

APPENDIX F – POLICY CONSISTENCY ANALYSIS

**TABLE 1
PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN AIR QUALITY POLICIES**

General Plan Goals & Policies	Consistency with General Plan	Analysis
<p>Goal 9-G-9 – Work toward improving air quality and meeting all Federal and State ambient air quality standards by reducing the generation of air pollutants from stationary and mobile sources.</p>	<p align="center">Consistent</p>	<p>Based on the analysis conducted for the proposed project, short-term construction emissions would exceed applicable significance thresholds for NO_x and fugitive emissions of PM. Net increases of long-term operational emissions would exceed applicable significance thresholds for NO_x. Mitigation measures have been included to reduce short-term and long-term air quality impacts. With mitigation, air quality impacts attributable to the proposed project would be considered less than significant.</p>
<p>Goal 9-G-10 – Reduce the potential for human discomfort or illness due to local concentrations of toxic contaminants, odors and dust.</p>	<p align="center">Consistent</p>	<p>As discussed above, implementation of proposed mitigation measures would reduce air quality impacts, including short-term emissions of fugitive dust, to a less-than-significant level. In addition, an Odor Impact Minimization Plan and a Dust Minimization Plan have been prepared for the proposed project to minimize potential impacts to nearby sensitive receptors and to ensure compliance with applicable regulatory requirements.</p>
<p>Goal 9-G-11 – Reduce the number of motor vehicle trips and emissions accounted to Pittsburg residents and encourage land use and transportation strategies that promote use of alternatives to the automobile for transportation, including bicycling, bus transit, and carpooling.</p> <ul style="list-style-type: none"> • Policy 9-P-29 – Cooperate with the Bay Area Air Quality Management District to achieve emissions reductions for ozone and its precursor, PM-10. • Policy 9-P-30 – Cooperate with Bay Area Air Quality Management District to ensure compliance with dust abatement measures during construction. 	<p align="center">Consistent</p>	<p>As noted above, mitigation measures have been included to reduce project-generated emissions of criteria air pollutants and precursors, including emissions of ozone-precursor pollutants and PM-10, including mitigation measures for the control of construction-generated fugitive dust.</p>

**TABLE 2
PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN HAZARDS AND HAZARDOUS MATERIALS POLICIES**

General Plan Policies	Consistency Determination	Analysis
Policy 10-P-33: Prevent the spread of hazardous leaks and spills from industrial facilities to residential neighborhoods and community focal points, such as Downtown.	Consistent	The project site is located in an industrial area with the nearest residentially zoned area approximately one-half mile southwest of the site. The existing facility has an approved Hazardous Materials Business Plan and operates in compliance with all applicable hazardous materials regulations. The HMBP will be revised to address the proposed improvements and expanded operations. Updating the HMBP and continuing to comply with all applicable regulations will ensure that any potential hazardous leak or spill on the project site would not affect residential uses in the City.
Policy 10-P-35: Require historical assessments and/or sampling as part of the environmental review process for redevelopment projects in the Loveridge and Northeast River subareas. Ensure that contamination from industrial waste is mitigated before redevelopment occurs.	Consistent	The proposed project has a history of hazardous material contamination associated with previous operations (as described in the Environmental Setting in Section 3.3 above). However, environmental investigation and remediation has been completed on the site and the RWQCB continues to monitor groundwater wells in the area. As remediation has been completed, no additional historical assessments, sampling, or mitigation will be required. See Impact 3.3-2.

