

2 Introduction

2.1 Purpose of this Environmental Impact Report

This Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with the construction and implementation of the proposed Deer Ridge and Shadow Lakes Community Improvement Plan Project (proposed project or project). The Draft EIR has been prepared in conformance with the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Sections 21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], Chapter 3, Sections 15000 et seq.). The Draft EIR has also been prepared in accordance with the Brentwood Municipal Code, Title 18: CEQA Procedures.

The City of Brentwood (City) is the “public agency which has the principal responsibility for carrying out or approving the project” and, as such, is the “Lead Agency” for this project under CEQA (14 CCR Section 15367). CEQA requires the Lead Agency to consider the information contained in an EIR prior to taking any discretionary action.

Pursuant to CEQA, “[t]he purpose of the environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the proposed project, and to indicate the manner in which significant environmental effects can be mitigated or avoided” (PRC Section 21002.1[a]). An EIR is the most comprehensive form of environmental documentation identified in CEQA and the State CEQA Guidelines, and provides the information needed to assess the environmental consequences of a project to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a project that may have the potential to result in significant adverse environmental impacts.

This Draft EIR is a public informational document that describes the existing environmental setting of the area in which the project would be developed (“project area”) and vicinity, discusses the project’s proposed characteristics, and identifies the project’s potential environmental impacts. Additionally, the Draft EIR identifies feasible mitigation measures and a reasonable range of alternatives that would avoid or reduce significant impacts. This Draft EIR is intended to inform the public, as well as City decision-makers, and responsible, trustee, and other interested agencies, of the project’s potential environmental impacts.

2.2 Type of Environmental Impact Report

This Draft EIR analyzes the potential environmental impacts related to the implementation of the proposed Deer Ridge and Shadow Lakes Community Improvement Plan, which is described in Chapter 3.0, *Project Description*. In accordance with Section 15161 of the State CEQA Guidelines, a Project EIR “examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would

result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.”

This Draft EIR is further intended to serve as the primary environmental document for all entitlements associated with the proposed project, including all discretionary approvals requested or required in order to implement the project. The Lead Agency can approve subsequent actions without additional environmental documentation unless otherwise required by Section 21166 of the CEQA Statutes and Section 15162 of the State CEQA Guidelines. Section 21166 of the CEQA Statutes states that:

“When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:

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

Section 15162 of the State CEQA Guidelines states that:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at

the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.
- (c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.
- (d) A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed."

2.3 Standards of Adequacy Under CEQA

While Sections 15120 through 15132 of the State CEQA Guidelines generally describe the content of an EIR, CEQA does not contain specific, detailed, quantified standards for the content of environmental documents. Section 15151 of the State CEQA Guidelines states:

“An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have not looked for perfection but for adequacy, and a good faith effort at full disclosure.”

2.4 Proposed Action

The project applicant (Deer Ridge & Shadow Lakes Golf, L.P.) has submitted an application to the City of Brentwood to construct up to 560 age-restricted residential units and to reconfigure the two existing Shadow Lakes and Deer Ridge golf courses (18 holes each for a total of 36 holes), into a single, 18-hole golf course, with 10 holes north of Balfour Road (currently in Shadow Lakes) and eight holes south of Balfour Road (currently in Deer Ridge). The reconfiguration would provide for the construction of up to 560 units of age-restricted (55 years and older) housing, with an option to provide a mix of both independent and assisted living units. The proposed zoning would allow for both age-restricted independent living units and assisted living units, with the exact mix of housing to be determined by the applicant, based on market demand. Given the uncertainty in the total number of units of either housing type, the analyses within this DEIR includes the most intensive uses associated with each housing type, thereby allowing for the full range of impacts to be assessed .

In addition, the residential facilities may also include ancillary uses such as, but not limited to, swimming pools, clubhouses, fitness centers, and dining facilities. The 18 existing golf course holes to be closed would be repurposed into a form of open space or other amenities, such as, but not limited to, walking trails, vineyards, community gardens, play areas, picnic areas, wildlife habitat areas, and other open space areas. A conceptual landscaping plan is included in Chapter 3, Project Description that shows proposed amenities for the project site.

Village One (Deer Ridge) would be located on approximately 13.77 acres west of Foothill Drive, approximately $\frac{3}{4}$ mile south of Balfour Road. This facility would involve the demolition and redevelopment of the existing Deer Ridge clubhouse facility, located at 801 Foothill Drive, and the construction of up to 250 age-restricted housing units. Village Two (Shadow Lakes) would be located on approximately 18.26 acres north of Balfour Road, between West Country Club Drive and East Country Club Drive. This facility would be located directly east of the existing Shadow Lakes clubhouse, located at 401 West Country Club Drive, and include up to 310 age-restricted housing units.

2.5 Scope of the Environmental Impact Report

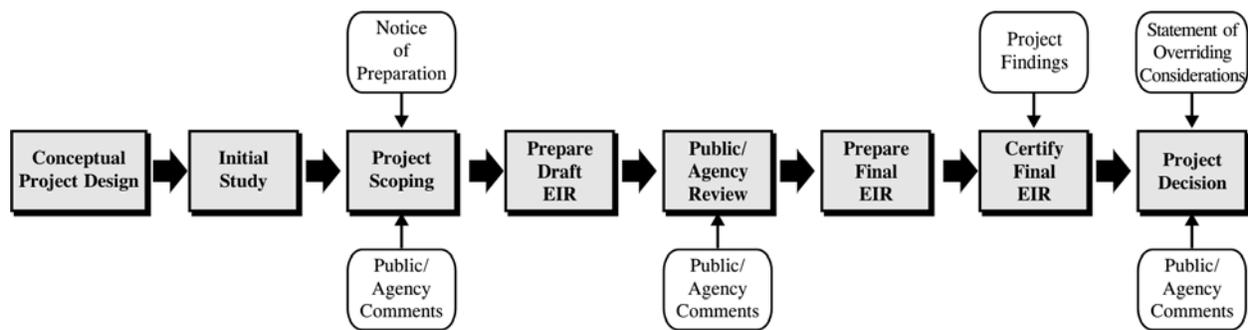
This Draft EIR provides a comprehensive evaluation of the reasonably anticipated scope of the proposed project. It is intended to serve as an informational document for public agency

decision makers and the general public regarding (1) the objectives and components of the project; (2) any potentially significant environmental impacts (individual and cumulative) that may be associated with the planning, construction, and operation of the project; (3) an appropriate and feasible Mitigation Program; and (4) alternatives that may be adopted to reduce or avoid these significant impacts.

The Lead Agency has conducted an environmental analysis of 15 resource topic areas from the project in accordance with the State CEQA Guidelines. Chapters 5 through Chapter 19 of the Draft EIR analyze both project specific impacts as well as cumulative impacts to the 15 resource topic areas, which include: aesthetics, air quality, biological resources, cultural resources/tribal resources, energy conservation, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, population and housing, public services and recreation, utilities and service systems, and transportation and circulation.

In compliance with the State CEQA Guidelines, the City has taken steps to maximize opportunities for the public and other public agencies to participate in the environmental review process. The scope of this Draft EIR includes issues identified in consultation with the City during the Notice of Preparation (NOP) comment period; one public scoping meeting; and environmental issues raised by agencies and the general public in response to the scoping process. Figure 2-1 below provides a flowchart of the EIR process.

Figure 2-1: The EIR Process



2.5.1 Notice of Preparation (NOP)

Pursuant to Section 15082 of the CEQA Guidelines, as amended, the City of Brentwood prepared and circulated a Notice of Preparation (NOP) to affected agencies and interested parties for a 30-day public review period beginning on August 4, 2017 and ending on September 5, 2017. Table 2-1 (Summary of NOP Scoping Comments) in Section 2.5.3 summarizes the comments received from agencies/persons during the NOP process. The NOP and comment letters are provided in their entirety in Appendix A of this Draft EIR.

2.5.2 Scoping Meeting

Pursuant to Section 21083.9 of the CEQA Statute, the lead agency is required to conduct at least one scoping meeting for all projects of statewide, regional, or area-wide significance. A scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, and environmental effects to be analyzed. The City of Brentwood hosted a Scoping Meeting on August 16, 2017, from 7:00 PM to 9:00 PM, at the Adams Middle School Gymnasium located at 401 American Avenue, Brentwood, California 94513. Table 2-2 (Summary of NOP Scoping Comments) in Section 2.5.3 includes a summary of the issues identified at the public scoping meeting.

Through the NOP scoping process, the City determined that the project would have no significant impact on certain environmental issues, or the impact could be feasibly mitigated with identified mitigation measure(s); these issues have been excluded from further analysis in this Draft EIR. Refer to Chapter 4.2, Effects Found Not to be Significant, for a discussion of the effects found not to be significant as identified in the NOP.

2.5.3 Summary of NOP and Public Scoping Comments

Table 2-1 (Summary of Written Comments on Notice of Preparation) and Table 2-2 (Summary of Verbal Comments received at the Public Scoping Meeting) provide a summary of comments received during the NOP public review period and comments received during the public scoping meeting. Due to level of detail included in comments from interested parties, those comments are included verbatim below to avoid misinterpretation by summarization. Comments from Federal, State, and local agencies have been summarized below. Full text of agency comments can be found in Appendix A.

