California Environmental Quality Act
Initial Study
Pittsburg Technology Park

April 2020

Prepared For:
City of Pittsburg
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Pittsburg, CA 94565

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List of Acronyms and Abbreviations

Acronym	Name
ASTM	American Society of Testing & Materials
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMP	Best Management Practice
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CCWD	Contra Costa Water District
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
ConFire	Contra Costa Fire Protection District
CPUC	California Public Utilities Commission
CRAH	Computer Room Air Handling
DDSD	Delta Diablo Sanitation District
HCP/NCCP	East Contra Costa County Habitat Conservation Plan / Natural Community Conservation Plan
EDS	Energy Delivery Solutions, LLC (Applicant)
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
FAR	Floor Area Ratio
GHG	Greenhouse Gas
IP-P	Industrial Park with a Master Plan Overlay
IT	Information Technology
LID	Low Impact Development
MAU	Makeup Air Units
MRP	Municipal Regional Permit
MRZ	Mineral Resource Zone
MW	Megawatt
NPDES	National Pollutant Discharge Elimination System
OS	Open Space
OSHA	Occupational Health and Safety Administration
PG&E	Pacific Gas & Electric
PM-2.5	Fine Particulate Matter
PM-10	Particulate Matter
PMC	Pittsburg Municipal Code
POA	Property Owners' Association
PUSD	Pittsburg Unified School District
RWQCB	Regional Water Quality Control Board
SCP	Stormwater Control Plan
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
TIS	Traffic Impact Study
TTCP	Temporary Traffic Control Plan

UPS	Uninterruptable Power Supplies
USACE	United States Army Corps of Engineers

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1.0 INTRODUCTION

1.1 Project Overview

Energy Delivery Solutions, LLC (EDS) ("Applicant"), has submitted an application to the City of Pittsburg ("City") requesting entitlements to facilitate future construction, operation and maintenance of the Pittsburg Technology Park, a data center campus comprised of multiple data center buildings with appurtenant access roads, landscaping, ancillary support infrastructure, and open spaces (collectively the "Proposed Project" or "Project"). The Project is proposed on an approximately 105-acre site ("Site") encompassing Assessor's Parcel Numbers (APN) 095-150-032, 094-080-011, 095-160-001, and 095-160-002 and portions of APNs 094-090-001 and 094-080-002. Lot line adjustments are proposed to reflect site boundaries within APNs 094-090-001 and 094-080-002. The Site location and parcels are shown in Figures 1 and 2. The Site comprises a portion of the former Delta View Golf Course owned by the City. The Applicant has entered into an option agreement with the City for the potential acquisition and development of the Site following the necessary environmental review for the Project and dependent upon receiving required permit approvals.

The data center buildings would include data halls and support spaces. Data halls would house the equipment necessary for information technology (IT) operations such as computers, servers, storage hardware, cables, racks and communications equipment. Support spaces would house staff accommodations, equipment, and other support needs. At full buildout, the Proposed Project could include up to 4.5 million square feet of floor space, which would be the upper limit and may not be reached. Each data center building would be up to 50 feet tall, excluding rooftop equipment and parapet walls. Development would be completed in phases to meet market conditions over an estimated 15 or more years, with construction of the initial phase beginning in 2021.

The Project would require an amendment to the City's General Plan and Zoning Ordinance (Pittsburg Municipal Code [PMC] Title 18) to change the adopted General Plan land use designation from *Park* to *Industrial,* and to change the zoning of the property from OS (Open Space) District to IP-P (Industrial Park with a Master Plan Overlay) District. EDS and the City are working together to create subsequent documents necessary for the Project. These include a Master Plan, a vesting tentative subdivision map, and a development agreement. The Master Plan is currently being developed. The Master Plan will provide development requirements for the phased buildout of the data center campus. Each phase of development would be subject to City staff review to ensure consistency with the Master Plan and the Project's environmental analysis prepared pursuant to the California Environmental Quality Act (CEQA). Tree removal, grading and construction/building permits from the City would also be needed for each phase of development. Certain aspects of the Project would also require permits or approvals from the Bay Area Air Quality Management District (BAAQMD), Contra Costa Water District (CCWD), Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), the U.S. Army Corps of Engineers (USACE), and the National Park Service.

1.2 California Environmental Quality Act

The Project, the Master Plan, and the approval requests being considered by the City constitute a "project" as defined by CEQA (Public Resources Code, Section 21000 *et seq*.) and the "CEQA

Guidelines" (California Code of Regulations, Title 14, Section 15000 *et seq*.), and are thereby subject to the requirements of CEQA as a whole. For purposes of CEQA, the term "project" refers to the whole of an action which has the potential to result in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378). As the principal public agency that would be responsible for approval of the Project, the City is the "lead agency" overseeing and administering the CEQA environmental review process.

As set forth in various provisions of the CEQA Statute, before deciding whether to approve a project, public agencies must consider the potential significant environmental impacts of the project and must identify feasible measures to eliminate or minimize significant impacts. Pursuant to CEQA Guidelines Section 15063, if any aspect of the proposed project, either individually or cumulatively, may cause a significant adverse effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, an environmental impact report (EIR) must be prepared unless the lead agency determines that a previously prepared EIR or other appropriate process has already addressed the significant impacts. In this case, no previous EIR or other process has addressed the potential significant impacts of the Project.

This Initial Study is a factual document, prepared in conformance with CEQA, and written for the purpose of providing the lead agency with information to use as the basis for determining whether the Project has the potential for one or more significant impacts. In accordance with CEQA Guidelines Section 15063, the analyses in this Initial Study will also be used to focus the EIR on those Project impacts determined herein to have the potential to be significant. Impacts determined not to be significant in this Initial Study need not be analyzed in the EIR. Furthermore, in accordance with CEQA Guidelines, this Initial Study may also be used by the Applicant to identify Project features that could be modified to avoid or minimize potential significant impacts.

1.3 Environmental Review

This Initial Study and the corresponding Notice of Preparation of an EIR are available for public review for 60 days, during which time written comments on the Initial Study may be submitted to:

Kristin Pollot, AICP
Planning Manager
City of Pittsburg
Planning Division
65 Civic Avenue
Pittsburg, CA 94565

kpollot@ci.pittsburg.ca.us

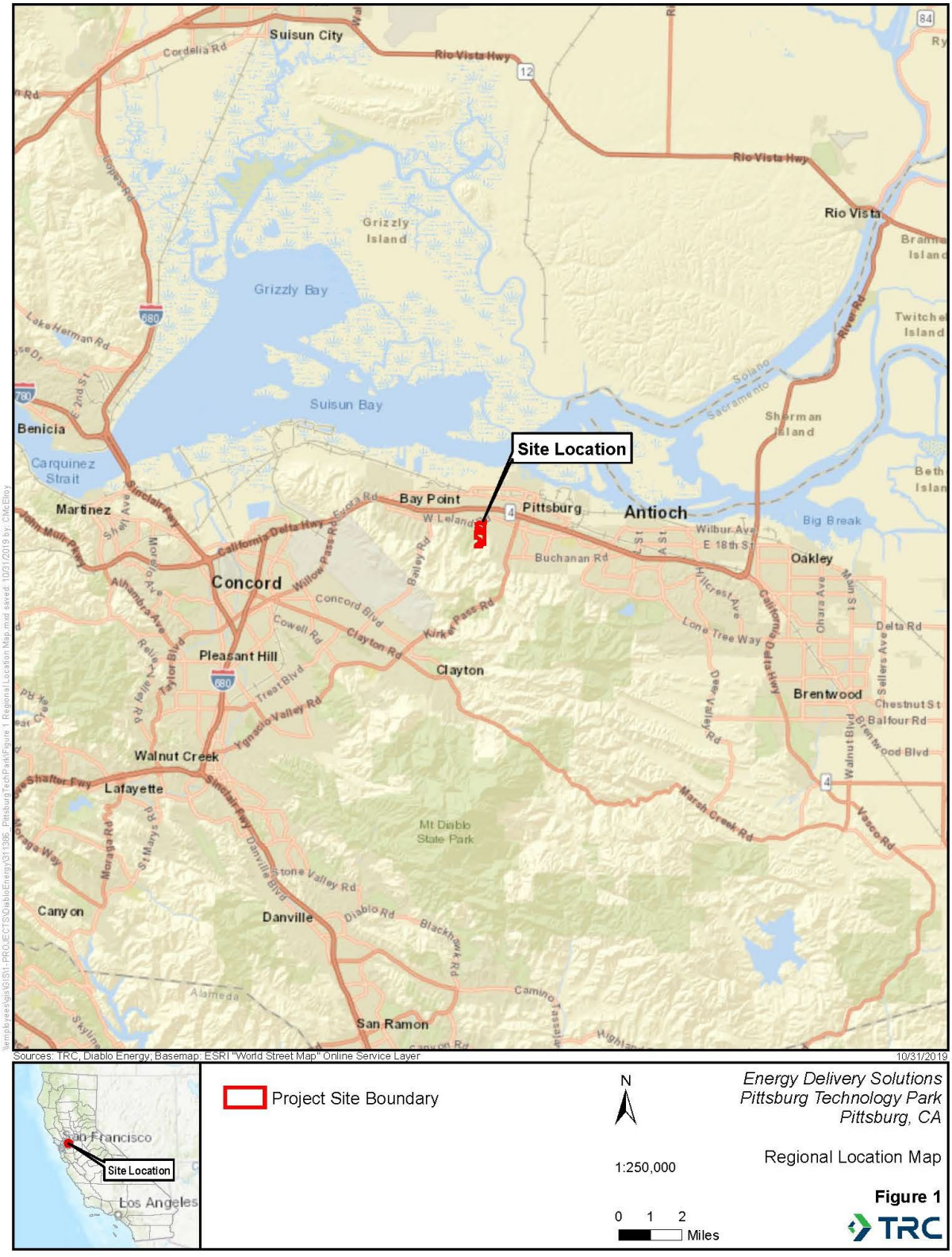

Figure 1: Regional Location Map

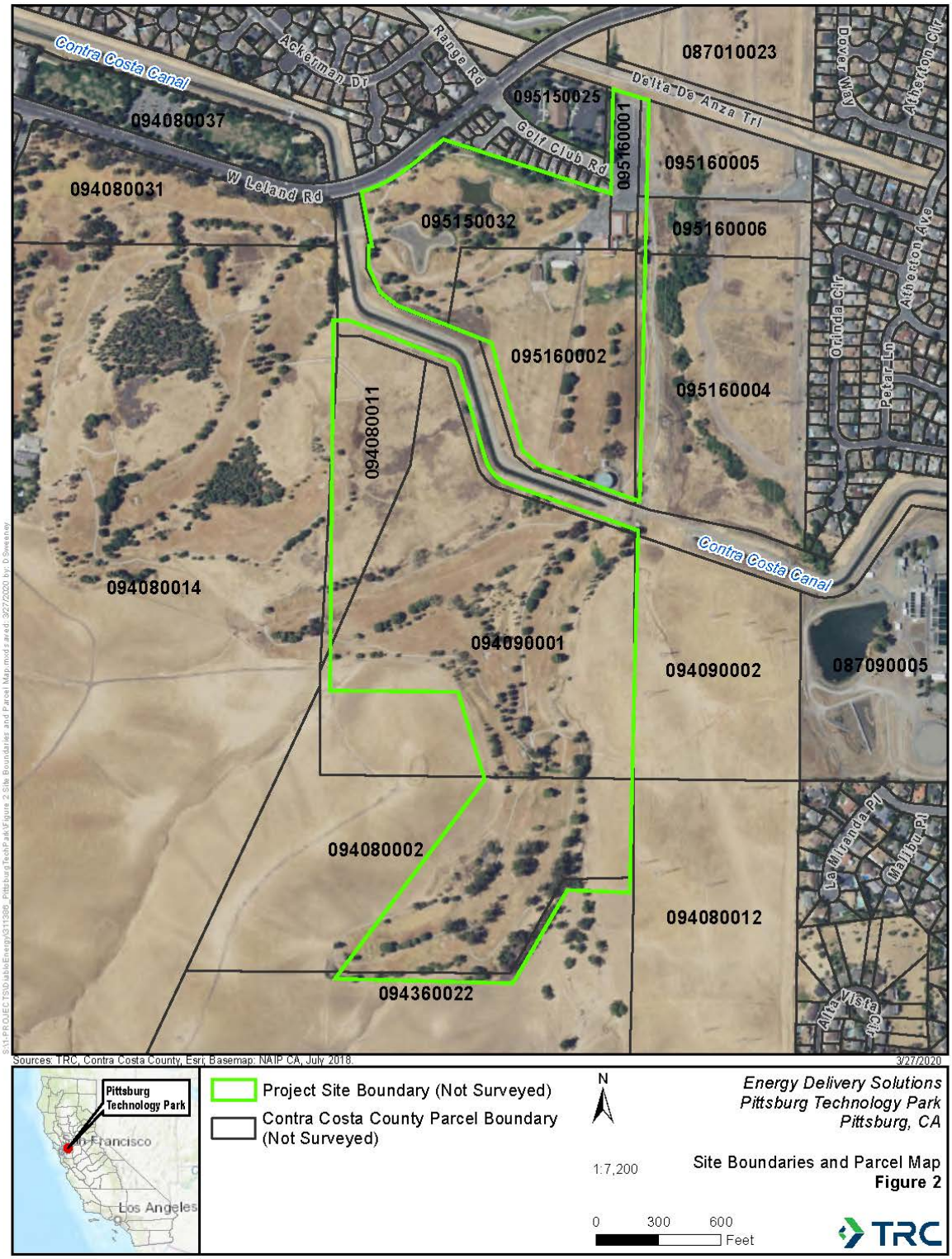

Figure 2: Site Boundaries and Parcel Map

2.0 EXISTING ENVIRONMENT

2.1 Site Conditions

The Site encompasses the eastern portion of the defunct Delta View Golf Course, formerly an 18-hole golf course with features that included sand pits, two constructed ponds, paved cart paths, and fencing. Originally opened in 1947 as the Pittsburg Golf and Country Club, the City-owned golf course ceased operations in early 2018 due to financial constraints. The vegetation onsite primarily consists of ruderal grasses and small- to medium- sized trees within the developed golf course lands, and annual grassland in undeveloped areas. Some wetlands occur in larger drainage swales. Topography alternates between rolling hills and gently sloping areas (Figure 3) with surface water drainage generally northward. Photographs of representative existing Site conditions are provided in Figure 4. The Site is located within the southwest portion of the Los Medanos land grant and the western half of Section 19 of Township 2 North Range 1 East, Mount Diablo Base and Meridian. The Contra Costa Canal runs between some of the Site parcel boundaries separating the Site into northern and southern areas (refer to Figure 2). The portions of the Site comprising APNs 094-080-011 and 095-150-032 are subject to deed restrictions that currently limit use of those parcels to public recreational purposes; those deed restrictions would need to be removed through a separate process before the Project's phased development could occur on the affected parcels.

