PRIORITY AREA 1 (PA-1) SPECIFIC PLAN EIR ADDENDUM

INTRODUCTION

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the Priority Area 1 (PA-1) Specific Plan Project (State Clearinghouse No. 2018042064), which was certified by the City of Brentwood on November 13, 2018 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum analyzes proposed modifications (the Modified Project) to the PA-1 Specific Plan Project approved in 2018, and demonstrates that all of the potential environmental impacts associated with the proposed modifications would be within the envelope of impacts already evaluated in the Certified EIR.

CEQA AUTHORITY FOR ADDENDUM

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

> *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

Section 15162 of the CEQA Guidelines requires a Subsequent EIR when an MND has already been adopted or an EIR has been certified and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the

project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein, the Modified Project would not result in any new additional significant impacts, nor would it substantially increase the severity of previously anticipated significant impacts. Rather, all of the impacts associated with the Modified Project are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Based on this determination, the Modified Project does not meet the requirements for preparation of a Subsequent or Supplemental EIR pursuant to Section 15162 of the CEQA Guidelines.

OVERVIEW OF APPROVED PROJECT

The Certified EIR evaluated the adoption and implementation of the PA-1 Specific Plan. The PA-1 Specific Plan Area is defined as the approximately 431.27-acre area in the northwestern portion of the City of Brentwood, designated as PA-1 by the General Plan. The Specific Plan Area is located south of Lone Tree Way, west of Shady Willow Lane, generally north of Sand Creek, and east of Heidorn Ranch Road. State Route 4 (SR 4) traverses the Specific Plan Area from north to south and bisects the area nearly in half. An existing East Bay Municipal Utilities District (EBMUD) aqueduct crosses the Specific Plan Area from east to west on the western side of SR 4, and from northwest to southeast on the eastern side of SR 4. Existing uses within the Specific Plan Area include vacant land, agricultural fields, ranchette homes, churches, and commercial uses (including Lone Tree Plaza and Brentwood Station).

The overall purpose of the PA-1 Specific Plan is to identify the community's vision for the future growth, development, and conservation of open space and resources within the Specific Plan Area in a manner consistent with the quality of life desired by residents and businesses. The PA-

1 Specific Plan contains detailed development standards, distribution of land uses, infrastructure requirements, and implementation measures for the development of a specific geographic area.

These land use distributions, development standards, and regulations are critical components of a specific plan, since it is through these standards that the goals and policies of the General Plan are implemented.

A specific plan is similar in nature to the zoning ordinance because it deals with implementation through the use of development regulations. Unlike the citywide zoning ordinance, however, specific plans are targeted to specific planning areas. This allows for greater flexibility and provides an opportunity to focus regulations and standards on the goals of a specific geographic area. This is the primary purpose of a specific plan, which provides a mechanism to target implementation measures toward a specific planning area. In addition, detailed, project-level environmental review (as is the case of the City's plans for PA-1) can provide streamlining benefits for future development within the respective specific plan area.

Full buildout of the Specific Plan Area could accommodate up to 2,041 dwelling units (DU) (for a maximum residential population of 4,569 persons) and up to 3,834,086 square feet (SF) of non-residential uses (for a maximum non-residential population of 8,383 employees). Table 1 below provides a specific breakdown of development potential within PA-1, which was the subject of analysis in the Certified EIR.

TABLE 1: APPROVED PROJECT GROWTH PROJECTIONS

LAND USE	*ACRES*	*DU*	*NON-RES. SF*	*RES. POP.*	*EMP. POP.*	*OFFICE SF*	*NRC SF*	*RC SF*	*BP SF*	*LI SF*
HDR	27.02	405	-	1,297	-	-	-	-	-	-
MFVHDR	40.19	1,005	-	2,010	-	-	-	-	-	-
TV	39.44	631	644,252	1,262	1,933	322,126	322,126	-	-	
RC	8.40	-	164,657	-	299	-	-	164,657	-	-
ECLI	154.33	-	3,025,177	-	6,151	-	-	-	1,815,106	1,210,071
PF	0.99	-	-	-	-	-	-	-	-	-
Transit Station	20.00	-	-	-	-	-	-	-	-	-
Total	*290.37 Acres*	*2,041 DU*	*3,834,086 SF*	*4,569 Persons*	*8,383 Employees*	*322,126 SF*	*322,126 SF*	*164,657 SF*	*1,815,106 SF*	*1,210,071 SF*

