFC

3. The developer shall provide an adequate and reliable water supply for fire protection with a minimum fire flow of 2125 GPM. Required flow must be delivered from not more than 2 hydrants

flowing simultaneously for a duration of 120 minutes while maintaining 20-pounds residual pressure in the main. (507.1), (B105) CFC

- The developer shall provide hydrants of the East Bay type in compliance with Chapter 5 and Appendix B and C of the California Fire Code. The proposed locations are acceptable to the Fire District. (C103.1) CFC
- 5. Provide emergency escape and rescue openings in Group R occupancies of type V construction. Basements and sleeping rooms below the fourth story above grade plane shall have at least one exterior emergency escape and rescue opening. Such openings shall open directly into a public way or to a yard or court that opens to a public way.

Landscaping, signage and other obstructions must not hinder the positioning of firefighting ground ladders from apparatus access to the rescue windows.

A ground ladder access exhibit will be required with Land Development submittal.

 A land development permit is required for access and water supply review and approval prior to submitting building construction plans.

The developer shall submit scaled site improvement plans indicating:

All existing or proposed hydrant locations,

Fire apparatus access to include slope and road surface

Aerial fire apparatus access,

Elevations of building,

Size of building and type of construction,

Gates, fences, retaining walls, bio-retention basins, any obstructions to access.

Detail showing the lowest level of fire department vehicle access and the floor level of the highest occupied floor,

Striping and signage plan to include "NO PARKING-FIRE LANE" markings

<u>Provide drawings</u> for paths from the public way to under emergency escape and rescue openings showing a proposed clear path and clear space under these openings that allow for the placement of ground ladders at a climbing angle of 70 to 75 degrees and a minimum of 18" clearance from the base of the ladder to any obstruction (see attached ground ladder access standard) for review and approval prior to obtaining a building permit.

This is a separate submittal from the building construction plans. These plans shall be approved prior to submitting building plans for review. (501.3) CFC

7. Emergency apparatus access roadways and hydrants shall be installed, in service, and inspected by the Fire District prior to construction or combustible storage on site. (501.4) CFC

Note: A temporary aggregate base or asphalt grindings roadway is not considered an all-weather surface for emergency apparatus access. The first lift of asphalt concrete paving shall be installed as the minimum roadway material and must be engineered to support the designated gross vehicle weight of 37 tons.

8. The buildings as proposed shall be protected with an approved automatic fire sprinkler system complying with the 2022 edition of NFPA 13. Submit to this office for review and approval prior to installation. (903.2) CFC, Contra Costa County General Plan / Contra Costa County Ordinance 2022-34.

- New buildings shall have approved radio coverage for emergency responders. An emergency responder radio coverage system shall be installed when the conditions of CFC 510.4.1 are not met. Testing shall be conducted and the results submitted to the Fire District prior to the building final. (510.1) CFC
- The developer shall provide traffic signal pre-emption systems (Opticom) on any new or modified traffic signals installed with this development. (21351) CVC
- 11. Flammable or combustible liquid storage tanks shall *not* be located on the site without obtaining approval and necessary permits from the Fire District. (3401.4) CFC
- 12. The owner shall cut down and remove all weeds, grass, vines, or other growth that is capable of being ignited and endangering property. (304.1.2) CFC
- 13. The owner or the owner's authorized agent shall be responsible for the development, implementation and maintenance of a written plan in compliance with NFPA 241, establishing a fire prevention program at the project site applicable throughout all phases of the construction. The plan shall be made available for review by the fire code official upon request. (Ch.33) CFC

The fire prevention program superintendent shall develop and maintain an approved prefire plan in cooperation with the fire chief. The fire chief and fire code official shall be notified of changes affecting the utilization of information contained in such prefire plans. (Ch.33) CFC

- 14. The developer shall submit building construction plans and specifications for the subject project to the through the Fire District public portal (https://confire.vision33cloud.com/citizenportal/app/landing). After the new construction / tenant improvement plans are approved, plans and specifications for all deferred submittals shall be submitted, including, but not limited to the following.
 - Private underground fire service water mains
 - Fire sprinklers
 - Standpipe
 - Fire alarm
 - Fire pump if required
 - Energy systems
 - Emergency generator if required
 - Photovoltaic
 - Emergency Responder Radio Coverage System (ERRCS)

All plan submittals shall be submitted to the through the <u>Fire District public portal</u> (https://confire.vision33cloud.com/citizenportal/app/landing) for review and approval <u>prior</u> to construction of the building or installation of the systems to ensure compliance with minimum requirements related to fire and life safety. Plan review and inspection fees shall be submitted at the time of plan review submittal. (105.4.1) CFC, (901.2) CFC, (107) CBC

TO SCHEDULE A FIRE DISTRICT INSPECTION OF THE ACCESS AND HYDRANT INSTALLATION PRIOR TO CONSTRUCTION OR THE STORAGE OF COMBUSTIBLE MATERIAL ON THE JOB SITE, CONTACT THE FIRE DISTRICT (MINIMUM 2 WORKING DAYS IN ADVANCE) AT 925-941-3300 EXT 3902 OR SCHEDULE THROUGH THE FIRE DISTRICT PUBLIC PORTAL UNDER THE CORRECT PERMIT NUMBER.

https://confire.vision33cloud.com/citizenportal/app/landing

Our preliminary review comments shall not be construed to encompass the complete project. Additional plans and specifications may be required after further review.

If you have any questions regarding this matter, please contact this office at (925) 941-3300.

Sincerely,

Michael Cameron Fire Inspector

File: 2500 WILDFLOWER STATION PL-PLN-P-2024-000721

ATTACHMENT "D"

Villagrana, Monique

From: Achal Maharaj <

Sent: Friday, February 2, 2024 8:17 PM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

As a current owner and resident, I am very concerned not only for my safety but safety of all the residents/tenants that live here. There's been a lot of car break-ins, along with vandalism, as well as strange people just walking up to people's homes or sleeping in their front patio. We also have people that do side shows use our driveway as a means of getting ready to go start these illegal car shows. If gates were available, it will become a barrier for them and prevent them from using our community's driveways and perhaps it will help slow down these illegal car shows. I ask if you can please understand our concerns and the safety of everyone that lives here.

Kindly,

Achal Singh

Sent from my iPhone

From: Aurel Drai < > > Sent: Friday, February 2, 2024 7:39 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Aurelien Drai

Antioch, CA 94531

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

It is extremely important for the entire community (the current one and the new project) to be gated due to the lack of safety and increased crime in the area. In the past few years since moving into the Wildflower Condos, we've had countless car break-ins, trespassing, theft, high-speed vehicles using the community as a shortcut, vandalism, to name a few. These incidents compromise our security and our quality of life as Antioch residents. Therefore, having a gated community would extremely benefit us.

Kindly,

Aurelien Drai

From: Brenda Gonzalez <

Sent: Saturday, February 3, 2024 7:25 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Brenda Gonzalez

Antioch, CA 94531

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing to you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

There have been several incidents that have led me to not feel safe in my own home such as my car being stolen from my parking spot. I strongly advocate for action to be taken to help secure and improve our living space.

In Community Spirit,

Brenda Gonzalez

--

Brenda Gonzalez, MS

Puente Co-Coordinator/General Counselor Diablo Valley College Pronouns: She/Her/Ella

From: Calvin Douglas <

Sent: Monday, February 5, 2024 9:30 PM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Calvin Douglas

Antioch, CA 94531

Hello Commissioners,

I'm a resident owner at the original Wildflower Station Condos. I am writing to you today to further reinforce the public comment submitted by our HOA Board (The Landing at Wildflower Station) requesting the fence and gate be a required part of the new project approval.

I've been a proud resident of Antioch since 1999. I have been a resident of this development since April of 2021, with this being my first home purchase. Since living in Antioch, I have seen the crime rate increase dramatically. Being employed as a Police Officer in San Francisco, I understand the staffing crisis for law enforcement. While during this staffing crisis, I also understand criminals are taking advantage of the low staffing to commit a number of crimes, mainly property crimes. Understanding that it will take time for law enforcement staffing levels to rise, I feel it would be important to protect this development with security fencing and gates. Since living in this development, I have been a victim of vehicle theft twice (APD Case #23-002438 and Case #23-006004). Most recently on 01/20/2024, I observed subjects attempting to steal my car for the third time. As a result of this observation, I was able to run the subjects away, without taking my vehicle, but the fleeing subjects fired numerous gunshots in the air prior to exiting the complex (APD Case #24-000519).

I have witnessed the development (residential communities, population, restaurants, etc) of Antioch and still believe it has the potential to be great. Aside from the large amount of money spent on homes, citizens of Antioch just want to feel safe. With that in mind, I respectfully request for the addition of security fencing and gates to be required in Wildflower Townhomes 2 Project. I also respectfully request for you to consider making it a requirement for future developers to add security fencing/gates to future residential communities.

Kindly,

Calvin Douglas

From: Cat Ramos <

Sent: Friday, February 2, 2024 3:57 PM

To: Planning Division

Subject: Wildflower Station Place Antioch CA

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Catherine Ramos

Antioch ca 94531

Hello Commissioners,

I'm a resident owner/renter at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

We also have a lack of safety due to potential of increased crime, car break-ins, non-community residents speeding through our street to cut through traffic on Hillcrest Ave, unhoused individuals loitering, doing drugs.

Catherine Ramos

From: Earnesta Lewis < Sent: Friday, February 2, 2024 9:09 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Earnesta and Anthony Lewis

Antioch. CA. 94531

February 2,2024

Dear Antioch Staff, Commissioners, Council Members, and Mayor;

Subject: We are seeking your support in our request to make the approval of the Wildflower Station 2 residential project contingent on the "required" construction of a fence and gate around both the new development and the first and current Wildflower Station 1 development.

I've been a resident of The Landing at Wildflower Station Place for 3 years, and was the first resident to move in. We have seen and been the victims of theft 3 times and have witnessed the issues of the community. Some of the issues we face are:

- 1 Trespassing
- 2 Unhoused individuals destroying property, stealing property, and sleeping on private patios.
- 3 Porch property theft
- 4 Vehicle thefts and break-ins
- 5 Home burglaries including forced entry.
- 6 High-speed vehicles endangering residents.
- 7 Vandalism
- 8 Common hiding, organizing, and spectating location for car sideshows.

These incidents have not only compromised our sense of security but have also detracted from the quality of life that our community member services. The problems our community face will likely become exacerbated with the increased ability to hide, and opportunity provided by more homes. The proposed fencing and gated access would provide a much-needed barrier against these issues, enhancing the safety and privacy of all residents within the involved properties.

In conclusion, we plead with the City to consider our request as a necessary condition for the approval of the new residential project.

Thank you for considering our concerns and request. We look forward to a positive response and the opportunity to speak to you.

Thanks,

Earnesta and Anthony Lewis

From: Ellaine Joyce Bullecer <

Sent: Friday, February 2, 2024 8:19 PM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

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This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

It's been very rough for everyone who lives in the community dealing with homeless people and non residents speeding through our street and worse doing car break ins and loitering. I myself have been a victim of property theft last year.

Please help us require DeNova Homes to keep the current and future community residents by providing us with the fence and gate system.

Kindly,

Ellaine Bullecer

From: Elsie Baluyut <

Sent: Friday, February 2, 2024 10:19 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Elsie M. Baluyut

Antioch, CA 94531

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

Since moving in on November 2021, there have been multiple occasions where a transient has sat on my porch for a few hours while I was not home and came back late in the night to sleep on my porch. Another person also peeked through my glass front door even when the indoor lights were on. Non-community residents speeding through our street to cut through traffic on Hillcrest. We have had multiple car break-ins and thefts. There are safety concerns from our entire community.

Kindly,

Elsie M. Baluyut

From: Emerson Lagpacan <

Sent: Friday, February 2, 2024 3:22 PM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Emerson Lagpacan

Antioch CA 94531

Hello Commissioners,

I'm a resident owner/renter at the original Wildflower Condos. I am writing to you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

As a resident, I am deeply concerned about the escalating security issues we are facing due to the influx of homeless individuals and thieves in our area.

The safety and security of our community should be a top priority for all of us. Unfortunately, recent events have highlighted the urgent need for additional measures to protect our homes, families, and property. Incidents of theft and vandalism have become all too common, leaving many of us feeling vulnerable and anxious about the safety of our neighborhood.

By gating our community, we can significantly reduce the risk of unauthorized access and deter criminal activity. Gated communities have been proven to experience lower crime rates compared to open neighborhoods, as they create a physical barrier that makes it more difficult for criminals to enter and escape unnoticed. This added layer of security will not only help to safeguard our property but also enhance the overall quality of life for residents by providing a greater sense of peace and tranquility. Moreover, gating our community will also serve as a deterrent to homeless individuals who may seek shelter or engage in disruptive behavior within our vicinity. While we sympathize with the plight of the homeless, it is essential to prioritize the safety and well-being of our residents. Implementing gating will help to ensure that our community remains a safe and welcoming environment for everyone. I understand that there may be concerns about the potential impact of gating on traffic flow and accessibility. However, I believe that these concerns can be effectively addressed through careful planning and consultation with traffic engineers and city officials. Measures such as installing access control systems or implementing designated entry and exit points can help to minimize any inconvenience while maximizing security.

In conclusion, I urge the city council to support the HOA's request to make our condominium community gated. The safety and security of our residents should always come first, and gating is a proactive step

towards achieving that goal. Together, we can create a safer, more secure environment for everyone to enjoy.

Thank you for your attention to this matter.

Kindly,

Emerson Lagpacan

From: Hugo Fernando Melgar Zúñiga <

Sent: Friday, February 2, 2024 1:11 PM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Hugo Melgar

Antioch, CA 94531

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

The city of Antioch is responsible for public safety and currently our condominium is constantly invaded by Homeless, using the common areas of the buildings as accommodation and to consume liquor and drugs, affecting the safety and physical integrity of our families. They also remove garbage from the containers daily and break the bags, scattering their contents, which causes contamination and sources of infection. Reason why it is necessary to implement a fence and a gate to limit access to guarantee the comprehensive security and general well-being of the condominium residents.

Sincerely,

Hugo Fernando Melgar Zúñiga Electronic & Systems Engineer

United States of America Phone:

From: Jacqueline Estrada

Sent: Sunday, February 4, 2024 12:08 PM

To: Planning Division

Subject: Fencing both communities by Denova

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Jacqueline R. Estrada

Hello Commissioners,

I'm a resident owner/renter at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

[Optional - add in additional comments of why it's important to you. For example: lack of safety due to potential of increased crime, car break-ins, non-community residents speeding through our street to cut through traffic on Hillcrest ave., unhoused individuals loitering, doing drugs, etc]

Kindly,

Jacqueline R. Estrada

From: Kathy Rufus < > > Sent: Sunday, February 4, 2024 12:42 PM

To: Planning Division

To: Planning Division

Subject: Public comment for wildflower townhomes

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello commissioners:

I'm a resident homeowner at the original Wildflower Station Condos. I am writing to you today (02/03/2024) to further reinforce the public comment submitted by our Collaborative Community Management Solutions HOA and the Board requesting the fence and gate to be required as part of the new project approval.

Wildflower Townhouses 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-015-016

The Landing At Wildflower Station Community has been experiencing a homeless population entering our community and walking into our patios, stealing and

trashing our new community. We have cars driving very fast through our community using it as a shortcut and causing traffic and concern for our families and children's safety.

We are recommending a gate/fence to be installed for our safety and to protect our families.

I look forward to hearing from you.

Thank you. Stanley and Kathy Rufus

Antioch, CA 94531

From:

Sent: Friday, February 2, 2024 7:09 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

Follow Up Flag: Follow up Flag Status: Flagged

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval of Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016.

Since my family moved into the Wildflower Station community, our car catalytic converter was stolen, and in another incident, our car was broken into. These incidents caused us undue stress, lost workdays, and costly repairs. These are not isolated cases as our neighbors have also been victims of theft and car break-ins. Moreover, I am really concerned of the safety in the community with non-residents loitering around, and/or speeding through our street to cut through traffic on Hillcrest Ave.

In this regard, I petition the City to consider our request as a necessary condition for the approval of the new residential project.

Thank you for your time and consideration of our concerns and request. I look forward to your favorable response.

Sincerely, Leonor Arriola

Antioch, CA 94531-5007

From: Lynnette Warfield

Sent: Saturday, February 3, 2024 11:52 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhouses 2 - East Of Hillcrest Avenue, north side of

Wildflower

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello Commissioners:

I'm a resident homeowner at the original Wildflower Station Condos. I am writing to you today (02/03/2024) to further reinforce the public comment submitted by our Collaborative Community Management Solutions HOA and the Board requesting the fence and gate to be required as part of the new project approval.

Wildflower Townhouses 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-015-016

The Landing At Wildflower Station Community has been experiencing a homeless population entering our community and walking into our patios, stealing and trashing our new community. We have cars driving very fast through our community using it as a shortcut and causing traffic and concern for our families and children's safety.

We are recommending a gate/fence to be installed for our safety and to protect our families.

I look forward to hearing from you.

Thank you. Lynnette Warfield

Antioch, CA 94531

From: Ulloa Tribe > Sent: Thursday, February 1, 2024 5:50 PM

To: Planning Division

Subject: PUBLIC COMMENT FOR Wildflower Townhomes 2 - East of Hillcrest Avenue, north side

of Wildflower Drive

Attachments: 2024-02-01 Letter to the City Regarding Townhomes.pdf

Follow Up Flag: Follow up Flag Status: Completed

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

Please submit the attached PDF as a **Public Comment** for the following project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Thank you for considering our concerns and request. If possible please share a planned date this project will come before the Planning Commission.

I look forward to a positive response and am available for any further discussion or clarification needed.

Sincerely,

Mauricio Ulloa

The Landing at Wildflower Station Condo Association Board President

From: Sent: To: Subject:	Mia Salvosa < > > Friday, February 2, 2024 7:30 AM Planning Division Fwd: Public Comment for Wildflower Townhomes 2			
Follow Up Flag: Flag Status:	Follow up Flagged			
CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.				
> > > Wildflower Townhomes 2- E 140-014; 052-140-015; 052-14	ast of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052			
>				
> Mia Balamiento				
> >				
> Hello Commissioners,				
>				
	original Wildflower Condos. I am writing to you today to further reinforce the our HOA Board requesting the fence and gate be a required part of the new			
> The control of the				
had our cars broken into, hom stolen from his car. As a reside	of incidents where we have felt unsafe, scared, and frustrated. Many of us have neless people sleeping around on our doorsteps, and my son had his wheels ent of the original Wildflower Condos. I want our community to be able to feel ouldn't have to worry about what goes on in our front yard every night.			
> Kindly,				
>				
> Mia Balamiento				

From: Red Nata Sent: Friday, February 2, 2024 10:03 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project: Wildflower Townhomes 2-East of Hillcrest Avenue, north side of Wildflower drive/APNs:

052-140-013; 052-140-015; 052-140-016

Ms.Natasha Rozenoer

Antioch, CA 94531

Hello, Commissioners,

I am a resident owner at the original Wildflower condos.

I am writing to you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

This approval is extremely important to me as being a senior person with hearing problems I don't feel safe at home due to potential of increased crime and many homeless individuals loitering and doing drugs around our complex. A year ago someone cut off the catalytic converter from my car and it brought me a lot of troubles with repair. I still get up few times in the middle of the night to look at my car. Kindly,

Natasha Rozenoer

Get Outlook for Android

From: ramon ramirez >

Sent: Friday, February 2, 2024 10:15 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2 3.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello Commissioners,

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

From: Ramón Ramirez

Antioch Ca 94531

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

I am asking for it due lack of safety due to potential of increased crime, car break-ins, non-community residents speeding through our street to cut through traffic on Hillcrest ave., unhoused individuals loitering, doing drugs.