Commenter Name	Comment
<i>Federal Agencies</i>	No federal agencies submitted comments in response to the IS/NOP.
<i>State Agencies</i>	
Native American Heritage Commission (letter dated August 23, 2017)	Requests early consultation with Native American tribes, provides a list of Native American contacts and requests that additional archeological activities be conducted with the NAHC. In addition, the NAHC reminds the City of appropriate regulations regarding resources if they are identified during project construction.
California Department of Transportation (Caltrans) District 4 (letter dated September 11, 2017)	Requests greater detail to clarify whether the project will be constructed in phases, the dates for each phase, and more detail on the number of parking sites. Caltrans recommends the City conduct a cultural resource technical study that at minimum includes a records search at the Northwest Information Center of the California Historical Resources Information System (CHRIS), as well as a field survey of the project area by a qualified archaeologist and qualified architectural historian. Caltrans also recommends the City conduct Native American consultation with tribes, groups, and individuals, who are interested in the project area and may have knowledge of Tribal Cultural Resources or

Table 2-1: Summary of Written Comments on Notice of Preparation

Commenter Name	Comment
	<p>other sacred sites. In addition, Caltrans recommends the applicant contact the Caltrans District 4 Office of Cultural Resource Studies should any ground-disturbing activities take place within Caltrans’ right-of-way and archaeological discoveries are inadvertently found. Caltrans recommends the City work with local transit providers to improve regional accessibility through means other than automobile, given the number of users the project will add to state routes. Caltrans encourages allocation of contributions from developments through transportation impact fees towards multi-modal and regional transportation improvements to fully mitigate cumulative impacts to regional transportation. Caltrans also encourages the development of Travel Demand Management policies to encourage the use of nearest public transit lines to reduce vehicle trips.</p>
<p>California Water Boards- Central Valley Regional Water Quality Control Board (letter dated August 30, 2017)</p>	<p>The Central Valley Regional Water Quality Control Board (RWQCB) is tasked with protecting the quality of surface and groundwater in the region. The CVRWQCB notes that the EIR must demonstrate how the discharge associated with the proposed project will meet the Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan) water quality objectives. The RWQCB states the project must provide an analysis demonstrating that the project will comply with the State Antidegradation Policy: “Any discharge of waste to high quality waters must apply best practicable treatment or control... the information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.”</p> <p>The RWQCB also notes that construction or demolition activity equal or greater than one acre, is subject to the Construction Storm Water General Permit (Order No. 2009-009-DWQ, implementation of a Storm Water Pollution Prevention Plan (SWPPP), Phase I and II MS4 permits, Industrial Storm Water General Permit Order No. 2014-0057-DWQ, and NPDES permits.</p> <p>The RWQCB letter includes more information on complying with commercially irrigated agricultural land and groundwater dewatering. If the project were involved with disturbance of navigable waters or wetlands it must obtain Clean Water Act Section 404 and 401 permits and follow other waste discharge requirements.</p>
Local Agencies	
<p>Contra Costa Environmental Health Division (letter dated August 18, 2017)</p>	<p>The Environmental Health Division recommends that the applicant contact the Land and Water Program for destruction permitting procedures should any abandoned water wells be discovered during the construction and grading process. The Division further recommends the applicant obtain a permit from Contra Costa Environmental Health Division for any well or soil boring prior to commencing drilling activities, which include those associated with environmental investigation and clean up, and geotechnical investigation. The Division also recommends debris from construction or demolition activity go to a solid waste or recycling facility that complies with applicable requirements that can lawfully accept the material (e.g., solid waste permit, EA Notification, etc.). The Division recommends the applicant obtain plan approval from Contra Costa Environmental Health Division if food service or pool/spa facilities are</p>

Table 2-1: Summary of Written Comments on Notice of Preparation

Commenter Name	Comment
	proposed prior to issuance of building permits.
Interested Parties	
<p>Jim Miller (Email dated August 21, 2017)</p>	<p>I attended last week's meeting and wanted to make a couple of more comments.</p> <p>First, I think I misspoke – what I meant to say was I wanted to see a full electromagnetic environmental impact included (not electromechanical). This is to include the basic AC power as well as phone, internet, cable, open air TV and any other transmissions that the proposed development plans to use. We have experienced dropouts, failures and interference in Shadow Lakes in the past 18 years and want to ensure there will not be more. The other more common utilities are also needed such as gas, water, sewer, and recycled water.</p> <p>Second, is the height of the proposed building – 3 floors on top of a raised grade is too high. The EIR should include the visual impairment caused by a structure that is higher than any home within Shadow Lakes plus the surface elevation of the impacted area is already high. Visually this would change the entire neighborhood – one would see this facility from anywhere in the southern part of Shadow Lakes or north/central Deer Ridge.</p> <p>Third, is the traffic impact on/off of East Country Club Drive. Currently the morning school traffic along East Country Club Drive makes it nearly impossible to get out of my driveway. Added traffic for the staff of the proposed facility at the same time as school traffic would make this worse and possibly impossible. The EIR needs to address this.</p> <p>Forth, are the statements made by the developer. The EIR should address all these allegations. Was there an operational loss (not with profits, just costs), when each of the golf courses were in full operation? Are there parties that are willing to purchase the golf courses?</p> <p>Fifth, the EIR needs to address all the environmental factors around the "lakes" – the birds, fish, and wildlife. Also, the current and future sanitation of the "lakes" needs to be addressed, as there are current issues related to cleanliness and mosquito breeding. If the development plans to remove the "lakes" that is a major issue as even the name of the neighborhood is Shadow <u>Lakes</u>.</p> <p>Finally, the EIR needs to address the specific development plan – we have not seen a specific proposal, only a general idea. The neighborhood needs to know what exactly is proposed and how the City will only allow this plan and not future changes be approved.</p>
<p>Melissa Overgaard (email dated August 23, 2017)</p>	<p>I'd like the following items included in the EIR:</p> <p>Traffic</p> <ul style="list-style-type: none"> ▪ Impact at 3-way stop (Lakeview, E. Country Club) at various times of the day and specifically between 7-8:00AM Monday thru Friday. ▪ Speed of cars down Lakeview, specifically in front of the corner park where children and pets play. ▪ Speed and frequency of cars through residential neighborhood to get to work at assisted living centers. Balfour is not the only route as most people use San Jose to Roundhill to East Country Club to "commute" through the Shadow Lakes neighborhood.

Table 2-1: Summary of Written Comments on Notice of Preparation

Commenter Name	Comment
	<p>24 Hour</p> <ul style="list-style-type: none"> ▪ During break and lunch time for the employees of the assisted living facilities. Review Cortona Park and Westmont to see smoke breaks, cell phone breaks, sitting in cars, walking, and sitting on curbs throughout the parking lot of 350 John Muir Parkway. Will the corner park in Shadow Lakes turn into a 24 hour/day break room for employees of the facility? ▪ Review the skyline and ability to see stars in the Shadow Lakes/Deer Ridge neighborhoods. Assess the impact of parking lot lights, indoor and outdoor lights around the building and car lights on the night sky. <p>Price Range/Lot Size</p> <ul style="list-style-type: none"> ▪ An assessment of the City's property lines in comparison to other cities with similar demographics. Base the comparison on population, educational attainment, median household income. Assess whether our City has the right mix of homes with property lines above 7,500 square feet for our level of education and income. <p>I welcome anyone from the City of Brentwood or Kimley-Horn to our home, including front and back yard access any time of the day or night to analyze our views and way of life pre-project. Being in our home since 2004, we survived the housing downfall of '07 and '08 and we respectfully ask that the City take ample time to assess the viability and impact of this project on the near and long-term goals of our families, community, and city.</p>
<p>Jennifer and Brian McEvoy (email dated August 31, 2017)</p>	<p>This email is in response to the recent scoping meeting for the DR/SL Development Project Environmental Impact Report, due by 9/4/17. It is our understanding that the comments on this report are to be limited to the environmental issues to be analyzed in the EIR.</p> <p>We are questioning how an EIR can be prepared when the developers have not presented a firm plan. Everything to date, has used very vague terms such as anticipated, could be, may include. In addition, we do not know why a company which is delinquent in its taxes should have any standing before the City of Brentwood. That being said, common sense dictates that the addition of these high density senior housing facilities in the midst of the existing low density residential neighborhoods built around beautiful open space, does not make sense. The development would be totally inconsistent and incompatible with the surrounding area. Buildings of the proposed nature will not complement the existing community. There will surely be a negative impact on current homeowners' property values as we experience a loss of views and experience significantly increased traffic congestion in an already overly congested area. This area is already experiencing severe congestion due to traffic to and from Krey Elementary, Adams Middle School and Heritage High School in combination with normal work and personal trips. We will experience increased traffic due to the residents and their visitors and, most importantly, from the coming and going of shifts of staff to run the facilities. Residents will be subjected to lights shining from these facilities and their parking lots all night.</p> <p>We are extremely concerned about the lack of adequate emergency services to the area due to the reduction in the district to a 3-station district model. It is anticipated that response times will be longer and station workloads will</p>