**TABLE 3
PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN HYDROLOGY POLICIES**

General Plan Goals, Policies and Performance Standards	Consistency Determination	Consistency Analysis
Policy 3-S-10: Ensure that adequate water supply, quality, and distribution infrastructure will be available to serve all proposed development projects.	Consistent	The project is located in an area with existing water infrastructure. No new or upgraded conveyance infrastructure would be required.
Policy 3-S-12: For fire flow demands, maintain water pressure at 20 pounds per square inch.	Consistent	The project is located in an area with existing water infrastructure. No new or upgraded water infrastructure would be required, including that required for adequate fire flows.
Policy 3-S-15: Ensure that new development provides adequate on-site storm drain facilities to accommodate 10- and 25-year flood flows, and that downstream City flood control facilities are not exceeded in 100-year flows.	Consistent	The project site is currently developed and includes storm drainage infrastructure, including a stormwater retention basin, a landscaped stormwater treatment planter, and a landscaped stormwater pretreatment bioswale. The project includes minimal changes to the site that would affect

		stormwater flows or volumes such that there would be changes to the downstream drainage system.
Policy 3-S-17: Ensure that storm drainage from new development, either surface or piped, shall not drain into Contra Costa Canal rights-of-way.	Consistent	The project site is currently developed and includes storm drainage infrastructure, including a stormwater retention basin, a landscaped stormwater treatment planter, and a landscaped stormwater pretreatment bioswale. The project includes minimal changes to the site that would affect stormwater flows or volumes such that there would be changes to the downstream drainage system.
Policy 9-P-21: As part of project review and CEQA documentation, require an assessment of downstream drainage (creeks and channels) and City storm-water facilities impacted by potential project runoff.	Consistent	The project site is currently developed and includes storm drainage infrastructure, including a stormwater retention basin, a landscaped stormwater treatment planter, and a landscaped stormwater pretreatment bioswale. The project includes changes to the site that would affect stormwater flows and volumes; however, those changes would not require upgrades to the downstream drainage system.
Policy 10-P-18: Evaluate storm drainage needs for each development project in the context of demand and capacity when the drainage area is fully developed. Ensure drainage improvements or other mitigation of the project's impacts on the storm drainage system appropriate to the project's share of the cumulative effect.	Consistent	The project site is currently developed and includes storm drainage infrastructure. The project includes changes to the site that would affect stormwater flows and volumes; however, those changes would not require upgrades to the downstream drainage system.
Policy 10-P-19: Assure through the Master Drainage Plan and development ordinances that proposed new development adequately provides for on-site and downstream mitigation of potential flood hazards.	Consistent	The project site is currently developed and includes storm drainage infrastructure. The project includes changes to the site that would affect stormwater flows and volumes; however, those changes would not require upgrades to the downstream drainage system.
Policy 10-P-23: Ensure that all new development (residential, commercial, or industrial) contributes to the construction of drainage improvements in the Kirker Creek and other watersheds in the Planning Area, as required by the City's adopted ordinances.	Consistent	The project site is located along the downstream portion of the creek that does not contribute to flooding risks in affected watersheds. As such, the project site, is exempt from the drainage fee.
Policy 10-P-24: Allow the construction of detention basins as mitigation in new developments. Ensure that detention basins located in residential neighborhoods, schools, or child-care facilities are surrounded by a gated enclosure, or protected by other safety measures.	Consistent	The project site is currently developed and includes drainage improvements, including a stormwater retention basin, a landscaped stormwater treatment planter, and a landscaped stormwater pretreatment bioswale.
Policy 10-P-25: Ensure adequate minimum setbacks to reduce potential for property damage from storm flooding.	Consistent	Setbacks would not be required as structures would be designed in accordance with Municipal Code Section

		15.80.050 regarding construction within special flood hazard areas
Policy 10-P-26: Reduce the risk of localized and downstream flooding and runoff through the use of high infiltration measures, including the maximization of permeable landscape.	Consistent	The proposed project would alter the permeability of approximately 15 acres of currently undeveloped land as detailed in Section 3.4, Hydrology and Water Quality. However, on-site improvements will direct drainage to an existing ditch that can accommodate the additional volume.
Policy 11-P-6: Continue water conservation efforts from industrial facilities.	Consistent	The proposed project would increase the City's total water demand by a relatively small 20,000 gpd. The project would comply with the City's Water-Efficient Landscape Ordinance and would participate in Delta Diablo Sanitation District's wastewater reclamation feasibility study.
Policy 11-P-7: Ensure that new residential, commercial, and industrial development equitably shares costs associated with providing water services to areas of urban expansion within the Planning Area.	Consistent	The project is located in an area with existing water infrastructure. No new or upgraded conveyance infrastructure would be required.