NOTES: THE PA-1 SPECIFIC PLAN PROPOSES 86.36 ACRES OF REGIONAL COMMERCIAL (RC) USES. HOWEVER, 77.95 ACRES OF THIS AREA ARE CURRENTLY DEVELOPED. THEREFORE, THE RC GROWTH PROJECTIONS ARE APPLIED TO THE 8.40 ACRES OF UNDEVELOPED RC.
DU = DWELLING UNITS; NON-RES SF = NON RESIDENTIAL SQUARE FEET; RES POP= RESIDENTIAL POPULATION; EMP POP= EMPLOYEE POPULATION; NRC = NEIGHBORHOOD RETAIL COMMERCIAL; RC= REGIONAL COMMERCIAL; BP = BUSINESS PARK; LI = LIGHT INDUSTRIAL.

The PA-1 Specific Plan includes a comprehensive set of goals, policies, and implementation measures, as well as a Land Use Map. The PA-1 Specific Plan includes the following chapters:

- Introduction;
- Existing Conditions;
- Vision;
- Land Use Plan;
- Circulation Plan;
- Private Realm Development;
- Public Realm Development;
- Infrastructure and Public Services;
- Economic Development; and
- Implementation and Administration.

PROPOSED MODIFICATIONS TO THE PROJECT

In November 2018, the Brentwood City Council approved the Priority Area 1 Specific Plan and certified the Environmental Impact Report, setting a foundation for future development to support an employment center that would create new economic development opportunities and future jobs growth within Brentwood.

On October 22, 2019, City Council and Planning Commission held a joint special meeting to receive a report and provide feedback related to the Urban Land Institute (ULI) Technical Assistance Panel's findings and recommendations related to PA-1. One of the objectives of the ULI report was to perform a Master Plan design process for the plan area, including considering updating the PA-1 Specific Plan to reflect any necessary changes as a result of the Master Plan.

The City Council entered into agreement with ELS Architecture and Urban Design ("ELS") to lead the Master Plan design process, including managing a team of consulting experts in the fields of land use, economic analysis, development strategy, civil engineering and marketing. The PA-1 Specific Plan Area and the accompanying Master Plan would effectively be rebranded as the Innovation Center.

Community and stakeholder input have been important components of developing the Master Plan. The City and ELS hosted three virtual town hall meetings with the community, a joint City Council and Planning Commission design workshop on January 13, 2021, in addition to meetings with regional public agency representatives and multiple design input meetings with property owners. The City's project website at www.innovatebrentwood.site includes a record of 400 comments received during the project discovery and presentation of the Master Plan to both the Planning Commission and City Council.

Adopted by the City in 2021, the Innovation Center Master Plan (ICMP) builds upon the foundation of the PA-1 Specific Plan. The ICMP refined the vision for the PA-1 Specific Plan as a next generation employment center with employee experience, health, and collaboration being high priorities. The ICMP refined the acreages attributed to each land use within the PA-1 Specific Plan to better accommodate small scale incubator spaces, large-scale corporate campus

development, and the transit village. However, it is important to note that none of the changes to the PA-1 Specific Plan that were made in response to the ICMP have resulted in increased development capacity beyond what was assumed and described in the 2018 adopted PA-1 Specific Plan. The ICMP also revised the internal circulation network within PA-1 in order to better accommodate the revised land use map and to better enhance the pedestrian-oriented streetscape. The ICMP also incorporated additional open space amenities that meet the goals of the City's Parks, Trails, and Recreation Master Plan, which was updated in 2019, following adoption of the PA-1 Specific Plan.