Table 2-1: Summary of Written Comments on Notice of Preparation

Commenter Name	Comment
	<p>increase. The district is encouraging residents to take necessary precautions to ensure fire safety around one's own property and to stock up on medical supplies as needed. The district would like to remind everyone that a recent City Gate Associates report states the ECCFPD should operate a 9-station model to appropriately cover the district of 249 square miles, with firefighters/EMT's serving more than 110,000 residents. The City of Brentwood has already approved other developments including 336 homes at the SW intersection of Sand Creek Road and Highway 4 - Bridle Gate, which will add additional strain to the fire district. In the East Bay Times on 12/8/16, Vice Mayor Joel Bryant voiced concerns over the addition of more homes without a clear path forward for the sustainability of fire protection in the area.</p> <p>Also concerning is that there are several gas pipelines running directly under the two proposed building sites. While California may not, as yet, have adopted more stringent building codes around gas pipeline sites, federal pipeline representatives and representatives of pipeline companies recommend allowing only low density development around transmission pipelines. Some government entities have gone even further in reaction to spills and explosions. Title 5 in the California Code of Regulations - School Facilities Construction - Article 2 School Sites 14010 H states that sites shall not be located near an above ground water or fuel storage tank or within 1500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard. The potential of loss of life from a natural gas disaster increases dramatically in high density housing where there is a greater chance of trapping the occupants. While we realize this is a senior facility, not a school, logic dictates that egress from a high density senior facility where many of the occupants may not be mobile, would definitely be compounded.</p> <p>While this does not in any way cover all of our concerns and objections regarding the proposed project, we believe it states those directly related to preparation of the draft EIR. The proposed project certainly does not seem consistent with the community planning experienced to date by the City of Brentwood. That planning is what has set this City apart from other Bay Area communities and has attracted residents to the City.</p>
<p>Paul Atkins (email dated September 4, 2017)</p>	<p>I live on East Country Club Drive in Brentwood CA and my house backs up to the Shadow Lakes Golf Course.</p> <p>I am strongly opposed to the proposed redevelopment project for several reasons.</p> <ul style="list-style-type: none"> ▪ 3 story density housing has no business in a residential single family home development. ▪ There are already numerous traffic problems in our neighborhood, especially at school and work commute times both mornings and evenings. There are speeding cars and complete traffic backups already existing, not only on our residential streets but also on Balfour Road. ▪ The proposed entrance for the Shadow Lakes density dwelling is off a residential street on Lakeview Drive across the street and adjacent to single family homes that paid a lot premium to be on a golf course, not next to such a project.

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Commenter Name	Comment
	<ul style="list-style-type: none"> ▪ Lighting, noise, smells from high density living kitchens and increase in traffic will be at completely unacceptable levels for an already planned and built quiet single family home residential neighborhood. ▪ There are already several senior housing facilities and other more acceptable future locations approved in Brentwood. ▪ Negative Effects on Property Values in both Deer Ridge and Shadow Lakes neighborhoods. ▪ The owners of the Golf Courses have intentionally neglected the required maintenance of the property to push their plan to change our existing neighborhoods to propel their financial gain. ▪ These Golf Course Properties have historically lacked the required maintenance of the surrounding grounds in areas such as Fire Break Control, Weed Control, Rodent Control (gophers, rats, etc.). ▪ I have personally labored to maintain an acceptable Fire Break immediately behind my house for many years now. ▪ The Course owners are also responsible for maintaining the grounds adjacent to the public sidewalks and have failed miserably. There are weeds and even large shrubs and palm type plants that are blocking the public walkway and creating an additional Fire Hazard and a threat to public safety. ▪ The Proposed Development is a Threat to Natural Wildlife currently living on this property. There are numerous Bird Species, burrowing Owls and Squirrels, Snakes, Hawks and even Wild Turkeys. There are bound to be more documented animal species when studied by an expert. ▪ Fire/EMT demands will increase with High Density Senior Housing when our Emergency Services are limited, already strapped with too much demand for existing personnel available to respond in a timely manner. Our current response times are far below the standards in other California communities. ▪ Owners of the Golf Courses are attempting to profit off the backs of existing Brentwood residents. This has been their plan all along to intentionally allow the courses to degrade and have a financial loss on paper so they can push for a rezone to sell the plan at a great profit to a developer. They attempted this in Southern California and eventually failed by a public vote. The politics of the town were also highly criticized for the entire well documented fiasco. That Golf Property is now thriving because they were encouraged to operate as a Golfing Property when their Rezoning Plan failed. ▪ There are other Golf Course operators interested in purchasing, managing and turning around these courses, yet it will not be considered by the owners unless the rezoning is not approved. ▪ How can these operators even be trusted to do what they say based on their intentional history to deceive, influence and push our town and neighborhood with their personal business agenda? ▪ In Opposition of this Rezoning for these reasons stated plus what they are

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Commenter Name	Comment
Kevin Barnett (email dated September 5, 2017)	<p>not being clear and forthcoming about in full transparency and disclosure.</p> <p>My name is Kevin Barnett and I'm an original owner at Shadow Lakes. My biggest concern is that current golf course ownership provided a semi-baked plan to recover their losses and make a profit at the expense of homeowners.</p> <p>Another issue is that many of my neighbors still did not, or don't, know about the EIR question deadline.</p> <p>Many don't have their emails submitted with the city.</p> <p>The only reason I caught the deadline was from the NextDoor app, as I have communicated with the city via email before, but did not receive a notification in any form from the city.</p> <p>It seems that not notifying all homeowners in the affected area is illegal and some homeowners have mentioned that they think the lack of notification is due to the City, the GC owners and Kimley-Horn are working together.</p> <p>I don't believe the latter, but the lack of notification has left the city open to those accusations.</p> <p>Since the GC owner's announcement, our property values have already begun to fall.</p> <ul style="list-style-type: none"> ▪ I know this since I have friends and neighbors that have had to drop their selling prices in both communities. ▪ Another indicator is a person very close to us is a local appraiser and has been refusing appraising opportunities in our communities' due to the golf course situation and disclosure concerns. If a homeowner paid a premium to live on the course; and the course will no longer be there what is a fair amount to devalue the property by? ▪ I'd argue that the amount of potential combined equity loss that we've experienced since the announcement already exceeds the owners \$10 million in losses – will this be analyzed? <p>Golf Course ownership talks about the inability of the community to support too many golf courses in the area.</p> <ul style="list-style-type: none"> ▪ It is interesting that once Lone Tree GC in Antioch began marketing their venue, made some upgrades, etc. that their business has seemingly taken off. ▪ We've gone to a few events there, played golf and they sure turned that place around within the last few years. ▪ During the same period, current ownership at SL & DR claims there are too many golf courses. ▪ With the exception of some emails to those that subscribed / Ownership at Shadow and Deer have never allowed their courses to hit their potential. ▪ GM Ron Parish was the last person that I remember that attempted to engage the entire community directly – That was several years ago and he is now at Lone Tree – did these owners want the courses to succeed? <p>What guarantees are there that once the property is rezoned that:</p> <ul style="list-style-type: none"> ▪ It will be developed within a reasonable amount of time.

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	<ul style="list-style-type: none"> ▪ Will people want to play the new course? ▪ They are arguably taking away the most compelling / signature holes at both courses <p>Some of the golfers I've spoken with have said they're not sure they will play the new configuration unless they just want to get a quick round in</p> <ul style="list-style-type: none"> ▪ Will the remaining single golf course be less viable than each of the current ones currently are? ▪ Who is going to want to play on a course without any compelling holes? ▪ If the new course fails, then what happens? ▪ Why not let those interested in buying or leasing the current courses the opportunity to turn them around by running them correctly? <p>Is there demand for over 500 assisted living units?</p> <ul style="list-style-type: none"> ▪ Coincidentally I'm helping my mom find a place now and there is currently availability ▪ What happens if the demand is not there? ▪ How will open spaces be cared for? ▪ Will there be an assessment on the viability of 500 additional rooms for senior care in the area that currently has vacancies in an area that has already approved other similar facilities in the area? <p>Who is going be responsible for carrying out the plan?</p> <ul style="list-style-type: none"> ▪ Current ownership has a proven track record of not being able to manage what they have and that's public knowledge. <p>I also have some personal knowledge of some examples of questionable business decisions from a person very close to me that worked at the courses for many years - they are not to be trusted.</p> <ul style="list-style-type: none"> ▪ How was GC ownership allowed to include "Active Adult" housing into their request? <p>Is the plan to convert the so called, possibly unoccupied "Assisted Living" units into apartments part of their plan too?</p> <p>How will open spaces be maintained, policed, etc.</p> <ul style="list-style-type: none"> ▪ What if the plan is not executed well, who will be responsible? ▪ We already have issues at night around the lake and with partying between holes 3 and 4 on Shadow - who will keep the areas secure and safe, enforce the law, etc.? <p>How will emergency services keep up with the increased demand or how will they respond when the streets are full due to school traffic?</p> <ul style="list-style-type: none"> ▪ It can easily take 20 minutes for us to get to Balfour now from Lakeview at certain times of the day. <p>Mis-management is a larger issue vs there being too many golf courses in the area, how will that change?</p> <ul style="list-style-type: none"> ▪ Will the potential resulting blight from unoccupied buildings or open space be analyzed? <p>What is the City of Brentwood going to do to assure their residence that they have our best interest at heart, not a Southern California company</p>