**TABLE 4
PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES**

General Plan Goals, Policies and Performance Standards	Consistency Determination	Consistency Analysis
Policy 2-P-7: During development review, consider project compatibility with existing surrounding land uses. Ensure that sensitive uses — such as residences, schools, and parks — are not subject to hazardous or unhealthy conditions.	Consistent	The project site is located in an industrial area. All properties adjacent to the project site are developed with heavy industrial uses (USS-POSCO, Dow Chemical, power plant, etc.) or are vacant and designated for industrial use. The nearest sensitive receptors are a hotel and residential neighborhood located approximately 2,450 feet and 2,900 feet from the site, respectively. Due to the distance to these sensitive receptors, incompatibilities with the proposed project are not anticipated. The reader is referred to Sections 3.1, Air Quality, and 3.3, Hazards and Hazardous Materials, for further discussion of this issue.
Policy 2-P-13: Ensure that buffers — including landscaping, berms, parking areas, and storage facilities — are used to separate potentially incompatible activities.	Consistent	The project site is located in an industrial area and no incompatibilities are anticipated with surrounding properties. However, the project site does feature landscaped buffers to provide screening of outdoor operations.

**TABLE 5
PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN PUBLIC SERVICES AND UTILITIES POLICIES**

General Plan Policies	Consistent with General Plan	Analysis
Policy 11-P-7 – Ensure that new residential, commercial, and industrial development equitably shares costs associated with providing water services to areas of urban expansion within the Planning Area.	Consistent	The project is located in an area with existing water infrastructure. No new or upgraded conveyance infrastructure would be required.
Policy 11-P-9 – Cooperate with Contra Costa Water District to ensure compliance with District regulations and State law for new development requiring annexation to the Contra Costa Water District service area. Cooperate with Contra Costa Water District in processing all necessary information to allow a determination if Los Vaqueros facilities can be used to service new annexation areas.	Consistent	The project site is currently within the City of Pittsburg, which is served by Contra Costa Water District. Therefore, annexation would not be required.

**TABLE 6
PROJECT CONSISTENCY WITH APPLICABLE GENERAL PLAN TRANSPORTATION AND CIRCULATION POLICIES**

General Plan Goals, Policies and Performance Standards	Consistency Determination	Analysis
<p>Goal 7-G-1: Achieve service level standards for Basic Route intersections that conform to the Contra Costa Transportation Authority’s Growth Management requirements for Routes of Regional Significance at signalized intersections. Define intersections within Pittsburg city limits as being located in rural, semirural, suburban, urban, or Downtown areas, as designated in Figure 7-2.</p> <ul style="list-style-type: none"> • Rural – LOS low C (volume to capacity ratio 0.70 to 0.74) • Semi-Rural – LOS high C (volume to capacity ratio 0.75 to 0.79) • Suburban – LOS low D (volume to capacity ratio 0.80 to 0.84) • Urban – LOS high D (volume to capacity ratio 0.85 to 0.89) • Downtown (CBD) – LOS high D (volume to capacity ratio 0.85 to 0.89) 	Consistent	Pittsburg-Antioch Highway and SR 4 are designated Routes of regional Significance by the Contra Costa Transportation Authority. The proposed project would add traffic to intersections on these routes that could result in level of service below the listed standards unless mitigation is implemented. Although funding for the full improvement has not been identified, mitigation measures identified in the EIR require payment of fair share fees for these improvements. The physical impacts of increased traffic generated by the project are addressed in Section 3.7 of the Draft EIR.
<p>Policy 7-G-7: Complete arterial roadway improvements required to mitigate traffic impacts of an approved project before the project is fully occupied. Arterial improvements should be completed by creating funding sources, which include but are not limited to Traffic Mitigation Fees, Development Agreements, and Assessment Districts.</p>	Consistent	Pittsburg-Antioch Highway and SR 4 are designated Routes of regional Significance by the Contra Costa Transportation Authority. The proposed project would add traffic to intersections on these routes that could result in level of service below the listed standards unless mitigation is implemented. Although funding for the full improvement has not been