In summary, the proposed changes to the PA-1 Specific Plan include the following:

LAND USE MAP REVISIONS

The PA-1 Land Use Map has been revised to slightly move the location of some land use designations, and to make minor adjustments to the acreage of some land use designations. The allowed uses and densities established by the land use designations have not changed, with the exception of the addition of Recreational Amenity (RA) as a new designation not included in the Original Project. The RA designation allows for trails corridors, parks and linear parks, and social spaces.

The original land use map, which was analyzed in the Certified EIR, is shown on Figure 1. The Modified Project land use map is shown on Figure 2. The project boundaries are unchanged.

Table 2 shows the acreages of each land use designation in the Original Plan and the Modified Plan.

TABLE 2: LAND USE DESIGNATION ACREAGE COMPARISON

LAND USE DESIGNATION	*ORIGINAL PA-1 ACRES*	*MODIFIED PA-1 ACRES*	*DIFFERENCE*
ECLI	154.33	130.3	-24.1
TV/MU	39.44	24.3	-15.1
RC	8.4	27.2	18.8
MFVHDR	40.19	30.0	-10.2
HDR	27.02	27.7	0.7
PF	0.99	0.0	-1.0
Transit Overlay	20	13.5	-6.5
RA	0	33.0	33.0

The overall development potential, or full buildout, of the Original PA-1 Specific Plan was calculated and analyzed as part of the Certified EIR, as shown in the table below.

TABLE 3: ORIGINAL PA-1 SPECIFIC PLAN BUILDOUT POTENTIAL

LAND USE	*ACRES*	*DU*	*NON-RES. SF*	*RES. POP.*	*EMP. POP.*	*OFFICE SF*	*NRC SF*	*RC SF*	*BP SF*	*LI SF*
HDR	27.02	405	-	1,297	-	-	-	-	-	-
MFVHDR	40.19	1,005	-	2,010	-	-	-	-	-	-
TV	39.44	631	644,252	1,262	1,933	322,126	322,126	-	-	
RC	8.40	-	164,657	-	299	-	-	164,657	-	-
ECLI	154.33	-	3,025,177	-	6,151	-	-	-	1,815,106	1,210,071
PF	0.99	-	-	-	-	-	-	-	-	-
Transit Station	20.00	-	-	-	-	-	-	-	-	-
Total	*290.37 Acres*	*2,041 DU*	*3,834,086 SF*	*4,569 Persons*	*8,383 Employees*	*322,126 SF*	*322,126 SF*	*164,657 SF*	*1,815,106 SF*	*1,210,071 SF*

NOTES: THE ORIGINAL PA-1 SPECIFIC PLAN INCLUDED 86.36 ACRES OF REGIONAL COMMERCIAL (RC) USES. HOWEVER, 77.95 ACRES OF THIS AREA ARE CURRENTLY DEVELOPED. THEREFORE, THE RC GROWTH PROJECTIONS ARE APPLIED TO THE 8.40 ACRES OF UNDEVELOPED RC.
DU = DWELLING UNITS; NON-RES SF = NON RESIDENTIAL SQUARE FEET; RES POP= RESIDENTIAL POPULATION; EMP POP= EMPLOYEE POPULATION; NRC = NEIGHBORHOOD RETAIL COMMERCIAL; RC= REGIONAL COMMERCIAL; BP = BUSINESS PARK; LI = LIGHT INDUSTRIAL.

The overall development potential of the proposed revisions to the PA-1 Specific Plan are shown in the table below.

TABLE 4: MODIFIED PA-1 SPECIFIC PLAN BUILDOUT POTENTIAL

LAND USE	*ACRES*	*DU*	*NON-RES. SF*	*RES. POP.*	*EMP. POP.*	*OFFICE SF*	*NRC SF*	*RC SF*	*BP SF*	*LI SF*
HDR	27.7	416	-	1,330	0	-	-	-	-	-
MFVHDR	30	750	-	1,500	-	-	-	-	-	-
TV/MU	24.3	875	105,851	1,750	318	52,925	52,925			
RC	27.2	-	533,174	0	969			533,174	-	-
ECLI	130.25	-	2,553,161	0	5,191				1,531,896	1,021,264
PF	0	-	-	-	-	-	-	-	-	-
RA	33									
Transit Station	13.5	-	-	-	-	-	-	-	-	-
Total	*286.0*	*2,040*	*3,192,186*	*4,579*	*6,478*	*52,925*	*52,925*	*533,174*	*1,531,896*	*1,021,264*