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Commenter Name	Comment
Mike Cook (email dated September 4, 2017)	<p>looking to capitalize on a situation they caused? Perhaps by design?</p> <p>I was able to attend the EIR outline a couple of weeks back involving our community and it's concerns. I was late but wanted to make sure there was involvement of the fish and game during this process. This being said I wouldn't want to see just informing them of the project nor just following their guidelines. There are way too many species that make home to a golf course like ours here and the immediate outlining areas. Not just the property lines of the golf course but how the flora and fauna would be affected by any construction that is being proposed. Much of the wildlife has become migratory to our locations and this needs to be understood well. Also, I would hope that quality of life for all the residents would take TOP priority when a developer proposes such a large project. Simple thoughts about senior housing is not a bad thing, however being dumped into our neighborhoods is, AND three stories as well?? One of the good things about living out here is there is plenty of land to buy or lease for such activity. Just like the lot between the John Muir and current senior housing over by the bypass. This would be a nice location, not in our neighborhood. This is just a developer trying to maximize his profits. This is not San Francisco where land is so hard to come by and must go up, rather than out. Traffic, where do I start? It's hard now getting in and out during school. I would hate to see how this would affect us with more homes and senior housing.</p> <p>If it were up to me, the owners would sell to another group that wanted to run a golf course at a fair value and not try and capitalize on a failing business. Also, if it were not rezoned then owners should repurpose the whole area to open space, with trails and room for the wildlife.</p>
Debra Renter-Pinney (email dated September 4, 2017)	<p>Although I support the rezoning proposal, I still have some concerns that I would like to have addressed in the scope of the EIR. Most specifically:</p> <ul style="list-style-type: none"> ▪ Three Story Assisted/Active Living Facilities – Two story structures would be more compatible with our existing landscape and communities. We live in neighborhoods of one and two story homes and I am not in favor of the buildings being taller than the homes. ▪ Assisted/Active Living Parking – The number of units and parking spaces seem to be incongruent. The parking lots do not seem large enough to accommodate the number of vehicles the units will require. Obviously, each unit will house at least one tenant. A two-bedroom unit could often have two tenants. “Active” residents will most likely have one car. Many “active” residential households could possibly have two vehicles. Employees and visitors will require additional parking space. ▪ Oversight of the Common Area Maintenance Expenses – The City should be tasked with ensuring the common area maintenance expenses are borne by the Owners and/or the newly constructed facilities - - not by the existing Shadow Lakes and Deer Ridge homeowners. <p>I also have one question:</p> <p>Should this project be approved and allowed to move forward, will the project be done in phases? For example, will the City of Brentwood continuously oversee the project and require the Owner to complete all aspects of Phase 1</p>

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	<p>before moving on to Phase 2? I believe vigilant.</p> <p>City oversight will safeguard our community, protect our property values, and ensure the greatest possibility of success.</p> <p>In closing, thank you for considering my comments and the collaborative process that has been spearheaded by the City.</p>
<p>Clifton Fagerquist (email dated September 3, 2017)</p>	<p>The attached file contains comments that are in response to the EIR Scoping Meeting on the Deer Ridge & Shadow Lakes re-zoning development plan held on August 16, 2017 at 7:00 P.M. Adams Middle School. I attended this meeting, and my comments about this meeting and the proposed re-zoning are addressed to both Kimley-Horn (hired to produce the EIR report) as well as the City of Brentwood. TRAFFIC ANALYSIS</p> <ol style="list-style-type: none"> 1. During the Q&A session of this meeting, I specifically asked Ms. Laura Worthington-Forbes (Kimley-Horn) whether Kimley-Horn will conduct a thorough traffic analysis along the main streets of Deer Ridge and Shadow Lakes for a period of 1 week (24 hours/day) as part of a comprehensive study of existing traffic patterns and levels. I received a very <i>evasive</i> reply from her suggesting that such an analysis may not be done for that length of time. Her response was disconcerting because, if such an analysis is not performed, the EIR report being prepared by Kimley-Horn may severely <i>underestimate</i> the already significant amount of traffic (cars and people) that exists in Deer Ridge & Shadow Lakes communities. My suggestion of a period of 1 week (24 hours/day) seemed a reasonable suggestion if the goal was to obtain an accurate estimate of <i>current</i> Deer Ridge/Shadow Lakes traffic. The proposed re-zoning (if it is approved) will only increase the amount of traffic in Deer Ridge and Shadow Lakes due to the planned high density housing (i.e. senior housing facilities). 2. The major roads of Deer Ridge are: Foothill, Saint Andrews, Spyglass and Mountain View. Kimley-Horn needs to perform an in-depth analysis of the traffic on these streets. In addition, Kimley-Horn should also monitor Crawford Drive and Ventura Drive as they appear to be the primary avenues used for access to Krey Elementary. 3. I would also request an assessment of the pedestrian traffic to and from Krey Elementary as that would not be covered by monitoring vehicular traffic alone. 4. Krey Elementary is adjacent to a recreational park used for amateur baseball, soccer and other outdoor activities. An analysis should be made of the amount of pedestrian traffic the park generates both weekends and weekdays. 5. As the proposed senior living facility at Deer Ridge is planned to be located on Foothill, the overall vehicular and pedestrian traffic on Foothill needs to be fully assessed (as this would not be covered by any kind of vehicular traffic monitoring). 6. Ms. Laura Worthington-Forbes was not very specific as to which streets in Deer Ridge and Shadow Lakes would be monitored as part of the traffic analysis. Another speaker at this meeting expressed frustration that more streets in these communities should be monitored for this traffic analysis.

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	<p>7. Both Deer Ridge & Shadow Lake communities are close to Brentwood schools. Deer Ridge, in particular, is adjacent to Krey Elementary School. The proposed senior housing facility for Deer Ridge will be located on Foodhill Drive, and Krey Elementary is located on Ventura Drive less than 1 block away from Foothill Drive. This presents an obvious hazard with respect to schoolchildren on foot, bicycles, or skateboards, etc. going to and from Krey and the increased traffic that would occur with a Senior Housing Facility situated on Foothill.</p> <p>8. As with any elderly population residing at a senior housing facility, a facility on Foothill Drive will receive increased levels of emergency vehicles seven days a week, 24 hours a day.</p> <p>9. The proposed senior housing facility at Shadow Lakes faces a similar problem. Adams Middle School and Heritage High School are diagonally across a major intersection from the proposed location of the senior living facility for Shadow Lakes. Once again, traffic (which is already very congested during drop-off and pick-up times of students in the morning and afternoon) will get significantly worse if the re-zoning plan is approved. Not to mention the pedestrian student traffic from these schools. A senior housing facility at the location of the current Shadow Lakes Club House will significantly increase vehicular traffic (as well as emergency vehicles) on Balfour and adjacent streets. It should be emphasized that the areas adjacent to two busy schools can only result in more traffic congestion of pedestrians and vehicles. How does the re-zoning plan address what is a highly foreseeable outcome, i.e. increased traffic congestion caused by a senior housing facility? Pedestrian and vehicular congestion will lead to increased public safety issues, i.e. accidents.</p> <p>10. Finally, I would like to express my disappointment for the lack of adequate preparation by Kimley-Horn with respect to their presentation. The projection screen used by Kimley-Horn was too small to be visible by the over 300 attendees. The screen needed to be 10 times larger so as to be visible by the attendees. Perhaps Kimley-Horn did not expect such a large turnout? As there are approximately 2000 homes in Deer Ridge and Shadow Lakes combined, Kimley-Horn should have been better prepared.</p> <p>The following comments are specifically addressed to the City of Brentwood.</p> <p>1. At the beginning of the Q&A session of the meeting, I and other attendees demanded to know (from Mr. Casey McCann) why the City of Brentwood did not notify all Deer Ridge & Shadow Lakes residents (2000 homes) about this EIR Scoping meeting by mail. Mr. McCann provided a very evasive answer suggesting that people were notified through social media. Mr. McCann’s response is unacceptable. Some residents do not use social media. I for one do not use social media. Given the official nature of this meeting, it was critical that the City of Brentwood adequately notify the Deer Ridge & Shadow Lakes residents about it so that they would have the opportunity to provide their feedback on the proposed re-zoning. Thus, from the outset of the EIR process, the City of Brentwood has failed in its responsibility to adequately notify the residents of Deer Ridge & Shadow</p>

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	<p>Lakes of this critical issue. An issue that has already impacted their property values and threatens their quality of life as well as raises significant public safety issues.</p> <ol style="list-style-type: none"> 2. I specifically asked Mr. McCann whether the applicant (Suncoast Properties, LLC), would be allowed to build apartments or condominiums (or other high density housing) instead of a senior housing facility if the re-zoning plan is approved by the City? My McCann proceeded to give a very convoluted, somewhat evasive reply. In brief, Mr. McCann seemed to suggest that Suncoast would need to obtain an amendment to the approved re-zoning plan if they wanted to build high density housing other than a senior housing facility. 3. I then asked Mr. McCann if such an amendment to an approved re-zoning plan would require a new EIR report? Mr. McCann seemed to suggest that such an amendment may not require a new EIR report. 4. I have noticed a rather unfortunate tendency on the part of Mr. McCann to be less than forthcoming in his answers to specific questions. His seeming reticence was all too apparent to the audience that night and creates the impression that he is not very forthcoming. Too often Mr. McCann’s answers appeared deliberately evasive or even opaque as if they were carefully designed to reveal as little useful information as possible. 5. This impression of Mr. McCann was compounded by the original venue selected by him for the EIR Scoping meeting, i.e. Shadow Lakes Event Center. It was only after a vigorous protest was lodged by many individuals of Deer Ridge & Shadow Lakes about having the EIR Scoping meeting on Suncoast’s property that an alternative venue was selected, i.e. Adams Middle School. The protest to change the venue was also due to the fact that Suncoast had scheduled a pre-meeting/dinner for its supporters at 5:45 PM (the same day) in the Shadow Lakes Club House immediately adjacent to the Event Center. This pre-meeting/dinner organized by Suncoast effectively ensured that adequate parking spaces were available <i>for its supporters</i> (about 40 people as it turned out) in the Shadow Lakes parking lot. 6. The change of venue to Adams Middle School was a significant improvement because it was both an impartial location (not on the re-zoning applicant’s property) as well as had adequate parking. The change of venue turned out to be very important as over 300 people attended this meeting at Adams Middle School. 7. Based on the comments and questions at the August 16, 2017 meeting, it would seem that the vast majority (at least 80%) of the 300 plus attendees of the EIR scoping meeting were firmly opposed to the Suncoast re-zoning plan. Supporters of Suncoast and its re-zoning plan numbered about 40 people (as mentioned previously). 8. I and other residents of Deer Ridge & Shadow Lakes who are opposed to Suncoast’s re-zoning plan have become increasingly frustrated by what they perceive as deliberate bias on the part of some City officials and some Council members who appear to be doing everything possible to favor