General Plan Goals, Policies and Performance Standards	Consistency Determination	Analysis
		identified, mitigation measures identified in the EIR require payment of fair share fees for these improvements. The physical impacts of increased traffic generated by the project are addressed in Section 3.7 of the Draft EIR.
Policy 7-P-1: Require mitigation for development proposals that are not part of the Traffic Mitigation Fee program which contribute more than one percent of the volume to an existing roadway or intersections with inadequate capacity to meet cumulative demand.	Consistent	Mitigation measures identified in the EIR require payment of their fair share to implement the SR 4 widening project currently under construction and fair share to implement measures at the Pittsburg-Antioch Highway/ Loveridge Road intersection.
Policy 7-P-2: Use the adopted Regional and Local Transportation Impact Mitigation Fee ordinances to ensure that all new development pays an equitable pro-rata share of the cost of transportation improvements. Review the Traffic Impact Mitigation Fee schedule annually and update every five years at a minimum.	Consistent	The project would pay all applicable fees toward the cost of transportation improvements determined to be required as a result of the project.
Policy 7-P-4: Require that all traffic studies be conducted by professional transportation consultants selected by the Planning and Building and Engineering Departments, with the City acting as the lead agency. Ensure that all costs associated with the traffic study are paid by the applicant.	Consistent	The traffic study for the proposed project was prepared by professional transportation consultants at the expense of the project applicant.
7-P-6: Design roadway improvements and evaluate development proposals based on Level of Service standards set forth in Goal 7-G-1.	Consistent	The proposed project has been evaluated to determine impacts relative to the standards set forth in Goal 7-G-1 and has identified improvements consistent with these standards.
Policy 7-P-10: Require mitigation for development proposals which result in projected parking demand that would exceed the proposed parking supply on a regular and frequent basis.	Consistent	The City's parking requirements are based on structure square footage and the proposed project would not modify the existing structures, so the facility's required parking requirement would not change; however, an additional 52 parking spaces would be added to accommodate an increase in the number of employees.
Policy 7-P-11 Maximize the carrying capacity of arterial roadways by controlling the number of intersections and driveways, minimizing residential access, implementing Transportation Systems Management measures, and requiring sufficient on-site parking to meet the needs of each project.	Consistent	The proposed project would occur within an existing facility and would not alter the number of intersections or driveways on the project site.
Policy 7-P-24: Continue to designate appropriate truck routes, and discourage unnecessary through traffic in residential areas.	Consistent	The project would not alter the truck routes in the City, nor would project-related traffic be directed to residential areas.
Policy 7-P-25: Require trucks accessing the industrial land uses east of Downtown to use the Pittsburg/Antioch Highway in order to bypass the Creeds/Central Addition neighborhood.	Consistent	Project-generated traffic would follow designated truck routes, including the Pittsburg/Antioch Highway.
Policy 7-P-33: Require mitigation for development	Consistent	The project site is located in an industrial area

General Plan Goals, Policies and Performance Standards	Consistency Determination	Analysis
proposals which result in potential conflicts, or fail to provide adequate access, for pedestrians and bicycles.		that does not generally have pedestrian or bicycle traffic. The project would not result in pedestrian or bicycle conflicts.
Policy 7-P-45: During review of development projects, encourage secure bicycle facilities and other alternative transportation facilities at employment sites, public facilities, and multi-family residential complexes.	Consistent	The project site is located in an industrial area that does not generally have pedestrian or bicycle traffic. Given the nature of the project operation, transit service would not provide a substantial reduction in trips for project operation. Tri-Delta Transit provides service to the intersection of Pittsburg-Antioch Highway and Loveridge Road, which can be utilized by employees.