NOTES: THE MODIFIED PA-1 SPECIFIC PLAN INCLUDES 105.2 ACRES OF REGIONAL COMMERCIAL (RC) USES. HOWEVER, 77.95 ACRES OF THIS AREA ARE CURRENTLY DEVELOPED. THEREFORE, THE RC GROWTH PROJECTIONS ARE APPLIED TO THE 27.2 ACRES OF UNDEVELOPED RC.
DU = DWELLING UNITS; SF = SQUARE FEET; NRC = NEIGHBORHOOD RETAIL COMMERCIAL; BP = BUSINESS PARK; LI = LIGHT INDUSTRIAL.

As shown in the tables above, the Original PA-1 Specific Plan estimated the potential for development of up to 2,041 dwelling units. The proposed changes to the Modified PA-1 Specific Plan could result in the development of up to 2,040 dwelling units. The total residential population yield was originally estimated at 4,569 persons, and with the proposed changes would be estimated at 4,579 persons.

In terms of non-residential, or jobs-generating, development potential, the Original PA-1 Specific Plan was estimated to yield up to 3,834,086 SF of non-residential building square footage, which

was projected to generate up to 8,383 employees. The Modified PA-1 Specific Plan is estimated to yield up to 3,192,186 SF of non-residential building square footage, which is projected to generate up to 6,478 employees.

It is noted that the minor differences in total acreages in the Project Area acres shown in Tables 3 and 4 above are due to discrepancies in GIS data outputs and non-parcelized right-of-way within the Project Area. The Project Area boundaries are unchanged.

CIRCULATION PLAN REVISIONS

The Modified PA-1 Specific Plan includes minor revisions and changes to the configuration of the internal roadway network. The Original Conceptual Circulation Diagram is shown on Figure 3. The Modified Conceptual Circulation Diagram is shown on Figure 4.

SPECIFIC PLAN TEXT REVISIONS

Minor text revisions have been made to the Modified Project in order to properly articulate the City's refined economic development goals, update existing baseline conditions, and improve the clarity of things such as definitions and implementation strategies. None of the text changes would result in new uses or more intense uses than those analyzed in the Certified EIR. Additionally, none of the text changes have altered or removed any Specific Plan policies that would reduce the severity of any environmental impacts. No new policies have been added that have any potential to result in new or more severe impacts to the environment.

ANALYSIS OF PROPOSED MODIFICATIONS

The proposed modifications to the PA-1 Specific Plan are described above. The project area that was studied and analyzed in the Certified EIR is unchanged. The proposed changes under the Modified Project with the greatest potential to result in altered environmental impacts relate to the land use plan and its corresponding development potential. As shown in Tables 3 and 4 above, the residential development potential under the Modified Project is nearly identical in terms of projected dwelling unit counts to the projected residential development levels analyzed in the Certified EIR. The projected employment generation of the Modified Project would decrease slightly when compared to the Original Project, based on a projected yield of up to 3,192,186 SF of non-residential building square footage under full buildout of the Modified Project compared to a projected yield of up to 3,834,086 SF of non-residential building square footage under the Original Project.

The land use designations, including residential densities, non-residential floor area ratios (FARs), and allowed uses would remain essentially unchanged. The only change to the land use designations is the addition of the Recreational Amenity (RA) designation, which facilitates trail connections, parks and linear parks, and social amenities. Urban development is not permitted within this new designation. This RA designation would facilitate additional open space and improved bike and pedestrian connectivity, which is likely to have beneficial environmental impacts.

None of the minor changes associated with the Modified Project have the potential to result in new or more severe environmental impacts than those that were analyzed and disclosed in the

Certified EIR, for which Findings of Fact and a Statement of Overriding Considerations were adopted by the City Council. Thus, a new or substantially greater significant impact would not result from the proposed modifications. In addition, all of the mitigation measures included as part of the Certified EIR would continue to be implemented, as would the relevant policies and actions in the Brentwood General Plan, which are identified in the Certified EIR. As all of the impacts associated with the Modified Project would be within the envelope of impacts identified in the Certified EIR, no additional environmental analysis pursuant to Section 15162 of the CEQA Guidelines is necessary.