Kindly

Ramón Ramirez

From: Salve Maduli < > > > Sent: Thursday, February 1, 2024 11:41 PM

To: Planning Division

Follow Up Flag: Follow up Flag Status: Flagged

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Salve Maduli

Antioch Ca.94531

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

It is very important that this community needs a gate for the main reason that is lack of safety due to potential of increased crime, car break-ins, non-community residents speeding through our street to cut through traffic on Hillcrest ave., unhoused individuals loitering, doing drugs, etc

Kindly,

Salve Maduli Sent from my iPhone

From: Shakeel Hai < Sent: Shakeel Hai < Sent:

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-01

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

The lack of security/safety due to potential of increased crime, car break-ins, non-community residents speeding through our street to cut through traffic on Hillcrest ave., unhoused individuals loitering, doing drugs, etc. has left us wanting more to keep our families safe.

Thank you for your time and consideration

Kindly, Shakeel Hai ()

From: Tajinder Singh <

Sent: Saturday, February 3, 2024 1:54 PM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Name: Tajinder Singh

Address: , Antioch, California - 94531

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing to you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

I just want to emphasize that this is really important to me and my family. Recently we are observing an increased number of crimes in the community and surrounding area, including people speeding through our streets when kids are playing outside, increased number of stolen packages, theft etc. This is really concerning to us and hence would really appreciate it if you include fencing+gate into consideration when reviewing/approving the project.

Thank you so much.

Best,

Tajinder Singh

From:	Vicki Williams	>
Sent:	Friday, February 2, 2024 4:36 PM	
To:	Planning Division	

Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Vicki Wiliams

Antioch, CA 94531

Hello Commissioners,

I'm a resident owner/renter at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

A fence is critical to keeping our community as well as the new community safe from increased crime, car break-ins, non-community residents speeding through to cut traffic on Hillcrest ave, unhoused individuals loitering and doing drugs as well as illegal dumping that has costed us thousands.

Our area is repeatedly targeted and DeNova needs to take these critical steps to ensure safety as well as profits when it comes to their developments which they have not this far.

Kindly,

Vicki

From: Sent: To: Subject:	Fr Pl	cki Williams < iday, February 2, 2024 4:39 PM anning Division e: Public Comment for Wildflower 1	> Fownhomes 2	
,				
	_	from outside your organizations specially from unknown send	on. Exercise caution when opening ers.	
Hello,				
vandaliz			ng crowds for illegal sideshows and which is why there is an urgent need to have	
Thank yo	ou.			
Vicki				
C	On Feb 2, 2024, at 4:36 F	'M, Vicki Williams <	> wrote:	
T	his is a public comment for the	project:		
	Vildflower Townhomes 2 - Easi 052-140-015; 052-140-016	of Hillcrest Avenue, north side of Wild	dflower Drive/APNs: 052-140-013; 052-140-014;	
V	/icki Wiliams	_		
A	Antioch, CA 94531			
Н	Hello Commissioners,			
l'r co	I'm a resident owner/renter at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.			
no	on-community residents speed		unity safe from increased crime, car break-ins, ve, unhoused individuals loitering and doing	
		and DeNova needs to take these critic nents which they have not this far.	cal steps to ensure safety as well as profits	
K	Kindly,			
V	/icki			

From: Victoria Vargas <

Sent: Friday, February 2, 2024 10:05 AM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Victoria Vargas

Hello Commissioners,

I'm a resident owner at the original Wildflower Condos. I am writing you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

I bought my condo at the end of 2021 and since then I have experienced three car break-ins, suspicious people coming to my door and have felt unsafe at times to just even go throw away my trash. Because this property is open to the public from two sides, people constantly drive through our community at fast speeds, they loiter, and dump their trash into our bins causing a mess and money for our community. When recent sideshows occurred in the hillcrest/deer valley intersection, tens of cars came and parked in our parking lot to see the sideshow and were drinking. Additionally, suspicious people have been seen looking through windows to try and steal, transients doing drugs on the sidewalks, and break-ins into our gym. I do not feel safe leaving early in the morning while it's still dark to go to work and I shouldn't have to feel that way.

I assure you that the new residents of this proposed community will want a gated community, especially if they knew all the events that have transpired since this community was built. I wouldn't want them feeling unsafe or feeling like it's not a place to raise their families. I hope you consider this comment when determining whether a fenced community is necessary for this new project.

Sincerely,

Victoria Vargas

Mauricio Ulloa

Antioch, CA 94531

February 1, 2024

City of Antioch Planning Commission P.O. Box 5007 Antioch, CA 94531-5007

Dear Antioch Staff, Commissioners, Council Members, and Mayor,

Subject: We are seeking your support in our request to make the approval of the Wildflower Station 2 residential project contingent on the "required" construction of a fence and gate around both the new development and the first and current Wildflower Station 1 development.

I am writing on behalf of the 98 families/residents of Wildflower Station Condominium Association, located at the corner of Wildflower and Hillcrest. Our community, initially part of a mixed-use residential-commercial plan, is now facing significant changes with the rezoning of the adjacent land from commercial to residential use and the proposed development of another townhome condominium association. Our situation is further complicated due to the shared private roadway including entrances previously constructed with the intent of sharing with commercial property.

We understand that the applicant has filled their project leveraging the processes under California Senate Bill 330 and understand time is of the essence. Under the stipulations of California Senate Bill 330, we understand that the city still has the authority to impose certain conditions on new housing developments, particularly concerning safety and privacy. We respectfully request that the approval of the new residential project adjacent to our community be made contingent on the construction of a comprehensive fencing system, complete with automated electronic access gates, encompassing both properties.

Our request stems from a series of safety and privacy concerns that have escalated over time, including:

- Trespassing
- Unhoused Individuals destroying property, stealing property, and sleeping on private patios.
- Porch property theft
- Vehicle thefts and break-ins
- Home burglaries including forced entry
- High-speed vehicles endangering residents
- Vandalism
- Common hiding, organizing, and spectating location for car sideshows

These incidents have not only compromised our sense of security but have also detracted from the quality of life that our community members deserve. The problems our community face will likely

become exacerbated with the increased ability to hide and opportunity provided by more homes. The proposed fencing and gated access would provide a much-needed barrier against these issues, enhancing the safety and privacy of all residents within the involved properties.

We believe this measure is in line with the city's commitment to ensuring the safety and wellbeing of its residents. The addition of a fence and gate system would serve as a proactive step in preventing future incidents, promoting a secure and peaceful living environment.

In conclusion, we plead with the City to consider our request as a necessary condition for the approval of the new residential project.

Thank you for considering our concerns and request. We look forward to a positive response and are available for any further discussion or clarification needed.

Sincerely,

Mauricio Ulloa

The Landing at Wildflower Station Condo Association Board President

From: Xiang Ding < >

Sent: Thursday, February 1, 2024 9:30 PM

To: Planning Division

Subject: Public Comment for Wildflower Townhomes 2

Follow Up Flag: Follow up Flag Status: Flagged

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

This is a public comment for the project:

Wildflower Townhomes 2 - East of Hillcrest Avenue, north side of Wildflower Drive/APNs: 052-140-013; 052-140-014; 052-140-015; 052-140-016

Xiang Ding

Hello Commissioners,

I'm a resident owner/renter at the original Wildflower Condos. I am writing to you today to further reinforce the public comment submitted by our HOA Board requesting the fence and gate be a required part of the new project approval.

There has been lack of safety due to increased crime, car break-ins, non-community residents speeding through our street to cut through traffic on Hillcrest ave., unhoused individuals loitering and doing drugs.

Thank you for your time and consideration.

Kind regards, Xiang Ding

ATTACHMENT "E"

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000 SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660 FAX: (650) 589-5062 amcquire@adamsbroadwell.com

July 15, 2025

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350 SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201 FAX: (916) 444-6209

Via Email and Overnight Mail

KEVIN T. CARMICHAEL

CHRISTINA M. CARO

THOMAS A. ENSLOW

KELILAH D. FEDERMAN

RICHARD M. FRANCO

ANDREW J. GRAF

TANYA A. GULESSERIAN DARION N. JOHNSTON

RACHAEL E. KOSS

AIDAN P. MARSHALL

ALAURA R. McGUIRE ISABEL TAHIR

Of Counsel

DANIEL L. CARDOZO

MARC D. JOSEPH

City of Antioch Planning Commission Kevin Riley, Chair Seth Webber, Vice-Chair Commissioners Jennifer Perez, Robert Martin, Ramesh Suman, Cortney L. Jones City of Antioch 200 H Street Antioch, CA 94531

Email: planning@antiochca.gov

Via Email Only

Kevin Scudero, Acting Director Community Development Department 200 H Street Antioch, CA 94531 Email: planning@antiochca.gov

Zoe Merideth, Senior Planner Email: zmerideth@antiochca.gov

Re: Antioch Planning Commission Hearing, Agenda Item 6-1; Wildflower Station Townhomes 2 Multifamily Residential Project (TM-02, AR-23-05)

Dear Chair Riley, Vice-Chair Webber, Commissioners, Mr. Scudero, and Ms. Merideth:

We are writing on behalf of Contra Costa Residents for Responsible Development ("Contra Costa Residents") to provide comments on Agenda Item 6-1, the Wildflower Station Townhomes 2 Multifamily Residential Project (TM-02, AR-23-05) ("Wildflower Townhomes Project" or "Project") proposed by DeNova Homes, Inc. ("Applicant"). The Project consists of a vesting tentative map to create 19 residential lots for 19 townhome buildings, containing 159 residential units total. The Project site is a 10.35 acre undeveloped site located east of Hillcrest Avenue and west of Wildflower Station Place in the City of Antioch ("City").

The City contends that the Project previously has been analyzed under the California Environmental Quality Act¹ ("CEQA") and that further evaluation is not

7194-005acp

¹ Pub. Res. Code ("PRC") §§ 21000 et seq.; 14 Cal. Code Regs. §§ 15000 et seq. ("CEQA Guidelines").

required pursuant to CEQA Guidelines section 15183.² Specifically, the City contends that the Project was adequately analyzed in the Antioch Housing, Environmental Hazards, and Environmental Justice Elements Project Draft Environmental Impact Report ("Housing Element EIR") adopted by the City in February 2023, and that additional environmental review is therefore not required for the Project pursuant to section 15183. These conclusions are set forth in the 15183 Consistency Memorandum, which purports to "determine if project-specific impacts would occur that are not adequately covered in [the Housing Element EIR]. To the extent the Housing Element policies and/or actions substantially mitigate a particular project impact, the impact shall not be considered peculiar, pursuant to 15183(f), thus, eliminating the need for further environmental review."³

The City's conclusion is not supported by substantial evidence in the record and further CEQA review is required. The City's reliance on section 15183 to avoid any project-specific environmental review is misplaced, as none of the Project's specific impacts were studied in the Housing Element EIR or the 15183 Consistency Memorandum, and the 15183 Consistency Memorandum does not provide evidence that the single Housing Element policy applicable to this Project will substantially mitigate any Project-level impact. Moreover, the Project will result in new or more significant impacts that are peculiar to the Project site. As a result, the Planning Commission lacks substantial evidence to approve the Project.

In particular, Contra Costa Residents' noise expert found that the Project's construction and operational noise impacts were not analyzed and would exceed applicable significance thresholds. These impacts are peculiar to the Project, were not analyzed in the Housing Element EIR and will not be mitigated by any uniformly applied policies or standards. The City also lacks substantial evidence to conclude that the Project would not result in transportation impacts peculiar to the Project site. Neither the Housing Element EIR nor the 15183 Consistency Memorandum conducts a VMT analysis or provides evidence that the Project possesses characteristics exempting it from a detailed VMT analysis. Finally, neither the Consistency Memorandum nor the Housing Element EIR performed any emissions modeling to determine the scope of potential air quality and public health impacts from the Project's construction and operational emissions, in violation of CEQA. The City therefore may not properly rely on CEQA Guidelines section 15183 to avoid further environmental review.

 $^{^2}$ March 2024 Wildflower Townhomes Section 15183 Consistency Memorandum ("15183 Consistency Memorandum"), pg. 1.

³ *Id.* at pg. 9.

⁷¹⁹⁴⁻⁰⁰⁵acp

We prepared these comments with the assistance of acoustics, noise, and vibration expert Jack Meighan of Wilson Ihrig. As explained below, the Project will have potentially significant air quality, public health, noise and transportation impacts that are peculiar to the project and were not analyzed at a project-level in the Housing Element EIR, or are more severe than previously analyzed by the City. These impacts are not reduced to less than significant levels by the mitigation measures in the Housing Element EIR or any other standard conditions of approval, and therefore require disclosure and mitigation in a project-level Environmental Impact Report ("EIR") before the City can consider approval of the Project.

I. STATEMENT OF INTEREST

Contra Costa Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental and public service impacts of the Project. The coalition includes the International Brotherhood of Electrical Workers Local 302, Plumbers & Steamfitters Local 159, Sheet Metal Workers Local 104, Sprinkler Fitters Local 483, along with their members, their families, and other individuals who live and work in the City of Antioch and Contra Costa County.

Contra Costa Residents' individual members live, work, recreate, and raise their families in the City of Antioch and surrounding communities. Accordingly, they would be directly affected by the Project's environmental, health, and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist on site.

Contra Costa Residents also has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for businesses and industries to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

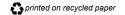
⁴ Mr. Meighan's Comments ("Meighan Comments") and CV are attached hereto as **Attachment A.**

II. LEGAL BACKGROUND

CEQA has two basic purposes, neither of which has the City satisfied in this case. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental impacts of a project before harm is done to the environment.⁵ The EIR is the "heart" of this requirement,⁶ and has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." To fulfill this purpose, the discussion of impacts in an EIR must be detailed, complete, and "reflect a good faith effort at full disclosure." An adequate EIR must contain facts and analysis, not just an agency's conclusions.⁹

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring imposition of mitigation measures and by requiring the consideration of environmentally superior alternatives. ¹⁰ CEQA imposes an affirmative obligation on agencies to avoid or reduce environmental harm by adopting feasible project alternatives or mitigation measures to address all potentially significant impacts identified in the agency's CEQA analysis. ¹¹ Without an adequate analysis and description of feasible mitigation measures, it would be impossible for agencies relying upon an EIR or other environmental document to meet this obligation.

Following preliminary review of a project to determine whether an activity is subject to CEQA, a lead agency is required to prepare an initial study to determine whether to prepare an EIR or negative declaration, identify whether a program EIR, tiering, or other appropriate process can be used for analysis of the project's environmental effects, or determine whether a previously prepared EIR could be used with the project, among other purposes. ¹² CEQA requires an agency to



⁵ Cal. Code Regs., tit. 14, § 15002, subd. (a)(1) ("CEQA Guidelines"); Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs. (2001) 91 Cal.App.4th 1344, 1354 ("Berkeley Jets"); County of Inyo v. Yorty (1973) 32 Cal.App.3d 795, 810.

⁶ No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 84.

⁷ County of Inyo v. Yorty (1973) 32 Cal.App.3d 795, 810.

 $^{^8}$ CEQA Guidelines, $\$ 15151; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 721-722.

⁹ See Citizens of Goleta Valley v. Bd. of Supervisors (1990) 52 Cal.3d 553, 568.

¹⁰ CEQA Guidelines, § 15002, subd. (a)(2) and (3); Berkeley Jets, 91 Cal.App.4th, at p. 1354; Laurel Heights Improvement Ass'n v. Regents of the University of Cal. (1998) 47 Cal.3d 376, 400.

¹¹ Pub. Resources Code, §§ 21002-21002.1.

¹² CEQA Guidelines, §§ 15060, 15063, subd. (c).

analyze the potential environmental impacts of its proposed actions in an EIR except in certain limited circumstances. ¹³ A CEQA exemption may be invoked only if expressly authorized by the CEQA statute or guidelines and if there is no possibility of a significant effect on the environment. Exemptions must be narrowly construed and are not to be expanded beyond the scope of their plain language. ¹⁴

CEQA Guidelines Section 15183 provides an exemption for projects which are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, except as necessary to evaluate whether there are project-specific significant impacts which are peculiar to the project or project site. ¹⁵ In relying on section 15183 to approve a project, a lead agency may not forgo further analysis of potentially significant impacts unless it makes certain findings. An agency is required to perform further analysis as to impacts that (1) are peculiar to the proposed project or parcel, (2) were not analyzed as significant effects in a prior EIR for the zoning, community or general plan with which the project is consistent, (3) are potentially significant off-site or cumulative impacts that were not discussed in the prior EIR, or (4) are previously identified significant impacts which, due to substantial new information not known at the time the EIR was certified, are determined to have a more severe impact than discussed in the prior EIR. ¹⁶

Under section 15183(f), an effect of a project on the environment is not considered peculiar to the project or project site if "uniformly applied development policies or standards have been previously adopted ...with a finding that the development policies or standards will substantially mitigate the environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect." ¹⁷

Agency determinations under Guidelines section 15183 are reviewed under the substantial evidence standard. In determining whether an agency's findings concerning the use of a statutory exemption from CEQA may be upheld, courts

¹³ See, e.g., Pub. Resources Code, § 21100.

¹⁴ Castaic Lake Water Agency v. City of Santa Clarita (1995) 41 Cal.App.4th 1257.

¹⁵ 14 CCR § 15183(a).

¹⁶ 14 CCR § 15183(b)(1)-(4).

¹⁷ 14 CCR § 15183(f).

¹⁸ Lucas v. City of Pomona (2023) 92 Cal.App.5th 508, 538, citing Concerned Dublin Citizens v. City of Dublin (2103) 214 Cal.App.4th 1301, 1311; see also, Hilltop Group v. County of San Diego (2024) 99 Cal.App.5th 890, 909-10.

review the administrative record to see that substantial evidence supports each element of the exemption. ¹⁹ This includes the determination that "uniformly applied development policies or standards" will substantially mitigate the project's environmental effects. ²⁰ Agency findings must specifically address the effect of uniform policies and standards on potential environmental impacts. ²¹

Section 15168's two-step inquiry of a program EIR's applicability to later activities holds that "if a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration." The City insists that, pursuant to sections 15162 and 15183, the Project is within the scope of the program EIR and no subsequent EIR is required. "Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record."

Here, the Housing Element EIR analyzed impacts at a program level, and did not analyze quantify, or disclose Project-level impacts for issues including transportation, air quality and public health, and noise.

III. THE PROJECT IS NOT EXEMPT FROM FURTHER CEQA REVIEW AND AN EIR IS REQUIRED

The City contends that the Housing Element EIR provides the basis for its determination that no further environmental review of the Project's impacts is required. The 15183 Consistency Memorandum notes that the Project's density of 20.05 dwelling units per acre ("du/ac") is consistent with the development density established in the Housing Element EIR, i.e., 20-25 du/ac, and purports to evaluate whether the Project will have any effects peculiar to the Project or Project site. ²² It goes on to state that "[t]o the extent that the Housing Element policies and/or actions substantially mitigate a particular project impact, the impact shall not be considered peculiar, pursuant to [CEQA Guidelines section] 15183(f), thus, eliminating the requirement for further environmental review."²³

However, while the Consistency Memorandum recites the requirements of section 15183, it does not actually analyze whether the Project will have any effects

¹⁹ Lucas, 92 Cal.App.5th at 538.

²⁰ 14 CCR § 15183(f).

²¹ Hilltop Group, 99 Cal.App.5th at 918.

²² 15183 Consistency Memorandum, pg. 9.

²³ *Id.* at pgs. 8-9.