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	<p>Suncoast in its bid to obtain re-zoning approval. The lack of adequate notification of the EIR Scoping meeting to DR & SL residents, the earlier problems with the meeting venue, the lack of candor by Mr. McCann, etc. All of these <i>incidents</i> suggest a pattern of deliberate bias, on the part of the City of Brentwood, to favor Suncoast Properties LLC. The residents of Deer Ridge & Shadow Lakes would hope and expect that the City would look out for the interests of the two thousand homeowners of DR & SL (who regularly pay their property taxes that support the community) instead of the interests of a developer who is now unhappy with his investment.</p>
<p>Maila Encarnacion-Atkins (email dated September 4, 2017)</p>	<p>I live on E Country Club Drive in Brentwood CA and my house backs up to the Shadow Lakes Golf Course.</p> <p>I am STRONGLY OPPOSED to the proposed redevelopment project for the stated reasons listed by my husband below:</p> <ul style="list-style-type: none"> ▪ 3 story density housing has no business in a residential single family home development. ▪ There are already numerous traffic problems in our neighborhood, especially at school and work commute times both mornings and evenings. There are speeding cars and complete traffic backups already existing, not only on our residential streets but also on Balfour Road. ▪ The proposed entrance for the Shadow Lakes density dwelling is off a residential street on Lakeview Drive across the street and adjacent to single family homes that paid a lot premium to be on a golf course, not next to such a project. ▪ Lighting, noise, smells from high density living kitchens and increase in traffic will be at completely unacceptable levels for an already planned and built quiet single family home residential neighborhood. ▪ There are already several senior housing facilities and other more acceptable future locations approved in Brentwood. ▪ Negative Effects on Property Values in both Deer Ridge and Shadow Lakes neighborhoods. ▪ The owners of the Golf Courses have intentionally neglected the required maintenance of the property to push their plan to change our existing neighborhoods to propel their financial gain. ▪ These Golf Course Properties have historically lacked the required maintenance of the surrounding grounds in areas such as Fire Break Control, Weed Control, Rodent Control (gophers, rats, etc.). ▪ I have personally labored to maintain an acceptable Fire Break immediately behind my house for many years now. ▪ The Course owners are also responsible for maintaining the grounds adjacent to the public side-walks and have failed miserably. There are weeds and even large shrubs and palm type plants that are blocking the public walkway and creating an additional Fire Hazard and a threat to public safety. ▪ The Proposed Development is a Threat to Natural Wildlife currently living

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	<p>on this property. There are numerous Bird Species, burrowing Owls and Squirrels, Snakes, Hawks and even Wild Turkeys. There are bound to be more documented animal species when studied by an expert.</p> <ul style="list-style-type: none"> ▪ Fire/EMT demands will increase with High Density Senior Housing when our Emergency Services are limited, already strapped with too much demand for existing personnel available to respond in a timely manner. Our current response times are far below the standards in other California communities. ▪ Owners of the Golf Courses are attempting to profit off the backs of existing Brentwood residents. This has been their plan all along to intentionally allow the courses to degrade and have a financial loss on paper so they can push for a rezone to sell the plan at a great profit to a developer. They attempted this in Southern California and eventually failed by a public vote. The politics of the town were also highly criticized for the entire well documented fiasco. That Golf Property is now thriving because they were encouraged to operate as a Golfing Property when their Rezoning Plan failed. ▪ There are other Golf Course operators interested in purchasing, managing, and turning around these courses, yet it will not be considered by the owners unless the rezoning is not approved. ▪ How can these operators even be trusted to do what they say based on their intentional history to deceive, influence and push our town and neighborhood with their personal business agenda? ▪ In Opposition of this Rezoning for these reasons stated plus what they are not being clear and forthcoming about in full transparency and disclosure.
<p>Bill Murphy (email dated September 4, 2017)</p>	<p>We have the following comments regarding the scope, focus, and content of the upcoming EIR:</p> <ol style="list-style-type: none"> 1. We believe that an EIR should include 3-dimensional (or at least 2 dimensional) scale models of the proposed development, including surrounding housing which clearly delineates adjoining streets, golf hole #'s, and any other customary landmarks to place such models in context of geography of area. Pacifica and other townships have required such and it is difficult to contemplate the impact of such development absent such models. 2. EIR must take into context not only the existing traffic and infrastructure plus the impact of proposed senior centers but also any other approved development. On August 16 EIR meeting it was stated that there were additional 2000-4000 single family residences approved for development along Balfour Road, between Deer Ridge/Shadow Lakes and Deer Valley Road. Any consideration of traffic and environmental impact of any Suncoast properties proposals must take any such other approved development into EIR since Suncoast proposal is incremental to those yet to be started/completed projects. 3. This one is not related to EIR, per se, but rather to the overall project. It has come to residents' attention that there has been no earnest, overarching mailing to all residents of DR/SL and that many residents are

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	<p>unaware of what is transpiring. The City of Brentwood must take any/all reasonable measures to contact all residents. As taxpayers and voters of the city, we are entitled to such notice. There are certainly legal notice requirements to which the city must meet. Please ensure that responsible parties are made aware that residents are extremely concerned that such notifications have not been made to date.</p>
<p>Douglass Muse (email dated September 4, 2017)</p>	<p>I am strongly against the idea of placing buildings on the 10th and 18th fairway of Shadow Lakes Golf course. I have small children; the traffic involved at the entrance and exit points will be tremendous. And dangerous.</p> <p>The owners of the golf course have poorly run their business into the ground, why should my home equity, quality of life and neighborhood bail them out? The idea of all the future promises involved in this, displays too many unknowns.</p> <p>My main concern is activity in the housing parking lots (adult dependent children who live with elderly enabling parents) transitioning the senior housing to high density section 8 housing if the builder cannot get a senior housing project started, traffic - increased pedestrian traffic plus vehicle traffic in the neighborhood and on Balfour Blvd, no guarantees to the continued functionality of the reconstituted Shadow Lakes golf course and the overall lack of foresight. Also, the noise from continual AMR and fire response to the senior housing project would be disruptive. Also, we do not have the fire district coverage to handle this plan.</p> <p>This neighborhood was not planned for not designed to support this project.</p>
<p>Larry Plate (email dated August 23, 2017)</p>	<p>Here are some comments.</p> <p>Page 2 A false statement is made. The existing site use is one open 18-hole golf course (Deer Ridge) and one closed golf course (Shadow Lakes) and related facilities.</p> <p>Page 3 The existing detention basin at Shadow Lakes will not be large enough for the size of the project. The basin over flows now with grass on the site. Concrete and buildings create more runoff when it rains than grass.</p> <p>Page 5 The new buildings would be used as active adult residential or a mix including assisted living units. A mix of what, this is not defined.</p> <p>Page 5 Walking trails, vineyards, community gardens, play areas, picnic areas, wildlife habitat areas, and other open space areas are not amenities. A more suitable word would be facilities. The property owner would have to maintain these areas at great expense.</p> <p>Page 9 & 10 The proposal does not specify which repurposed holes will contain the walking trails, picnic areas, community gardens, or vineyards.</p>
<p>Rashmi Said (email dated September 4, 2017)</p>	<p>I live on Myrtle Beach Drive, with full view of the current Deer Ridge club house from my back yard. I am concerned about the impact of the proposed "village" that would be built on that site as disruptive and destructive to my lovely, low density, open space neighborhood. I have the same issues with any village style projects impacting my wonderful neighbors in Shadow Lakes.</p> <p>Here are some issues directly related to the EIR:</p> <ol style="list-style-type: none"> 1. Aesthetics - The huge 3 story apartment style buildings that are being

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	<p>proposed will completely destroy the idyllic nature of our neighborhoods. Currently the single-family homes nestled among the open spaces, rolling hills and oak trees are what make the neighborhood so appealing to the many families that live in the area. Cramping high density villages into this beautiful scenic neighborhood will completely destroy the aesthetics of the neighborhood.</p> <ol style="list-style-type: none"> <li data-bbox="574 499 1438 764">2. Air Quality - The proposed villages will bring many more cars and traffic to the neighborhood. The roads leading to the proposed facilities are all narrow two lane roads. Due to the current zoning these roads were not designed to handle the traffic and commercial vehicles that will be required to service these villages. This additional traffic will negatively affect the air quality. I am particularly concerned about the proximity to Krey Elementary School and how air quality will affect the small children who study there. <li data-bbox="574 779 1438 947">3. Biological Resources - There are burrowing owls nesting directly across the street from the Deer Ridge clubhouse as can be seen in the attached video. These are protected species and should not be disturbed by new development that will alter their habitat, nor should they be relocated. Greenhouse Gas Emissions - see Air Quality above. <li data-bbox="574 961 1438 1646">4. Hazards and Hazardous Materials - Part of the proposed development includes senior assisted living. <ol style="list-style-type: none"> <li data-bbox="613 1031 1438 1226">a. Facilities that generate regulated medical waste (aka biohazardous or infectious medical waste) have absolutely no business being established in a residential area. These materials can pose a significant risk of transmitting infection and should not be located right across the way from an elementary school or any other place where children might play. <li data-bbox="613 1241 1438 1394">b. These facilities also generate pharmaceutical waste. Unused medications create a public health and safety concern, because they are highly susceptible to accidental ingestion, theft, misuse, improper disposal, and abuse. Again, these type of facilities should not be located in a residential area or near schools. <li data-bbox="613 1409 1438 1646">c. Hazardous waste - Assisted care communities generate significant quantities of waste materials. Some of these materials have been designated by EPA as "hazardous wastes" because of their potential to become particularly harmful to human health or the environment. Examples include spent cleaning products and paint solvent. Again, these commercial facilities do not belong in a low density residential neighborhood, nor near schools. <li data-bbox="574 1661 1438 1885">5. Land Use and Planning - This low- density community was not designed to accommodate the amount of cars, commercial vehicles, or foot traffic that will be associated with these proposed large villages. The current zoning for low density housing and wide, open spaces is more appropriate for our neighborhood. There are other areas in Brentwood already zoned for high density, commercial senior living facilities that have been planned to take in to account the requirements of these types of facilities.