Figure 1- Original PA-1 Land Use Map

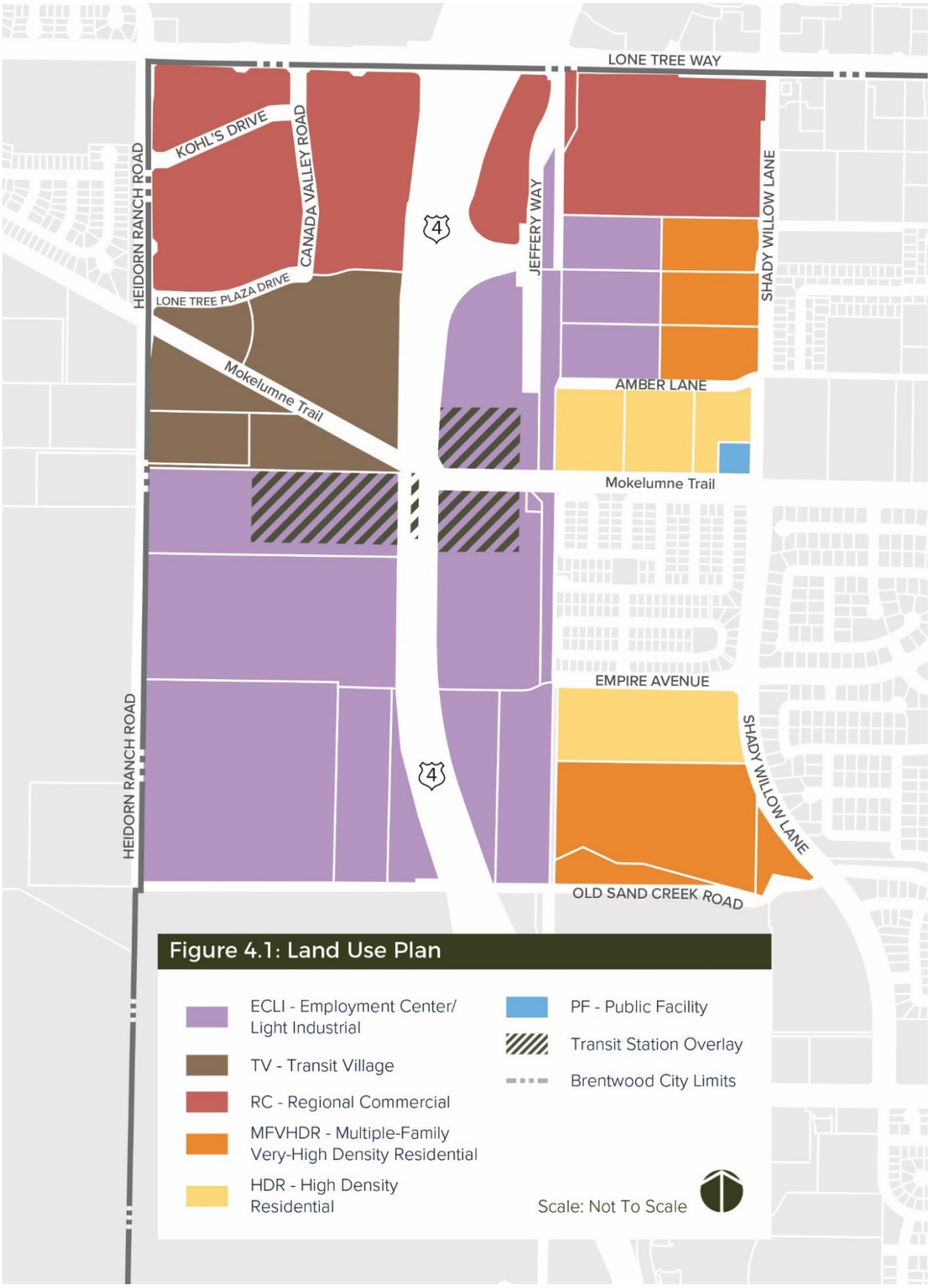

Figure 2- Modified