There are six structures on the Site, plus a water storage tank and an asphalt-surfaced parking lot. Three of the structures were accessible to the public prior to closure of the golf course and included a pro shop, restaurant and golf course clubhouse. The remaining three structures, located just to the southwest of the restaurant and clubhouse, are utilitarian buildings that housed equipment, carts and other items in support of golf course maintenance and operations. The water storage tank is located near the east edge of the Site, just north of the Contra Costa Canal. The paved parking lot is located at the northeast corner of the Site, proximal to the restaurant and clubhouse buildings.

2.2 Surrounding Land Uses

Figure 5 shows the surrounding land uses and General Plan land use designations of properties surrounding the Site. The surrounding area north of the Site is mostly single-family residences but also includes a church and the Delta de Anza Regional Trail. Rancho Medanos Junior High School is located north of West Leland Road, approximately 0.1 mile from the Site at the closest approach. City-owned open space lands occur to the west of the Site, including additional lands of the defunct golf course. Undeveloped and unincorporated Contra Costa County lands occur to the south of the Site. Adjacent to the east boundary of the Site is a Pacific Gas & Electric (PG&E) transmission corridor, an approximately 1,000-foot wide utility corridor that runs north-south through the City. Another neighborhood of single-family residences is further east of the PG&E transmission corridor. The closest highway is State Route (SR) 4, located 0.4 mile north of the Site.

2.3 General Plan and Zoning

The City of Pittsburg's General Plan was last comprehensively amended by the City in 2001. Amendments to the City's zoning regulations to implement General Plan policies and land use designations were adopted by the City Council in 2005 and 2007. The adopted General Plan has a horizon year of 2020, and the City has recently initiated a comprehensive update to the General Plan to establish a vision, goals and objectives for the next phase of the City's future extending into the year 2040.

The current General Plan land use designation for the Site is *Park*. The *Park* land use designation is used for parks, recreation complexes, community fields, public golf courses, stadiums, greenways, regional trails and ancillary facilities. The zoning classification of the property is OS District. As written in PMC Chapter 18.58, one of the intents of the OS District is to provide a suitable classification for large public or private sites permanently designed for park or open space use.

Implementation of the Proposed Project would require a General Plan amendment to change the Site's land use designation from *Park* to *Industrial*. The Project would also require a zoning amendment to change the Site's existing OS District zoning to IP-P District. The zoning amendment would include the Master Plan of development for the Site.

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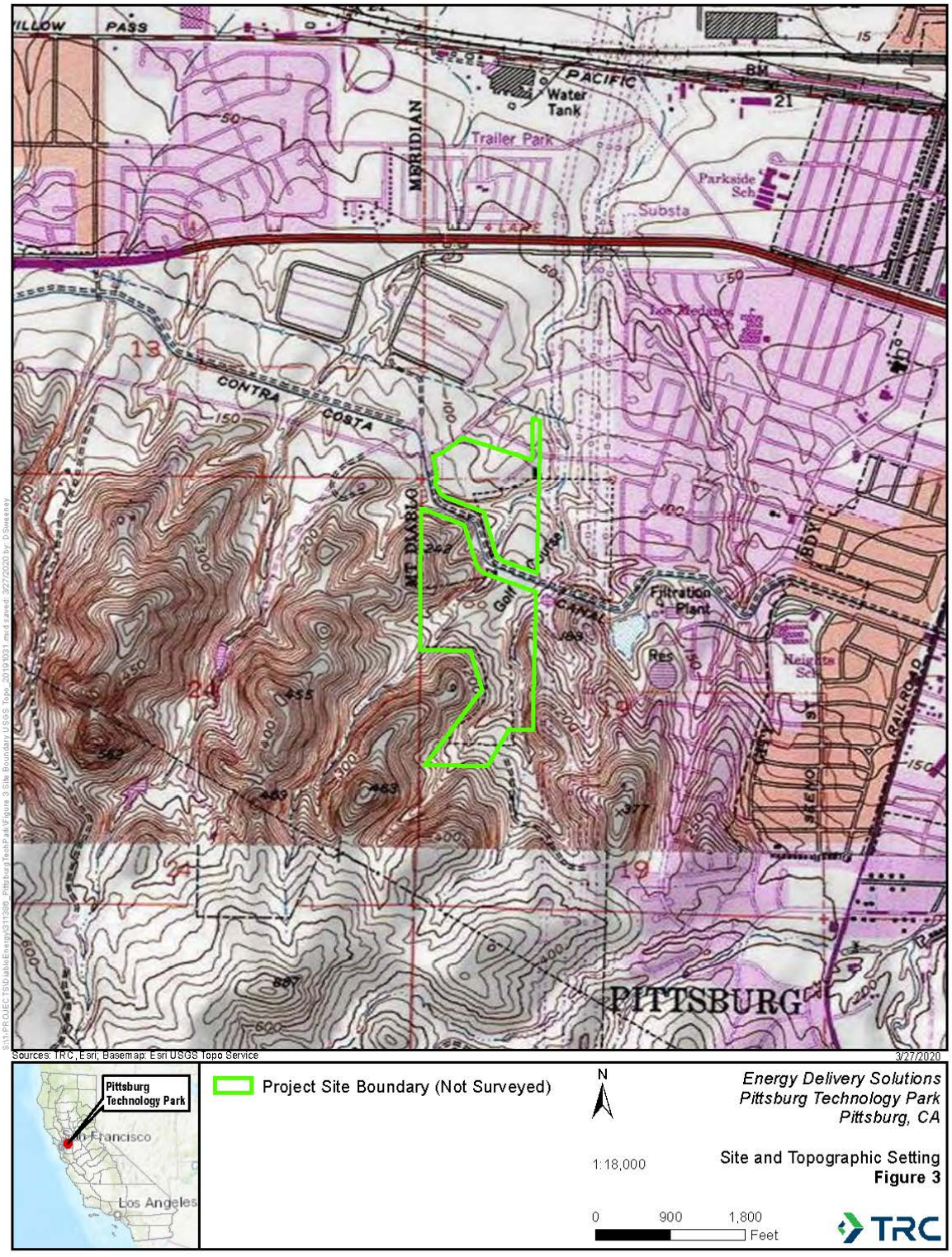

Figure 3: Site and Topographic Setting

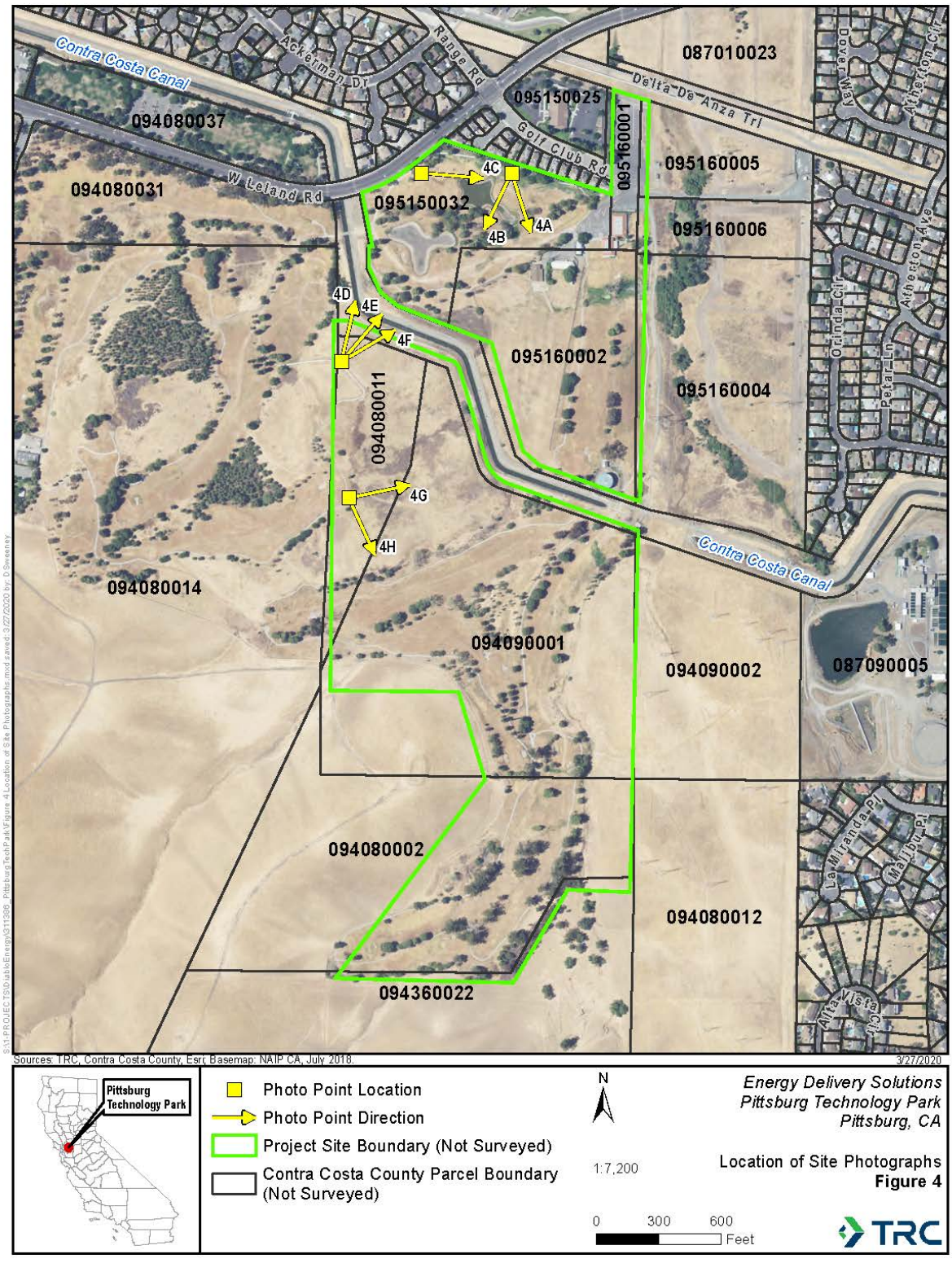

Figure 4: Location of Site Photographs

Site Photo 4A: From north end of Site looking southeast. Vacant utility buildings are visible in background.

Site Photo 4B: From north end of Site looking southwest. Invasive weeds have overtaken the former golf course landscape. A dried artificial pond is visible in the photo midground.

Site Photo 4C: From northwest corner of Site looking east generally along the north edge of the Site. The vacant golf course clubhouse and restaurant buildings are visible in the background at right, and single-family residences on Golf Club Road are visible at left.

Site Photo 4D: From western boundary of Site looking generally northward over the Contra Costa Canal. Residences north of West Leland Road are visible in the background at left. Invasive weed covered terrain and trees of the former golf course are visible in middle ground at right.

Site Photo 4E: From western boundary of Site looking northeast. Paved access road within the Contra Costa Canal is visible at foreground while the canal is hidden from view by terrain. Former golf course area overgrown with weeds is visible throughout the middle ground.

Site Photo 4F: From western boundary of Site looking east-northeast. View is similar to Photo 4E but further eastward toward vacant golf course buildings and PG&E transmission corridor.

Site Photo 4G: From western boundary of Site looking eastward across the middle portion of the Site. PG&E transmission line towers are visible in background. On-site water tank is at far right. Foreground is undeveloped former golf course land with non-native annual grass vegetation cover.

Site Photo 4H: From western boundary of Site looking southeast over southern portion of the former golf course property. Trees and invasive weeds dominate the former fairways. Nonnative annual grasslands of the hills south and west of the City dominate the background.

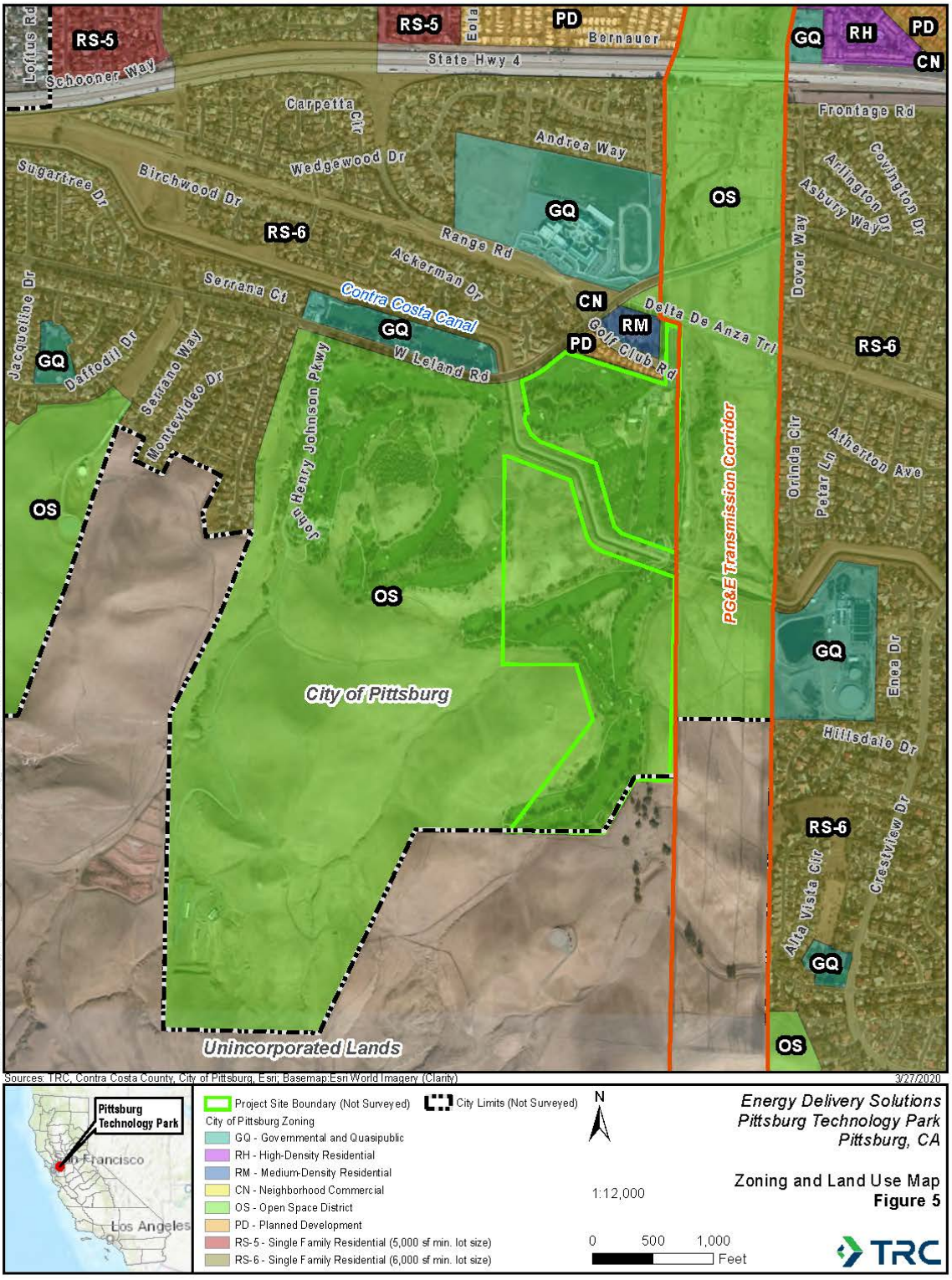

Figure 5: Zoning and Land Use Map

3.0 PROJECT DESCRIPTION

3.1 Project Facilities

The Project would include: demolition of existing golf course structures and facilities; clearing of areas to be graded; rough grading and finish grading of areas to be developed; construction and installation of utilities, buildings, roads, landscaping features, and ancillary facilities; and operation and maintenance of the Project development. Individual data centers would each have a building footprint between approximately 40,000 and 500,000 square feet, depending on the needs of the customer at the time of phased construction. Figures 6 and 7 together show examples of build-out concepts. Example 1 in Figure 6 depicts a build-out configuration with 20 similar sized data centers, and Example 2 in Figure 7 depicts a smaller number of mostly larger buildings. The maximum number of buildings would be 26, and the final size and location of each building would be reviewed by City staff for consistency with the Master Plan in conjunction with applications for grading and building permits.