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	<p>6. Population and Housing - Cramming ~500 units into our serene neighborhood is ridiculous. Again, there are plenty of other appropriately zoned areas in Brentwood that would be more ideal for this sort of development. No need to rezone DR/SL.</p> <p>7. Public Services - The current financial issues with the emergency services in Brentwood should be taken into account prior to any new developments being approved. The elderly are particularly vulnerable due to this issue, and I believe it is unethical to approve new senior projects of this size before emergency services are fiscally sound and can provide adequate care for the entire community.</p> <p>8. Transportation/Traffic - The traffic in DR/SL is already an issue due to the locations of Krey Elementary, Adams Middle and Heritage High School. The proposed villages will add to the existing traffic issues during peak times. In addition, the narrow roads in SL/DR will not easily accommodate the additional traffic that will be driven by 500+ new residents. I am also concerned that emergency services only have a few ways in and out of our neighborhoods, and the location of the proposed villages may be difficult to get to.</p> <p>9. Project Alternatives - There are already lots in Brentwood that are zoned properly for senior housing developments. These properly zoned lots do not have the same issues with traffic, access for emergency services and commercial vehicles, destruction of open spaces, etc., as the DR/SL proposed locations. The owners of DR/SL should purchase one of those properties and build facilities there if they are so interested in creating senior developments. Leave DR/SL as open spaces if they are unable to profitably run golf courses.</p> <p>I hope all these issues are studied thoroughly prior to making a decision that will negatively affect current homeowners in Deer Ridge and Shadow Lakes.</p>
<p>Victoria Sandberg (email dated August 16, 2017)</p>	<p>EIR Meeting</p> <p>My remarks mainly concern the proposed development at the Deer Ridge Clubhouse site but may pertain to the Shadow Lakes site as well.</p> <p>Aesthetics -Aside from studying the impact the project will have on a home owner like me whose one- story home is 20 feet from the edge of the project and could potentially lose a wide- open view of the golf course/open space, broad sky, killer sunsets, hills and Mt. Diablo—The importance of the scenic corridor to the neighborhood should be studied as well. The clubhouse area is very centrally located and the same views that I value are enjoyed by the many who drive, walk or bike past that area every day.</p> <p>Air Quality- The impact of placing high density housing in an area not well served by transit should be studied.</p> <p>Geology- The original EIR for Deer Ridge found that the country club building was proposed to be placed in the vicinity of mined areas of the old Brentwood Coal Mine. A detailed analysis of soil and subsurface conditions was to be conducted on the area. It should be determined if that analysis was done and if the analysis was sufficient for a project of this size.</p> <p>Hazards- A high-pressure gas transmission pipeline and petroleum pipelines</p>

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	<p>cross the clubhouse site. The potential consequences of placing high-density residential structures so close to the pipelines as well as potential evacuation route difficulties should be studied with a post San Bruno perspective.</p> <p>Land Use- The impact of adding so many residential units without adding more employment centers to the City of Brentwood should be studied.</p>
<p>Lars and Victoria Sandberg (letter dated September 4, 2017)</p>	<p>We appreciate the opportunity to provide comments on the Notice of Preparation for the Deer Ridge and Shadow Lakes Golf Course Development Project. Any project of this magnitude would have significant impacts on the Deer Ridge and Shadow Lakes neighborhoods, and it is important to base any decision on a thorough environmental analysis.</p> <p>Our comments are mainly focused on impacts to Deer Ridge, as we are residents there and not as familiar with Shadow Lakes, though some issues there may be similar.</p> <p>Pipeline Safety</p> <p>Nobody wants another San Bruno firestorm. Three natural gas pipelines (24", 26" and 36") and one 18" petroleum pipeline traverse the Deer Ridge Project site. The potential impact of a pipeline rupture should be addressed. The ability to evacuate a high-density complex like the one proposed in the event of a pipeline incident should be analyzed. Egress routes may be cut off, as the pipelines are adjacent to Foothill Drive.</p> <p>The Pipeline Safety Trust website, pstrust.org, contains good information, including adopted local government ordinances related to hazardous material pipeline setbacks, and links to additional resources. The U.S. Department of Transportation also has good information regarding pipeline safety at primis.phmsa.dot.gov.</p> <p>Emergency Services - Due to financial constraints, the East Contra Costa Fire Protection District has only three fire stations for 115,000 residents over an area of 249 square miles. The proposed project would put an additional burden on this already overtaxed agency, especially if the assisted living option comes to fruition. In addition, the Deer Ridge Project site would be difficult for emergency vehicles to access during school drop-off and pick-up times. A site closer to Balfour Road would be better.</p> <p>Neighborhood Safety</p> <p>With a severely underfunded and understaffed fire agency, would a fire in a 250-unit complex pose an increased fire risk to neighboring properties?</p> <p>Traffic- A 250-unit complex would impact traffic in the neighborhood, especially during school drop-off and pick-up times. If the project includes assisted living facilities, additional traffic would include delivery trucks, emergency vehicles and staff driving to and from a 24/7 commercial facility.</p> <p>Also, the city's capital improvement plan calls for extending Foothill Drive to the south to connect to John Muir Parkway, providing access, and adding traffic, through the Deer Ridge neighborhood to and from the ever-expanding Vineyards development and the soon to be constructed Los Medanos College satellite campus. The cumulative impacts of these projects should be included in any traffic analysis in the EIR.</p>

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	<p>Geology - The 1992 Deer Ridge EIR includes information about the abandoned Brentwood Coal Mine, developed in the 1860's, in the southeast corner of Deer Ridge, including a portion of the area proposed for the Deer Ridge Project. The EIR should address the appropriateness of constructing large buildings over or adjacent to an abandoned mine.</p> <p>Other impacts - A 250-unit complex for active adults would require parking spaces well in excess of those proposed, as many senior citizens continue to drive into their 80's, and many residents of the project would be couples owning more than one car. Residents on Foothill Drive currently use up the existing street parking, and during weekend and evening events at Oak Meadow Park street parking can be a problem. Overflow parking from the Deer Ridge Project would further exacerbate that problem. This should be addressed in the EIR.</p> <p>The NOP states that vacated holes would be repurposed into some form of open space, such as walking trails, picnic areas, and community gardens. The EIR should address public safety on the trails and picnic areas (we have had some bad experience with this) and potential impacts to residents and aquatic habitats from fertilizer or pesticide use in the gardens or vineyards.</p>
<p>William Pinney (email dated September 4, 2017)</p>	<p>The concerns I have with proposed project are as follows:</p> <p>The traffic on Balfour Road, American Ave and W. & E. County Club has become so congested with two schools at the top of the hill and the city has not addressed the problem.</p> <p>Now if we have two Senior Care Centers on each side of Balfour Rd., they should only have entrances & exits on Balfour Rd. This means that Balfour needs additional lanes and/or a new road for the two schools and closure of American Ave. The city can then correct the traffic problem before it becomes worse than it is already.</p> <p>As to the golf course and unused holes (the spaces to maintained by the owner on record, of the land). There should be no option to change it in the future (i.e.: no buildings of any kind).</p> <p>The Senior Care Centers should not be more than two stories with nothing on the roofs (except solar panels and air conditioning units. No antennas or dishes of any kind.) The look should be similar to the houses in the area. They should also have trees around the perimeter to block the view of the facility and parking areas.</p>
<p>Cindy Williamson (email dated September 4, 2017)</p>	<p>I would like the EIR to address;</p> <p>Traffic on Balfour during commute and school commute hours Traffic on East and west country Club during school commute hours Proposed Traffic on Lakeview Dr.</p> <p>Entry to proposed complex is on a street never meant for a commercial building, receiving large daily shipments, ambulances, 100's of employees with different shift rotations.</p> <p>Impact on creek side by the property on Balfour and all the burrowing owls and wild turkeys. I'm sure there is more wildlife and plants that would be destroyed by this proposed commercial complex in a low- density neighborhood. In</p>