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peculiar to the Project or the Project site. Neither the Housing Element EIR nor the 15183 Consistency Memorandum examine the Project-level effects on environmental impacts such as air quality, health risks, transportation and noise. Nor does the Consistency Memorandum identify any "Housing Element policies and/or practices" that apply to the Project to substantially mitigate the Project's impacts. As discussed below, the City lacks substantial evidence to support the necessary findings to exempt the Project from CEQA review, and the City must prepare and circulate for public review an EIR that analyzes the Project's potentially significant impacts.

A. The City Lacks Substantial Evidence to Support its Conclusions with Respect to the Project's Transportation Impacts

CEQA requires analysis of a project's transportation impacts via analysis of the project's vehicle miles traveled ("VMT").²⁴ The Housing Element EIR evaluated the VMT impacts of all of the potential new housing sites in the City (including the site for the Wildflower Townhomes Project) and found a significant impact on VMT.²⁵ To address these impacts, the Housing Element EIR adopted Mitigation Measure TRANS-1, which provides that individual housing development projects (like this one) that do not screen out from VMT impacts analysis shall provide a quantitative VMT analysis. 26 Individual projects which result in a significant VMT impact are required to implement travel demand management measures and physical measures to reduce VMT to a less-than-significant level.²⁷ The Housing Element EIR lists seven criteria that are used to screen projects out of conducting project-level VMT analysis: (1) CEQA-exempt projects, (2) small projects, (3) localserving uses, (4) proximity to a major transit stop, (5) projects located in low VMT areas, (6) affordable housing, and (7) transportation projects.²⁸ These criteria screen out projects from performing a full VMT analysis because projects meeting these criteria are presumed to have less-than-significant VMT impacts absent substantial evidence to the contrary.²⁹

²⁴ 14 CCR § 15064.3.

²⁵ Housing Element EIR, pg. IV.B-27.

 $^{^{26}}$ *Id*.

 $^{^{27}}$ *Id*.

²⁸ *Id.*, pgs. IV.B-21—IV.B-22.

 $^{^{29}}$ *Id*.

The Housing Element EIR makes clear that it did not analyze VMT impacts from individual housing projects like this one. Nor does the 15183 Consistency Memorandum for this Project analyze the Project's VMT impacts. Instead, the City asserts that because the 15183 Consistency Memoranda concludes that the Project qualifies for the Guidelines section 15183 exemption, the Project "screens out" from having to perform a quantitative VMT analysis as required under Housing Element EIR mitigation measure TRANS-1. Specifically, the 15183 Consistency Memorandum states:

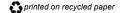
"As demonstrated through this 15183 Consistency Memorandum, the proposed project would not result in significant impact that is peculiar to the project or project site, a significant effect that was not identified in the Housing Element EIR, or a substantially more severe significant effect related to transportation beyond what was identified in the Housing Element EIR. Therefore, pursuant to Section 15183 of the CEQA Guidelines, the proposed project qualifies for exemption from further environmental review under CEQA. Because the proposed project would be considered exempt from CEQA, Mitigation Measure TRANS-1 is not applicable."

The City's position is legally and logically flawed. The City's argument employs circular reasoning by claiming that because the Project is exempt from CEQA, it does not need to conduct a VMT analysis, citing the Housing Element EIR screening criteria. This reasoning is fundamentally flawed because the argument's premise ("the Project is exempt from CEQA") assumes the conclusion rather than supporting it. The City argues that an exemption from CEQA means an exemption from VMT analysis, but the CEQA exemption itself is predicated on the absence of significant environmental impacts peculiar to the Project, including transportation impacts which a VMT analysis is designed to determine. In other words, the City claims that it need not evaluate the Project's potentially significant VMT impacts because the Project is exempt from CEQA, but the exemption determination itself rests on unsupported assumptions regarding the lack of Project-specific peculiar impacts. The City lacks any evidence to support the conclusion that the Project will not have significant VMT impacts peculiar to the Project or Project site because it performed no Project-specific VMT analysis. By bypassing the VMT analysis this way, the City avoids an analysis that could reveal significant impacts, and preclude the use of the section 15183 exemption. This approach undermines the purpose of CEQA, which is to ensure that potential environmental impacts are identified, disclosed and mitigated.

While the Consistency Memorandum relies solely on the "CEQA Exemption" screening criterion, the Project does not qualify for any of the other screening criteria set out in the Housing Element EIR. The Project is not a "Small Project," defined as having 10,000 square feet or less³⁰ of non-residential space or 10 residential units or less. The Project will not consist of "Local-Serving Uses," as this screening criteria is intended to apply to commercial uses and is not relevant to residential projects.³¹ The Project does not qualify for the "Proximity to a Major Transit Stop" VMT screening criteria, as this criteria is limited to the 0.5 mile (walking radius) surrounding the Antioch BART and Antioch Amtrak stations, and the Housing Element EIR found that none of the housing sites analyzed fall within this boundary.³² The Project does not include any affordable housing, and therefore does not screen out from VMT analysis on that basis. Nor is the Project a "Transportation Project." Finally, neither the 15183 Consistency Memoranda nor the Housing Element EIR evaluates whether the Project is in a "Low VMT Area," defined as having home-based VMT per resident at or below 85% of the Antioch citywide average.³³ This determination requires TAZ-level screening using Contra Costa Countywide VMT maps and Travel Demand Model ("CCTA Model") results. 34 The Housing Element EIR, due to its programmatic scope, did not conduct this screening. 35 It does acknowledge, however, that such analysis may be necessary for individual projects.³⁶ Similarly, the 15183 Consistency Memoranda omits TAZbased screening. Therefore, the City has not provided substantial evidence to support a finding that the Project is located in a low VMT area.

As discussed above, the City's failure to perform a quantitative VMT analysis prevents an understanding of the extent to which the Project's VMT is expected to exceed the significance threshold, or the nature of mitigation required to reduce such impacts to below the threshold. The City's conclusion lacks the support of substantial evidence because it neither includes a site-specific VMT analysis nor demonstrates that the Project qualifies for screening under any recognized exemption. Accordingly, the City must prepare a Project-specific EIR that includes a quantitative VMT analysis and appropriate mitigation.

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 $^{^{30}}$ *Id*.

 $^{^{31}}$ Id. at pg. IV.B-24.

 $^{^{32}}$ *Id*.

³³ *Id.* at pg. IV.B-22.

³⁴ *Id.* at pg. IV.B-24.

³⁵ *Id*.

 $^{^{36}}$ *Id*.

B. The Project Will Have Significant, Unmitigated Air Quality and Public Health Impacts That are More Severe than Previously Analyzed

The City has not performed any emissions modeling to determine potential impacts of Project construction or operations; neither the 15183 Consistency Memorandum nor the Housing Element EIR analyzed any Project site-specific air quality impacts or identified any sensitive receptors near the Project site. Under CEQA Guidelines section 15168(c), these air quality and public health impacts are effects that were not examined in the Housing Element EIR, requiring a new initial study leading to either an EIR or negative declaration. The 15183 Consistency Memorandum includes a cursory discussion of the Project's potential air quality impacts, as follows:

"The proposed project would be consistent with the Housing Element and, thus, was anticipated by the City and considered under the Housing Element EIR analysis. Accordingly, the proposed project would not result in any new significant effects related to air quality. However, the Housing Element EIR requires mitigation measures related to construction emissions of criteria air pollutant emissions from future housing developments (AIR-1), operational emissions of criteria air pollutant emissions from future housing developments (AIR-2), and health risks related to the generation of toxic air contaminants (TACs) and particulate matter (PM) 2.5 microns in diameter (PM_{2.5}) during construction and operation of future housing developments (AIR-3a and AIR-3b)."³⁷

However, the Consistency Memorandum goes on to state that only the Housing Element EIR's air quality mitigation measure AIR-3a is applicable to this Project. But because the measure is structured so that development projects choose one option or the other, only part of Mitigation Measure AIR-3a is applicable to the project. Specifically, the proposed project will be required to equip all off-road diesel equipment with Tier 4 engines and the Applicant must prepare a Construction Emissions Minimization Plan for all identified reduction measures. Based on the Project's size, location and characteristics, none of the other Housing

³⁷ 15183 Consistency Memorandum, pg. 10.

³⁸ *Id.* at pg. 11.

 $^{^{39}}$ Id

 $^{^{40}}$ Id.

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Element EIR's air quality mitigation measures would apply to this Project. The City then concludes, without any supporting evidence, that "[i]mplementation of Mitigation measure AIR-3a would ensure the proposed project would not result in a significant impact that is peculiar to the project or the project site, would not be identified as a significant effect in the Housing Element EIR, and would not result in a more severe adverse impact than the significant effects previously identified within the Housing Element EIR." This conclusion lacks the support of any evidence, let alone substantial evidence as required by CEQA.

The Housing Element EIR expressly recognized that the use of construction equipment during construction of housing developments like the Project can pose health risks related to the generation of TACs and PM_{2.5}. ⁴² DPM is a known toxic air contaminant ("TAC") carcinogen that contains numerous harmful compounds. Diesel exhaust has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death. ^{43,44,45} Fine DPM is deposited deep in the lungs in the smallest airways and can result in increased respiratory symptoms and disease; decreased lung function, particularly in children and individuals with asthma; alterations in lung tissue and respiratory tract defense mechanisms; and premature death. ⁴⁶ Exposure to DPM increases the risk of lung cancer. It also causes non-cancer effects including chronic bronchitis, inflammation of lung tissue, thickening of the alveolar walls, immunological allergic reactions, and airway constriction. ⁴⁷ DPM is a TAC that is recognized by state and federal agencies as causing severe health risk because it

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⁴¹ *Id*.

⁴² Housing Element EIR, pgs. IV.C-21—23.

⁴³ California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998; see also California Air Resources Board, Overview: Diesel Exhaust & Health,

https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-

 $[\]frac{health\#:\sim:text=Diesel\%20Particulate\%20Matter\%20and\%20Health\&text=In\%201998\%2C\%20CARB\ \%20identified\%20DPM, and\%20other\%20adverse\%20health\%20effects.}$

 $^{^{44}}$ U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

⁴⁵ Environmental Defense Fund, Cleaner Diesel Handbook, Bring Cleaner Fuel and Diesel Retrofits into Your Neighborhood, April 2005; http://www.edf.org/documents/4941_cleanerdieselhandbook.pdf, accessed July 5, 2020.

⁴⁶ California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.

⁴⁷ Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel's April 22, 1998, Meeting.

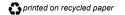
contains toxic materials, unlike PM_{2.5} and PM₁₀. ⁴⁸ Despite the Housing Element EIR's express recognition of the health risks from construction equipment emissions of TACs from construction of projects like this one, the City failed to conduct a quantitative health risk analysis ("HRA") and omitted a comparison of the Project's health risk impacts to the Bay Area Air Quality Management District's ("BAAQMD") threshold of 10 in one million. ⁴⁹

The City's omission of an HRA also conflicts with the Office of Environmental Health Hazard Assessment's ("OEHHA") *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments.* These guidelines recommend that all short-term projects lasting at least 2 months assess cancer risks and that exposure from projects lasting more than 6 months should be evaluated for the duration of the project.⁵⁰ Here, the Project's construction is expected to take longer than six months.⁵¹ Because the anticipated duration of the Project's construction would exceed the 2-month and 6-month requirements set forth by OEHHA, a quantified HRA under OEHHA guidance should have been prepared to evaluate the Project for its entire duration.

Therefore, based on the current record, the City cannot conclude that implementation of AIR-3a will prevent significant new air quality impacts associated with the Project. As a result, the City may not rely on the section 15183 exemption to approve this Project, and an EIR must be prepared and circulated for public review.

C. The City Lacks Substantial Evidence to Support its Conclusions with Respect to the Project's Noise Impacts

The City has not performed any site-specific analysis of the Project's potential noise impacts. Neither the Housing Element EIR nor the 15183 Consistency



⁴⁸ Health & Safety Code § 39655(a) (defining "toxic air contaminant" as air pollutants "which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412 (b)) is a toxic air contaminant.")

⁴⁹ BAAQMD, Regulation 11-18 Reduction of Risk From Air Toxic Emissions at Existing Facilities, p.
5.

⁵⁰ OEHHA, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, pgs. 8-18, available at: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.

⁵¹ 15183 Consistency Memo, pg. 11.

Memorandum includes any analysis of ambient noise in the area of the Project site, modeling of the Project's construction or operational noise impacts, or identification of sensitive receptors near the Project site. The 15183 Consistency Memorandum contains no discussion whatsoever regarding whether the Project may have peculiar noise impacts necessitating further CEQA review. Under CEQA Guidelines section 15168(c), these Project-specific noise impacts were not examined in the Housing Element EIR, requiring a new initial study leading to either an EIR or negative declaration.

The Housing Element EIR recognizes that for individual projects like this one, "construction activities could generate exterior noise levels that exceed the City's noise objectives established under General Plan Policy 11.8.2."52 The Housing Element EIR also states that "[i]ndividual housing developments...would result in a potentially significant impact if they cause a new exceedance of the General Plan noise objectives, or an audible (3.0 dBA) increase in areas where the General Plan noise objectives are already exceeded as the result of existing development."⁵³ General Plan Policy 11.8.2 (f) requires a detailed noise attenuation study to be prepared by a qualified acoustical engineer to determine appropriate mitigation and ways to incorporate such mitigation into project design and intervention. Finally, the Housing Element EIR points out that General Plan Policy 11.8.2 requires development adjacent to occupied noise sensitive land uses to implement a construction-related noise mitigation plan that should depict the location of construction equipment and how the noise from this equipment will be mitigated during construction through the use of noise reduction methods listed in Policy 11.8.2(o).54

Therefore, while the City expressly recognizes that individual housing projects like this one may have significant noise impacts on existing nearby sensitive receptors and requires studies and mitigation to reduce noise impacts, the 15183 Consistency Memo simply assumes without any analysis or evidence that the proposed Project "would not result in new significant impacts or substantially more significant impacts related to" impacts including noise. 55 It does not analyze or even consider whether the Project would "cause a new exceedance of the General Plan noise objectives, or an audible (3.0 dBA) increase in areas where the General Plan noise objectives are already exceeded." Nor does it consider whether Housing

⁵² Housing Element EIR, pg. IV.L-12.

⁵³ *Id.* at pg. IV.L-10.

⁵⁴ *Id.* at pg. IV.L-12.

⁵⁵ 15183 Consistency Memorandum, pg. 13.

Element policies and/or actions might substantially mitigate the Project's noise impacts. At a minimum, to demonstrate consistency with the Housing Element EIR, it must consider Project impacts in relation to General Plan Policy noise objectives, and must prepare a construction-related noise mitigation plan depicting the location of construction equipment and how the noise from this equipment will be mitigated during construction. Without any actual analysis, or consideration of any applicable uniformly applied development policies or standards, there is no support whatsoever for the conclusion that the Project will not have peculiar noise impacts.

Moreover, Mr. Meighan provides substantial evidence that the Project will cause new potentially significant noise impacts. First, the 15183 Consistency Memorandum lacks any measurement or disclosure of ambient noise conditions in the area of the Project site. This violates CEQA's requirement that a lead agency consider both the "absolute noise level" associated with a project as well as the increase in the level of noise that will result from a project.⁵⁶ This also fails to disclose a potentially significant operational noise impact. Based on information provided in the 15183 Consistency Memoranda, Mr. Meighan estimates the Project's nighttime operational noise levels to be 53 dBA at the Townhomes to the Northeast of the Project site.⁵⁷ Mr. Meighan goes on to explain that nighttime noise levels in suburban areas can be as quiet as 40 dBA. 58 When this ambient level is compared to the Project's estimated noise levels, the Project would far exceed the City's significance threshold of 3 dBA over ambient levels.⁵⁹ This is a new significant impact that was not addressed in the Housing Element EIR or the 15183 Consistency Memoranda and would not be mitigated even if the Housing Element EIR and General Plan noise policies and standards are applied.⁶⁰ In order to mitigate these impacts, Mr. Meighan suggest shielding HVAC units' noise emissions to the southeast.⁶¹

Second, Mr. Meighan provides substantial evidence that the Project will have significant construction noise impacts. As explained in Mr. Meighan's comments, the City fails to set its own construction noise significance threshold, leaving the

⁵⁶ Gardiner Farms, LLC v. County of Kern (2020) 45 CA5th 814, 887, 893; Keep Our Mountains Quiet v. County of Santa Clara (2015) 236 CA4th 714, 733.

⁵⁷ Meighan Comments, pg. 6.

 $^{^{58}}$ *Id*.

⁵⁹ *Id*.

⁶⁰ *Id.* at pgs. 2-3.

⁶¹ *Id.* at pg. 6.

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City's conclusion unsupported by any meaningful standard of evaluation. ⁶² Because of this, Mr. Meighan's analysis assumes a significance threshold of 75 dBA, which comes from the Los Angeles Municipal Code. ⁶³ Based on information provided in the 15183 Consistency Memoranda, Mr. Meighan estimates the Project's construction noise levels to range from 80 dBA to 85 dBA. ⁶⁴ This exceeds the significance threshold by at least 5 dBA, which is a new significant impact that the Housing Element EIR and the 15183 Consistency Memoranda did not address. To reduce this impact, Mr. Meighan proposes the use of a temporary soundwall for the Project. ⁶⁵

Third, Mr. Meighan explains that the City fails to conduct a screening level construction vibration analysis as required by the Housing Element EIR.⁶⁶ The Housing Element EIR states that "if sensitive receptors are located within these buffer distances [about 115 feet], future developments under the Project should prepare a screening level vibration analysis for City review in accordance with General Plan Policy 11.8.2(k)."⁶⁷ Despite the closest structures from the Project site being only 90 feet away, the City does not conduct this analysis. Mr. Meighan explains that a thorough evaluation of the Project's potential vibration impacts is "vital" because, if those impacts are significant, they could interfere with people's daily lives and potentially damage nearby homes.⁶⁸

For the above reasons, the City cannot rely on the 15183 CEQA exemption. The City must prepare an EIR that adequately analyzes the Project's potentially significant noise impacts by establishing ambient noise levels for the Project site, comparing them against applicable noise significance thresholds, and proposing mitigation for any significant impacts found.

IV. THE CITY LACKS SUBSTANTIAL EVIDENCE TO MAKE THE REQUIRED FINDINGS TO APPROVE THE PROJECT'S VESTING TENTATIVE SUBDIVISION MAP

The Project requires the City to approve a Vesting Tentative Subdivision Map ("VTSM") for condominium purposes that would subdivide the project site for

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 $^{^{62}}$ *Id*.

⁶³ *Id.* at pg. 5.

 $^{^{64}}$ *Id*.

 $^{^{65}}$ *Id*.

⁶⁶ *Id.* at pg. 6.

⁶⁷ *Id*.

 $^{^{68}}$ *Id*.

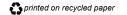
the development of 19 townhome buildings, containing a total of 159 residential units.⁶⁹ However, as discussed above, the City fails to adequately analyze or mitigate several new project-specific environmental impacts that were not addressed by the Housing Element EIR. As a result, the City cannot make the requisite findings to approve the Project's VTSM.

California's Subdivision Map Act precludes the approval of a tentative map where the design or improvement of the proposed subdivision is not consistent with the applicable general plan, is likely to cause substantial environmental damage, or is likely to cause serious public health problems.⁷⁰

Additionally, Antioch Municipal Code Section 9-4.323 states that a VTSM may be made conditional or denied if any of the following is determined:

- A failure to do so would place the residents of the subdivision or the immediate community, or both, in a condition dangerous to their health or safety, or both; or
- The condition or denial is required in order to comply with state or federal laws.

As detailed in our comments and those of our noise expert, there is substantial evidence that the Project may result in several potentially significant environmental impacts, including: (1) construction and operational noise, (2) VMT, and (3) air quality and related health risks. These impacts remain unaddressed and could pose serious risks to public health and safety—both for future subdivision residents and the surrounding community. Therefore, the City cannot make the required findings under the Subdivision Map Act and Antioch's Municipal Code to approve the VTSM until all of the Project's potentially significant impacts are thoroughly analyzed and effectively mitigated.