PA-1 Land Use Map

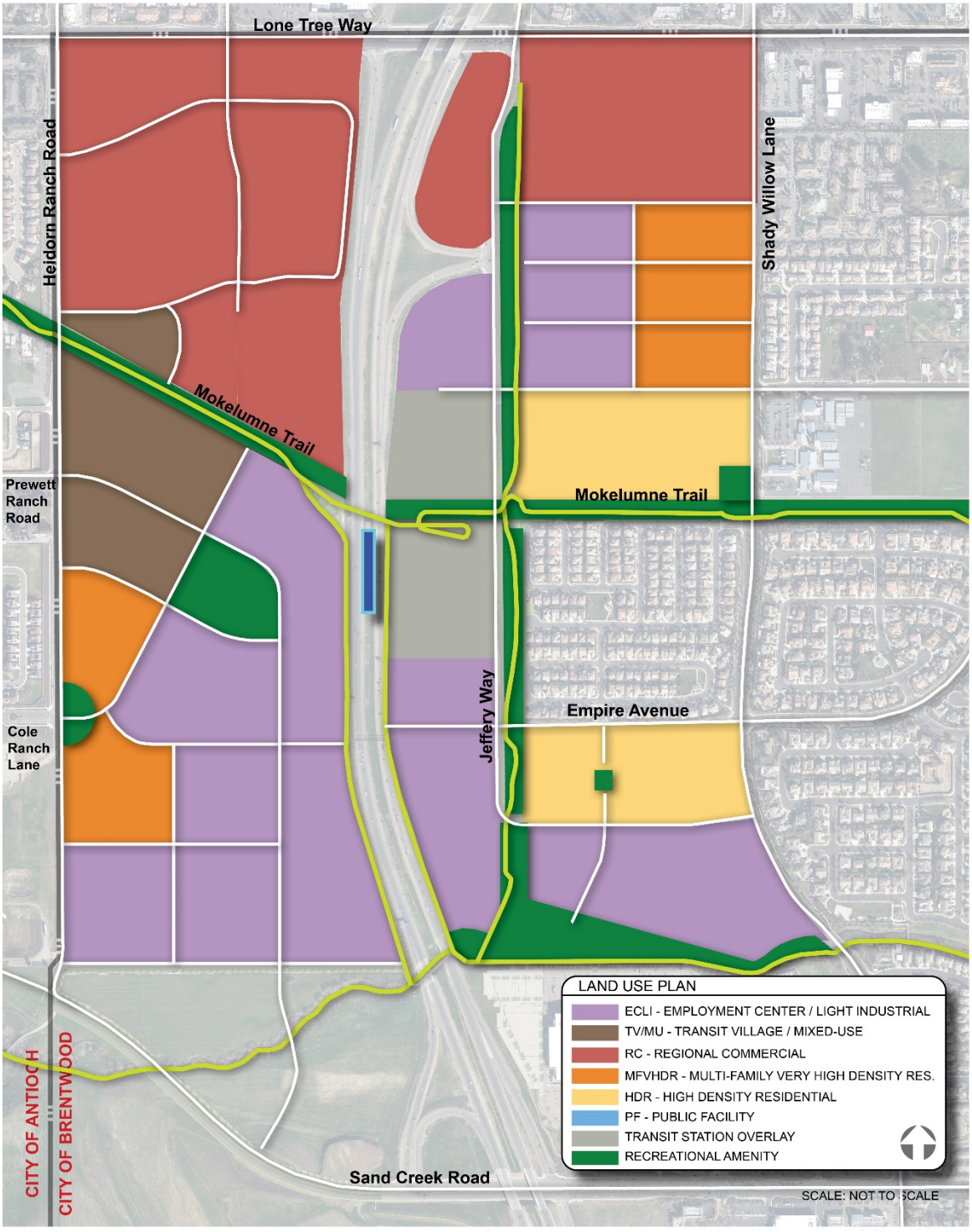

Figure 3- Original Conceptual Circulation Diagram