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Commenter Name	Comment
	<p>addition, the impact of plopping a large commercial high density complex with all of its deliveries, ambulances, employees and high density residents in the middle of an established low density housing development.</p>
<p>Larry Plate (email dated September 12, 2017)</p>	<p>Please address these issues in the appropriate section of the EIR.</p> <p>The location of the proposed golf cart bridge at Shadow Lakes is too far from the previous hole. The 10th hole on the proposed course is the existing 9th hole and the green is adjacent to the clubhouse. The proposed cart bridge will be just west of the water fountain. That is a distance of at least 500 yards. Based on the proposed conceptual site map, the golfers will have to travel either in the parking lot or walking trail of the proposed village, then onto Lakeview Drive to reach the path to the bridge. In addition, after the golf round is complete the golfers will have to go back over the bridge, on to Lakeview, and through the parking lot to reach the clubhouse area. There is a safety risk to golfers when they share the street and parking lot with regular traffic. The bridge itself will have to be wide enough to accommodate carts going in both directions at the same time.</p> <p>How can the aesthetics of the proposed villages be reviewed in the EIR, when there are not detailed plans about how high the structures will be, how many lights there are, the parking layout, the landscaping, etc.? That part of the study will be inadequate.</p> <p>The proposed layout of the new course holes will create long distances between some of greens and the next tees. For example, the distance from hole 7 green to hole 8 tee is about 400 yards and the distance from hole 13 green to hole 14 tee is about 300 yards. This could make the course un-walkable which would hurt its viability. In addition, to go from hole 6 green to hole 7 tee will require using a city street or sidewalk for about 100 yards which is dangerous.</p>
<p>Interested Parties (Comment Cards)</p>	
<p>Clifton Fagerquist (comment card dated August 16)</p>	<p>Opposed to re-zoning</p>
<p>Jim Halter (comment card dated N/A)</p>	<p>In Shadow Lakes, will the new building tenants participating in the home owner association? How would that be broken out?</p>
<p>Sanya Hill Maxion (comment card dated August 16)</p>	<p>I would like the EIR to evaluate the following:</p> <ol style="list-style-type: none"> 1. The impact on our already declining emergency services (fire and EMS and police – one fire station has been shut down). 2. The impact on local traffic – the Deer Ridge Club House will be located near an elementary school which already causes traffic congestion. 3. The impact on the natural watershed which is located near the 11th hole in Deer Ridge and near the proposed Senior Center. 4. The impact on the natural animals i.e. the frogs located near the above-referenced watershed. 5. The impact on the home values of all residents at Shadow Lakes and Deer Ridge – We care about this very much!!! 6. The impact on our property tax values and also the impact that will have

Commenter Name	Comment
	<p>on city revenue.</p> <p>7. The impact on the aesthetics of the properties that will no longer have golf holes behind them – we care about this very much!!!</p>
Bruce and Susan Wood (comment card dated August 16)	<p>? Security for repurposed holes</p> <p>Traffic already crazy – how can we handle more?</p> <p>? Long & Short term = ↓ Mortgage values</p> <p>Who & how will our C.C.&R's be upheld?</p>
Richard Larsen (comment card dated August 16)	<p>Will the EIR assess the impact of the open space that has deteriorated as a result of little maintenance on the course? How much environmental impact will it take to get the course back in working order?</p>
Name not provided (comment card dated August 16)	<p>Do renters have any say in the alternate uses of the space? What are their rights as renters to impact the outcome of a proposed project?</p>
Richard Larsen (comment card dated August 16)	<p>Will the EIR account for the alternative use of the land that will include additional housing on the golf course. E.g. the golf course owners leave the land and someone comes in and builds houses.</p>
Name not provided (comment card dated August 16)	<p>What is the EIR for home owners? Values of our homes.</p>
Furman Forte (comment card dated August 16)	<ul style="list-style-type: none"> ▪ The following negative impacts to residents? ▪ Increased demand and use of a short water supply. ▪ Increased traffic impacts on Foothill. ▪ Increased demand on public services. ▪ Increased trash, car fumes, noise, and light pollution. ▪ Demographic change leading to overwhelmed schools. ▪ As the neighborhood deteriorates, I will need to move my family and rent out my home. ▪ The senior housing map as shown will shut down both neighborhoods. ▪ Significantly changes voter makeup.
Gopal Shetty (comment card dated August 16)	<p>My prayer is that the City Council Members would pray to contact Lord Jesus Christ and ask for Lord's leading & take into account all the reports and then decide. God Bless Brentwood with his bountiful spirit.</p>
Mike Siemsen (comment card dated August 16)	<p>Hi there, I'd like the City to reject any rezoning of Shadow Lake/Deer Ridge for numerous reasons: 1. Permanent alteration of the neighborhood we moved into/paid premium for, 2. Traffic increases, 3. Ruining premium views/home environment, 4. Short-term investment by property owner → 20-year life span of senior assisted boom before that industry collapses. Please let other buy golf course, or let open space, or parks take place.</p>
Name not provided (comment card dated August 16)	<p>Will any siting council representatives be conflicted because they live in Shadow Lakes & Deer Ridge?</p>

2.5.4 EIR Public Scoping Comments

The City of Brentwood received a series of verbal comments in response to the NOP at the public scoping meeting held on August 16, 2017 to discuss the scope and content of the EIR. These comments are organized by topics of interest in Table 2-2 (Summary of Verbal Comments on Notice of Preparation).

Topic	Summary of Comment
Aesthetics/Visual	<ul style="list-style-type: none"> ▪ Our house is at ground zero. Our views will be blocked to build senior housing- 3 stories, lights on all night, cooking hospital food all day, looking at urban blight. We do not want it. Currently, we cannot get out of Shadow Lakes at 7:30 in the morning or later in the afternoon because of traffic. ▪ How can you have mitigation of views that will go from unobstructed to blocked? How will the EIR determine feasible mitigation? We want the City to know that this cannot be mitigated. ▪ Light and Noise would come from the project and impact our quality of life.
Affordable Housing	<ul style="list-style-type: none"> ▪ If high-density housing is constructed, will there be low income housing for seniors? Will that be included in the project? A) The City has an inclusionary housing ordinance that requires 2% of total units to be set aside for low income, or the developer can pay an in-lieu fee. If it is for-sale market rate housing, the project would come under the City’s requirement. In the past, most developers have opted for the fee.
Alternatives	<ul style="list-style-type: none"> ▪ EIR Alternatives: Can a vineyard or wineries be an alternative? In nearby areas, there are people with very large yards, who pay farmers to farm their land. Can this be an alternative? ▪ Will the EIR address the impact of not doing anything? E.g. the no project alternative? ▪ For the EIR, if looking at status quo—will that involve a sale of the property to another owner? Even if a sale were to result in a financial loss to the applicant? What if someone else comes in and manages it properly?
Biological/Wildlife	<ul style="list-style-type: none"> ▪ Behind my house is a wetland in the spring. The wetland is around hole #11 (Shadow Lakes). Please see how it will be affected. Also #18 (Shadow Lakes). ▪ Are you looking at wildlife? Where does the consultant get the information on the animals, ponds, and how they will be impacted by the project? A) Those working on this topic are experts in their fields and are specialists in the various species.
Cultural Resources	<ul style="list-style-type: none"> ▪ Cultural impacts-- what does that mean? What does that mean to your company?
Emergency Services	<ul style="list-style-type: none"> ▪ How will the project affect, or be affected by, emergency services? They are already taxed. ▪ EMS is already understaffed! ▪ Transportation- facilities are 24/7, service vehicles (emergency vehicles and associated vehicles) are coming and going. ▪ Concern of already limited emergency services. They cannot get to calls we have now- who will take responsibility if someone dies?

Table 2-2: Summary of Verbal Comments on Notice of Preparation

Topic	Summary of Comment
	<ul style="list-style-type: none"> ▪ Is there any way to measure the EMS service affected by the project? Where is the mutual aid coming from for a 3-story building? Who will respond to all of these emergency needs if accidents happen at the same time? ▪ The City still has 4 more years of residential building. The City will need to address the need for first responder’s capacity. ▪ Fire and emergency services –there have been service calls not answered. Balfour Road is already impacted.
Financial/Economics	<ul style="list-style-type: none"> ▪ Is the City going to study the impacts to the financial values of the homes as a result of the project? ▪ High density housing- how can it be mixed in with the low density? ▪ Lack of communication- 4 of 7 houses are rentals. No one from the City has communicated with the owners to let them know what is going on. ▪ Will the City re-valuate property values and re-assess the taxes? ▪ Regarding the EIR process, what will go on behind the homes that will lose the golf course areas? Will that be in the EIR? ▪ Housing values: The third-party consultant is not doing anything regarding potential impacts to housing values. Therefore, using examples from the area and based on research from the surrounding area, it is up to the City Council. ▪ Will the one new course be more or less viable due to the loss of the better holes? Who will even want to play at the new reconfigured course? ▪ Can the effects of taxes and decreased property values be included in the EIR? Can research be done to see what the actual impacts are to the residents as a result of the proposed project? Can that be included as one of the 18 environmental topics that are studied? How does that impact me as the home owner? ▪ This is a frustrating process- this should be all about the economics- how will the project affect homeowner values, home equity, etc.?
General EIR Questions	<ul style="list-style-type: none"> ▪ Is there a point that the EIR consultant comes back and says that we do not have enough development detail? Example- visual-views from people’s yards? How do you assess without actual construction to know what it is really like? What about traffic? Grading and drainage? Both sites have significant slopes. How do you address drainage along the Shadow Lakes flood areas? It seems like a lot of guesses. How about assessing dust, pesticides, grapes; and if there’s a park, how about the noise. How do you assess without a full project design? City should not approve the project until we know what the project will actually look like. ▪ Will our questions and comments be included in the EIR? All of them or just some? A) All comments will be included in the EIR in some form. ▪ Timing of the roll out of EIR needs to miss all of the holidays: we want to pay attention to this. ▪ Does the EIR take into account the acreage of both golf courses, as well as the actual construction site? Does it encompass both courses? A) Yes, all 355 acres. ▪ Will you compare the original EIR’s to the new one? ▪ Based on comments heard, can the scope of the EIR change? If so, does that change the cost? If so, who pays the additional cost?? A) There is a max contract