⁶⁹ Staff Report for the Antioch Planning Commission Regular Meeting of July 16, 2025, pg. 1 ⁷⁰ Government Code § 66474(b), (e) and (f).

V. CONCLUSION

As discussed herein, the City lacks substantial evidence to rely on a CEQA Guidelines section 15183 exemption for Project approval. The Project will result in potentially significant project-level impacts which are peculiar to the Project and Project site and will require mitigation. Therefore, the Project cannot be approved until the City complies with CEQA by preparing an EIR.

Sincerely,

Alaura McGuire

Glown McGuire

Attachment ARM:acp

EXHIBIT A



CALIFORNIA WASHINGTON NEW YORK

WI #24-001.32

July 12, 2025

Alaura R. McGuire Adams Broadwell Joseph & Cardozo 601 Gateway Boulevard, Suite 1000 South San Francisco, CA 94080

SUBJECT: Wildflower 2 Section 15183 Consistency Memorandum

Antioch, CA

Review and Comments on the Initial Study Noise Analysis

Dear Ms. McGuire.

As requested, we have reviewed the information and noise impact analysis for the Wildflower 2 Townhomes Project in Antioch, CA. The project consists of construction and operation/occupancy of 168 townhome units along Hillcrest Avenue, northeast of the intersection with Davidson Drive and Deer Valley Road. This letter is based on the Section 15183 Consistency Memorandum prepared by Raney Planning and Management, dated March 2024. The site is surrounded by noise-sensitive receivers, most notably existing townhomes to the northeast of the site along Wildflower Station Place.

Wilson Ihrig is an acoustical consulting firm that has practiced exclusively in the field of acoustics since 1966. During our 58 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also utilize industry-standard acoustical programs such as Roadway Construction Noise Model (RCNM), SoundPLAN, and CadnaA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Adverse Effects of Noise¹

Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive.

Noise-Induced Hearing Loss. If a person is repeatedly exposed to loud noises, he or she may experience noise-induced hearing impairment or loss. In the United States, both the Occupational Health and Safety Administration (OSHA) and the National Institute for Occupational Safety and

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¹ More information on these and other adverse effects of noise may be found in *Guidelines for Community Noise*, eds B Berglund, T Lindvall, and D Schwela, World Health Organization, Geneva, Switzerland, 1999. (https://www.who.int/publications/i/item/a68672)

Health (NIOSH) promote standards and regulations to protect the hearing of people exposed to high levels of industrial noise.

Speech Interference. Another common problem associated with noise is speech interference. In addition to the obvious issues that may arise from misunderstandings, speech interference also leads to problems with concentration fatigue, irritation, decreased working capacity, and automatic stress reactions. For complete speech intelligibility, the sound level of the speech should be 15 to 18 dBA higher than the background noise. Typical indoor speech levels are 45 to 50 dBA at 1 meter, so any noise above 30 dBA begins to interfere with speech intelligibility. The common reaction to higher background noise levels is to raise one's voice. If this is required persistently for long periods of time, stress reactions and irritation will likely result.

Sleep Disturbance. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as increased fatigue, depressed mood, and decreased work performance.

Cardiovascular and Physiological Effects. Human's bodily reactions to noise are rooted in the "fight or flight" response that evolved when many noises signaled imminent danger. These include increased blood pressure, elevated heart rate, and vasoconstriction. Prolonged exposure to acute noises can result in permanent effects such as hypertension and heart disease.

Impaired Cognitive Performance. Studies have established that noise exposure impairs people's abilities to perform complex tasks (tasks that require attention to detail or analytical processes) and it makes reading, paying attention, solving problems, and memorizing more difficult. This is why there are standards for classroom background noise levels and why offices and libraries are designed to provide quiet work environments.

Introduction

Under Section 15183 of the California Code, a project that is consistent with development density established by a General Plan for which an EIR has been certified is exempt from CEQA review except for project-specific impacts peculiar to the project or project site. Per 15183(f), an impact is not considered peculiar if uniformly applied development standards or policies have been previously adopted by the City with a finding that the development standards or policies would substantially mitigate the impact when applied to future projects, unless substantial new information shows otherwise.

According to the Consistency Memorandum, the City considered uniformly applied development standards and policies in the Draft Environmental Impact Report entitled Antioch Housing, Environmental Hazards, and Environmental Justice (EJ) Elements (Housing Element DEIR)². None of these policies is mentioned in the Consistency Memorandum, and there is no evidence that they would mitigate the Project's noise impacts in any event. The Housing Element DEIR's operational

² https://www.antiochca.gov/fc/community-development/planning/housing-element/DHEEIR-DEIR_22_0902.pdf

noise section states "General Plan Policy 11.8.2 (f) requires a detailed noise attenuation study to be prepared by a qualified acoustical engineer to determine appropriate mitigation and ways to incorporate such mitigation into project design and implementation." And that "compliance with Code of Ordinance 9-5.1901 (A) and General Plan Policy 11.8.2 (f) would ensure that future development under the Project would not result in a substantial temporary or permanent increase in ambient noise levels from stationary sources, and this impact would be less than significant" (Housing Element DEIR page IV.L-13).

Similarly, for construction noise, General Plan Policy 11.8.2 "requires development adjacent to occupied noise sensitive land uses to implement a construction-related noise mitigation plan and requires that all construction equipment utilize noise reduction features" Additionally, the construction-related noise mitigation plan should "depict the location of construction equipment and how the noise from this equipment will be mitigated during construction through the use of noise reduction methods" that are listed in General Plan Policy 11.8.2 (m) (DEIR page IV.L-12).

General Plan 11.8.2 (f) and (m) proceed to list several design guidelines that reduce noise. None of these are guaranteed to reduce noise, depending on the unique characteristics of each site. In Section m, mufflers are already included in construction noise source models of the cited FTA database, which takes its source values from measurements of modern equipment already equipped with mufflers. Nighttime construction restrictions do not mitigate daytime noise levels. Strategic staging will reduce the length of unnecessary noise impacts, but will not mitigate the worst-case construction noise scenarios when necessary activities occur adjacent to sensitive uses. Similarly for section f, most of these best practices do not mitigate worst-case noise and are already included in modeling assumptions. Strategic project design and orientation will reduce some potential impacts. However, this does not preclude there being operational noise impacts, either due to the constraints set by the geometry of each individual site plan, or project orientation that was set by considerations other than efficiency of reducing on-site noise.

The Housing Element DEIR establishes that the general plan will reduce noise to less than significant if followed, but the same DEIR cites the general plan requirements that projects which can result in the "development of proposed uses could result in a significant increase in noise a detailed noise attenuation study to be prepared by a qualified acoustical engineer to determine appropriate mitigation and ways to incorporate such mitigation into project design and implementation" (DEIR page IV.L-13). Those steps have not been taken here, and we believe that this project has the potential to result in a significant increase in noise and vibration, and thus a detailed analysis is required, as detailed in this letter.

Construction Noise Impacts are Potentially Significant.

To estimate construction noise, the Federal Highway Administration's Roadway Construction Noise Model (RCNM)³ was used for this analysis. Typically, multiple pieces of equipment are used in a construction noise analysis, based on a realistic estimation of a construction environment where multiple activities occur simultaneously. Up to three pieces of equipment were modeled at once as a conservative estimate, based on typical construction procedures and timelines. The one exception to this was pile driving, which is a typically more intense procedure than most construction methods.

³ https://www.fhwa.dot.gov/ENVIRonment/noise/construction_noise/rcnm/rcnmcover.cfm

Program default usage factors, or the percentage of time the equipment generally operates, were used for all pieces of analyzed equipment. Source levels typically used in a construction noise analysis are shown in Table 1.

Table 1: Typical Construction Equipment Noise Levels

Equipment	Lmax Sound Level at 50 feet (dBA)	Utilization %
Backhoe	77.6	40%
Compactor (ground)	80.0	20%
Compressor (air)	78.0	40%
Concrete Mixer Truck	79.0	40%
Concrete Pump Truck	81.0	20%
Concrete Saw	89.6	20%
Crane	81.0	16%
Dozer	81.7	40%
Excavator	80.7	40%
Forklift	75.0	10%
Pneumatic Tools	85.0	50%
Generator	81.0	50%
Mounted Impact Hammer (hoe ram)	90.0	20%
Impact Pile Driver	95.0	20%
Front End Loader	79.0	40%
Paver	77.0	50%
Roller	80.0	20%
Tractor	84.0	40%
Welder / Torch	73.0	40%
Source: RCNM 1.1		

The results of this analysis at the closest sensitive receiver, which are the townhomes approximately 90 feet northeast of the project boundary⁴, are shown in Table 2.

Table 2: Modeled Noise Levels from the Proposed Project and Nearest Sensitive Receiver

Noise Source(s)	Modeled Noise Level (dBA)
Impact Pile Driver Only	83
Impact Pile Driver + Pneumatic Tools + Concrete Saw	85
Concrete Saw + Pneumatic Tools	80

City of Antioch General Plan⁵ section 11.6.2i-n addresses construction noise. It limits construction hours to 7pm Monday through Saturday. However, during daytime hours, no limits are set.

⁴ This is measured via google earth to the project site

⁵ https://www.antiochca.gov/fc/community-development/planning/Antioch Adopted General Plan.pdf

Even if the city does not set its own construction noise daytime limits, the IS should set thresholds based on other similar documents. For example, the County of Los Angeles code has a construction noise limit of 75 dBA⁶. Certainly, that has no jurisdiction for this project, but other government agencies and other municipalities do have daytime construction noise limits. It is the responsibility of the project applicant to find an applicable guideline to use and determine if noise levels will create an adverse impact on the community. If the applicant finds, chooses and properly cites another threshold that they feel is more appropriate, it is within their right to do so. Many such thresholds are based on ambient noise levels, which are not present here. Either way, the IS must be revised to include such a threshold to evaluate, identify, and potentially mitigate construction noise impacts.

All three modeled scenarios yield noise levels that match or exceed the 75 dBA construction noise guideline. As it currently stands, this is an exceedance of the recommended construction noise threshold which would require mitigation, such as a temporary soundwall. A study should be developed, consistent with the General Plan Policy 11.8.2, that shows how implementation of recommended barriers reduce noise levels below significance limits.

Operational Noise Impacts are Potentially Significant.

Operational noise from the project may represent long-term changes in the surrounding noise environment for nearby receptors. Typically, operational noise sources can include rooftop mechanical units and noise from outdoor spaces and balconies. In order to model the noise, the following assumptions were used:

- Mechanical equipment, such as HVAC units, can generate sound power levels as high as 91 dBA⁷.
- The HVAC units would be located on building rooftops and are 10 feet behind the edge of the building.
- The distance from the new buildings to the residence to the southeast is 180 feet.
- Three units were assumed, 10 feet apart
- 4 dB of reduction was assumed from a rooftop parapet
- HVAC systems may run constantly, especially in the City of Antioch where summer average heat can reach as high as 90 degrees Fahrenheit⁸.

Based on the above assumptions, the potential nighttime operational noise levels are shown in Table 3. No rooftop amenity space was indicated in the Initial Study, so it was not studied. If more detailed plans show balconies or rooftop amenity space, those should be analyzed as well.

⁶ https://codelibrary.amlegal.com/codes/los angeles/latest/lamc/0-0-0-193925

⁷ https://www.americanstandardair.com/content/dam/Trane/en-

engineer/products/rooftopunits/Voyager/Voyager%20III/RT-PRC022-E4 0513.pdf, page 23

⁸ https://weatherspark.com/y/1111/Average-Weather-in-Antioch-California-United-States-Year-Round

Receiver	Modeled Noise Level (dBA)	Noise Criteria	Exceedance
Townhomes to the	53	n/aª	Unknown
Northeast			
^a Without measured ambient levels, increases over the ambient are impossible to determine.			

Table 3: Predicted Project Operational Noise Levels

Since there is no ambient measurement, there is no criteria, because nighttime criteria levels are typically based on ambient levels. Suburban areas at night can be as quiet as 40 dBA9. Based on the housing element DEIR, a significance threshold is used in the city of 3 dBA over ambient limits, of which this scenario exceeds. Due to the proximity of highway SR-4, ambient levels may be higher than this, but this is why it is important to measure ambient noise levels to establish a baseline. The available Project plans are unclear as to the placement of HVAC units. More developed plans may show an HVAC arrangement that is less intrusive, or ambient measurements may present a higher criterion. But the potential for significant impacts do exist, and more thorough study is needed.

The project has the potential to result in significant operational noise levels, which should be considered in a noise study, as required by General Plan Policy 11.8.2. This noise study should determine potential mitigation measures, such as shielding of the HVAC units' noise emissions to the southeast, to reduce community exposure to excessive noise. The noise study must also measure ambient noise levels and determine if the increase over ambient levels would be significant.

Construction Vibration Impacts are Potentially Significant.

The DEIR on pages IV.L-14 and IV.L-15 describes the construction vibration analysis used for housing with the city limits of Antioch, based on procedures and thresholds found in the Caltrans Transportation and Construction Vibration Guidance Manual and the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual. The DEIR states that "a buffer distance of about 115 feet" is required "to protect vibration sensitive structures (below the 0.12 in/sec criterion in Table IV.L-4)." The closest structure for this project is 90 feet away. The DEIR continues, "if sensitive receptors are located within these buffer distances, future developments under the Project should prepare a screening level vibration analysis for City review in accordance with General Plan Policy 11.8.2 (k)." This was not completed for this project as required by the City and should be part of a noise study associated with this project. The DEIR continues, stating that if the "screening level analysis shows that construction has the potential to result in damage to structures" then a "detailed vibration impact assessment must be prepared by a structural engineer or other appropriate professional to determine appropriate design means and methods of construction to avoid the potential damage" (DEIR pages IV.L-14 and IV.L-1). This is vital to study, as a potential impact would not just impact people's day to day lives, but could result in damage to nearby housing, and thus should be studied more thoroughly.

⁹ https://ehs.yale.edu/sites/default/files/files/decibel-level-chart.pdf

Baseline Noise not Established.

CEQA requires evaluation of whether a project would cause a "substantial temporary or permanent increase in ambient noise levels." Without knowing how loud the environment is, it is impossible to determine if the new project will increase noise in the surrounding community. Baseline noise measurements are the preferred way to determine background noise sources. These measurements serve as a crucial reference point for evaluating the potential noise impacts of proposed projects or activities. Without establishing the baseline noise conditions before any new development occurs, decision-makers cannot effectively determine whether the project complies with noise regulations nor identify any potential adverse effects on the surrounding environment and communities. Given the proximity to both local streets and highway SR-4 along with noise from nearby residences, as well as shielding from nearby structures, noise levels should be physically measured to be accurately determined.

The Federal Transit Administration's 2018 Transit Noise and Vibration Impact Assessment Manual¹⁰ (FTA Manual) Appendix E recommends a minimum of three one-hour Equivalent Sound Level (Leq) noise measurements (peak-hour roadway traffic, typical midday conditions, and typical nighttime conditions) to estimate the Day-Night Sound Level (Ldn) at site, which can be used to establish baseline noise conditions for the project, including the Community Noise Equivalent Level (CNEL). An EIR should be prepared with these baseline noise measurements to properly describe the noise environment.

Conclusions

Considering the potentially significant impacts from construction and operational noise and vibration on the surrounding community, it is imperative that an EIR be conducted to disclose and analyze these potentially significant impacts. Failure to evaluate these impacts would be a violation of CEQA's core purpose of providing a transparent and comprehensive assessment of a project's environmental effects.

Very truly yours, WILSON IHRIG

Jack Meighan Associate

meighan - updated wildflower noise analysis.docx

¹⁰ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123 0.pdf





JACK MEIGHAN

Associate

Jack joined Wilson Ihrig in 2021 and is an experienced acoustics engineer with expertise in projects involving rail transit systems, highways, CEQA analysis, environmental noise reduction, mechanical drawing reviews, and construction noise and vibration mitigation. He has hands-on experience with project management, including client coordination and presentations, as well as in designing, developing, and testing MATLAB

code used in acoustics applications. Additionally, his expertise includes taking field measurements, developing test plans and specifying, purchasing, setting up and repairing acoustic measurement equipment. He has experience in using Traffic Noise Model (TNM), CadnaA, EASE, Visual Basic, LabView, and CAD software.

Education

B.S. in Mechanical Engineering, University of Southern California, Los Angeles, CA

Project Experience

Metro Regional Connector, Los Angeles CA

Planned, took, and processed measurements as part of a team to determine the effectiveness of floating slab trackwork for a new subway in downtown Los Angeles that travels below the Walt Disney Concert Hall and the Colburn School of Music.

Rodeo Credit Enterprise CEQA Analysis for New Construction, Palmdale, CA

Wrote an accepted proposal and executed it for a noise study project to determine noise mitigation requirements on a new housing development. Led all aspects of the project and managed the budget during all phases of project completion. Completed 5 separate projects of this type for this developer.

Blackhall Studios, Santa Clarita, CA

Led the vibration measurement effort for a new soundstage directly adjacent to an existing freight and commuter rail line. Tested equipment, processed data, and analyzed results to determine the vibration propagation through the soil to the proposed soundstage locations, and was part of the team that developed mitigation techniques for the office spaces directly next to the rail line.

Octavia Residential Condos CEQA Study, San Francisco, CA

Calculated the STC ratings for the proposed windows to meet Title 24 requirements, modeled the acoustic performance of floor and ceiling structures, researched noise codes, helped with a mechanical design review, and wrote a report summarizing the results for a new Condominium project being developed in San Francisco.

San Diego International Airport Terminal I Replacement, CA

Conducted interior noise and vibration measurements, analyzed measurement data to help determine project criteria, modeled the existing and future terminals in CadnaA, and was part of a team that did a complete HVAC analysis of the entire terminal, as part of a CEQA analysis where a new terminal for the airport is being designed.

Five Points Apartments Noise Study, Whittier, CA

Took measurements, researched sound data and solutions, and recommended mitigation for a new apartment complex that was located next to an existing car wash, as part of a CEQA review.

USC Ellison Vibration Survey, Los Angeles, CA

Conducted vibration measurements as part of a survey to determine the effectiveness of vibration isolation platforms that are used to insulate cell growth in a cancer research facility. Determined the effectiveness and presented this information to the client. Researched and recommended a permanent monitoring system so the client could view data in real time.

TEN50 Condos 'Popping' Noise Investigation, Los Angeles, CA

Was part of a team that investigated the noise source of an unwanted popping noise in luxury condos in Downtown Los Angeles. Helped isolate the noise source location with accelerometers to determine where vibrations were occurring first and used an acoustic camera to determine where in the condo the noise was coming from.

2000 University Project, Berkely, CA

Wrote a construction noise monitoring plan based on environmental noise calculations, wrote a report summarizing the results, and attending a meeting with the client to discuss options.

Bay Area Rapid Transit (BART) On-Track, CA, San Francisco Bay Area, CA*

Day to day project manager, responsible for meetings, presentations, and coordination with the client for an ongoing noise study on the BART system. Developed MATLAB code to process measurements and determine areas where high corrugation was present, contributing to excessively high in-car noise levels. Performed noise measurements inside both the right of way and the vehicle cabin, in addition to rail corrugation measurements.

California I-605/SR-60 Interchange Improvement, Los Angeles, CA*

Developed a noise model of the area that predicted sound levels for abatement design, in addition to conducting noise measurements and analysis. Led the Team in use of the FHWA Traffic Noise Model Software for the project, involving three major highways and two busy interchanges extending over 17 miles in southern California.