Noteworthy aspects of the grading concept shown in Figures 6 and 7 include:

- A graded and landscaped earthen berm provided at the north end of the Site to separate the data center campus from the closest residences on Golf Club Road.
- Grading set back from the drainage that traverses the southeast corner of the Site in order to avoid impacts to wetlands and sensitive habitat associated with the drainage.
- Grading set back from the Contra Costa Canal to avoid any disturbance to the canal.
- Site grading to form an inclined plane from an elevation of approximately 95 feet at the northern end of the Site to an elevation of approximately 200 feet at the southern end of the Site.
- Balancing of cut and fill on-site such that off-haul or import of soil would not be necessary.
- Two Site access/egress routes provided from West Leland Road.

Key project facilities to be developed onsite include:

- A landscaped visual screening berm at the north end of the Site, as described above.
- Data center buildings up to 50 feet in height excluding rooftop equipment and screening.
- Stormwater conveyance systems and bio-retention basins for management of runoff following requirements of the Contra Costa County Clean Water Program.
- Electric switchyard and substation equipment to receive and step-down the voltage of electric power from the adjacent PG&E high voltage transmission system.
- Paved Site entry and access roads to each data center, and a paved parking area at each data center.
- Backup power systems for use in the event of an electric power outage.
- Environmental control systems including cooling systems for data center heat rejection.
- Security fencing and other security infrastructure.
- Landscaping of developed areas.

A minimum of 15 percent of the Site acreage would be retained as open space as further described in Section 3.1.9.

Project facilities to be developed outside the Site boundaries include:

- A Site entrance from West Leland Road on City-owned property just west of the Contra Costa Canal.

- A road connecting the northern and southern areas of the Site crossing the Contra Costa Canal right-of-way near the PG&E transmission line corridor.
- An electric offtake connection from transmission lines in PG&E's regional transmission corridor abutting the eastern Project boundary.
- A fiber optic communication connection either to one of PG&E's optical ground wires within their adjacent transmission line corridor, or to existing commercial fiber optic infrastructure in the vicinity as further described in Section 3.1.10.
- Utility connections for natural gas and sanitary sewer.

The onsite and off-site project features are further described in the following sections.

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Figure 6: Buildout Concept Example 1 (20-building configuration)

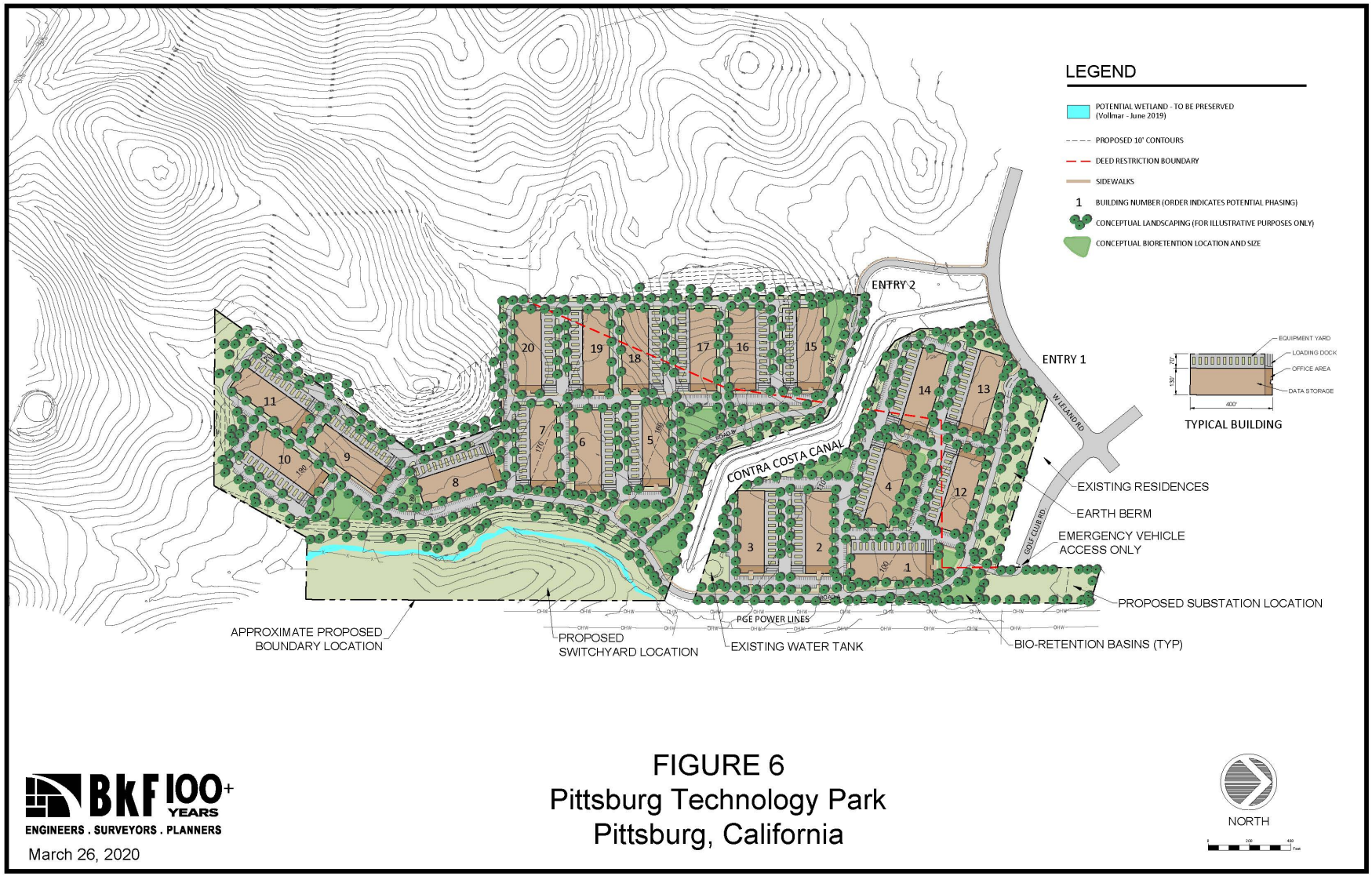
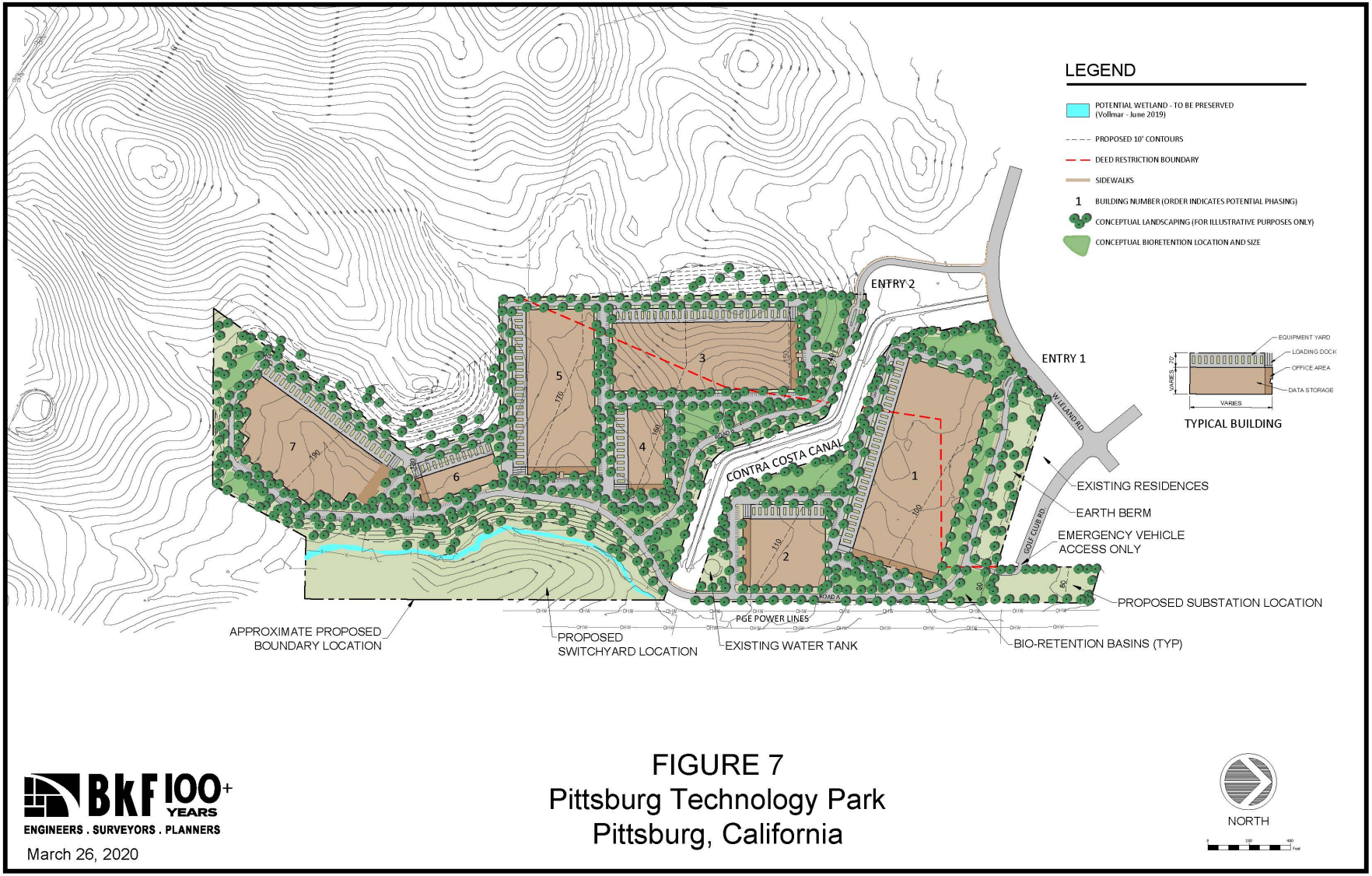


Figure 7: Buildout Concept Example 2 (7-building configuration)



3.1.1 Visual Screening Berm

Prior to construction on APN 095-150-032 immediately south of the houses on Golf Club Road, an earthen berm would be constructed and landscaped along the northern edge of the Site to shield views of the data center campus and activities from the existing residences on Golf Club Road (refer to Figures 2, 6 and 7). The berm would be landscaped with a mix of trees, shrubs and groundcover and would be maintained along with other data center campus landscaping for aesthetic appeal and visual screening. Trees would be selected to reach mature heights that would largely block views of the data center from adjacent residences. A trail would be integrated with the landscaped screening berm providing pedestrian and bicycle access along the northern end of the Site and with connection to the West Leland Road via the northern primary access road onsite.

3.1.2 Data Center Buildings

Each data center building would include a lobby, data rooms, and support rooms including offices, electrical rooms, storage rooms, meeting rooms, break rooms and restrooms. Data rooms house information technology hardware such as computers, servers, storage hardware, cables and racks. A loading dock and parking area would be provided at each data center building. Parking is proposed to be provided onsite at a minimum ratio of one stall per 4,000 square feet of building area. The parking lots and the dimensions of parking spaces at each data center would be designed to meet City requirements as prescribed in PMC Chapter 18.78.

The buildings are proposed to be constructed with materials such as plaster, cementitious materials, metal, and glass. Rooftop equipment would be concealed from view by parapet walls or metal screening along the rooftop perimeter. The data center buildings would be designed to comply with California Code of Regulations (CCR) Title 24 building energy efficiency standards. A mechanical yard would be located adjacent to each building and would house backup generators and other outdoor equipment. The Master Plan will provide guidance for building specifications, materials, design guidelines and accent elements. The Master Plan design guidelines would allow detailed building designs for each phase of development to be reviewed by City staff for conformance with Master Plan requirements.

3.1.3 Stormwater Conveyance and Control

Project facilities would be designed with Low Impact Development (LID) stormwater best management practices to minimize runoff and facilitate infiltration. Stormwater from developed areas would be conveyed by control features such as curbs, drop inlets, ditches, culverts and pipes to stormwater bio-retention basins for detention and infiltration. Stormwater quality treatment and peak flow controls would be designed to manage runoff consistent with the Contra Costa County Clean Water Program *Stormwater C.3 Guidebook*. Stormwater detention and infiltration would be designed such that peak runoff from the Site would not exceed existing discharge rates consistent with requirements of the Contra Costa County Clean Water Program.

3.1.4 Onsite Electric Substation and Off-site Electric Interconnection

An electric switchyard would be constructed in the southeast portion of the Site and a substation would be located at the north end of the Site approximately as shown in Figures 6 and 7. The substation and switchyard would be developed during the initial phase of development.

Substation and switchyard equipment would be enclosed by a masonry wall for visual screening, security, and conformance with high voltage electric code requirements.

Power would be delivered to the substation(s) via an overhead 230 kilovolt interconnection to the adjacent PG&E transmission system. The precise interconnection location(s) would be defined in consultation with PG&E. Power would be delivered from the substation(s) to individual data centers via underground distribution lines.

3.1.5 Access and Circulation

The design and dimensions of Site entrances, roads and driveways would follow the City's design requirements in effect at the time detailed plans are submitted for approval. The primary onsite roads would be paved, private roads allowing two-way vehicular traffic, with provision for pedestrian and bicycle access via a multi-use path on one side of the roadway The primary entrance to the northern portion of the Site would be from West Leland Road south of the landscaped berm separating the campus from the residences on Golf Club Road (refer to Figures 6 and 7). The primary entrance to the southern portion of the Site would be from West Leland Road, west of the Contra Costa Canal. Secondary roads would be extended from the primary roads to each of the data center buildings and service areas. The final locations and designs of the Project roads would be subject to approval by the City's Engineering Division in conjunction with review of final designs for phased development. The Master Plan will include a transportation and circulation plan to which the Project's phased development would need to adhere.