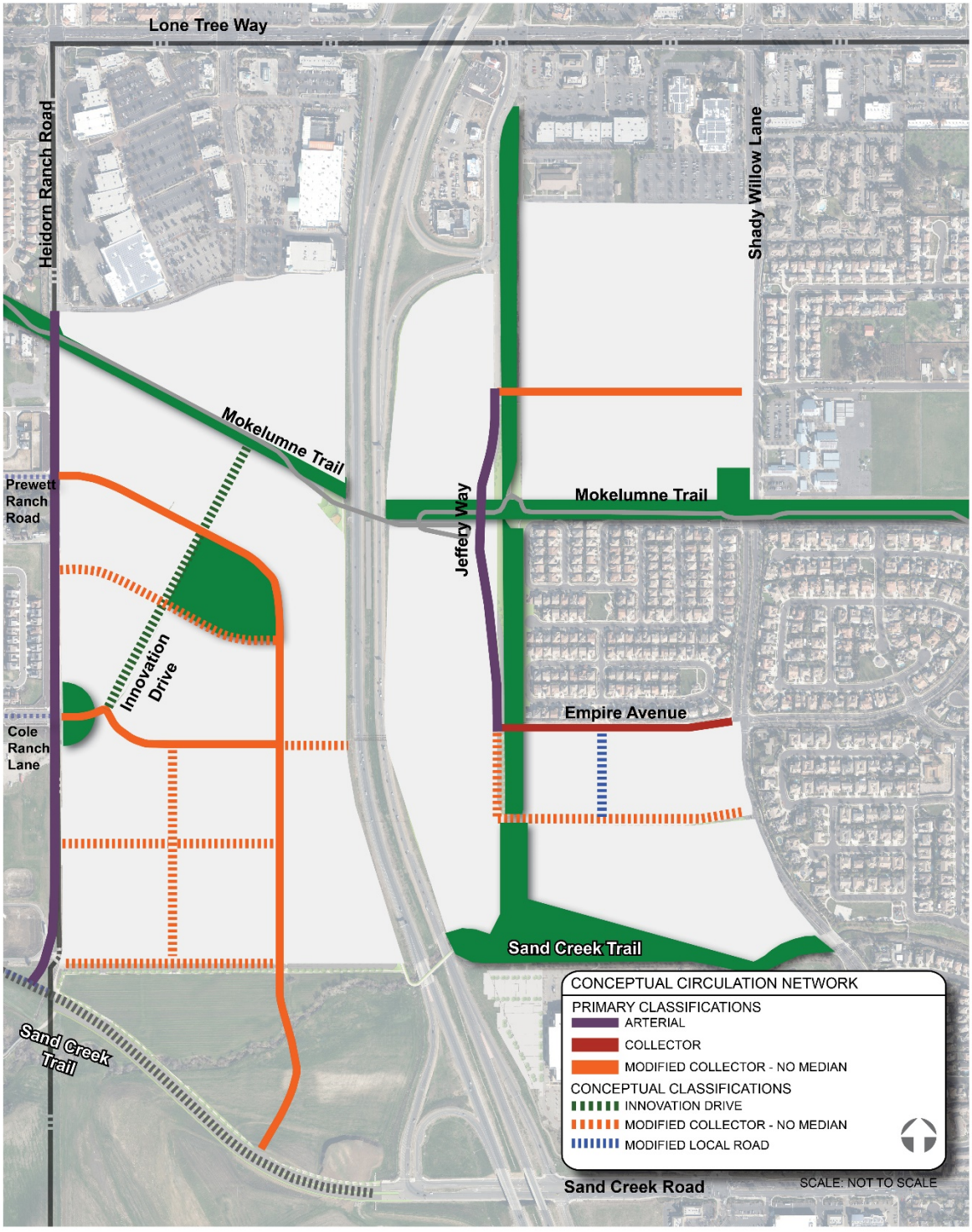
Figure 4- Modified Conceptual Circulation Diagram