Sound Transit On-Track, Seattle, WA*

Took measurements, fixed equipment, and developed software in MATLAB to process Corrugation Analysis Trolley measurements as part of an ongoing noise study on the Sound Transit Link system. Tested vibration data to determine the best measurement and processing techniques to store the data in an online database for in-car measurements.

LA Metro CRRC Railcar Testing, Los Angeles, CA*

Led the effort to plan the measurements, determine measurement locations and finalize the test plan. Formulated a method to capture speed data directly from legacy train vehicles. Executed noise and vibration specification measurements for new rail cars delivered by CRRC.

City of Los Angeles, Pershing Square Station Rehabilitation Noise Monitoring, CA*

Built noise models, wrote a construction noise plan, and assisted in on-site construction noise issues as they arose for a renovation of the Pershing Square metro station in downtown Los

Angeles. Trained construction personnel in techniques for noise reduction and how to conduct noise monitoring measurements to meet project specifications.

City of Orange Metrolink Parking Garage Construction Monitoring, CA*

Wrote an adaptive management vibration monitoring plan, set up equipment to monitor live vibration levels, and generated weekly reports as part of an effort to build a new parking garage. Designed, planned, and completed measurements to predict and mitigate pile driving construction impacts at three historic building locations adjacent to the construction site. Coordinated with the client whenever an on-site problem arose.

LA Metro Westside Subway Construction, Los Angeles, CA*

Planned, organized, and processed noise measurements for the Purple Line extension construction. Implemented both long term microphones to measure noise levels and accelerometers to measure vibration levels in existing subway tunnels. Oversaw noise monitoring at sensitive construction sites for the project and worked with the contractor to find ways to reduce construction noise levels by approximately 10dB.

Montreal Réseau Express Métropolitain, Canada*

Conducted vibration propagation measurements used to create models to predict operational vibration levels for an under-construction transit line. Managed equipment, solved problems in the field, and wrote parts of the report summarizing the findings of the acoustic study.

NHCRP Barrier*

Took on-highway measurements and wrote, designed, developed, and tested MATLAB code to identify specific spectrograms to use for analyses for a project evaluating barrier reflected highway traffic noise differences in the presence of a single absorptive or reflective noise barrier.

Siemens Railcar Testing for Sound Transit, Seattle, WA*

Measured in-car noise and vibration for new rail cars delivered by Siemens. Developed new internal techniques for measurements based on the written specifications. Contributed to the team that helped identify issues that new cars had in meeting the Sound Transit specifications for noise and vibration. Participated in developing the test plan and specified then acquired new equipment for the measurement.

Toronto/Ontario Eglinton Crosstown Light Rail, Final Design, Canada*

Assisted in vibration propagation measurements, analysis, and recommendations for mitigation for a 12-mile light-rail line both on and under Eglinton Avenue. Set up and ran equipment for at-grade measurements with an impact hammer for underground measurements with an impact load cell that was used during pre-construction borehole drilling.

RESPONSES TO COMMENTS



INTRODUCTION

This Responses to Comments document contains comments received on the Wildflower Townhomes Project (proposed project) for which a 15183 Consistency Memorandum was prepared. Unlike for an Environmental Impact Report (EIR), comments received regarding the 15183 Consistency Memorandum are not required to be attached to the document, nor must the lead agency provide specific written responses to public comments. Nonetheless, the lead agency has chosen to provide responses to the comments for consideration by the City decision makers.

COMMENT LETTERS

The City of Antioch received one comment letter on the proposed project that includes comments regarding the 15183 Consistency Memorandum. The comment letter was received from Adams Broadwell Joseph & Cardozo on behalf of the Contra Costa Residents for Responsible Development. The comment letter is included in the Responses to Comments section below.

RESPONSES TO COMMENTS

The Responses to Comments section below includes the comment letter received regarding the proposed project, as well as responses to each comment. The bracketed comment letter is followed by numbered responses to each bracketed comment.



Letter 1

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

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> > July 15, 2025

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Email: planning@antiochca.gov

Via Email Only

Kevin Scudero, Acting Director Community Development Department 200 H Street Antioch, CA 94531 Email: planning@antiochca.gov

Zoe Merideth, Senior Planner Email: zmerideth@antiochca.gov

Re: Antioch Planning Commission Hearing, Agenda Item 6-1; Wildflower Station Townhomes 2 Multifamily Residential Project (TM-02, AR-23-05)

Dear Chair Riley, Vice-Chair Webber, Commissioners, Mr. Scudero, and Ms. Merideth:

We are writing on behalf of Contra Costa Residents for Responsible Development ("Contra Costa Residents") to provide comments on Agenda Item 6-1, the Wildflower Station Townhomes 2 Multifamily Residential Project (TM-02, AR-23-05) ("Wildflower Townhomes Project" or "Project") proposed by DeNova Homes, Inc. ("Applicant"). The Project consists of a vesting tentative map to create 19 residential lots for 19 townhome buildings, containing 159 residential units total. The Project site is a 10.35 acre undeveloped site located east of Hillcrest Avenue and west of Wildflower Station Place in the City of Antioch ("City").

The City contends that the Project previously has been analyzed under the California Environmental Quality Act1 ("CEQA") and that further evaluation is not

7194-005acp





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¹ Pub. Res. Code ("PRC") §§ 21000 et seq.; 14 Cal. Code Regs. §§ 15000 et seq. ("CEQA Guidelines").

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required pursuant to CEQA Guidelines section 15183.² Specifically, the City contends that the Project was adequately analyzed in the Antioch Housing, Environmental Hazards, and Environmental Justice Elements Project Draft Environmental Impact Report ("Housing Element EIR") adopted by the City in February 2023, and that additional environmental review is therefore not required for the Project pursuant to section 15183. These conclusions are set forth in the 15183 Consistency Memorandum, which purports to "determine if project-specific impacts would occur that are not adequately covered in [the Housing Element EIR]. To the extent the Housing Element policies and/or actions substantially mitigate a particular project impact, the impact shall not be considered peculiar, pursuant to 15183(f), thus, eliminating the need for further environmental review."³

The City's conclusion is not supported by substantial evidence in the record and further CEQA review is required. The City's reliance on section 15183 to avoid any project-specific environmental review is misplaced, as none of the Project's specific impacts were studied in the Housing Element EIR or the 15183 Consistency Memorandum, and the 15183 Consistency Memorandum does not provide evidence that the single Housing Element policy applicable to this Project will substantially mitigate any Project-level impact. Moreover, the Project will result in new or more significant impacts that are peculiar to the Project site. As a result, the Planning Commission lacks substantial evidence to approve the Project.

In particular, Contra Costa Residents' noise expert found that the Project's construction and operational noise impacts were not analyzed and would exceed applicable significance thresholds. These impacts are peculiar to the Project, were not analyzed in the Housing Element EIR and will not be mitigated by any uniformly applied policies or standards. The City also lacks substantial evidence to conclude that the Project would not result in transportation impacts peculiar to the Project site. Neither the Housing Element EIR nor the 15183 Consistency Memorandum conducts a VMT analysis or provides evidence that the Project possesses characteristics exempting it from a detailed VMT analysis. Finally, neither the Consistency Memorandum nor the Housing Element EIR performed any emissions modeling to determine the scope of potential air quality and public health impacts from the Project's construction and operational emissions, in violation of CEQA. The City therefore may not properly rely on CEQA Guidelines section 15183 to avoid further environmental review.





1-1

cont.

 $^{^2}$ March 2024 Wildflower Townhomes Section 15183 Consistency Memorandum ("15183 Consistency Memorandum"), pg. 1.

 $^{^3}$ Id. at pg. 9.

⁷¹⁹⁴⁻⁰⁰⁵acp

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We prepared these comments with the assistance of acoustics, noise, and vibration expert Jack Meighan of Wilson Ihrig. As explained below, the Project will have potentially significant air quality, public health, noise and transportation impacts that are peculiar to the project and were not analyzed at a project-level in the Housing Element EIR, or are more severe than previously analyzed by the City. These impacts are not reduced to less than significant levels by the mitigation measures in the Housing Element EIR or any other standard conditions of approval, and therefore require disclosure and mitigation in a project-level Environmental Impact Report ("EIR") before the City can consider approval of the Project.

I. STATEMENT OF INTEREST

Contra Costa Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental and public service impacts of the Project. The coalition includes the International Brotherhood of Electrical Workers Local 302, Plumbers & Steamfitters Local 159, Sheet Metal Workers Local 104, Sprinkler Fitters Local 483, along with their members, their families, and other individuals who live and work in the City of Antioch and Contra Costa County.

Contra Costa Residents' individual members live, work, recreate, and raise their families in the City of Antioch and surrounding communities. Accordingly, they would be directly affected by the Project's environmental, health, and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist on site.

Contra Costa Residents also has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for businesses and industries to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

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cont.

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 $^{^4}$ Mr. Meighan's Comments ("Meighan Comments") and CV are attached hereto as **Attachment A.** 7194-005acp

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II. LEGAL BACKGROUND

CEQA has two basic purposes, neither of which has the City satisfied in this case. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental impacts of a project before harm is done to the environment.⁵ The EIR is the "heart" of this requirement,⁶ and has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." To fulfill this purpose, the discussion of impacts in an EIR must be detailed, complete, and "reflect a good faith effort at full disclosure." An adequate EIR must contain facts and analysis, not just an agency's conclusions. ⁹

1-1 cont.

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring imposition of mitigation measures and by requiring the consideration of environmentally superior alternatives. ¹⁰ CEQA imposes an affirmative obligation on agencies to avoid or reduce environmental harm by adopting feasible project alternatives or mitigation measures to address all potentially significant impacts identified in the agency's CEQA analysis. ¹¹ Without an adequate analysis and description of feasible mitigation measures, it would be impossible for agencies relying upon an EIR or other environmental document to meet this obligation.

Following preliminary review of a project to determine whether an activity is subject to CEQA, a lead agency is required to prepare an initial study to determine whether to prepare an EIR or negative declaration, identify whether a program EIR, tiering, or other appropriate process can be used for analysis of the project's environmental effects, or determine whether a previously prepared EIR could be used with the project, among other purposes. ¹² CEQA requires an agency to





⁵ Cal. Code Regs., tit. 14, § 15002, subd. (a)(1) ("CEQA Guidelines"); Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs. (2001) 91 Cal.App.4th 1344, 1354 ("Berkeley Jets"); County of Inyo v. Yorty (1973) 32 Cal.App.3d 795, 810.

⁶ No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 84.

⁷ County of Inyo v. Yorty (1973) 32 Cal. App. 3d 795, 810.

⁸ CEQA Guidelines, § 15151; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 721-722.

⁹ See Citizens of Goleta Valley v. Bd. of Supervisors (1990) 52 Cal.3d 553, 568.

 $^{^{10}}$ CEQA Guidelines, § 15002, subd. (a)(2) and (3); Berkeley Jets, 91 Cal.App.4th, at p. 1354; Laurel Heights Improvement Ass'n v. Regents of the University of Cal. (1998) 47 Cal.3d 376, 400.

¹¹ Pub. Resources Code, §§ 21002-21002.1.

¹² CEQA Guidelines, §§ 15060, 15063, subd. (c).

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analyze the potential environmental impacts of its proposed actions in an EIR except in certain limited circumstances. ¹³ A CEQA exemption may be invoked only if expressly authorized by the CEQA statute or guidelines and if there is no possibility of a significant effect on the environment. Exemptions must be narrowly construed and are not to be expanded beyond the scope of their plain language. ¹⁴

CEQA Guidelines Section 15183 provides an exemption for projects which are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, except as necessary to evaluate whether there are project-specific significant impacts which are peculiar to the project or project site. ¹⁵ In relying on section 15183 to approve a project, a lead agency may not forgo further analysis of potentially significant impacts unless it makes certain findings. An agency is required to perform further analysis as to impacts that (1) are peculiar to the proposed project or parcel, (2) were not analyzed as significant effects in a prior EIR for the zoning, community or general plan with which the project is consistent, (3) are potentially significant off-site or cumulative impacts that were not discussed in the prior EIR, or (4) are previously identified significant impacts which, due to substantial new information not known at the time the EIR was certified, are determined to have a more severe impact than discussed in the prior EIR. ¹⁶

Under section 15183(f), an effect of a project on the environment is not considered peculiar to the project or project site if "uniformly applied development policies or standards have been previously adopted ... with a finding that the development policies or standards will substantially mitigate the environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect." ¹⁷

Agency determinations under Guidelines section 15183 are reviewed under the substantial evidence standard. ¹⁸ In determining whether an agency's findings concerning the use of a statutory exemption from CEQA may be upheld, courts

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¹³ See, e.g., Pub. Resources Code, § 21100.

¹⁴ Castaic Lake Water Agency v. City of Santa Clarita (1995) 41 Cal.App.4th 1257.

^{15 14} CCR § 15183(a).

¹⁶ 14 CCR § 15183(b)(1)-(4).

^{17 14} CCR § 15183(f).

 $^{^{18}}$ Lucas v. City of Pomona (2023) 92 Cal. App.5th 508, 538, citing Concerned Dublin Citizens v. City of Dublin (2103) 214 Cal. App.4th 1301, 1311; see also, $Hill top\ Group\ v.$ County of San Diego (2024) 99 Cal. App.5th 890, 909-10.

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review the administrative record to see that substantial evidence supports each element of the exemption.¹⁹ This includes the determination that "uniformly applied development policies or standards" will substantially mitigate the project's environmental effects.²⁰ Agency findings must specifically address the effect of uniform policies and standards on potential environmental impacts.²¹

1-1 cont.

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Section 15168's two-step inquiry of a program EIR's applicability to later activities holds that "if a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration." The City insists that, pursuant to sections 15162 and 15183, the Project is within the scope of the program EIR and no subsequent EIR is required. "Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record."

Here, the Housing Element EIR analyzed impacts at a program level, and did not analyze quantify, or disclose Project-level impacts for issues including transportation, air quality and public health, and noise.

III. THE PROJECT IS NOT EXEMPT FROM FURTHER CEQA REVIEW AND AN EIR IS REQUIRED

The City contends that the Housing Element EIR provides the basis for its determination that no further environmental review of the Project's impacts is required. The 15183 Consistency Memorandum notes that the Project's density of 20.05 dwelling units per acre ("du/ac") is consistent with the development density established in the Housing Element EIR, i.e., 20-25 du/ac, and purports to evaluate whether the Project will have any effects peculiar to the Project or Project site.²² It goes on to state that "[t]o the extent that the Housing Element policies and/or actions substantially mitigate a particular project impact, the impact shall not be considered peculiar, pursuant to [CEQA Guidelines section] 15183(f), thus, eliminating the requirement for further environmental review."²³

However, while the Consistency Memorandum recites the requirements of section 15183, it does not actually analyze whether the Project will have any effects





¹⁹ Lucas, 92 Cal.App.5th at 538.

^{20 14} CCR § 15183(f).

 $^{^{21}\,}Hill top\,\,Group,\,99$ Cal. App.5th at 918.

^{22 15183} Consistency Memorandum, pg. 9.

 $^{^{23}}$ Id. at pgs. 8-9.

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1-2 cont.

peculiar to the Project or the Project site. Neither the Housing Element EIR nor the 15183 Consistency Memorandum examine the Project-level effects on environmental impacts such as air quality, health risks, transportation and noise. Nor does the Consistency Memorandum identify any "Housing Element policies and/or practices" that apply to the Project to substantially mitigate the Project's impacts. As discussed below, the City lacks substantial evidence to support the necessary findings to exempt the Project from CEQA review, and the City must prepare and circulate for public review an EIR that analyzes the Project's potentially significant impacts.

1-3

A. The City Lacks Substantial Evidence to Support its Conclusions with Respect to the Project's Transportation Impacts

CEQA requires analysis of a project's transportation impacts via analysis of the project's vehicle miles traveled ("VMT").²⁴ The Housing Element EIR evaluated the VMT impacts of all of the potential new housing sites in the City (including the site for the Wildflower Townhomes Project) and found a significant impact on VMT.²⁵ To address these impacts, the Housing Element EIR adopted Mitigation Measure TRANS-1, which provides that individual housing development projects (like this one) that do not screen out from VMT impacts analysis shall provide a quantitative VMT analysis.²⁶ Individual projects which result in a significant VMT impact are required to implement travel demand management measures and physical measures to reduce VMT to a less-than-significant level.²⁷ The Housing Element EIR lists seven criteria that are used to screen projects out of conducting project-level VMT analysis: (1) CEQA-exempt projects, (2) small projects, (3) localserving uses, (4) proximity to a major transit stop, (5) projects located in low VMT areas, (6) affordable housing, and (7) transportation projects.²⁸ These criteria screen out projects from performing a full VMT analysis because projects meeting these criteria are presumed to have less-than-significant VMT impacts absent substantial evidence to the contrary.²⁹

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²⁴ 14 CCR § 15064.3.

 $^{^{25}}$ Housing Element EIR, pg. IV.B-27.

 $^{^{26}}$ Id.

 $^{^{27}}$ Id.

²⁸ Id., pgs. IV.B-21—IV.B-22.

²⁹ Id.

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The Housing Element EIR makes clear that it did not analyze VMT impacts from individual housing projects like this one. Nor does the 15183 Consistency Memorandum for this Project analyze the Project's VMT impacts. Instead, the City asserts that because the 15183 Consistency Memoranda concludes that the Project qualifies for the Guidelines section 15183 exemption, the Project "screens out" from having to perform a quantitative VMT analysis as required under Housing Element EIR mitigation measure TRANS-1. Specifically, the 15183 Consistency Memorandum states:

"As demonstrated through this 15183 Consistency Memorandum, the proposed project would not result in significant impact that is peculiar to the project or project site, a significant effect that was not identified in the Housing Element EIR, or a substantially more severe significant effect related to transportation beyond what was identified in the Housing Element EIR. Therefore, pursuant to Section 15183 of the CEQA Guidelines, the proposed project qualifies for exemption from further environmental review under CEQA. Because the proposed project would be considered exempt from CEQA, Mitigation Measure TRANS-1 is not applicable."

1-4 cont.

The City's position is legally and logically flawed. The City's argument employs circular reasoning by claiming that because the Project is exempt from CEQA, it does not need to conduct a VMT analysis, citing the Housing Element EIR screening criteria. This reasoning is fundamentally flawed because the argument's premise ("the Project is exempt from CEQA") assumes the conclusion rather than supporting it. The City argues that an exemption from CEQA means an exemption from VMT analysis, but the CEQA exemption itself is predicated on the absence of significant environmental impacts peculiar to the Project, including transportation impacts which a VMT analysis is designed to determine. In other words, the City claims that it need not evaluate the Project's potentially significant VMT impacts because the Project is exempt from CEQA, but the exemption determination itself rests on unsupported assumptions regarding the lack of Project-specific peculiar impacts. The City lacks any evidence to support the conclusion that the Project will not have significant VMT impacts peculiar to the Project or Project site because it performed no Project-specific VMT analysis. By bypassing the VMT analysis this way, the City avoids an analysis that could reveal significant impacts, and preclude the use of the section 15183 exemption. This approach undermines the purpose of CEQA, which is to ensure that potential environmental impacts are identified, disclosed and mitigated.