The Project's conceptual plan includes a road across the Contra Costa Canal right-of-way near the PG&E transmission corridor to connect the northern and southern portions of the Site. A transfer of the ownership of the canal from the U.S. Bureau of Land Reclamation to CCWD is in progress. The road across the canal right-of-way is included in the conceptual plan anticipating completion of the transfer and issuance of an easement for the road by the CCWD prior to phased construction south of the canal.

A supplemental single-lane access would be provided from Golf Club Road for service to the electric substation and for redundant emergency access.

Both the primary and emergency access roads into the portion of the Site north of the Contra Costa Canal would be completed as part of initial construction, providing for redundant access in the event of an emergency. Both roads into the portion of the Site south of the Contra Costa Canal would be completed as part of initial phased construction in that area as a similar emergency response planning measure.

3.1.6 Backup Power Systems

Data centers require consistent power to maintain operation and temperature control of the servers. Backup generators are needed to ensure critical equipment is never without electricity. The amount of power needed at any given time would depend on the number and intensity of running servers and cooling system demand. Diesel-fired backup generators would be provided in the mechanical yard outside of each data center building. The Project's customers may also be offered optional dual-fuel capability for backup generators using natural gas from PG&E. Diesel fuel for the generators would be stored in aboveground storage tanks or double-walled underground storage tanks with leak detection monitoring systems. Underground diesel fuel storage tanks would be required to follow design and monitoring requirements of CCR Title 23

Chapter 16 regulations, and above ground diesel fuel storage tanks would be required to be designed and operated in compliance with Spill Prevention, Control and Countermeasures Plan requirements of Code of Federal Regulations Title 40 Part 112 and the California Aboveground Petroleum Storage Act.

Buildings would also be equipped with an uninterruptable power supply (UPS) comprised of deep-cycle battery banks for providing instantaneous short-term power until the generators can reach full operating power. The batteries would be encased in cabinets and located in temperature-controlled battery rooms in the data center buildings or in enclosures located in the mechanical yard. The quantity of batteries in each data center building would be matched to the critical power demand for the building and the duration of time needed for generators to reach full operating power, typically less than one minute, plus an additional several minute duration of battery power to provide a factor of safety. Batteries may be lead-acid or lithium ion type. Different batteries could be used if breakthroughs in battery technology over the life of the project result in another more suitable battery type with proven reliability and safety.

Backup generators would be tested once per month and would be used only in the event of a power outage.

3.1.7 Environmental Control Systems

Buildings would be equipped with the critical climate controls needed for data center operations. The dominant climate control would be to displace the heat produced by the working servers to regulate temperature. The data center buildings would include makeup air units (MAU) that provide ventilation and maintain positive space pressure in the buildings with filtered air and humidity control. Working servers are consistently converting electricity into heat as they operate.

Cooling towers would be located on the roof of data center buildings or at grade level in building mechanical yards. The cooling towers would be coupled with water-cooled chillers located on the roof or in mechanical yards. Air-cooled chillers may be used as a back-up cooling system. Cooling towers and chillers would be screened from view with parapet walls or metal screening on rooftops or with modular enclosures in mechanical yards. The chillers would be connected to closed-loop chilled water piping systems that would be connected to computer room air handling (CRAH) units. The heat generated by server equipment would be absorbed through the CRAH units connected to chilled water coils, and the warmed water would then be recirculated through the chillers. Aboveground or underground water storage tanks may be provided in the building mechanical yards to provide backup water supply for the cooling system in the event of a water supply interruption. For energy efficiency, the air handling units would also have economizers that use the outside ambient air temperature to cool the system when the outdoor temperature is low enough.

Free cooling using an air-side or water-side economizer is an available option. An air-side economizer introduces outdoor ambient air into the space for use as cooling when outdoor temperatures are low enough. A water-side economizer uses outdoor ambient conditions to cool the process water in lieu of using a chiller. When outdoor conditions are no longer adequate for use of the economizer cycle, the original base system will resume as the primary means of cooling.

3.1.8 Security

Security fencing would be constructed around the perimeter of each data center building. A perimeter fence around the entire data center campus may also be installed. The extent, type, and design of fencing will be specified in the Master Plan design guidelines. Security systems would be installed in each data center building including security cameras and a secure lobby, check-in system, and security staff.

3.1.9 Landscaping and Open Space

Landscaping would be placed between the residences and data center development near the northern border of the Site, as well as throughout the Site in accordance with Master Plan requirements. Landscaping would provide visual screening for residents near the Site and would create a cohesive design for the data center campus. Landscaping near the northern border of the Site would include a berm constructed using native soil from the Site to visually screen the Project from nearby residences. Drought-tolerant vegetation would be planted on the berm and within the transition zone between the residences and data center buildings. Vegetation of various heights (i.e., trees, shrubs, grasses) would be selected to provide layered screening and improve the visual quality of the Project. Landscaping concept and design guidelines to be included in the Master Plan would establish a cohesive theme for development that would visually distinguish the Site from the surrounding area.

A minimum of 15 percent of the Site would be landscaped area or open space consistent with the property development regulations applicable to properties with industrial park zoning (PMC Section 18.54.115). The areas proposed for open space preservation will be designated in the Master Plan and will include, but not be limited to, the area around the seasonal creek that runs south to north in the southeastern portion of the Site.

3.1.10 Fiber Optic Communications

A fiber optic connection would be extended to the Site to provide the necessary data transfer capacity. The Applicant is proposing the Project to include one or more of the following options for fiber optic connectivity to existing off-site fiber optic infrastructure:

- **Option 1:** Installation of a fiber optic connection to PG&E's optical ground wire system located in PG&E's transmission corridor abutting the east side of the Site.
- **Option 2:** Installation of a fiber optic connection from the Site to existing fiber optic facilities approximately 1.3 miles east of the Site. The connection would be underground, either along the route of the Delta de Anza Regional Trail or within existing street rights-of-way.
- **Option 3:** Installation of a fiber optic connection from the Site to existing fiber optic facilities on the north side of SR 4 approximately 1.4 miles west-northwest of the Site. The connection would be underground, either along the route of the Delta de Anza Regional Trail or within existing street rights-of-way. Either alignment under this option would require horizontal boring beneath SR 4.

3.1.11 Other Utilities

The Project would also require utility connections for natural gas, water supply, and wastewater disposal. Similarly, infrastructure needs to support the Project's needed wastewater disposal capacity would be determined by City and Delta Diablo Sanitation District (DDSD) engineering staff. Fresh water mains already occur onsite as does a recycled water pipeline and storage tank.

The Project would use potable water and may also use recycled water. Recycled water from DDSD could be used for landscaping and potentially for cooling when an adequate supply meeting the Project's water quality requirements is available. An existing 1.3-million-gallon recycled water storage tank exists onsite adjacent to the Contra Costa Canal and could be utilized for the Project. The Project would have access to existing 20-inch and 14-inch potable water main pipelines located along the north, east and west edges of the property.

3.1.12 Public Services

The Project is not anticipated to have significant increase in demand for public fire and safety services due to on-site security and fire suppression measures and low occupancy of the data center buildings. To offset the Project's incremental increases in demand for these services, the Applicant has committed to annexing the Site into the City's existing community services districts for fire and police protection. Annexation into the City's community services districts would be a condition in the development agreement and would be completed prior to issuance of the first building permit for the Project.

3.2 Construction

The initial phase of construction is projected to start in 2021 on all or portions of parcels 095-160-001, and 095-160-002 north of the Contra Costa Canal. The Project entrance and access road to the north portion of the Site from West Leland Road would be developed as part of initial construction and used for construction access. After one or more phases of construction north of the canal, the portion of the Site south of the canal would be developed in phases. The rate of phased development over time would be dependent on market demand and individual customers' interest. The portions of the Site subject to deed restrictions would not be developed until such restrictions are removed. Utilities connections, Site roads, stormwater controls and other infrastructure would be developed as needed for each phase before the construction of the respective data center buildings is completed. Construction would use standard construction equipment such as dozers, scrapers, graders, loaders, dump trucks, lifts, bobcats, and light vehicles. Final grading and facility design plans would be submitted to the City for each building phase and subject to review for conformance with the Master Plan and approval by City staff.

Construction would disturb more than one acre of land and, therefore, would require coverage under the State General Permit for stormwater discharges from construction sites. Stormwater quality Best Management Practices (BMPs) would be required to be implemented during construction pursuant to a Storm Water Pollution Prevention Plan (SWPPP) that would need to be developed for the construction activities in order to obtain coverage under the General Permit. The SWPPP would identify potential sources of stormwater pollution such as sediment, vehicle fuels and lubricants, paints, adhesives, trash and litter, and BMPs to be implemented to ensure that potential pollutants are effectively controlled to a level that does not cause water quality standards to be violated.

Existing structures, parking facilities, utility infrastructure and other existing development associated with the former golf course would be demolished and removed from the Site during grading. Buried utility lines not needed for the development would be abandoned and buried in place. Consistent with stormwater pollution prevention BMPs, ground disturbance and vegetation clearing would occur only as areas are being prepared for imminent grading and development. Following demolition and clearing, grading would occur to achieve an optimal cut and fill balance for the overall Project. Soil borrow and soil storage would occur within the footprint of subsequent development phase areas if needed to optimize the cut and fill balance for the overall project to avoid the need for off-site soil hauling. Topsoil would be stockpiled separately as needed for final landscaped areas. Following rough grading, underground utilities would be installed, and streets, parking areas, walkways, landscaping, building pads, and other support infrastructure would be completed for the respective development phase prior to completion of the data center buildings.

Project construction would require the use and storage of hazardous materials commonly used at construction sites such as diesel fuel and lubricating oil, paints, coatings, solvents, cleaning products, and compressed gases. Construction contracts would require secondary containment for any fuel or oil storage tank or container to be stored onsite with a capacity of 55 or more gallons. Construction contracts would also require that vehicle and equipment maintenance occur offsite or over an impermeable surface.

Construction contracts would require that construction and demolition waste be recycled, reused or otherwise diverted from landfills consistent with the California Green Building Standards Code and Contra Costa County requirements. Sanitary facilities during construction would be provided by portable self-contained units maintained by a licensed contractor. Construction contracts would require that the contractor comply with all applicable environmental regulations including those for management of all waste streams.

Project construction would implement the following measures to control dust emissions during construction in accordance with Bay Area Air Quality Management District guidance:

- Water or another non-toxic dust palliative would be used during construction to control dust.
- Exposed soil areas would be watered two times per day when needed to control dust emissions;
- Haul trucks transporting soil, sand or other loose material off-site would be covered;
- BMPs would be implemented to minimize track-out onto adjacent public streets;
- A 15 mile per hour speed limit would be used for roadways until stabilized with gravel or other treatment to minimize dust; and
- Disturbed surfaces would be stabilized as soon as practical.

3.3 Operation and Maintenance

Data centers employ staff in multiple work shifts to support operations 24 hours per day and seven days per week. At full build-out, the Project could provide an estimated 500 full-time employment positions including technical and administrative positions for data center management as well as for security and maintenance of buildings, equipment, and other Project infrastructure and activities. A Property Owner's Association (POA) would be established for maintenance including, but not limited to, that for common areas, landscaping and private

streets. Street improvements, including the shared storm drain infrastructure, would be maintained by the POA. A maintenance agreement would be recorded with the deed for each lot.

Equipment and materials would be delivered to the Site as needed, and waste streams typical of data center operations and maintenance would be generated. The estimated number of vehicle trips generated by data center operations and maintenance is approximately one trip per 1,000 square feet of floor space.

At full buildout, the Project's estimated peak electric power demand is estimated to be up to 500 megawatts (MW). Routine power supply would be delivered to the Site via a connection to the adjacent PG&E high voltage transmission lines and onsite switching and substation infrastructure. Backup generators would be fueled with diesel fuel stored in onsite tanks as described in Section 3.1.6. Biodiesel and renewable diesel could also be considered as potential fuel sources for the backup generators.

The Project's estimated peak water demand at full buildout is 5.2 million gallons per day. Recycled water may be used to reduce the Project's need for fresh water. Recycled water could be used for landscape irrigation, and for cooling to the extent the recycled water supply is adequate in quantity and quality for use in cooling. Potable water for drinking, hand washing and other domestic use in the data center buildings would be purchased from the City. Potable water for data center cooling systems would be purchased from the City.

Project operations and maintenance would require the use and storage of common hazardous materials. The hazardous materials stored and used in the largest quantity would be petroleum products including diesel fuel and lubricating oil for the backup generators and insulating oil for oil-filled transformers. Biocides and other chemicals would be needed for cooling water treatment. Paints, coatings, lubricants, solvents, cleaning products, compressed gases and other hazardous materials would be needed for facility maintenance. The UPS battery systems may utilize sulfuric acid or other hazardous electrolytes. The Project is not anticipated to require the use or storage of any hazardous material in excess of thresholds requiring a Risk Management Plan under State or Federal regulations. Data center facilities would be equipped with secondary containment for bulk hazardous chemicals.

Non-hazardous and hazardous wastes would be generated by Project operations and maintenance. Typical non-hazardous waste streams would include materials such as wastepaper, plastic, glass, steel aluminum, wood, filter media, and landscape cuttings. Typical waste streams that may be hazardous include materials such as waste oil and coolant from generator banks, oily rags and absorbent, spent batteries, empty hazardous material containers, and cleaning wastes. Electronic equipment waste may also require management of hazardous waste unless excepted through management in accordance with State recyclable waste or universal waste regulations. Sanitary wastewater would be generated by operations and would be discharged to the City sanitary sewer for treatment at the DDSD wastewater treatment plant. Cooling tower blowdown would also be generated by operations and would be conveyed via the City sanitary sewer to DDSD treatment facilities, or it would be pre-treated onsite and conveyed to the City's water treatment plant. All waste streams would be managed in accordance with applicable State regulations for safe storage, transport and treatment or disposal.

4.0 CEQA INITIAL STUDY CHECKLIST

1. **Project title:** Pittsburg Technology Park

2. **Contact person and phone number:**
   Kristin Pollot, AICP
   Planning Manager
   City of Pittsburg
   (925) 252-4941
   kpollot@ci.pittsburg.ca.us

3. **Project location:** South of W. Leland Road/Golf Club Road intersection, Pittsburg, CA 94565

4. **Project sponsor's name and address:**
   Energy Delivery Solutions, LLC
   Attention: Cliff Losh
   One Harbor Drive, Suite 101
   Sausalito, CA 94965

5. **General Plan designation:** *Park* (existing) *Industrial* (proposed)

6. **Zoning:** OS (Open Space) District (existing) IP-P (Industrial Park with a Master Plan Overlay) District (proposed)

7. **Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)**
   The Proposed Project consists of development of an approximately 105-acre portion of the former Delta View Golf Course with a data center campus. The development would include up to 26 data center buildings with a combined floor area of up to 4.5 million square feet, along with infrastructure that would include new internal roads and pedestrian paths, landscaping, parking, utilities and other ancillary support infrastructure. A comprehensive Project Description including maps and Preliminary Site Plans is provided in Section 3.0 of this Initial Study.

8. **Surrounding land uses and setting (briefly describe the project's surroundings):**
   The approximately 105-acre Site is located south of the intersection of West Leland Road and Golf Club Road in the City of Pittsburg. The surrounding area north of the Site is mostly single-family residences but also includes a church and the Delta de Anza Regional Trail. The Rancho Medanos Junior High School located on the opposite side of West Leland Road approximately 0.1 mile north of the Site. City-owned open space is west of the Site, including additional lands of the defunct golf course. Undeveloped and unincorporated Contra Costa County lands occur to the south of the Site. Adjacent to the east of the Site is a PG&E transmission corridor, an approximately 1,000-foot wide utility corridor that runs north-south through the City. Another neighborhood of single-family residences is further east of the corridor. The closest highway is SR 4, located 0.4 mile north of the Site.

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)**
In addition to City approvals and permits, the Proposed Project would be required to obtain coverage under the State General National Pollutant Discharge Elimination System Permit for discharges of stormwater from construction projects. This permit is administered by the RWQCB and is in place for use by applicants upon filing of satisfactory Permit Registration Documents.

The Project would require a Fish and Game Code Section 1600 permit from CDFW, a Clean Water Act Section 404 Permit from USACE, as well as a Clean Water Act Section 401 Water Quality Certification from the RWQCB for impacts to waters and wetlands.

Demolition of the existing structures onsite would require approval from the BAAQMD. Permits to construct and operate emission sources including the backup generators would also be required from the BAAQMD.

The Project's proposed private road across the Contra Costa Canal would require authorization from the CCWD for work within the canal right-of-way.

The National Park Service would be the agency responsible for removing deed restrictions on parcels affected by those restrictions.

If an individual data center exceeds 50 MW of generating capacity, the California Energy Commission should be consulted as a permitting jurisdiction.

4.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project. Check marks are indicated by the following symbol: ☑

☑ Aesthetics	☐ Agriculture and Forest Resources	☑ Air Quality
☑ Biological Resources	☑ Cultural Resources	☑ Energy
☑ Geology/ Soils	☑ Greenhouse Gas Emissions	☑ Hazards & Hazardous Materials
☑ Hydrology/ Water Quality	☑ Land Use/ Planning	☐ Mineral Resources
☑ Noise	☑ Population/ Housing	☑ Public Services
☑ Recreation	☑ Transportation	☑ Tribal Cultural Resources
☑ Utilities/ Service Systems	☑ Wildfire	☑ Mandatory Findings of Significance

4.2 Determination

(To be completed by the Lead Agency) On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

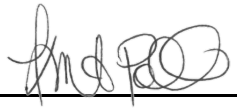
☑ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared By: Joan Lamphier, Project Planner

Reviewed By: Kristin Pollot, Planning Manager



Signature — April 7, 2020 Date

4.3 Evaluation of Impacts

I. AESTHETICS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☑	☐	☐	☐
Potentially Significant Impact: *According to the City of Pittsburg General Plan, one of the community's most identifying features is the rolling, grassy hills to the south of the City. The Site is located along the southern border of the City and sits at the base of those hills. Data center buildings would not exceed a height of 50 feet, excluding rooftop equipment and screening. Surrounding land uses include residential and open space, and buildings among these land uses do not typically exceed 30 feet in the Project area. Introduction of a new industrial park complex could change the existing character of the area. The Master Plan will detail building and landscape designs to create a cohesive design for the data center campus to achieve aesthetic goals and limit visual impacts.* *There are two public recreational trails that lie west of the Site and lead south into the hills, as well as two public parks nearby. The extent to which the Project would be visible from these and other publicly-accessible vantage points, as well as the extent to which the Project would block views or change the aesthetic character of the area, will be analyzed in the EIR.*				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☑	☐	☐	☐
Potentially Significant Impact: *According to the California Department of Transportation (Caltrans), SR 4 in the vicinity of the Project area is not a designated scenic highway, and there are no other State scenic highways in the vicinity of the Site. The nearest State scenic highway is SR 24, located approximately 20 miles south of the Site, and SR 160, located approximately 13 miles northeast of the Site. The Site is not visible from SR 24 or SR 160; therefore, the Project would not affect scenic resources within a State scenic highway corridor. The Project would transform a part of the former golf course, with removal of vacant structures, removal of existing trees, change to contours of the existing terrain, and development of master-planned buildings, landscaping, roads and other infrastructure. The extent to which existing site elements to be removed have historic value will be evaluated in the EIR, and the extent to which the project could otherwise substantially affect natural scenic resources will also be analyzed in the EIR.*				
c) Substantially degrade the existing visual character or quality of public	☑	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
Potentially Significant Impact: *According to the City of Pittsburg General Plan, the eastbound drive into the City on SR 4, views of the hills to the south, and Suisun Bay to the north create an identifiable entryway for the City. The existing visual character of the Site, which is predominantly vacant, would change as a result of the Project, which would introduce master-planned buildings, landscaping, roads and other infrastructure to the Site. The Master Plan will detail building and landscape design, and approval of design plans would need to include a determination by the Pittsburg Planning Commission that the development does not substantially degrade the existing visual character of the site and its surroundings.* *As stated in Response I(a), above, surrounding land uses include residential and open space, and public amenities in the Project vicinity include two recreational trails and two public parks. Introduction of the master-planned buildings, landscaping, roads and other infrastructure to the Site would change the existing character of the Site. The extent to which the Project would affect views from public vantage points will be analyzed in the EIR.*				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☑	☐	☐	☐
Potentially Significant Impact: *The Project would include the construction of buildings and other features with potential to result in glare. Night-lighting would be needed in building interiors, as well as outdoors for safety and security. Project facilities would be operational 24 hours a day. Therefore, there would be a change in the amount of lighting that could potentially spillover from the Site to the nearby residences.* *The Project would have to comply with relevant code sections pertaining to light and glare. PMC Section 18.82.030 limits the use of highly reflective glass and requires that all security lighting be indirect or diffused and shielded or directed away from any residential zoning district. The potential impacts of the Project relative to creating a new source of light or glare will be analyzed in the EIR.*				

II. AGRICULTURE AND FOREST RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☑
No Impact: *No prime farmland, unique farmland, farmland of statewide importance (farmland) would be converted to non-agricultural use by the Project. Therefore, the Project would have no impact, and this issue will not be further analyzed in the EIR.*				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☑
No Impact: *The Site is within the OS District and has a General Plan designation of* Park*. The list of allowable land uses in the OS District includes agriculture, but the Site was used previously as a golf course, and no agricultural uses are occurring on the Site. The Project would not occur on any land under a Williamson Act contract nor conflict with any Williamson Act contract. Considering these factors, there would be no impact, and this issue will not be further analyzed in the EIR.*				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☑
No Impact: *The City does not have a forest or timberland zoning district or land use designation, and no forest or timberland occurs within or in proximity to the Site. Therefore, the Project would have no impact, and this issue will not be further analyzed in the EIR.*				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☑

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact: *As described in Response II(c), above, no forest or timberland occurs within or in proximity to the Project footprint. Therefore, the Project would have no impact with respect to conversion or loss of forest land, and this issue will not be further analyzed in the EIR.*				
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☑
No Impact: *No aspect of the Project would result in changes to the existing environment that could result in conversion of farmland or forest land. Therefore, there would be no impact, and this issue will not be further analyzed in the EIR.*				

III. AIR QUALITY

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☑	☐	☐	☐
Potentially Significant Impact: *The Project would be located within the jurisdiction of the BAAQMD. During construction, the Project would result in emissions, such as vehicle and equipment exhaust and fugitive dust. During operations, there would be emissions from vehicle exhaust and other sources, including backup generators. The Project has potential for emissions that will be analyzed in the EIR to evaluate consistency or conflicts with applicable air quality requirements.*				
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☑	☐	☐	☐
Potentially Significant Impact: *The San Francisco Bay Area is in nonattainment status for State and Federal standards for ozone and fine particulate matter (PM-2.5) and nonattainment status for State standards for particulate matter (PM-10). During construction, the Project would result in emissions during construction. Project operations would generate air pollutants from employees' automobiles. Particulate matter and ozone pre-cursor emissions from the Project will be evaluated in the EIR.*				
c) Expose sensitive receptors to substantial pollutant concentrations?	☑	☐	☐	☐
Potentially Significant Impact: *Sensitive receptors, including residences and a school, occur in the Project vicinity.* *Once built, the Project would function similarly to an office building campus. Office buildings and office campuses are not generally sources of substantial pollutant concentrations. However, diesel engine and contractor vehicle emissions, asphalt and other finish applications used during construction of the Project would produce air pollutants. The backup generators also would produce emissions during routine testing and when used for backup power. Potential air pollutant impacts of the Project will be evaluated in the EIR.*				
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?	☑	☐	☐	☐
Potentially Significant Impact: *The Project would occur in a populated area and would*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
result in various emissions during and after construction. Emissions from Project construction, operations and maintenance will be evaluated in the EIR.				

IV. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☑	☐	☐	☐
Potentially Significant Impact: *The Site is located on land previously developed as a golf course and planted with many nonnative and exotic trees. Some areas of the Site are undeveloped, and the southern and western portions of the Site adjoin large areas of undeveloped open space. During the general level biological surveys, the habitats on the Site were classified as managed golf course habitats, annual grassland, un-managed golf course habitat, and wetlands. Vegetation on the Site consists mostly of ruderal grasses, grazed annual grassland in undeveloped areas, and exotic and native shrubs and trees within portions of developed areas. Based on the results of the literature review and considering habitats present and connection to large undeveloped areas, suitable habitat may exist for several State and Federally listed species such as the California red-legged frog, California tiger salamander, Tricolored blackbird, White-tailed kite, and San Joaquin kit fox, as well as other special-status species such as the Western pond turtle, burrowing owl and others, some of which are covered by the East Contra Costa County Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP). A biological resources technical report will be prepared for the Project, and the EIR will analyze the Project's potential impacts on special-status species and their habitat.*				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☑	☐	☐	☐
Potentially Significant Impact: *The study area is dominated by disturbed habitats associated with the former golf course development and some undeveloped areas of annual grassland. The Site encompasses a variety of natural and created aquatic habitats, some of which support associated aquatic vegetation. However, limited riparian vegetation exists on the Site. It is mostly comprised of nonnative riparian tree and shrub species. Removal of riparian vegetation and associated impacts will be analyzed in the EIR. A biological*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
resources technical report and wetland jurisdictional report will be prepared for the Project and will identify sensitive natural communities present within the Project area. The EIR will analyze the Project's potential impacts on sensitive natural habitat communities.				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☑	☐	☐	☐
Potentially Significant Impact: *Seasonal wetland habitats and other waters that may be subject to the jurisdiction of the USACE, RWQCB and/or CDFW are present on the Project Site. There are also streams and swales that run through the east side of the Site, south of the Contra Costa Canal. In addition, potential jurisdictional wetlands are located at several locations on the Site. There are artificial ponds located in the northwest area of the Site. Some of these features would be removed by Project development. A biological resources technical report and wetland jurisdictional report will be prepared. The Project's potential impacts to State or Federally protected wetlands will be analyzed in the EIR.*				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☑	☐	☐	☐
Potentially Significant Impact: *The study area is located at the southern edge of the City of Pittsburg and is bounded on three sides by open space and undeveloped lands. The Site is currently fenced off; however, some wildlife movement may be occurring along drainages and associated wetland habitats. No native resident or migratory fish are expected to occur within or in proximity to the Project footprint. A biological resources technical report will be prepared for the Project, and the Project's impacts to potential native wildlife movement corridors and nursery sites will be analyzed in the EIR.*				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☑	☐	☐	☐
Potentially Significant Impact: *The City of Pittsburg has a tree preservation ordinance, the intent of which is to protect trees on private property (PMC section 18.84.825). The ordinance applies to trees on private property that measure at least 50 inches in circumference at four and one-half feet above grade and requires that a permit be obtained*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
from the City prior to tree removal. The Project would remove trees of this size or greater, and the ordinance would apply to the Project following transfer of the Site to ownership by the Applicant. The Project's Master Plan will address tree removal, and the potential for the Project to conflict with the City's tree preservation ordinance will be further evaluated in the EIR, including consideration of any relevant Master Plan requirements or allowances.				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☑	☐	☐	☐
Potentially Significant Impact: *The Final HCP/NCCP was approved by seven member agencies, including the City of Pittsburg and Contra Costa County, in October 2006. In 2007, the City of Pittsburg approved ordinances requiring future development projects to comply with the HCP/NCCP. Coverage under the HCP/NCCP authorizes take of covered species under the Endangered Species Act and Natural Community Conservation Planning Act for the reasonable expansion of urban development in the City of Pittsburg. The Site is located within the HCP/NCCP plan area. A biological resources technical report will be prepared for the Project and will identify the special status species that could be impacted by the Project. The Project's consistency and potential for conflict with the HCP/NCCP will be evaluated in the EIR.*				

V. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☑	☐	☐	☐
Potentially Significant Impact: *The Delta View Golf Course was originally established more than 50 years ago and has evolved over the years to include a collection of buildings structures and landscapes. Considering the age of original establishment, the facility has the potential to have buildings, structures, landscapes or other characteristics that may be significant in terms of a historic resources, and the Project could adversely affect such resources. Therefore, the potential for the Project to impact important historical resources will be evaluated in the EIR.*				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☑	☐	☐	☐
Potentially Significant Impact: *A cultural resources record search and field survey is needed to determine if identifiable archaeological resources occur in areas affected by the Project. The Project would include grading, excavations for utilities installations, and other ground disturbances that could unearth buried cultural resources that are not currently identifiable. A cultural resources evaluation will be completed, and the potential for the Project to significantly affect archaeological resources will be evaluated in the EIR.*				
c) Disturb any human remains, including those interred outside of formal cemeteries?	☑	☐	☐	☐
Potentially Significant Impact: *There are no known cemeteries or human burials on the Site, but the potential cannot be ruled out for unknown human remains to be disturbed during grading and excavation for Project construction. A cultural resource survey has not yet been completed for the property, and as such, the potential for Project grading to disturb human remains will be evaluated in the EIR.*				