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While the Consistency Memorandum relies solely on the "CEQA Exemption" screening criterion, the Project does not qualify for any of the other screening criteria set out in the Housing Element EIR. The Project is not a "Small Project," defined as having 10,000 square feet or less³⁰ of non-residential space or 10 residential units or less. The Project will not consist of "Local-Serving Uses," as this screening criteria is intended to apply to commercial uses and is not relevant to residential projects.³¹ The Project does not qualify for the "Proximity to a Major Transit Stop" VMT screening criteria, as this criteria is limited to the 0.5 mile (walking radius) surrounding the Antioch BART and Antioch Amtrak stations, and the Housing Element EIR found that none of the housing sites analyzed fall within this boundary.³² The Project does not include any affordable housing, and therefore does not screen out from VMT analysis on that basis. Nor is the Project a "Transportation Project." Finally, neither the 15183 Consistency Memoranda nor the Housing Element EIR evaluates whether the Project is in a "Low VMT Area," defined as having home-based VMT per resident at or below 85% of the Antioch citywide average.33 This determination requires TAZ-level screening using Contra Costa Countywide VMT maps and Travel Demand Model ("CCTA Model") results. 34 The Housing Element EIR, due to its programmatic scope, did not conduct this screening. 35 It does acknowledge, however, that such analysis may be necessary for individual projects.³⁶ Similarly, the 15183 Consistency Memoranda omits TAZbased screening. Therefore, the City has not provided substantial evidence to support a finding that the Project is located in a low VMT area.

As discussed above, the City's failure to perform a quantitative VMT analysis prevents an understanding of the extent to which the Project's VMT is expected to exceed the significance threshold, or the nature of mitigation required to reduce such impacts to below the threshold. The City's conclusion lacks the support of substantial evidence because it neither includes a site-specific VMT analysis nor demonstrates that the Project qualifies for screening under any recognized exemption. Accordingly, the City must prepare a Project-specific EIR that includes a quantitative VMT analysis and appropriate mitigation.

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³⁰ *Id*.

³¹ Id. at pg. IV.B-24.

³² Id.

³³ *Id.* at pg. IV.B-22.

³⁴ Id. at pg. IV.B-24.

³⁵ Id.

³⁶ *Id*.

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B. The Project Will Have Significant, Unmitigated Air Quality and Public Health Impacts That are More Severe than Previously Analyzed

The City has not performed any emissions modeling to determine potential impacts of Project construction or operations; neither the 15183 Consistency Memorandum nor the Housing Element EIR analyzed any Project site-specific air quality impacts or identified any sensitive receptors near the Project site. Under CEQA Guidelines section 15168(c), these air quality and public health impacts are effects that were not examined in the Housing Element EIR, requiring a new initial study leading to either an EIR or negative declaration. The 15183 Consistency Memorandum includes a cursory discussion of the Project's potential air quality impacts, as follows:

"The proposed project would be consistent with the Housing Element and, thus, was anticipated by the City and considered under the Housing Element EIR analysis. Accordingly, the proposed project would not result in any new significant effects related to air quality. However, the Housing Element EIR requires mitigation measures related to construction emissions of criteria air pollutant emissions from future housing developments (AIR-1), operational emissions of criteria air pollutant emissions from future housing developments (AIR-2), and health risks related to the generation of toxic air contaminants (TACs) and particulate matter (PM) 2.5 microns in diameter (PM_{2.5}) during construction and operation of future housing developments (AIR-3a and AIR-3b)."³⁷

However, the Consistency Memorandum goes on to state that only the Housing Element EIR's air quality mitigation measure AIR-3a is applicable to this Project. ³⁸ But because the measure is structured so that development projects choose one option or the other, only part of Mitigation Measure AIR-3a is applicable to the project. ³⁹ Specifically, the proposed project will be required to equip all offroad diesel equipment with Tier 4 engines and the Applicant must prepare a Construction Emissions Minimization Plan for all identified reduction measures. ⁴⁰ Based on the Project's size, location and characteristics, none of the other Housing





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Page 11

^{37 15183} Consistency Memorandum, pg. 10.

 $^{^{38}}$ Id. at pg. 11.

³⁹ Id

 $^{^{40}}$ Id.

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1-6 cont.

Element EIR's air quality mitigation measures would apply to this Project. The City then concludes, without any supporting evidence, that "[i]mplementation of Mitigation measure AIR-3a would ensure the proposed project would not result in a significant impact that is peculiar to the project or the project site, would not be identified as a significant effect in the Housing Element EIR, and would not result in a more severe adverse impact than the significant effects previously identified within the Housing Element EIR." This conclusion lacks the support of any evidence, let alone substantial evidence as required by CEQA.

The Housing Element EIR expressly recognized that the use of construction equipment during construction of housing developments like the Project can pose health risks related to the generation of TACs and PM_{2.5}.⁴² DPM is a known toxic air contaminant ("TAC") carcinogen that contains numerous harmful compounds. Diesel exhaust has been linked to a range of serious health problems including an increase in respiratory disease, lung damage, cancer, and premature death.^{43,44,45} Fine DPM is deposited deep in the lungs in the smallest airways and can result in increased respiratory symptoms and disease; decreased lung function, particularly in children and individuals with asthma; alterations in lung tissue and respiratory tract defense mechanisms; and premature death.⁴⁶ Exposure to DPM increases the risk of lung cancer. It also causes non-cancer effects including chronic bronchitis, inflammation of lung tissue, thickening of the alveolar walls, immunological allergic reactions, and airway constriction.⁴⁷ DPM is a TAC that is recognized by state and federal agencies as causing severe health risk because it

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 $^{^{41}}$ Id.

⁴² Housing Element EIR, pgs. IV.C-21—23.

⁴³ California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998; see also California Air Resources Board, Overview: Diesel Exhaust & Health, https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-

 $^{^{44}}$ U.S. EPA, Health Assessment Document for Diesel Engine Exhaust, Report EPA/600/8-90/057F, May 2002.

⁴⁵ Environmental Defense Fund, Cleaner Diesel Handbook, Bring Cleaner Fuel and Diesel Retrofits into Your Neighborhood, April 2005; http://www.edf.org/documents/4941_cleanerdieselhandbook.pdf, accessed July 5, 2020.

 ⁴⁶ California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, Staff Report, June 1998.
 ⁴⁷ Findings of the Scientific Review Panel on The Report on Diesel Exhaust as adopted at the Panel's April 22, 1998, Meeting.

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contains toxic materials, unlike $PM_{2.5}$ and PM_{10} . ⁴⁸ Despite the Housing Element EIR's express recognition of the health risks from construction equipment emissions of TACs from construction of projects like this one, the City failed to conduct a quantitative health risk analysis ("HRA") and omitted a comparison of the Project's health risk impacts to the Bay Area Air Quality Management District's ("BAAQMD") threshold of 10 in one million. ⁴⁹

The City's omission of an HRA also conflicts with the Office of Environmental Health Hazard Assessment's ("OEHHA") Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments. These guidelines recommend that all short-term projects lasting at least 2 months assess cancer risks and that exposure from projects lasting more than 6 months should be evaluated for the duration of the project. ⁵⁰ Here, the Project's construction is expected to take longer than six months. ⁵¹ Because the anticipated duration of the Project's construction would exceed the 2-month and 6-month requirements set forth by OEHHA, a quantified HRA under OEHHA guidance should have been prepared to evaluate the Project for its entire duration.

Therefore, based on the current record, the City cannot conclude that implementation of AIR-3a will prevent significant new air quality impacts associated with the Project. As a result, the City may not rely on the section 15183 exemption to approve this Project, and an EIR must be prepared and circulated for public review.

C. The City Lacks Substantial Evidence to Support its Conclusions with Respect to the Project's Noise Impacts

The City has not performed any site-specific analysis of the Project's potential noise impacts. Neither the Housing Element EIR nor the 15183 Consistency

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⁴⁸ Health & Safety Code § 39655(a) (defining "toxic air contaminant" as air pollutants "which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412 (b)) is a toxic air contaminant.")

⁴⁹ BAAQMD, Regulation 11-18 Reduction of Risk From Air Toxic Emissions at Existing Facilities, p.

⁵⁰ OEHHA, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, pgs. 8-18, available at: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.

⁵¹ 15183 Consistency Memo, pg. 11.

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1-8 cont.

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Memorandum includes any analysis of ambient noise in the area of the Project site, modeling of the Project's construction or operational noise impacts, or identification of sensitive receptors near the Project site. The 15183 Consistency Memorandum contains no discussion whatsoever regarding whether the Project may have peculiar noise impacts necessitating further CEQA review. Under CEQA Guidelines section 15168(c), these Project-specific noise impacts were not examined in the Housing Element EIR, requiring a new initial study leading to either an EIR or negative declaration.

The Housing Element EIR recognizes that for individual projects like this one, "construction activities could generate exterior noise levels that exceed the City's noise objectives established under General Plan Policy 11.8.2."52 The Housing Element EIR also states that "[i]ndividual housing developments... would result in a potentially significant impact if they cause a new exceedance of the General Plan noise objectives, or an audible (3.0 dBA) increase in areas where the General Plan noise objectives are already exceeded as the result of existing development."53 General Plan Policy 11.8.2 (f) requires a detailed noise attenuation study to be prepared by a qualified acoustical engineer to determine appropriate mitigation and ways to incorporate such mitigation into project design and intervention. Finally, the Housing Element EIR points out that General Plan Policy 11.8.2 requires development adjacent to occupied noise sensitive land uses to implement a construction-related noise mitigation plan that should depict the location of construction equipment and how the noise from this equipment will be mitigated during construction through the use of noise reduction methods listed in Policy 11.8.2(o).54

Therefore, while the City expressly recognizes that individual housing projects like this one may have significant noise impacts on existing nearby sensitive receptors and requires studies and mitigation to reduce noise impacts, the 15183 Consistency Memo simply assumes without any analysis or evidence that the proposed Project "would not result in new significant impacts or substantially more significant impacts related to" impacts including noise. ⁵⁵ It does not analyze or even consider whether the Project would "cause a new exceedance of the General Plan noise objectives, or an audible (3.0 dBA) increase in areas where the General Plan noise objectives are already exceeded." Nor does it consider whether Housing





⁵² Housing Element EIR, pg. IV.L-12.

 $^{^{53}}$ Id. at pg. IV.L-10.

 $^{^{54}}$ Id. at pg. IV.L-12.

 $^{^{55}}$ 15183 Consistency Memorandum, pg. 13.

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1-9 cont. Element policies and/or actions might substantially mitigate the Project's noise impacts. At a minimum, to demonstrate consistency with the Housing Element EIR, it must consider Project impacts in relation to General Plan Policy noise objectives, and must prepare a construction-related noise mitigation plan depicting the location of construction equipment and how the noise from this equipment will be mitigated during construction. Without any actual analysis, or consideration of any applicable uniformly applied development policies or standards, there is no support whatsoever for the conclusion that the Project will not have peculiar noise impacts.

Moreover, Mr. Meighan provides substantial evidence that the Project will cause new potentially significant noise impacts. First, the 15183 Consistency Memorandum lacks any measurement or disclosure of ambient noise conditions in the area of the Project site. This violates CEQA's requirement that a lead agency consider both the "absolute noise level" associated with a project as well as the increase in the level of noise that will result from a project.⁵⁶ This also fails to disclose a potentially significant operational noise impact. Based on information provided in the 15183 Consistency Memoranda, Mr. Meighan estimates the Project's nighttime operational noise levels to be 53 dBA at the Townhomes to the Northeast of the Project site.⁵⁷ Mr. Meighan goes on to explain that nighttime noise levels in suburban areas can be as quiet as 40 dBA. 58 When this ambient level is compared to the Project's estimated noise levels, the Project would far exceed the City's significance threshold of 3 dBA over ambient levels.⁵⁹ This is a new significant impact that was not addressed in the Housing Element EIR or the 15183 Consistency Memoranda and would not be mitigated even if the Housing Element EIR and General Plan noise policies and standards are applied.⁶⁰ In order to mitigate these impacts, Mr. Meighan suggest shielding HVAC units' noise emissions to the southeast.61

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Second, Mr. Meighan provides substantial evidence that the Project will have significant construction noise impacts. As explained in Mr. Meighan's comments, the City fails to set its own construction noise significance threshold, leaving the

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⁵⁶ Gardiner Farms, LLC v. County of Kern (2020) 45 CA5th 814, 887, 893; Keep Our Mountains Quiet v. County of Santa Clara (2015) 236 CA4th 714, 733.

⁵⁷ Meighan Comments, pg. 6.

⁵⁸ *Id*.

⁵⁹ *Id*.

 $^{^{60}}$ Id. at pgs. 2-3.

 $^{^{61}}$ Id. at pg. 6.

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1-11 cont.

City's conclusion unsupported by any meaningful standard of evaluation. ⁶² Because of this, Mr. Meighan's analysis assumes a significance threshold of 75 dBA, which comes from the Los Angeles Municipal Code. ⁶³ Based on information provided in the 15183 Consistency Memoranda, Mr. Meighan estimates the Project's construction noise levels to range from 80 dBA to 85 dBA. ⁶⁴ This exceeds the significance threshold by at least 5 dBA, which is a new significant impact that the Housing Element EIR and the 15183 Consistency Memoranda did not address. To reduce this impact, Mr. Meighan proposes the use of a temporary soundwall for the Project. ⁶⁵

Third, Mr. Meighan explains that the City fails to conduct a screening level construction vibration analysis as required by the Housing Element EIR.⁶⁶ The Housing Element EIR states that "if sensitive receptors are located within these buffer distances [about 115 feet], future developments under the Project should prepare a screening level vibration analysis for City review in accordance with General Plan Policy 11.8.2(k)."⁶⁷ Despite the closest structures from the Project site being only 90 feet away, the City does not conduct this analysis. Mr. Meighan explains that a thorough evaluation of the Project's potential vibration impacts is "vital" because, if those impacts are significant, they could interfere with people's daily lives and potentially damage nearby homes.⁶⁸

For the above reasons, the City cannot rely on the 15183 CEQA exemption. The City must prepare an EIR that adequately analyzes the Project's potentially significant noise impacts by establishing ambient noise levels for the Project site, comparing them against applicable noise significance thresholds, and proposing mitigation for any significant impacts found.

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IV. THE CITY LACKS SUBSTANTIAL EVIDENCE TO MAKE THE REQUIRED FINDINGS TO APPROVE THE PROJECT'S VESTING TENTATIVE SUBDIVISION MAP

The Project requires the City to approve a Vesting Tentative Subdivision Map ("VTSM") for condominium purposes that would subdivide the project site for

⁶² *Id*.

63 Id. at pg. 5.

 64 Id.

⁶⁵ *Id*.

 66 Id. at pg. 6.

⁶⁷ *Id*.

68 Id.





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the development of 19 townhome buildings, containing a total of 159 residential units.⁶⁹ However, as discussed above, the City fails to adequately analyze or mitigate several new project-specific environmental impacts that were not addressed by the Housing Element EIR. As a result, the City cannot make the requisite findings to approve the Project's VTSM.

California's Subdivision Map Act precludes the approval of a tentative map where the design or improvement of the proposed subdivision is not consistent with the applicable general plan, is likely to cause substantial environmental damage, or is likely to cause serious public health problems.⁷⁰

Additionally, Antioch Municipal Code Section 9-4.323 states that a VTSM may be made conditional or denied if any of the following is determined:

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- A failure to do so would place the residents of the subdivision or the immediate community, or both, in a condition dangerous to their health or safety, or both; or
- The condition or denial is required in order to comply with state or federal laws.

As detailed in our comments and those of our noise expert, there is substantial evidence that the Project may result in several potentially significant environmental impacts, including: (1) construction and operational noise, (2) VMT, and (3) air quality and related health risks. These impacts remain unaddressed and could pose serious risks to public health and safety—both for future subdivision residents and the surrounding community. Therefore, the City cannot make the required findings under the Subdivision Map Act and Antioch's Municipal Code to approve the VTSM until all of the Project's potentially significant impacts are thoroughly analyzed and effectively mitigated.





 $^{^{69}}$ Staff Report for the Antioch Planning Commission Regular Meeting of July 16, 2025, pg. 1 70 Government Code § 66474(b), (e) and (f).

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V. CONCLUSION

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As discussed herein, the City lacks substantial evidence to rely on a CEQA Guidelines section 15183 exemption for Project approval. The Project will result in potentially significant project-level impacts which are peculiar to the Project and Project site and will require mitigation. Therefore, the Project cannot be approved until the City complies with CEQA by preparing an EIR.

Sincerely,

Alaura McGuire

Glown McGuire

Attachment ARM:acp





EXHIBIT A





CALIFORNIA WASHINGTON NEW YORK

WI #24-001.32

July 12, 2025

Alaura R. McGuire Adams Broadwell Joseph & Cardozo 601 Gateway Boulevard, Suite 1000 South San Francisco, CA 94080

SUBJECT: Wildflower 2 Section 15183 Consistency Memorandum

Antioch, CA

Review and Comments on the Initial Study Noise Analysis

Dear Ms. McGuire,

As requested, we have reviewed the information and noise impact analysis for the Wildflower 2 Townhomes Project in Antioch, CA. The project consists of construction and operation/occupancy of 168 townhome units along Hillcrest Avenue, northeast of the intersection with Davidson Drive and Deer Valley Road. This letter is based on the Section 15183 Consistency Memorandum prepared by Raney Planning and Management, dated March 2024. The site is surrounded by noise-sensitive receivers, most notably existing townhomes to the northeast of the site along Wildflower Station Place.

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Wilson Ihrig is an acoustical consulting firm that has practiced exclusively in the field of acoustics since 1966. During our 58 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also utilize industry-standard acoustical programs such as Roadway Construction Noise Model (RCNM), SoundPLAN, and CadnaA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Adverse Effects of Noise¹

Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive.

Noise-Induced Hearing Loss. If a person is repeatedly exposed to loud noises, he or she may experience noise-induced hearing impairment or loss. In the United States, both the Occupational Health and Safety Administration (OSHA) and the National Institute for Occupational Safety and

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¹ More information on these and other adverse effects of noise may be found in *Guidelines for Community Noise*, eds B Berglund, T Lindvall, and D Schwela, World Health Organization, Geneva, Switzerland, 1999. (https://www.who.int/publications/i/item/a68672)

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Health (NIOSH) promote standards and regulations to protect the hearing of people exposed to high levels of industrial noise.

Speech Interference. Another common problem associated with noise is speech interference. In addition to the obvious issues that may arise from misunderstandings, speech interference also leads to problems with concentration fatigue, irritation, decreased working capacity, and automatic stress reactions. For complete speech intelligibility, the sound level of the speech should be 15 to 18 dBA higher than the background noise. Typical indoor speech levels are 45 to 50 dBA at 1 meter, so any noise above 30 dBA begins to interfere with speech intelligibility. The common reaction to higher background noise levels is to raise one's voice. If this is required persistently for long periods of time, stress reactions and irritation will likely result.

Sleep Disturbance. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as increased fatigue, depressed mood, and decreased work performance.

Cardiovascular and Physiological Effects. Human's bodily reactions to noise are rooted in the "fight or flight" response that evolved when many noises signaled imminent danger. These include increased blood pressure, elevated heart rate, and vasoconstriction. Prolonged exposure to acute noises can result in permanent effects such as hypertension and heart disease.

Impaired Cognitive Performance. Studies have established that noise exposure impairs people's abilities to perform complex tasks (tasks that require attention to detail or analytical processes) and it makes reading, paying attention, solving problems, and memorizing more difficult. This is why there are standards for classroom background noise levels and why offices and libraries are designed to provide quiet work environments.

Introduction

Under Section 15183 of the California Code, a project that is consistent with development density established by a General Plan for which an EIR has been certified is exempt from CEQA review except for project-specific impacts peculiar to the project or project site. Per 15183(f), an impact is not considered peculiar if uniformly applied development standards or policies have been previously adopted by the City with a finding that the development standards or policies would substantially mitigate the impact when applied to future projects, unless substantial new information shows otherwise.

According to the Consistency Memorandum, the City considered uniformly applied development standards and policies in the Draft Environmental Impact Report entitled Antioch Housing, Environmental Hazards, and Environmental Justice (EJ) Elements (Housing Element DEIR)². None of these policies is mentioned in the Consistency Memorandum, and there is no evidence that they would mitigate the Project's noise impacts in any event. The Housing Element DEIR's operational

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cont.

² https://www.antiochca.gov/fc/community-development/planning/housing-element/DHEEIR-DEIR_22_0902.pdf

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noise section states "General Plan Policy 11.8.2 (f) requires a detailed noise attenuation study to be prepared by a qualified acoustical engineer to determine appropriate mitigation and ways to incorporate such mitigation into project design and implementation." And that "compliance with Code of Ordinance 9-5.1901 (A) and General Plan Policy 11.8.2 (f) would ensure that future development under the Project would not result in a substantial temporary or permanent increase in ambient noise levels from stationary sources, and this impact would be less than significant" (Housing Element DEIR page IV.L-13).

Similarly, for construction noise, General Plan Policy 11.8.2 "requires development adjacent to occupied noise sensitive land uses to implement a construction-related noise mitigation plan and requires that all construction equipment utilize noise reduction features" Additionally, the construction-related noise mitigation plan should "depict the location of construction equipment and how the noise from this equipment will be mitigated during construction through the use of noise reduction methods" that are listed in General Plan Policy 11.8.2 (m) (DEIR page IV.L-12).

General Plan 11.8.2 (f) and (m) proceed to list several design guidelines that reduce noise. None of these are guaranteed to reduce noise, depending on the unique characteristics of each site. In Section m, mufflers are already included in construction noise source models of the cited FTA database, which takes its source values from measurements of modern equipment already equipped with mufflers. Nighttime construction restrictions do not mitigate daytime noise levels. Strategic staging will reduce the length of unnecessary noise impacts, but will not mitigate the worst-case construction noise scenarios when necessary activities occur adjacent to sensitive uses. Similarly for section f, most of these best practices do not mitigate worst-case noise and are already included in modeling assumptions. Strategic project design and orientation will reduce some potential impacts. However, this does not preclude there being operational noise impacts, either due to the constraints set by the geometry of each individual site plan, or project orientation that was set by considerations other than efficiency of reducing on-site noise.

The Housing Element DEIR establishes that the general plan will reduce noise to less than significant if followed, but the same DEIR cites the general plan requirements that projects which can result in the "development of proposed uses could result in a significant increase in noise a detailed noise attenuation study to be prepared by a qualified acoustical engineer to determine appropriate mitigation and ways to incorporate such mitigation into project design and implementation" (DEIR page IV.L-13). Those steps have not been taken here, and we believe that this project has the potential to result in a significant increase in noise and vibration, and thus a detailed analysis is required, as detailed in this letter.

Construction Noise Impacts are Potentially Significant.

To estimate construction noise, the Federal Highway Administration's Roadway Construction Noise Model (RCNM)³ was used for this analysis. Typically, multiple pieces of equipment are used in a construction noise analysis, based on a realistic estimation of a construction environment where multiple activities occur simultaneously. Up to three pieces of equipment were modeled at once as a conservative estimate, based on typical construction procedures and timelines. The one exception to this was pile driving, which is a typically more intense procedure than most construction methods.

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cont.

³ https://www.fhwa.dot.gov/ENVIRonment/noise/construction_noise/rcnm/rcnmcover.cfm

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Program default usage factors, or the percentage of time the equipment generally operates, were used for all pieces of analyzed equipment. Source levels typically used in a construction noise analysis are shown in Table 1.

Table 1: Typical Construction Equipment Noise Levels

Equipment	Lmax Sound Level at 50 feet (dBA)	Utilization %
Backhoe	77.6	40%
Compactor (ground)	80.0	20%
Compressor (air)	78.0	40%
Concrete Mixer Truck	79.0	40%
Concrete Pump Truck	81.0	20%
Concrete Saw	89.6	20%
Crane	81.0	16%
Dozer	81.7	40%
Excavator	80.7	40%
Forklift	75.0	10%
Pneumatic Tools	85.0	50%
Generator	81.0	50%
Mounted Impact Hammer (hoe ram)	90.0	20%
Impact Pile Driver	95.0	20%
Front End Loader	79.0	40%
Paver	77.0	50%
Roller	80.0	20%
Tractor	84.0	40%
Welder / Torch	73.0	40%
Source: RCNM 1.1		

1-14 cont.

The results of this analysis at the closest sensitive receiver, which are the townhomes approximately 90 feet northeast of the project boundary⁴, are shown in Table 2.

Table 2: Modeled Noise Levels from the Proposed Project and Nearest Sensitive Receiver

Noise Source(s)	Modeled Noise Level (dBA)
Impact Pile Driver Only	83
Impact Pile Driver + Pneumatic Tools + Concrete Saw	85
Concrete Saw + Pneumatic Tools	80

City of Antioch General Plan⁵ section 11.6.2i-n addresses construction noise. It limits construction hours to 7 μ m monday through Saturday. However, during daytime hours, no limits are set.

⁵ https://www.antiochca.gov/fc/community-development/planning/Antioch Adopted General Plan.pdf





 $^{^{\}rm 4}\, {\rm This}$ is measured via google earth to the project site

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Even if the city does not set its own construction noise daytime limits, the IS should set thresholds based on other similar documents. For example, the County of Los Angeles code has a construction noise limit of 75 dBA6. Certainly, that has no jurisdiction for this project, but other government agencies and other municipalities do have daytime construction noise limits. It is the responsibility of the project applicant to find an applicable guideline to use and determine if noise levels will create an adverse impact on the community. If the applicant finds, chooses and properly cites another threshold that they feel is more appropriate, it is within their right to do so. Many such thresholds are based on ambient noise levels, which are not present here. Either way, the IS must be revised to include such a threshold to evaluate, identify, and potentially mitigate construction noise impacts.

All three modeled scenarios yield noise levels that match or exceed the $75~\mathrm{dBA}$ construction noise guideline. As it currently stands, this is an exceedance of the recommended construction noise threshold which would require mitigation, such as a temporary soundwall. A study should be developed, consistent with the General Plan Policy 11.8.2, that shows how implementation of recommended barriers reduce noise levels below significance limits.

Operational Noise Impacts are Potentially Significant.

Operational noise from the project may represent long-term changes in the surrounding noise environment for nearby receptors. Typically, operational noise sources can include rooftop mechanical units and noise from outdoor spaces and balconies. In order to model the noise, the following assumptions were used:

- Mechanical equipment, such as HVAC units, can generate sound power levels as high as 91 dBA7.
- The HVAC units would be located on building rooftops and are 10 feet behind the edge of the building.
- The distance from the new buildings to the residence to the southeast is 180 feet.
- Three units were assumed, 10 feet apart
- · 4 dB of reduction was assumed from a rooftop parapet
- HVAC systems may run constantly, especially in the City of Antioch where summer average heat can reach as high as 90 degrees Fahrenheit⁸.

Based on the above assumptions, the potential nighttime operational noise levels are shown in Table 3. No rooftop amenity space was indicated in the Initial Study, so it was not studied. If more detailed plans show balconies or rooftop amenity space, those should be analyzed as well.





1-14 cont.

⁶ https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193925

⁷ https://www.americanstandardair.com/content/dam/Trane/en-

 $engineer/products/rooftopunits/Voyager/Voyager\%20 III/RT-PRC022-E4_0513.pdf, page~23$

 $^{^{8}}$ https://weatherspark.com/y/1111/Average-Weather-in-Antioch-California-United-States-Year-Round

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Table 3: Predicted Project Operational Noise Levels

Receiver	Modeled Noise Level (dBA)	Noise Criteria	Exceedance
Townhomes to the	53	n/a ²	Unknown
Northeast		·	

Since there is no ambient measurement, there is no criteria, because nighttime criteria levels are typically based on ambient levels. Suburban areas at night can be as quiet as 40 dBA9. Based on the housing element DEIR, a significance threshold is used in the city of 3 dBA over ambient limits, of which this scenario exceeds. Due to the proximity of highway SR-4, ambient levels may be higher than this, but this is why it is important to measure ambient noise levels to establish a baseline. The available Project plans are unclear as to the placement of HVAC units. More developed plans may show an HVAC arrangement that is less intrusive, or ambient measurements may present a higher criterion. But the potential for significant impacts do exist, and more thorough study is needed.

The project has the potential to result in significant operational noise levels, which should be considered in a noise study, as required by General Plan Policy 11.8.2. This noise study should determine potential mitigation measures, such as shielding of the HVAC units' noise emissions to the southeast, to reduce community exposure to excessive noise. The noise study must also measure ambient noise levels and determine if the increase over ambient levels would be significant.

1-14 cont.

Construction Vibration Impacts are Potentially Significant.

The DEIR on pages IV.L-14 and IV.L-15 describes the construction vibration analysis used for housing with the city limits of Antioch, based on procedures and thresholds found in the Caltrans Transportation and Construction Vibration Guidance Manual and the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual. The DEIR states that "a buffer distance of about 115 feet" is required "to protect vibration sensitive structures (below the 0.12 in/sec criterion in Table IV.L-4)." The closest structure for this project is 90 feet away. The DEIR continues, "if sensitive receptors are located within these buffer distances, future developments under the Project should prepare a screening level vibration analysis for City review in accordance with General Plan Policy 11.8.2 (k)." This was not completed for this project as required by the City and should be part of a noise study associated with this project. The DEIR continues, stating that if the "screening level analysis shows that construction has the potential to result in damage to structures" then a "detailed vibration impact assessment must be prepared by a structural engineer or other appropriate professional to determine appropriate design means and methods of construction to avoid the potential damage" (DEIR pages IV.L-14 and IV.L-1). This is vital to study, as a potential impact would not just impact people's day to day lives, but could result in damage to nearby housing, and thus should be studied more thoroughly.

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⁹ https://ehs.yale.edu/sites/default/files/files/decibel-level-chart.pdf

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Baseline Noise not Established.

CEQA requires evaluation of whether a project would cause a "substantial temporary or permanent increase in ambient noise levels." Without knowing how loud the environment is, it is impossible to determine if the new project will increase noise in the surrounding community. Baseline noise measurements are the preferred way to determine background noise sources. These measurements serve as a crucial reference point for evaluating the potential noise impacts of proposed projects or activities. Without establishing the baseline noise conditions before any new development occurs, decision-makers cannot effectively determine whether the project complies with noise regulations nor identify any potential adverse effects on the surrounding environment and communities. Given the proximity to both local streets and highway SR-4 along with noise from nearby residences, as well as shielding from nearby structures, noise levels should be physically measured to be accurately determined.

The Federal Transit Administration's 2018 Transit Noise and Vibration Impact Assessment Manual¹ (FTA Manual) Appendix E recommends a minimum of three one-hour Equivalent Sound Level (Leq) noise measurements (peak-hour roadway traffic, typical midday conditions, and typical nighttime conditions) to estimate the Day-Night Sound Level (Ldn) at site, which can be used to establish baseline noise conditions for the project, including the Community Noise Equivalent Level (CNEL). An EIR should be prepared with these baseline noise measurements to properly describe the noise environment.

1-14 cont.

Conclusions

Considering the potentially significant impacts from construction and operational noise and vibration on the surrounding community, it is imperative that an EIR be conducted to disclose and analyze these potentially significant impacts. Failure to evaluate these impacts would be a violation of CEQA's core purpose of providing a transparent and comprehensive assessment of a project's environmental effects.

Very truly yours, WILSON IHRIG

Jack Meighan Associate

meighan - updated wildflower noise analysis.docx

 $^{^{10} \, \}underline{\text{https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123} \, \underline{\text{0.pdf}}$









JACK MEIGHAN

Associate

Jack joined Wilson Ihrig in 2021 and is an experienced acoustics engineer with expertise in projects involving rail transit systems, highways, CEQA analysis, environmental noise reduction, mechanical drawing reviews, and construction noise and vibration mitigation. He has hands-on experience with project management, including client coordination and presentations, as well as in designing, developing, and testing MATLAB

code used in acoustics applications. Additionally, his expertise includes taking field measurements, developing test plans and specifying, purchasing, setting up and repairing acoustic measurement equipment. He has experience in using Traffic Noise Model (TNM), CadnaA, EASE, Visual Basic, LabView, and CAD software.

Education

B.S. in Mechanical Engineering, University of Southern California, Los Angeles, CA

Project Experience

Metro Regional Connector, Los Angeles CA

Planned, took, and processed measurements as part of a team to determine the effectiveness of floating slab trackwork for a new subway in downtown Los Angeles that travels below the Walt Disney Concert Hall and the Colburn School of Music.

1-14 cont.

Rodeo Credit Enterprise CEQA Analysis for New Construction, Palmdale, CA

Wrote an accepted proposal and executed it for a noise study project to determine noise mitigation requirements on a new housing development. Led all aspects of the project and managed the budget during all phases of project completion. Completed 5 separate projects of this type for this developer.

Blackhall Studios, Santa Clarita, CA

Led the vibration measurement effort for a new soundstage directly adjacent to an existing freight and commuter rail line. Tested equipment, processed data, and analyzed results to determine the vibration propagation through the soil to the proposed soundstage locations, and was part of the team that developed mitigation techniques for the office spaces directly next to the rail line.

Octavia Residential Condos CEQA Study, San Francisco, CA

Calculated the STC ratings for the proposed windows to meet Title 24 requirements, modeled the acoustic performance of floor and ceiling structures, researched noise codes, helped with a mechanical design review, and wrote a report summarizing the results for a new Condominium project being developed in San Francisco.

San Diego International Airport Terminal I Replacement, CA

Conducted interior noise and vibration measurements, analyzed measurement data to help determine project criteria, modeled the existing and future terminals in CadnaA, and was part of a team that did a complete HVAC analysis of the entire terminal, as part of a CEQA analysis where a new terminal for the airport is being designed.



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Five Points Apartments Noise Study, Whittier, CA

Took measurements, researched sound data and solutions, and recommended mitigation for a new apartment complex that was located next to an existing car wash, as part of a CEQA review.

USC Ellison Vibration Survey, Los Angeles, CA

Conducted vibration measurements as part of a survey to determine the effectiveness of vibration isolation platforms that are used to insulate cell growth in a cancer research facility. Determined the effectiveness and presented this information to the client. Researched and recommended a permanent monitoring system so the client could view data in real time.

TEN50 Condos 'Popping' Noise Investigation, Los Angeles, CA

Was part of a team that investigated the noise source of an unwanted popping noise in luxury condos in Downtown Los Angeles. Helped isolate the noise source location with accelerometers to determine where vibrations were occurring first and used an acoustic camera to determine where in the condo the noise was coming from.

2000 University Project, Berkely, CA

Wrote a construction noise monitoring plan based on environmental noise calculations, wrote a report summarizing the results, and attending a meeting with the client to discuss options.

Bay Area Rapid Transit (BART) On-Track, CA, San Francisco Bay Area, CA*

Day to day project manager, responsible for meetings, presentations, and coordination with the client for an ongoing noise study on the BART system. Developed MATLAB code to process measurements and determine areas where high corrugation was present, contributing to excessively high in-car noise levels. Performed noise measurements inside both the right of way and the vehicle cabin, in addition to rail corrugation measurements.

California I-605/SR-60 Interchange Improvement, Los Angeles, CA*

Developed a noise model of the area that predicted sound levels for abatement design, in addition to conducting noise measurements and analysis. Led the Team in use of the FHWA Traffic Noise Model Software for the project, involving three major highways and two busy interchanges extending over 17 miles in southern California.

Sound Transit On-Track, Seattle, WA*

Took measurements, fixed equipment, and developed software in MATLAB to process Corrugation Analysis Trolley measurements as part of an ongoing noise study on the Sound Transit Link system. Tested vibration data to determine the best measurement and processing techniques to store the data in an online database for in-car measurements.

LA Metro CRRC Railcar Testing, Los Angeles, CA*

Led the effort to plan the measurements, determine measurement locations and finalize the test plan. Formulated a method to capture speed data directly from legacy train vehicles. Executed noise and vibration specification measurements for new rail cars delivered by CRRC.

City of Los Angeles, Pershing Square Station Rehabilitation Noise Monitoring, CA*
Built noise models, wrote a construction noise plan, and assisted in on-site construction noise issues as they arose for a renovation of the Pershing Square metro station in downtown Los

 st Work done prior to working for Wilson Ihrig





WILSON IHRIG Jack Meighan – Page 3

Angeles. Trained construction personnel in techniques for noise reduction and how to conduct noise monitoring measurements to meet project specifications.

City of Orange Metrolink Parking Garage Construction Monitoring, CA*

Wrote an adaptive management vibration monitoring plan, set up equipment to monitor live vibration levels, and generated weekly reports as part of an effort to build a new parking garage. Designed, planned, and completed measurements to predict and mitigate pile driving construction impacts at three historic building locations adjacent to the construction site. Coordinated with the client whenever an on-site problem arose.

LA Metro Westside Subway Construction, Los Angeles, CA*

Planned, organized, and processed noise measurements for the Purple Line extension construction. Implemented both long term microphones to measure noise levels and accelerometers to measure vibration levels in existing subway tunnels. Oversaw noise monitoring at sensitive construction sites for the project and worked with the contractor to find ways to reduce construction noise levels by approximately 10dB.

1-14 cont.

Montreal Réseau Express Métropolitain, Canada*

Conducted vibration propagation measurements used to create models to predict operational vibration levels for an under-construction transit line. Managed equipment, solved problems in the field, and wrote parts of the report summarizing the findings of the acoustic study.

NHCRP Barrier*

Took on-highway measurements and wrote, designed, developed, and tested MATLAB code to identify specific spectrograms to use for analyses for a project evaluating barrier reflected highway traffic noise differences in the presence of a single absorptive or reflective noise barrier.

Siemens Railcar Testing for Sound Transit, Seattle, WA*

Measured in-car noise and vibration for new rail cars delivered by Siemens. Developed new internal techniques for measurements based on the written specifications. Contributed to the team that helped identify issues that new cars had in meeting the Sound Transit specifications for noise and vibration. Participated in developing the test plan and specified then acquired new equipment for the measurement.

Toronto/Ontario Eglinton Crosstown Light Rail, Final Design, Canada*

Assisted in vibration propagation measurements, analysis, and recommendations for mitigation for a 12-mile light-rail line both on and under Eglinton Avenue. Set up and ran equipment for at-grade measurements with an impact hammer for underground measurements with an impact load cell that was used during pre-construction borehole drilling.

 st Work done prior to working for Wilson Ihrig



LETTER 1: CONTRA COSTA RESIDENTS FOR RESPONSIBLE DEVELOPMENT (ADAMS BROADWELL JOSEPH & CARDOZO)

Response to Comment 1-1

The comment provides background information and is introductory to the remainder of the comment letter. Responses to the specific concerns summarized within the comment are addressed in detail below.

Response to Comment 1-2

The Housing Element EIR is a program-level EIR. According to CEQA Guidelines Section 15168(a), a program-level EIR is an EIR that may be prepared on a series of actions that could be characterized as one large project and are related either: 1) geographically; 2) as logical parts in the chain of contemplated actions; 3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The programmatic level of CEQA analysis was appropriate based on criterion 1 through 3 above, as well as due to the fact that site-specific details, including development proposals or technical studies, were not available. Nonetheless, the Housing Element EIR does provide a project-level analysis where possible, including for issues related to project-level construction, operational emissions, and VMT.

CEQA Guidelines Section 15183 does not require a "project-level" analysis but, rather, an examination of whether a proposed project would result in environmental effects peculiar to the project or project site from what was addressed in the Housing Element EIR. Because the Housing Element EIR addresses air quality, health risks, transportation, and noise impacts, the 15183 Consistency Memorandum appropriately addresses whether the proposed project would result in any peculiar effects related to such. In addition, contrary to the comment, the 15183 Consistency Memorandum does include specific sections discussing potential impacts related to air quality, including health risks, and transportation on pages 12 and 13, respectively.