VI. ENERGY

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☑	☐	☐	☐
Potentially Significant Impact: *Construction of the Project would consume substantial amounts of energy to power equipment and vehicles. Operation and maintenance of the Project facilities would result in continuous demand for power to keep clients' servers running, along with additional power demands for climate control, lighting, maintenance and other needs. The EIR will evaluate the Project's energy demand and its potential to result in significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources.*				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☑	☐	☐	☐
Potentially Significant Impact: *On September 18, 2008, the California Public Utilities Commission (CPUC) adopted California's first Long-Term Energy Efficiency Strategic Plan. The Plan was subsequently updated in January 2011. Both iterations of the Plan included goals for reducing energy demands and maximizing energy savings for residential, commercial, agricultural and industrial land use sectors, as well as strategies for assisting the State in achieving energy efficiency and greenhouse gas reduction goals. The vision and primary goal for the commercial sector is for all new commercial buildings to be zero net energy by 2030.* *The Project includes an interconnecting power line from the adjacent PG&E power transmission corridor to an onsite power substation that would provide power to the proposed technology center campus. The Project would be required to comply with Title 24 Energy Efficiency requirements of the California Building Code (CBC), and demonstration of this compliance would be required by the City prior to the City's issuance of a building permit for any component of the development of the Project.* *While compliance with CBC would be a requirement of the Project, the industrial sector zero net energy goal of California's Long-Term Energy Efficiency Strategic Plan is not addressed in the Project design concept. Data centers have high energy demands, and the phased buildout horizon projected for the development would overlap with the zero net energy building goals of the CPUC. Thus, analysis of the consistency of the Project with State goals for energy efficiency will be included in the EIR.*				

VII. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☑
No Impact: *The Project location does not occur in any Alquist-Priolo earthquake fault zone nor does it occur on or cross any known active fault (California Department of Conservation, 2019a and 2019b). Therefore, the Project would have no impact associated with rupture of a known earthquake fault, and this issue will not be further analyzed in the EIR.*				
ii) Strong seismic ground shaking?	☑	☐	☐	☐
Potentially Significant Impact: *While there are no known active faults on or proximal to the Site, the Site is in the Coast Ranges geomorphic province that is dissected by a number of fault zones associated with the overall San Andreas fault system demarking the intersection of the North American and Pacific tectonic plates. Strong ground motions could occur in the area from movement on regional faults. Strong seismic ground shaking would be a potentially substantial seismic hazard if structures are not appropriately designed. The potential for significant Project impacts related to seismic ground motions will be evaluated in the EIR.*				
iii) Seismic-related ground failure, including liquefaction?	☑	☐	☐	☐
Potentially Significant Impact: *Liquefaction potential varies from low to very high on the properties in the City, with higher liquefaction potential adjacent to streams and along the delta waterfront. Regional geologic hazard mapping by the California Department of Conservation indicates that portions of the Project footprint may have a potential for liquefaction or earthquake-induced landslides (California Department of Conservation, 2019c). The specific geotechnical characteristics of the Site will be evaluated in a geotechnical study that will be prepared for the Project. The potential for seismic-related ground failure will be included in the Project geotechnical analysis and evaluated in the EIR.*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Landslides?	☑	☐	☐	☐
Potentially Significant Impact: *Landslides can occur where a combination of sloping terrain and geologic material characteristics, pore water pressure, surplus loading, groundborne vibration, and/or earthquake shaking can affect friction and the strength of materials supporting the slope. Regional geologic hazard mapping by the California Department of Conservation identified one area in the southeast portion of the Site that may have a potential for earthquake-induced landsliding. Furthermore, the Project would require grading that could have the potential to create unstable slopes if final slope angles and/or drainage controls are not properly designed. The potential for landslides will be evaluated in a geotechnical study that will be prepared for the Project. The potential for the Project to be impacted by landsliding or to exacerbate landslide risk will be evaluated in the EIR.*				
b) Result in substantial soil erosion or the loss of topsoil?	☑	☐	☐	☐
Potentially Significant Impact: *The Project would result in disturbance to vegetated soils and changes to topography with related erosion potential, as well as potential loss of topsoil in the area to be developed. The potential for soil erosion or loss of topsoil to occur as a result of the Project will be evaluated in the EIR.*				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☑	☐	☐	☐
Potentially Significant Impact: *The potential for landsliding and liquefaction are addressed in Responses VII(a)(iii) and (iv), above and, as previously noted, will be evaluated in the EIR. Lateral spreading is a phenomenon that can occur from seismic shaking or other lateral loading when the ground surface is not laterally supported on one or more sides, for example, on ridge tops or near edges of terraces or steep slope faces. Cut slopes from Project construction could have the potential to result in lateral spreading offsite at some locations if the slopes are not properly designed. Soil collapse occurs when loosely compacted soils are disturbed by seismic shaking, rewetting, or other activities.* *CBC Section 1803.2 would require that a geotechnical investigation be prepared for the Project and provided to the City Engineering Division. The geotechnical investigation would address potential geologic hazards, including, but not limited to, potential for lateral spreading and soil collapse, and identify measures such as appropriate foundation design, structural systems and ground stabilization to limit potential for adverse impacts. The CBC would require that recommended measures of the geotechnical report be incorporated into the final Project design to limit potential adverse impacts.*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Implementation of geotechnical report recommendations for grading slope design and to mitigate the potential for soil collapse, if needed, would limit the risk of lateral spreading and soil collapse to a less than significant level. *Subsidence can occur when pore pressures are reduced in thick unconsolidated geologic materials below a valley floor due to substantial fluid withdrawal. The Project does not involve substantial extraction of fluids from unconsolidated geologic deposits, nor does the Site overlie thick unconsolidated geologic deposits that could be materially affected by fluid withdrawal unrelated to the Project. Therefore, the Project does not have a material foreseeable risk related to subsidence. Considering these factors and excepting the potentials for liquefaction and landsliding as described in Responses VII(a)(iii) and VII(a)(iv), above, the Project would not be located on an unstable geologic unit nor cause a unit to become unstable. Accordingly, the potential for the Project or adjacent properties to be affected by a potentially unstable geologic unit or soil profile need not be evaluated in the EIR beyond the potential for liquefaction and landsliding.*				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☑	☐	☐	☐
Potentially Significant Impact: *Expansive soils occur where the soil profile of a site has a high quantity of certain clay minerals that can absorb water into their crystal structure and thereby increase in volume with moisture content and shrink in volume as drying occurs. The change in soil volume can cause foundation stability problems. Soils with clay minerals from the smectite group such as montmorillonite exhibit the most potential for swelling. The United States Department of Agriculture, Natural Resources Conservation Service Soil Survey interactive webtool indicates a combination of clay and clay loam soils occur on the Site including Capay Clay, Altamont Clay, Rincon Clay Loam, and Fontana Complex (U.S. Department of Agriculture, 2019). Based on characteristics published by the U.S. Department of Agriculture, some of these soils may have expansive properties. Potential for substantial direct or indirect risks to life or property will be evaluated in the EIR.*				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☑
No Impact: *Not applicable to the Project. The Project would have connections to the City's existing wastewater conveyance system. No septic tank or alternative wastewater treatment and disposal system is proposed with the Project.*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☑	☐	☐	☐
Potentially Significant Impact: *The Site terrain consists of rolling hills and gently sloped areas covered by soil with no unique geologic features. Offsite features would occur in similar terrain or in urbanized areas with no unique geologic features. Project grading on the Site would include excavation in sedimentary geologic units that are old enough to potentially contain paleontological resources. The potential for the Project to impact important paleontological resources will be evaluated in the EIR.*				

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☑	☐	☐	☐
Potentially Significant Impact: *Construction, operation and maintenance of the Project would generate GHG emissions, primarily from use of fossil fuels. Additional GHG contributions may also occur, for example, from refrigerants used for cooling or sulfur hexafluoride if used in electrical equipment. GHG emissions from the Project will be evaluated in the EIR.*				
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☑	☐	☐	☐
Potentially Significant Impact: *The Project would generate GHG as described in Response VIII(a), above. The potential for the Project to conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHG will be evaluated in the EIR.*				

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☑	☐

Less Than Significant Impact: *Project construction would require the transport, use and disposal of hazardous materials. Hazardous materials used during construction would be typical of construction sites and would include materials such as petroleum fuels and lubricants, compressed gases for welding and other needs, paint and epoxy coatings, adhesives, solvents and cleaning products. Once built, the Project's ongoing operations and maintenance also would require the use of similar types of hazardous materials, plus insulating oil for electric transformers and chemicals for onsite water treatment. Use of hazardous materials during construction, operations and maintenance would generate hazardous waste such as used oil, empty hazardous material containers, and off-specification products such as cleaned up spill residue and old products no longer suitable for use onsite. The Project is not anticipated to require the use or storage of any hazardous material in excess of thresholds requiring a Risk Management Plan under State or Federal regulations. The routine use of hazardous materials during construction, operation and maintenance would require routine transport of these materials to the Site and transport of hazardous waste from the Site.*

Routine transport, storage and use of hazardous materials during construction, operation or maintenance could create a significant exposure hazard to construction workers, the public or the environment if such materials are not properly contained and managed. Unsafe exposure to hazardous materials and hazardous waste can result in health effects to humans or the environment that are dependent on the harmful constituents present in the material and extent of exposure. Depending on the materials and extent of exposure, human health effects from hazardous materials can include, but are not limited to, acute or chronic toxicity, skin corrosion/irritation, eye or respiratory damage, organ damage, carcinogenicity, reproductive toxicity and asphyxiation. Conditions leading to fire, explosion, sudden pressure release, or other physical hazards can also occur if hazardous materials are not properly managed. Releases of hazardous materials to the environment can cause pollution and harm to wildlife, natural vegetation communities and ecosystems.

Project construction areas would not be open to the public. Construction would be required to occur in compliance with all applicable and relevant regulations including, but not limited to, Federal Occupational Safety and Health Administration (OSHA) and California OSHA General Industry Safety Orders for protection of workers. Key requirements in these regulations include Code of Federal Regulations Title 29 (29 CFR) Part 1910 and CCR Title 8 Section 5194 that would require a comprehensive hazard communication program to ensure that all workers are knowledgeable in the identification and proper handling of

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
hazardous materials to prevent unsafe exposure, unsafe storage or use, and to avoid spills. These and other requirements of Federal and State OSHA General Industry Safety Orders for hazardous substances and hazardous materials are designed to prevent accidents and unsafe levels of worker exposure. Furthermore, stormwater pollution prevention BMPs that must be implemented during construction under the State General Permit would be required to include measures to prevent contact of hazardous materials with stormwater, preventing hazardous materials in runoff from the Site. Hazardous wastes would be required to be managed, shipped offsite, and treated or disposed of in accordance with comprehensive environmental protection measures for human and environmental health and safety pursuant to CCR Title 22 Division 4.5. These regulations are designed under the authority of the Federal Resource Conservation and Recovery Act to ensure the safe management of hazardous wastes from "cradle to grave." Other Federal and State regulations are in place to minimize the potential for a release of hazardous materials during transportation to or from the Site. At a Federal level, transportation of hazardous materials is regulated by various Federal agencies within the U.S. Department of Transportation. Transportation of hazardous waste also falls under the jurisdiction of U.S. Environmental Protection Agency (EPA). These agencies implement and enforce a broad array of transportation safety regulations in CFR Title 49 including, but not limited to, requirements for Federal motor vehicle safety standards, vehicle inspection standards, fitness requirements for commercial drivers, motor carrier routing regulations, hours of service of drivers, spill prevention and response preparedness, placarding, hazardous material container specifications, and other regulations addressing safety for commercial carriers and hazardous material transport. The State of California also requires licensing of commercial transporters of hazardous material and enforces various other safety requirements for transport of hazardous materials in CCR Title 13. Considering these regulatory requirements in place that would apply to hazardous material transport, storage and use during construction, the routine transport, use and disposal of hazardous materials for construction would not create a significant hazard to the public or the environment. *Following construction, hazardous material transport, storage and use during project operations and maintenance would be required to comply with all of the regulations identified above for construction, plus additional project design and operations requirements including, but not limited to, California Fire Code hazardous material safety requirements (24 CCR Part 9 Chapter 50), California Office of Emergency Services 19 CCR Division 2, Chapter 4, Article 4 (Section 2650* et seq.*) requirements for Hazardous Material Business Plans, and U.S. EPA 40 CFR 112 requirements for Spill Containment Control and Countermeasures Plans. If fuel for backup generators is stored in underground tanks, then the tanks would be required to have secondary containment and monitoring in compliance with 23 CCR Chapter 16 regulations to ensure against leakage. Chapter 50 of the Fire Code provides and requires safe design requirement for buildings and other areas where hazardous materials are used or stored and safe practices for handling of hazardous materials. 19 CCR Division 2, Chapter 4, Article 4 requirements at 2659 requires an employee training program that includes methods for safe handling of hazardous materials. 40 CFR 112 would require that bulk oil storage, such as diesel fuel tanks for backup generators and oil filled equipment such as transformers be designed and operated with safeguards such as secondary containment and*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
routine inspections to prevent accidental releases of oil that could reach waters of the U.S. Considering these regulatory requirements in place with which the Project construction would be required to comply, the routine transport, use and disposal of hazardous materials for construction would not create a significant hazard to the public or the environment, and this issue will not be further analyzed in the EIR.				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑	☐
Less Than Significant Impact: *As described in Response IX(a), above, Project construction, operations and maintenance would require the transport, storage and use of various hazardous materials. Such materials have the potential for effects to human health and the environment as previously described if an upset or accident condition were to result in release or exposure. However, none of the hazardous materials that would be required for the Project, or hazardous wastes generated by the Project, would be of quantities or have characteristics that could comprise a hazard substantially different from typical construction sites and commerce throughout the region. The primary hazardous materials stored and used for construction and operations in terms of bulk container quantities would be diesel fuel and lubricating oils for construction equipment and backup generators. Following construction, diesel fuel consumption would be limited to monthly readiness testing and generator use when power outages occur. Above ground diesel fuel storage and oil-filled transformers over 55 gallons in oil capacity would be required to comply with 40 CFR 112 requirements including design and operational measures for preventing spills and secondary containment for potential spills. Underground diesel fuel storage tanks would be required to have secondary containment and monitoring in compliance with 23 CCR Chapter 16 regulations to ensure against leakage. Data center facilities would be equipped with secondary containment for any hazardous cooling water treatment chemicals in containers with a capacity of 55 gallons or more. Transformers are sealed once filled, and changing of transformer oil is rarely required, so the use is generally not consumptive. Considering these factors and the array of additional regulations that would apply to the Project's hazardous materials during construction, operation and maintenance, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving a release of hazardous materials into the environment. This issue will not be further analyzed in the EIR.*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☑	☐	☐	☐
Potentially Significant Impact: *The Project is not anticipated to handle acutely hazardous materials, substances or waste, but will handle some hazardous materials as previously described and will emit hazardous emissions in diesel exhaust. The Rancho Medanos Junior High School is located approximately 0.1 mile from the Site. The Project's use of hazardous materials and management of hazardous waste would not have a foreseeable impact to any school for the reasons described in Responses IX(a) and (b). The potential for hazardous emissions from diesel fuel combustion to have a significant impact to receptors at Rancho Medanos Junior High School will be evaluated in the EIR.*				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☑
No Impact: *A Phase I Environmental Site Assessment has been prepared for the Project following American Society of Testing and Materials (ASTM) guidelines to determine if there is any evidence of a past release of hazardous materials on the site. The Phase I Environmental Site Assessment did not identify the Site to be on any of the government lists compiled pursuant to Government Code Section 65962.5 and did not identify any evidence of a past release on the site of hazardous materials that could create a significant hazard to the public or the environment (TRC, 2020). Based on the Phase I Environmental Site Assessment, no impact is foreseeable. This issue will not be further analyzed in the EIR.*				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☑
No Impact: *The Project area is not within an airport land use plan or within two miles of a public or public use airport. The closest airport, Buchanan Field Airport in Concord, is over five miles west of the Site, and as such, this issue will not be further analyzed in the EIR.*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑	☐
Less than Significant Impact: *The City of Pittsburg Emergency Operations Plan (EOP), last updated in December 2018, "coordinate[s] all the facilities and personnel of the City into an efficient organization capable of responding effectively to any emergency." No element of the Project would have the effect of impairing implementation of the EOP in the event of a public emergency.* *In addition to two primary access routes onto the Site from West Leland Road, the Project includes a secondary emergency vehicle only access route from Golf Club Road, ensuring that the Site has an alternative access even prior to construction phases being initiated south of the Contra Costa Canal. The primary and emergency access routes for phased construction north of the Contra Costa Canal would be completed as part of initial construction work. During construction of the access routes from West Leland Road, short-term lane closures may be necessary on portions of West Leland Road. However, pursuant to PMC Chapter 10.12 (Traffic Control Devices), the City would require the Applicant to submit a Temporary Traffic Control Plan (TTCP) that would identify provisions, such as detour routes and limitations on lane closures, to ensure that vehicles would have evacuation routes and emergency responders' vehicles would have adequate access on the public right-of-way to respond in the event of an emergency. This issue will not be further analyzed in the EIR.*				
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☑	☐
Less than Significant Impact: *The Site is entirely within a Local Responsibility Area designated as a Non-Very High Fire Hazard Severity Zone (Department of Forestry and Fire Protection, 2007 and 2009). The southern border of the Project site abuts unincorporated County lands (refer to Figure 5) that are within a State Responsibility Area recognized by the Board of Forestry and Fire Protection as a High Fire Hazard Severity Zone. According to the City of Pittsburg Emergency Operations Plan, there have been wildfires in the hills of Mount Diablo State Park south of the City and near the former Concord Naval Weapons Station west of the City. The Site abuts grasslands to the east, south and west that can burn when dry but do not contain large amounts of woody fuel such as woody brush or extensive dense tree stands that can make fires difficult to manage. Furthermore, the Project's landscaped grounds would be irrigated and would not be particularly susceptible to fire. Workers could leave the Site if warranted due to a grassland wildfire if one were to occur in the area. The Site abuts an urbanized area to the north allowing for quick distancing from the grasslands, if needed. Considering these factors, the risk would be less than significant, and this issue will not be further analyzed in the EIR.*				

X. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☑	☐	☐	☐
Potentially Significant Impact: *Project construction, operations and maintenance would have the potential to create additional sources of polluted runoff, for example, from sediment loading, from vehicle fluid leaks, and from application of cleaners, fertilizers, finishes or other chemicals.* *Construction work would be required to implement stormwater quality BMPs pursuant to a SWPPP that must be submitted to the RWQCB prior to construction for coverage under the State General Permit for stormwater discharges from construction sites. Furthermore, for post-construction pollution prevention, the Applicant must provide a Stormwater Control Plan (SCP) in accordance with the National Pollutant Discharge Elimination System (NPDES), Municipal Regional Permit (MRP) Provision C.3 and the Contra Costa County Stormwater C.3 Guidebook. The SCP must demonstrate that the Project would comply with the MRP Provision C.3's stormwater treatment and flow-control requirements, so as not to violate requirements of the MRP. The potential applicability of other water quality standards and waste discharge requirements, such as for construction dewatering, if needed, will be evaluated in the EIR along with the Project's potential to violate water quality standards or waste discharge requirements or otherwise substantially degrade water quality.*				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☑	☐	☐	☐
Potentially Significant Impact: *The Project area includes drainages that recharge the Pittsburg Plain Ground Water Basin (Department of Water Resources Basin 2-4), which encompasses 18 square miles and extends approximately 10 miles along the southern shoreline of Suisun Bay between Port Chicago and the City of Antioch. Mapping published by the California Geological Survey shows the basin boundaries extending into the drainages beneath the Site (California Geological Survey, 2019). The Project would change existing natural drainage channels and would result in new impermeable surfaces, both of which could affect groundwater recharge. Accordingly, the potential for the Project to interfere substantially with groundwater recharge will be addressed in the EIR.* *The Project could utilize recycled water from the DDSD wastewater treatment plant for landscaping. Recycled water could also be used to supplement the Project's water demand*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
for cooling, but the recycled water supply is not continuously available or available in enough quantity to satisfy the Project's cooling demand. Beyond the recycled water supply, water for cooling could be purchased from the City of Pittsburg and may include potable water delivered via existing water mains that pass through the Site. In addition, potable water for domestic use (hand washing, drinking, etc.) in the data center buildings would be purchased from the City. A water supply assessment is required for the Project and will be prepared. The potential for the Project to substantially decrease groundwater supplies will be addressed in the EIR.				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☑	☐	☐	☐
Potentially Significant Impact: *The Project would change existing natural drainage patterns and increase the area of impermeable surfaces due to grading and construction of building pads, roadways, parking lots and other features. A hydrology study will be prepared by the Applicant to evaluate these proposed changes. The potential for increased erosion or siltation will be evaluated in the EIR.*				
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☑	☐	☐	☐
Potentially Significant Impact: *The Project would change existing natural drainage patterns and increase the area of impermeable surfaces due to grading and construction of building pads, roadways, parking lots and other features. The Applicant is preparing a hydrology study to evaluate existing and post-construction surface runoff conditions. The Project's proposed changes to surface drainage including the potential for the Project to change rates or amounts of surface runoff and related potential for flooding onsite or offsite will be evaluated in the EIR.*				
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☑	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Potentially Significant Impact: *Project construction, operations and maintenance would have the potential to create additional sources of polluted runoff as described in Response X(a), above. The Project would also change existing natural drainage patterns and increase the area of impermeable surfaces due to grading and construction of building pads, roadways, parking lots and other features. The Applicant is preparing a hydrology study to evaluate existing and post-construction surface runoff conditions. The potential for the Project to substantially increase stormwater pollution or generate runoff that exceeds the capacity of the existing or planned stormwater system will be evaluated in the EIR.*				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☑	☐	☐	☐
Potentially Significant Impact: *The Project is not in a tsunami hazard zone and is not proximal to any body of water large enough to pose a risk of seiche. Accordingly, these risks need not be further addressed in the EIR. The Site is in Flood Zone X (area of minimal flood hazard) as mapped by the U.S. Federal Emergency Management Agency. Therefore, the risk of inundation by regional flooding is less than significant. The Project would include grading and development in and adjacent to drainages from upstream areas. The Applicant is preparing a hydrology study to evaluate existing runon conditions and post-construction surface drainage conditions. The potential for the release of pollutants due to localized project inundation will be evaluated in the EIR.*				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☑	☐	☐	☐
Potentially Significant Impact: *The Project's potential for impacts to water quality and sustainable groundwater management are described in Responses X(a), (b), (c) and (d) above. As described in those responses, the potential for the Project to significantly impact water quality or sustainable groundwater management will be evaluated in the EIR.*				

XI. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☑
No Impact: *The Project would be constructed on a defunct public golf course at the edge of urban development. Lands to the west, south and east are open space. The Project would not remove any public roads or throughways joining established communities. Therefore, there would be no impact, and this issue will not be further analyzed in the EIR.*				
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☑	☐	☐	☐
Potentially Significant Impact: *The Project includes a request for a change in the General Plan land use designation of the Site from* Park *to* Industrial*, and a change to the zoning from OS District to IP-P District. Potential environmental impacts of these requested land use and zoning changes will be evaluated in the EIR.*				

XII. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☑
No Impact: *According to the City of Pittsburg General Plan Resource Conservation Element, there are no significant mineral deposits or active mining operations in the City. Review of Google Earth aerial imagery did not identify any apparent substantial ongoing or recent mining operations in the area. The California Department of Conservation also does not identify any significant mineral resource in the Project vicinity (California Department of Conservation, 2019d and 1996). Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State, and this issue will not be further analyzed in the EIR.*				
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☑
No Impact: *As described in Response XII(a), there are no known important mineral resources in the Project vicinity. Therefore, there would be no impact, and this issue will not be further analyzed in the EIR.*				

XIII. NOISE

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☑	☐	☐	☐
Potentially Significant Impact: *Grading of the site in preparation for development, use of tools and equipment, and other related activities would generate noise during construction. Once built and operational, the Project would generate noise from vehicles, backup generators, cooling systems, and climate control units. A noise technical analysis will be prepared, and temporary and permanent noise increases from the Project will be addressed in the EIR.*				
b) Generation of excessive groundborne vibration or groundborne noise levels?	☑	☐	☐	☐
Potentially Significant Impact: *Grading and excavation during construction would generate groundborne vibration that could potentially impact sensitive receptors or structures proximate to work areas. Once built and operational, the Project would not generate substantial groundborne vibration or noise. Levels of groundborne vibration during construction and the potential for related impacts will be addressed in the EIR.*				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑
No Impact: *The Project area is not within an airport land use plan nor within two miles of a public or public use airport. The closest airport is Buchanan Airfield in Concord and is more than five miles to the west of the Site. This issue will not be further analyzed in the EIR.*				

XIV. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☑	☐	☐	☐
Potentially Significant Impact: *The Project site is an infill site within City boundaries. No new roads are proposed except for onsite private roads that would be used for the Project to access the Site from existing West Leland Road, which would not require improvement other than the construction of Project entrances. Water supply infrastructure needed to supply the project already exists. Electric power to the Site would be from the adjacent PG&E transmission corridor. Natural gas tie-ins and sanitary sewer connections to existing infrastructure would be sized to accommodate the Project demand only. No new utility mains would be needed. The Project would not require construction or expansion of any public water treatment works. For these reasons, infrastructure improvements proposed for the Project would not result in any material population growth.* *The Project's phased construction would generate construction jobs. In addition, following construction, Project operations and maintenance would generate long-term employment positions totaling an estimated 500 jobs at full buildout. The potential for Project-related jobs to induce substantial unplanned population growth will be addressed in the EIR.*				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑
No Impact: *The Site is void of any housing units. Existing housing would not be displaced by the construction or operation of the Project; therefore, no impacts would occur, and this issue will not be further analyzed in the EIR.*				

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☑	☐
Less Than Significant Impact: *The Site is located within the service area of the Contra Costa County Fire Protection District (ConFire). The Project would be within 0.6-mile driving distance from ConFire Station 87, located at 800 West Leland Road, west of the Site. Generally, depending on service demands, properties located within a 1.5-mile radius of a fire station can experience emergency response times of five or fewer minutes, and this standard would be consistent with fire emergency response services as identified in the City's General Plan (Public Facilities Element, Policy 11-P-26). The Project could incrementally increase fire protection and response service demands, and such increase would be offset by the Applicant's commitment to annex the Site into a community services district with associated development fees for operational costs of the fire protection district. No new construction or physical alteration of fire protection facilities is anticipated to be needed. No construction of new fire protection facilities or physical alteration of fire protection facilities is proposed other than extension of fire suppression systems and fire hydrants on the Site. Extending the fire hydrant network onto the Site would not result in impacts outside of those addressed in other portions of this Initial Study for the overall Project development. This issue will not be further analyzed in the EIR.*				
Police protection?	☐	☐	☑	☐
Less Than Significant Impact: *The Project could incrementally increase police service demands as a result of security-related service calls to the data center buildings or calls for service made by data center employees. The Project would have on-site security measures including private security staff, perimeter fencing and cameras that would limit the incremental demand increase for police services. The incremental demand that could occur would be offset by the Applicant's commitment to annex the Site into a community services district with associated development fees for operational costs of police protection. The Project's potential incremental demand increase is not anticipated to result in a need for*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
construction of new police facilities or physical alteration of police facilities. This issue will not be further analyzed in the EIR.				
Schools?	☐	☐	☑	☐
Less than Significant Impact: *The Project would include construction of commercial office and data storage space in multiple campus buildings. Prior to receiving a building permit for any building in the Project, the developer must present evidence to the City of payment of development impact fees to the Pittsburg Unified School District (PUSD). The fee, currently collected by PUSD at a rate of $0.61 per square foot of commercial and industrial building area, helps to fund facilities expansions needed to house growth in the school district's student population. For a non-residential development, and pursuant to Section 65995(h) of California Government Code, payment of school fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, including development of real property. Thus, with mandatory payment of school fees, the impact of the Project on schools would be less than significant, and this issue will not be further analyzed in the EIR.*				
Parks?	☑	☐	☐	☐
Potentially Significant Impact: *No need for new park facilities or physical alterations to park facilities has been identified related to the Project. However, as described in Response XIV(a), the potential for Project-related jobs to induce substantial unplanned population growth will be addressed in the EIR and, if the Project is determined to have the potential for unplanned growth, new or expanded park facilities could be needed. Furthermore, full build-out of the Project would require lifting of deed restrictions on portions of the Site that currently limit use of the deed restricted areas to public recreational purposes. Lifting of the deed restrictions will be subject to approval by National Park Service, and it is not currently known whether new or altered park facilities will be required. For these reasons, the Project's potential to result in substantial adverse impacts from construction or physical alteration of park facilities will be evaluated in the EIR.*				
Other public facilities?	☐	☐	☐	☑
No Impact: *There are no other public facilities that would foreseeably require physical expansion or modification as a result of the Project. As such, this issue will not be further analyzed in the EIR.*				

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☑	☐	☐	☐
Potentially Significant Impact: *The City's standards for parkland demands are based on residential densities (PMC section 17.32.020). The Project is a commercial development that would introduce a new employment base to the Project area and potentially affect local residential population growth. The potential for the Project to result in an increased use of parks and other recreational facilities will be addressed in the EIR.*				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☑	☐	☐	☐
Potentially Significant Impact: *The Project does not include recreational facilities other than a trail along the north side of the Site. The Project does not have a foreseeable potential need for construction or expansion of recreational facilities aside from those to be addressed in the EIR as described in Responses XV(a) and XVI(a).*				