Response to Comment 1-3

Contrary to the comment, the 15183 Consistency Memorandum clearly describes the applicable policies and mitigation measures from the Housing Element EIR. For example, as discussed on page 11, the City would require compliance with Mitigation Measure AIR-3a of the Housing Element EIR as a Condition of Approval, which would ensure impacts related to exposing sensitive receptors to substantial pollutant concentrations would not be peculiar. In addition, page 13 of the 15183 Consistency Memorandum includes the following:

According to the Housing Element EIR, implementation of General Plan policies, such as Policy 11.7.2(c) and 11.7.2(d) (which were updated as part of the Housing Element Update), would comply with Options A and B of the BAAQMD's recommended plan-level thresholds of significance and ensure that future development would not result in a cumulatively considerable contribution to global climate change. Finally, implementation of existing General Plan Policies 7.4.2, 10.6.2, 10.7.2, 10.8.2, and Housing Element Policy 4.1 would help to reduce GHG emissions from transportation, energy use, and water use.



Response to Comment 1-4

In response to the comment, page 12 of the 15183 Consistency Memorandum is hereby revised as follows:

Transportation

Pursuant to Mitigation Measure TRANS-1 as set forth in the Housing Element EIR, individual housing project development proposals that do not screen out from a VMT impact analysis are required to provide a quantitative VMT analysis; however, the Housing Element EIR provides that any project that meets the screening criteria set forth in the Housing Element EIR is exempt from CEQA is not required to conduct a VMT analysis pursuant to Mitigation Measure TRANS-1. The screening criteria set forth in the Housing Element EIR include, but are not limited to, proximity to a major transit stop and projects located in low VMT areas. As shown in Figure IV.B-6 of the Housing Element EIR, the project site is located within a Transit Priority Area, defined by the Housing Element EIR as the 0.5-mile (walking radius) surrounding the City's Bay Area Rapid Transit (BART) and Amtrak stations. In addition, the project site is identified as Sites 158 through 161 by the Housing Element, which are shown in Figure IV.B-6 of the Housing Element EIR as having VMT below the significance threshold under the 2020 and 2040 scenarios, which include buildout of the City in addition to the development anticipated by the Housing Element through the horizon years 2020 and 2040. Based on such, the proposed project would be considered to screen out from a VMT impact analysis and would not be anticipated to result in a significant VMT impact. As demonstrated through this 15183 Consistency Memorandum, the proposed project would not result in a significant impact that is peculiar to the project or project site, a significant effect that was not previously identified in the Housing Element EIR, or a substantially more severe significant effect related to transportation beyond what was identified in the Housing Element EIR. Therefore, pursuant to Section 15183 of the CEQA Guidelines, the proposed project qualifies for exemption from further environmental review under CEQA. Because the proposed project would meet the screening criteria set forth in the Housing Element EIR and not be anticipated to result in a significant VMT impact, be considered exempt, Mitigation Measure TRANS-1 is not applicable. Thus, the proposed project would not result in a significant impact that is peculiar to the project or the project site, was not identified as a significant effect in the Housing Element EIR, and would not result in a more severe adverse impact than the significant effects previously identified within the Housing Element EIR.

The above changes do not modify the overall conclusion of the 15183 Consistency Memorandum that, pursuant to CEQA Guidelines Section 15183, additional environmental review under CEQA is not required for the proposed project.

Response to Comment 1-5

Please see Response to Comment 1-2 above.

Response to Comment 1-6

Mitigation Measures AIR-1 and AIR-2 are not required for all future housing proposals, but, rather, only for projects that exceed the Bay Area Air District's (BAAD) screening criteria. It should be noted that BAAD was formerly known as the Bay Area Air Quality Management District (BAAQMD) and is referred to as such in both the Housing Element EIR and the 15183 Consistency Memorandum. As discussed on page IV.C-14 and IV.C-15 of the Housing Element EIR, "...BAAQMD recommends using their project-level thresholds of significance to identify levels at which individual projects could cause significant air quality impacts related to emissions of ozone precursors (ROG and NO_x), PM₁₀, PM_{2.5}, and TACs." The screening criteria set forth by BAAD include the number of units for typical residential development types that, if exceeded,



would result in emissions that would exceed the BAAD's project-level thresholds of significance. Because, as explained in the 15183 Consistency Memorandum, the project is below the screening criteria, the project's emissions are expected to be below the applicable threshold of significance and, thus, implementation of Mitigation Measures AIR-1 and AIR-2 of the Housing Element EIR is not required.

Mitigation Measure AIR-3(b) is specific to residential emergency generators, as, according to the Housing Element EIR, generators could substantially contribute to the existing poor air quality in the City and expose sensitive receptors to substantial pollutant concentrations. As stated in the 15183 Consistency Memorandum, the proposed project would not include emergency generators and, thus, is not subject to Mitigation Measure AIR-3(b).

Mitigation Measure AIR-3(a) is only required for projects that involve a construction duration greater than six months that are located in a BAAD Planning Healthy Place Map area. The mapped areas are described by the Housing Element EIR on page IV.C-21 as areas with elevated levels of toxic air contaminants (TACs) and/or particulate matter pollution. As stated in the 15183 Consistency Memorandum, a portion of the project site is located within a BAAD Planning Healthy Place Map area defined as needing "Best Practices," and project construction is anticipated to take longer than six months. Thus, the proposed project would be subject to Mitigation Measure AIR-3a, which would be included as a Condition of Approval for the project imposed by the City. AIR-3a, as stated in the 15183 Consistency Memorandum and presented on page IV.C-22 of the Housing Element EIR, requires that one of two measures be implemented, as well as the preparation of a Construction Emissions Minimization Plan. The Housing Element EIR specifically concluded on page IV.C-23 that "implementation of Mitigation Measures AIR-3a and AIR-3b would ensure that impacts from future residential development under the Project would be less than significant related to plan- and project-level generation of TACs and PM_{2.5}." Mitigation Measure AIR-3a would be considered a uniformly applicable development policy or standard identified by the Housing Element EIR to substantially mitigate impacts associated with buildout of the Housing Element. With compliance with Mitigation Measure AIR-3a, pursuant to CEQA Guidelines Section 15183(f), the project's impacts associated with exposure of sensitive receptors to substantial pollutant concentrations would not be considered peculiar. Because impacts related to exposure of sensitive receptors to substantial pollutant concentrations are not peculiar to the project site or project, in accordance with Section 15183(c) of the CEQA Guidelines, the proposed project qualifies for exemption from further environmental review under CEQA. The comment does not provide any substantial new information to suggest that, pursuant to CEQA Guidelines Section 15183(b)(4), the project's impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be more severe than discussed in the Housing Element EIR.

Page 11 of the 15183 Consistency Memorandum also notes: "In addition, the proposed project would be subject to the same regulations governing criteria air pollutants and emissions as were identified for the development projects evaluated in the Housing Element EIR." Such regulations include the BAAD's dust control measures to be implemented during construction, as enforced by General Plan Policy 10.6.2(a), and measures sourced from the BAAD 2017 Clean Air Plan. As noted on page IV.C-18 of the Housing Element EIR, BAAD considers implementation of best management practices (BMPs) to control dust during construction sufficient to reduce potential impacts to a less-than-significant level. Thus, the 15183 Consistency Memorandum provides sufficient supporting evidence that the project's compliance with all applicable regulations would ensure that the proposed project would not result in a significant impact that is peculiar to the project or the project site and would not result in a more severe adverse impact than the significant effects previously identified within the Housing Element EIR.



Response to Comment 1-7

Please see Response to Comment 1-6.

Response to Comment 1-8

Please see Response to Comment 1-2. The proposed project is consistent with the General Plan land use and zoning designations for the project site and, thus, was considered as part of the Housing Element EIR's analysis. The Housing Element EIR concluded that compliance with General Plan Policy 11.8.2 would be sufficient to reduce potentially significant noise impacts to less-than-significant levels. Thus, General Plan Policy 11.8.2 is a uniformly applicable development policy identified by the Housing Element EIR as being sufficient to substantially mitigate impacts associated with buildout of the Housing Element related to noise. The proposed project would be subject to all measures and standards within Policy 11.8.2. For example, as discussed in further detail in Response to Comment 1-11, construction noise would be mitigated by Policy 11.8.2's requirements related to limited hours, noise reduction features, and the preparation and implementation of a construction-related noise mitigation plan. A noise attenuation study is not required, as the City has determined that the project would not result in a significant increase in noise and because the project is not located in an area exceeding the General Plan noise standards. Therefore, consistent with the conclusions of the 15183 Consistency Memorandum and pursuant to CEQA Guidelines Section 15183(f), noise associated with the proposed project is not peculiar. With respect to specific aspects of noise impacts, such as operational noise generation, construction noise and vibration, please see Responses to Comments 1-10 through 1-12 below.

Response to Comment 1-9

Please see Response to Comment 1-8. With respect to specific aspects of noise impacts, such as operational noise generation, construction noise and vibration, please see Responses to Comments 1-10 through 1-12 below.

Response to Comment 1-10

The proposed project is consistent with the General Plan land use and zoning designations for the project site and, thus, was considered as part of the Housing Element EIR's analysis. Residential uses are not typically considered significant noise-generating uses. The proposed project does not include any operational noise-generating uses outside of typical residential uses. Typical residential uses include heating, ventilation, and air conditioning (HVAC) units. The Housing Element EIR identifies that, according to the City's General Plan EIR, areas within 50 feet of studied roadways could be exposed to noise levels of approximately 60 dBA CNEL. Because Hillcrest Avenue is located adjacent to the project site, a noise level associated with potential HVAC units on the project site of 53 dB, as cited by the comment, would reasonably not be expected to result in a substantial increase in noise levels in the project vicinity. In addition, any proposed HVAC units would be shielded to reduce noise, as required by the City's adopted Multi-family Residential Objective Design Standards.

The proposed project would be subject to the aforementioned standard, as well as the requirements within General Plan Policy 11.8.2. General Plan Policy 11.8.2 is a uniformly applicable development policy identified by the Housing Element EIR as being sufficient to substantially mitigate impacts associated with buildout of the Housing Element related to noise. For example, as discussed in further detail in Response to Comment 1-11, construction noise would be mitigated by Policy 11.8.2's requirements related to limited hours, noise reduction features, and the preparation of a construction-related noise mitigation plan. Therefore, consistent



with the conclusions of the 15183 Consistency Memorandum and pursuant to CEQA Guidelines Section 15183(f), noise associated with the proposed project is not peculiar.

Response to Comment 1-11

The Housing Element EIR concluded that implementation of the City of Antioch Code of Ordinances and General Plan policies would ensure that the construction of individual residential developments under the Housing Element would not result in a substantial temporary increase in ambient noise levels related to construction activities, and impacts were determined to be less than significant. Specifically, as noted on pages IV.L-11 and IV.L-12 of the Housing Element EIR and pursuant to General Plan Policy 11.8.2, temporary construction periods would be subject to various measures, including the following:

- Construction activities shall be regulated to hours of operation within Section 5-17.05(B)
 of the City of Antioch Code of Ordinances in order to avoid or mitigate noise impacts on
 adjacent noise-sensitive land uses;
- Proposed development adjacent to occupied noise sensitive land uses shall implement a
 construction-related noise mitigation plan that depicts the location of construction
 equipment storage and maintenance areas, and documents methods to be employed to
 minimize noise impacts on adjacent noise sensitive land uses; and
- All construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are at least as effective as those originally installed by the manufacturer.

With respect to the construction-related noise mitigation plan, as noted within General Plan Policy 11.8.2(o), the City shall condition approval of subdivisions located adjacent to any developed/occupied noise-sensitive land uses to submit such a plan for review and approval prior to the issuance of any grading plans. The plan would depict the location of construction equipment and how such equipment noise would be mitigated, including through temporary noise-attenuation fences, equipment mufflers, staging area locations, and limiting construction-related activities (including truck deliveries) to the hours of 7:00 AM and 7:00 PM, Monday through Saturday. Lastly, the construction-related noise mitigation plan shall incorporate any other restrictions imposed by the City. General Plan Policy 11.8.2(o) is a uniformly applicable development policy identified by the Housing Element EIR as being sufficient to substantially mitigate impacts associated with buildout of the Housing Element related to construction noise. The comment does not provide any substantial new information that shows that compliance with General Plan Policy 11.8.2 would not substantially mitigate construction noise. General Plan Policy 11.8.2(o) specifically states, "The construction contractor shall use temporary noise-attenuation fences, where feasible, to reduce construction noise impacts on adjacent noise sensitive land uses." The proposed project would be subject to such measures, which the Housing Element EIR concluded would be sufficient to reduce project construction noise to a less-than-significant level. Therefore, pursuant to CEQA Guidelines Section 15183(f), construction noise associated with the proposed project is not peculiar and the 15183 Consistency Memorandum's conclusion is appropriate.

It should be noted that Comment 1-14 uses the Los Angeles County construction noise limit threshold of 75 dBA, which is inapplicable to the proposed project (located in the City of Antioch within Contra Costa County). The City does not have an established daytime noise level threshold for construction, but does limit the hours of construction within Section 5-17.05(B) of the Antioch Code of Ordinances, as enforced by General Plan Policy 11.8.2.



Because the proposed project is consistent with the type of on-site development anticipated by the Housing Element EIR, which concluded that compliance with the standards contained within the City of Antioch Code of Ordinances and with the applicable General Plan policies would be sufficient to ensure potential impacts related to noise would be less than significant, the 15183 Consistency Memorandum's conclusion that noise associated with the proposed project would not be peculiar remains adequate.

Response to Comment 1-12

As discussed on page IV.L-15 of the Housing Element EIR, the requirement for a screening level vibration analysis is based specifically on the use of impact pile drivers during construction. The use of pile drivers is generally required for the construction of deep foundations, bridges, docks, or skyscrapers, or excavations associated with temporary retaining walls. Pile drivers are not typically used for standard residential developments; therefore, the requirements of Policy 11.8.2(k) would not be required for the proposed project. Thus, consistent with the conclusions within the 15183 Consistency Memorandum, the proposed project would not result in any peculiar impacts related to noise.

Response to Comment 1-13

Please see Responses to Comments 1-2 through 1-12 above.

Response to Comment 1-14

Please see Responses to Comments 1-8 through 1-12 above.



ATTACHMENT "F"

CITY OF ANTIOCH PLANNING COMMISSION REGULAR MEETING

Regular Meeting July 16, 2025 6:30 p.m. City Council Chambers

1. CALL TO ORDER

Chairperson Webber called the meeting to order at 6:30 P.M. on Wednesday, July 16, 2025, in Council Chambers. He welcomed Commissioner Spijker to the Planning Commission.

Planning Manager Merideth introduced Commissioner Spijker and welcomed him to the Planning Commission.

2. ROLL CALL

Present: Commissioners Spijker, Martin, Riley, Perez, Vice Chairperson Jones and

Chairperson Webber

Absent: Commissioner Suman

Staff: Interim City Attorney, Derek Cole

Planning Manager, Zoe Merideth

Minutes Clerk, Kitty Eiden

3. PLEDGE OF ALLEGIANCE

Chairperson Webber led the Pledge of Allegiance.

- 4. **PUBLIC COMMENT** None
- 5. CONSENT CALENDAR
- 5-1 Planning Commission Meeting Minutes June 4, 2025

On motion by Commissioner Martin, seconded by Commissioner Riley the Planning Commission members present unanimously approved Item 5-1. The motion carried the following vote:

AYES: Spijker, Martin, Riley, Perez, Jones and Webber

NOES: None ABSTAIN: None ABSENT: Suman

6. NEW PUBLIC HEARING

6-1. Wildflower Station Townhomes 2 | TM-02, AR-23-05 | Northeast corner of Hillcrest Avenue and Wildflower Drive (APN: 052-140-013, 014, 015, and 016) The applicant, Kathryn Watt on behalf of DeNova Homes, Inc., is seeking approval of a Vesting Tentative

Subdivision Map and Design Review for the creation of 19 residential lots and 17 common area parcels for 159 multifamily townhome units in 19 buildings on a +/- 7.93-acre site. The project includes an internal road network, open space, landscaping, stormwater facilities, and utilities to serve the project site.

Interim City Attorney Cole announced that the City and Commission had received correspondence from a law firm regarding this agenda item. He stated that staff, the consultant, and himself request additional time to review and respond to the issues raised. On their behalf, he asked the Planning Commission to continue the Public Hearing to August 20, 2025. He also noted that the applicant's general counsel did not oppose the continuance. He requested the Planning Commission allow for public comment on the agenda item as well as the recommended action to continue the Public Hearing.

Chairperson Webber opened the public comment period.

Mauricio Ulloa, Wildflower Station Place Homeowners Association (HOA), thanked DeNova for incorporating resident feedback into the revised proposal to help address ongoing challenges related to security. He confirmed that the HOA accepted the offer to contribute their fair share toward the maintenance of fencing and gates.

Chairperson Webber closed the public comment period.

On motion by Commissioner Jones, seconded by Commissioner Martin the Planning Commission members present unanimously continued Public Hearing Item #6-1 to August 20, 2025. The motion carried the following vote:

AYES: Spijker, Martin, Riley, Perez, Jones and Webber

NOES: None ABSTAIN: None ABSENT: Suman

6-2. Slatten Ranch Town Homes | TM-01, AR-23-01 | North of Wicklow Way, East of Slatten Ranch Road, and West of Empire Avenue (APN: 056-120-098) The applicant, Kathryn Watt on behalf of DeNova Homes, Inc., is seeking approval of a Vesting Tentative Subdivision Map and Design Review for the creation of 17 residential lots and 13 common area parcels for 129 multifamily townhome units in 17 buildings on a +/- 6.41-acre site. The project includes an internal road network, open space, landscaping, stormwater facilities, and utilities to serve the project site.

Interim City Attorney Cole announced that the City and Commission had received correspondence from a law firm regarding this agenda item. He stated that staff, the consultant, and himself requested additional time to review and respond to the issues raised. On their behalf, he asked the Planning Commission to continue the Public Hearing to August 20, 2025. He requested the Planning Commission allow for public comment on the agenda item as well as the recommended action to continue the Public Hearing.

Chairperson Webber opened and closed the public comment period with no members of the public requesting to speak.

On motion by Commissioner Martin, seconded by Commissioner Jones the Planning Commission members present continued Public Hearing Item #6-2 to August 20, 2025. The motion carried the following vote:

AYES: Spijker, Martin, Riley, Perez, Jones and Webber

NOES: None ABSTAIN: None ABSENT: Suman

7. ORAL/WRITTEN COMMUNICATIONS

Planning Manager Merideth reported on her attendance at a Planning Directors meeting, and she provided an update on new California Environmental Quality Act (CEQA) laws. She announced the City had received responses to their RFP for the General Plan Update and staff was in the process of evaluating and interviewing firms and anticipated bringing a contract to Council for consideration soon.

8. COMMITTEE REPORTS

Commissioner Jones reported on her attendance at the TRANSPLAN Committee meeting.

9. NEXT MEETING: August 6, 2025

Planning Manager Merideth announced that the August 6, 2025, Planning Commission meeting would likely be canceled, and the next Planning Commission meeting would be held on August 20, 2025.

10. ADJOURNMENT

On motion by Commissioner Martin, seconded by Commissioner Jones, the Planning Commission members present unanimously adjourned the meeting at 6:51 P.M. The motion carried the following vote:

AYES: Spijker, Martin, Riley, Perez, Jones and Webber

NOES: None ABSTAIN: None ABSENT: Suman

Respectfully submitted:

<u>Kítty Eíden</u> KITTY EIDEN, Minutes Clerk