XVII. TRANSPORTATION

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable program, plan, ordinance or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☑	☐	☐	☐
Potentially Significant Impact: *Workers traveling to and from the site, deliveries of equipment and materials, and transport of waste from the site would generate vehicle trips during construction and during operations and maintenance. Vehicle trips generated by the Project would use existing roads and could affect traffic circulation. In addition, the Project proposes construction of entrances on West Leland Road and offsite utility tie-ins that could affect traffic circulation, transit systems, bicycle and pedestrian facilities. Tri Delta Transit (the local bus operator) maintains bus stops on West Leland Road near the intersection of Golf Club Road. Sidewalks, bike lanes and nearby regional trails could be affected by temporary offsite construction. Both the Tri Delta Transit routes and the Delta de Anza Regional Trail provide alternative, non-vehicular access from surrounding areas to the Pittsburg Center and Pittsburg/Bay Point BART stations within 2.5 miles to the east and west of the Site. A transportation impact study (TIS) will be prepared that will estimate vehicle trips that would be generated by Project construction, operations and maintenance and analyze the Project's traffic and multi-modal access impacts. The EIR will evaluate the Projects impacts on circulation and multi-modal access, including impacts of Project-generated vehicle trips and potential interruptions to road, transit and trail systems due to temporary offsite construction.*				
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☑	☐	☐	☐
Potentially Significant Impact: *The Project would generate vehicle trips as described in Response XVII(a), above. A TIS will be prepared that will, in part, evaluate Project transportation impacts in terms of vehicle miles traveled as outlined in CEQA Guidelines Section 15064.3. An evaluation of Project transportation impacts pursuant to CEQA Guidelines Section 15064.3 will be included in the EIR.*				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☑	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Less than Significant Impact: *The Project would include construction of two new intersections with West Leland Road. New intersections have the potential to create dangerous hazards if they are not properly designed and controlled. The City requires that new intersections to be designed and constructed in conformance with current City design standards for geometry and traffic controls, and the detailed designs would be reviewed by the City Engineering Department and subject to their approval prior to issuance of an encroachment permits for their construction. Final construction would be subject to inspection and approval by the City Engineering Department. With design and construction following current standards, there would not be a substantial hazard increase due to the new intersections. Oversize loads may occasionally be needed during construction. Oversize loads would be required to be delivered to the Site by properly licensed drivers under permits issued by Caltrans for State highways, Contra Costa County for County roads, and the City of Pittsburg Engineering Department for City roads. Permits are required for any load with dimensions exceeding 14 feet in height, 8.5 feet in width, 40 to 75 feet in length depending on the type of vehicle used, or 20,000 pounds per axle. West Leland Road with access from SR 4 via either Bailey Road or Railroad Avenue are designated Truck Routes and provide access to the proposed Site entrances. The City requires pilot cars for loads 11 feet and wider on West Leland Road. Considering permit requirements for oversize loads and available access to the Site entrances via designated truck routes, oversize loads would not create a significant hazard, and this issue will not be further analyzed in the EIR.*				
d) Result in inadequate emergency access?	☐	☐	☑	☐
Less Than Significant Impact: *The primary access roads to the Project would be paved two-way roads extending from West Leland Road. The Project design also includes an emergency vehicle access from Golf Club Road, allowing for two means of emergency ingress/egress for initial development on the north side of the Contra Costa Canal, plus a third route once development is initiated south of the canal. These access roads would be constructed as part of initial construction in each of the two respective areas, providing for redundant emergency access, and they would be constructed to City design standards providing for adequate emergency access. This issue will not be further analyzed in the EIR.*				

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☑	☐	☐	☐
Potentially Significant Impact: *A cultural resource record search and Native American outreach are being conducted to determine if tribal cultural resources are present in the Project vicinity. Furthermore, the Project would include grading, excavations for utilities installations, and other ground disturbances that could unearth buried cultural resources that are not currently identifiable. The potential for the Project to cause a substantial adverse change in the significance of a tribal cultural resource will be evaluated in the EIR.*				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☑	☐	☐	☐
Potentially Significant Impact: *As explained in Response XVIII(a), above, a cultural resource record search and Native American outreach are being conducted to determine if tribal cultural resources are present in the Project vicinity. The potential for the Project to impact tribal cultural resources is will be evaluated in the EIR.*				

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☑	☐	☐	☐
Potentially Significant Impact: *The Project would create new demand on infrastructure and would require offsite connections to existing infrastructure. Portions of onsite water mains occur within areas proposed for grading and, therefore, may need to be relocated. Wastewater conveyance capacity for the Project and the Project's natural gas demand, as well as the ability of existing offsite utility conveyance systems to support these needs, are being evaluated by the Applicant and City staff. Input is pending regarding the Project's electric power connection. Impacts of physical changes resulting from the Project infrastructure demands and connections will be evaluated in the EIR.*				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☑	☐	☐	☐
Potentially Significant Impact: *The Project is evaluating the use of recycled water from the DDSD wastewater treatment plant and potable water from the City to satisfy the Project's cooling demand. Potable water for domestic use (hand washing, drinking, etc.) in the data center buildings would be purchased from the City. A water supply assessment will be prepared. Water supplies planned for use by the Project will be evaluated for sufficiency in the EIR.*				
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☑	☐	☐	☐
Potentially Significant Impact: *Wastewater generated from the Project would require treatment. The quantity of wastewater anticipated to be generated by the Project and options for handling wastewater are being evaluated by the Applicant. The EIR will evaluate the*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
capacity existing to serve the Project's wastewater flow in addition to any existing commitments and impacts of needed infrastructure improvements, if any.				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☑	☐	☐	☐
Potentially Significant Impact: *Project construction and operations and maintenance would generate substantial quantities of solid waste. An inventory of anticipated solid waste streams is being developed. The EIR will evaluate anticipated Project waste quantities relative to available management capacity for disposal and diversion.*				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☑	☐
Less than Significant Impact: *The Project would be required to comply with all relevant statutes and regulations, and the Project as proposed would not conflict with any statute or regulation. The facility type is not unconventional or otherwise at risk of not being able to comply with regulatory requirements. Therefore, no significant impact is anticipated, and this issue will not be further analyzed in the EIR.*				

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑	☐
Less than Significant Impact: *The Project Site is entirely within a Local Responsibility Area designated as a Non-Very High Fire Hazard Severity Zone (Department of Forestry and Fire Protection, 2007 and 2009). The southern border of the Site abuts unincorporated County lands (refer to Figure 5) that are within a State Responsibility Area recognized by the Board of Forestry and Fire Protection as a High Fire Hazard Severity Zone.* *As described in Response IX(f), above, the Project proposes primary access roads that would connect to West Leland Road and run south to southern boundary of the Project site. Internal roads are proposed to be a minimum of 24 feet wide, which is enough width to allow emergency response and two-way traffic. During construction of the Project, encroachments into the public right-of-way of West Leland Road or Golf Club Road may be necessary to install utility connections and intersection or driveway improvements. Pursuant to PMC Chapter 10.12 (Traffic Control Devices), the City would require the Applicant to submit a TTCP that would identify provisions, such as detour routes and limitations on lane closures, to ensure that vehicles would have evacuation routes and emergency responders' vehicles would have adequate access on the public right-of-way to respond in the event of an emergency that might occur during construction of the Project. As described in Response IX(f), above, the Project would not impair implementation of the City's EOP in an emergency situation and would not result in permanent closure or obstruction of any access route that would impede response to a fire emergency in the vicinity of the Site. Therefore, the Project would not substantially impair an emergency response plan or emergency evacuation plan, and this issue will not be further analyzed in the EIR.*				
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☑	☐
Less than Significant Impact: *According to the City of Pittsburg Emergency Operations Plan, there have been wildfires in the hills of Mount Diablo State Park south of the City and near the former Concord Naval Weapons Station. The Project location is not in or near a Very High Fire Hazard Severity Zone. The adjacent hills are primarily grassland that can burn when dry but do not contain large amounts of woody fuel such as woody brush or trees that can make fires difficult to manage. Furthermore, the Project's landscaped grounds would not be particularly susceptible to fire, and the proposed use would comprise activities similar to*				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
an office complex and not an activity generally prone to creating an ignition source. Additionally, the data center buildings' climate control systems would include air particulate filtration due to the electronic equipment's sensitivity to high dust levels, and workers could leave the Site if warranted due to a grassland wildfire if one were to occur in the area. Considering these factors, the risk would be less than significant, and this issue will not be further analyzed in the EIR.				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☑	☐
Less Than Significant Impact: *The Project would require supporting infrastructure as described in Section 3.0 of this Initial Study and have impacts to the environment consistent with other responses to this Initial Study. None of the infrastructure needs would affect any State Responsibility Area or Very High Fire Hazard Severity Zone. Infrastructure would be designed and constructed consistent with applicable modern fire safety codes and requirements which are considered to limit fire risk to less than significant. This issue will not be further analyzed in the EIR.*				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☑	☐	☐	☐
Potentially Significant Impact: *The adjacent hills are primarily grassland that can burn when dry. The southern portion of the Site abuts slopes with grades up to 30 percent. Project design measures may be needed to ensure that the Project does not expose people or structures to significant risk of downslope flooding, landslides or mudflow following a grassland wildfire if one were to occur in areas upstream of the Site. These risks will be addressed in the EIR.*				

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☑	☐	☐	☐
Potentially Significant Impact: *The initial evaluation of the Project as discussed in this Initial Study has identified the potential for significant impacts in the resource areas of: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Potential impacts within some of these resource areas could degrade the quality of the environment, impact wildlife species, or affect important cultural resources. The potential for the Project to have significant impacts on these resources will be addressed in the EIR as outlined in other responses in this Initial Study.*				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☑	☐	☐	☐
Potentially Significant Impact: *The Project could result in cumulatively considerable impacts in some of the resource areas identified in Response XXI(a), above. Potential cumulative impacts of the Project will be addressed in the EIR.*				
c) Does the project have environmental effects which will cause substantial adverse effects on	☑	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
human beings, either directly or indirectly?				
Potentially Significant Impact: *The Project is proximal to populated areas. Potential Project impacts on humans as a result of construction and operation of the Project will be addressed in the EIR.*				

4.4 List of Preparers

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4.5 References/Sources Cited

Bay Area Air Quality Management District, 2012. *California Environmental Quality Act Air Quality Guidelines*. Updated May 2017.

Bay Area Air Quality Management District, 2019. Air Quality Standards and Attainment Status (http://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status). Site Visited October 11, 2019.

California Department of Forestry and Fire Protection, Cal Fire 2011. State Responsibility Areas (SRA) Map, Cal Fire Emergency Response Areas. Updated July 2016. Online**:** https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/ . Site Visited October 16, 2019.

California Department of Forestry and Fire Protection, Cal Fire 2009. Contra Costa County Very High Fire Hazard Severity Zones in LRA as Recommended by Cal Fire. January 7, 2009. Online: https://osfm.fire.ca.gov/media/6660/fhszl_map7.pdf. Site Visited November 30, 2019.

California Department of Forestry and Fire Protection, Cal Fire 2007. Contra Costa County Fire Hazard Severity Zones in SRA. November 7, 2007. Online: https://osfm.fire.ca.gov/media/6662/fhszs_map7.pdf. Site Visited November 30, 2019.

California Department of Conservation,2019a. *Fault Activity Map of California web page.* https://maps.conservation.ca.gov/cgs/fam/. Site visited November 27, 2019.

California Department of Conservation,2019b. *Earthquake Zones of Required Investigation web page.* https://maps.conservation.ca.gov/cgs/EQZApp/. Site visited November 27, 2019.

California Department of Conservation,2019c. *Earthquake Zones of Required Investigation web page.* http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/HONKER_BAY_EZRIM.pdf. Site visited November 27, 2019.

California Department of Conservation,2019d. *Division of Mines and Geology Special Report 146*, *Mineral Land Classification: Aggregate Materials in the San Francisco-Monterey Bay Area, 1987*. Accessed at https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/. Site visited November 30, 2019.

California Department of Conservation,1996. *Division of Mines and Geology Open File Report 96-03*, *Update of Mineral Land Classification: Aggregate Materials in the South San Francisco Bay Production-Consumption Region*.

California Department of Conservation, 1984. *Farmland Mapping and Monitoring Program Website for Contra Costa County. Online: https://www.conservation.ca.gov/dlrp/fmmp*. Site Accessed October 13, 2019.

California Department of Transportation, 2011. *California Scenic Highway System.* Online: www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Site visited October 16, 2019.

California Geological Survey. 2019. *Seismic Hazard Zone Report 127*, *Seismic Hazard Zone Report for the Honker Bay 7.5-Minute Quadrangle, Contra Costa County, California.*

California Public Utilities Commission, 2011. *California Energy Efficiency Strategic Plan. Online:* https://www.cpuc.ca.gov/General.aspx?id=4125. Site Visited October 11, 2019.

City of Pittsburg, 2001. *City of Pittsburg General Plan 2020: A Vision for the 21st Century. Online:* http://www.ci.pittsburg.ca.us/Modules/ShowDocument.aspx?documentid=1396. Site Visited October 11, 2019.

City of Pittsburg, 2014. *City of Pittsburg Emergency Operations Plan. Online: http://www.ci.pittsburg.ca.us/Modules/ShowDocument.aspx?documentid=9645* . Site Visited October 14, 2019.

City of Pittsburg, 2010. *Interactive Zoning Map*. Online*:* http://cityofpittsburg.maps.arcgis.com/apps/webappviewer/index.html?id=54f347e4fe8b405ab2b93b922bcce89c*.* Site visited November 26, 2019.

City of Pittsburg, *Pittsburg Municipal Code.* Online *https://www.codepublishing.com/CA/Pittsburg/*. Site Visited October 14, 2019.

City of Pittsburg, 2001. *Pittsburg 2020: A Vision for the 21st Century, City of Pittsburg General Plan Draft Environmental Impact Report* (SCH No. 1999082109).

City of Pittsburg, 2016. *City of Pittsburg 2015 Urban Water Management Plan – Final Draft.* Online http://www.ci.pittsburg.ca.us/Modules/ShowDocument.aspx?documentid=8283.

County of Contra Costa. 2000b. Contra Costa County General Plan. Online: http://www.co.contracosta.ca.us/4732/General-Plan. Site visited October 17, 2019.

East Contra Costa County Habitat Conservancy. *East Contra Costa County Habitat Conservation Plan.* Online: *https://www.contracosta.ca.gov/depart/cd/water/hcp/archive/final-hcp-rev/final_hcp_nccp.html*. Site Visited October 17, 2019.

Pittsburg Unified School District, 2018. *Commercial/Industrial Development School Fee Justification Study.*

TRC Solutions, Inc, 2020. *Phase I Environmental Site Assessment, Proposed Pittsburg Technology Park.* January 2020.

U.S. Department of Agriculture, 2019. Web Soil Survey. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Site Visited November 27, 2019.

U.S. Federal Emergency Management Agency. Website: FEMA Flood Map Service Center, (https://msc.fema.gov/portal/home). Site Visited October 18, 2019.