Table 2-2: Summary of Verbal Comments on Notice of Preparation

Topic	Summary of Comment
	<p>amount right now being paid by the applicant. If additional work is required beyond what was intended, then the City can make a contract amendment, which the applicant will pay for.</p> <ul style="list-style-type: none"> ▪ EIR Process: Will you review the original EIR’s to see how the project will affect this EIR? A) Info in the original EIR’s is very dated, but it will be reviewed for background information. ▪ Do you look at similar projects that were turned down or voted down by the public and the reasons why? A) This is not part of the EIR process. ▪ Has Kimley-Horn been paid by Suncoast for other EIRs? A) No. ▪ We need your help (Kimley-Horn) to get all of this information to the City so they can make an informed decision. ▪ Will the “worst case scenario” of the project be evaluated in the EIR? A) Yes.
Golf Course Operations	<ul style="list-style-type: none"> ▪ If the project is not approved, who will guarantee that the existing courses are operated in perpetuity? Who will make sure this will happen? A) This is not done through the GP or zoning process. It could be accomplished with a development agreement, which has not yet been requested by the applicant, but could be. ▪ If the project is built and fails as a business, where will we be? Will the City have any say if the project goes south and we are left with no golf course? ▪ I come from a town of 10K people—the town has two 18-hole courses that stay quite busy. So, it is not true that there are not enough golfers in the area. ▪ What happens to the Deer Ridge improvements that have already been made to the entry gate area? Since the clubhouse would be going away, will we still have an entry to the community? ▪ I am a former Berkeley resident-moved to Brentwood seven years ago. Moved here for the quiet, and relaxing. My friends want to come here when they retire. What do you do without a golf course?? Nothing else going on for retired folks. Keep the golf courses! It’s the only thing we have going. ▪ I told a friend I was moving to Brentwood and no one really knew where it was. What is Brentwood known for? Some people who have been here said –you have a very nice golf course (Shadow Lakes). So, I guess this is what the City is known for. By changing the courses and adding the development, we are changing what the City is known for. The City should have the vision of how to present the City and attract people to our city.
Golf Course Re-Use	<ul style="list-style-type: none"> ▪ Address the re-uses of the abandoned holes in the EIR. We want to know what will happen to these areas. ▪ Will the impacts of the areas to be re-used be evaluated in the EIR? ▪ What about the environmental impacts on the residents of existing communities? Can an analysis of this be included in the EIR so that the City Council will have information on the impacts? ▪ The reason we are here tonight is because Suncoast says that it is impossible for both courses to survive, economically. What about the Oakley or Antioch courses? Did the City check to see if we could sell the courses to another company? Can another single golf course survive in the area? We should keep them both open now.

Table 2-2: Summary of Verbal Comments on Notice of Preparation

Topic	Summary of Comment
Open Space	<ul style="list-style-type: none"> ▪ How will open space be analyzed? ▪ Save our open space. Whatever comes out of the EIR, please save our open space! ▪ Shadow Lakes is now open space. For the EIR, will you look at the various habitats for species? Will you look at the conditions now compared to the future-if there was no project?
Project Compatibility	<ul style="list-style-type: none"> ▪ RE: Project is out of character with our community. If the project is passed, does that set a precedent for other areas in the city that have unused areas? Will that result in additional high density developments? ▪ Population and housing would not be compatible. ▪ Question 23 of supplemental applicant's questionnaire asks: Will proposed changes be in scale to the existing character? Applicant indicated there would be no changes. Not true! ▪ Regarding the scaling of the development? Has a model of the proposed development been created for the EIR? A) Not required for CEQA, but the City may request that one be created. ▪ Does the City look at examples from other areas where similar projects have been proposed? San Juan Capistrano for example? Do you look at comparable projects to help determine the effects and impacts of this project? ▪ Audience member showed a brochure from SunCoast Properties. The brochure showed people running through the grass with smiles. It was not showing dope deals, vandalism, pet feces, and kids coming from anywhere because it is now public property. You all will have to live with it! ▪ SunCoast is apparently \$435k past due in taxes to someone (City/State—not sure). If this is the case, how do they have the money for this project (the EIR) if they are in default on taxes? ▪ Is there a real design plan? With all the details? Lights, parking, etc.? ▪ Zoning changes were already granted for the club house. The General Plan was just updated in 2014. Why adopt an amendment so soon? ▪ I came here tonight for the information. If the project does not go through, what happens if the developer just walks away? What happens to the courses? ▪ Compatible is not the right word. The project needs to show that it will improve our community! This is about our quality of life. I hope this is in the EIR. ▪ I live at 191 Putter Drive. I have been in the neighborhood for 20 years. I have seen a lot of change in both communities. The City has done whatever they wanted to do with the front of Shadow Lakes. Impacts of the bypass—this was supposed to have tons of trees to block noise- we never got these trees. This development is too much for the area. If we are waiting for an EIR, we need to stand up and fight the project.
Project Approvals/Council	<ul style="list-style-type: none"> ▪ Regarding the two City Council members who cannot vote due to conflict of interest—can those two members speak as homeowners, but not City Council members? A) Correct. ▪ The three City Council members who will make the decision: I would like to propose that the project is put out for a vote to residents of the City of

Table 2-2: Summary of Verbal Comments on Notice of Preparation

Topic	Summary of Comment
	<p>Brentwood and community residents. This would allow an opportunity to vote on the project. We are leaving all of this up to the fate of three people? What will happen to our property values?</p> <ul style="list-style-type: none"> ▪ The State agency recommended that the two City Council members should not vote on the project. What about the EIR? How will we be able to influence the three remaining members? Why are we even doing this? ▪ Does the City have a business plan from the applicant? A) No. ▪ Someone told me the number of people in favor of the project was 7:1 in favor. Based on tonight, I think that figure was exaggerated. ▪ What about polling for the project? Is it possible to do some unbiased opinion polling? A) Polling is not included in the legislative process. Although there may be another mechanism. ▪ Residents can influence the Planning Commission. Seven years ago, there was a similar project that the residents stopped at the Planning Commission process. ▪ Which City Council members will be eligible to vote on the project? Two of the members reside in the community. A) The state determined that the two City Council members residing in the community cannot participate/vote on the project. This means that three members will be responsible for reviewing the project. Any decision will require a 3-0 vote to approve the project. ▪ Will the City check in with Suncoast to see if there are any other potential buyers? They say there are no buyers to sell it to. They are trying to unload their financial situation on us in order to bail themselves out. Does the City fact check what they say? A) The City cannot require the applicant to show us their finances. The action is a discretionary action- if the City determined the project is acceptable, they can approve it w/o any magic formula. It could also go the other way and not approve the project. The City can also approve the project, but with conditions attached to it.
Public Involvement/ Communication/ Notification	<ul style="list-style-type: none"> ▪ Casey- you sent out emails. Would be nice to know when the letters will go out for the upcoming project phases? When will we receive letters for Planning Commission meetings? Does everyone receive letters so they can give input? ▪ The mayor promised a second meeting like this, will this be the one and only meeting? Not everyone has been informed. ▪ Can we expand the comment period? Not everyone knew about this project and not everyone was notified by the City. A) CEQA provides 45 days for review and comment of the Draft EIR. Per Casey, if holidays impacted by the release date, City can extend review period to 60 days. ▪ How were people informed about this meeting? You are the City, you have our parcel numbers and contact information and addresses—you should be using that info to send us project info.
Re-Zoning/Zoning	<ul style="list-style-type: none"> ▪ RE: the re-zoning for a senior housing facility, once rezoned, can the owners change the use from senior housing to something else without going back to the City Council? Would it require another EIR? A) If the applicant changes their mind to put in non-age restricted apartments after the area has been rezoned for senior housing, the applicant would have to apply for another zoning amendment. The zoning ordinance can specify in great detail the type of land

Table 2-2: Summary of Verbal Comments on Notice of Preparation

Topic	Summary of Comment
	<p>uses implemented/allowed.</p> <ul style="list-style-type: none"> ▪ Wouldn't it be easy for the applicant to get another zoning change approved? A) Under CEQA, the applicant would need to go through CEQA for any subsequent rezone. Could we tier off the old document? Or require a new document? Would supplemental or addendum be needed for the EIR? The City would look at the level of complexity of the proposal and make a determination of the type of CEQA document required once an application for a rezone is requested. ▪ If Brentwood changes the zoning to allow the project, this will be a black eye for the two communities. ▪ Can there be consolidation of the courses without re-zoning? Is the only option for rezoning to include the proposed development? What recourse do the residents have to push back on the limits of the project or changes made by the company? ▪ If the applicant changes its mind not to pursue the project, they could leave and sell the property-then we would be left to do this all over again.
Schools/Students	<ul style="list-style-type: none"> ▪ Schools-- how will this project impact the schools? People move to Brentwood for the schools—they are award winning. What is the impact going to be when the young families decide not to live here because of the senior housing? We have vineyards, concerts, open space. With the project, we will not be able to let the kids ride bikes because of traffic. How will we service the developed areas? What happens when an emergency occurs? We need to really look at the effects on schools!
Senior Housing	<ul style="list-style-type: none"> ▪ Senior assisted living, with certain number of apartments. What happens if the City Council approves the senior housing? What if developer changes mind and puts in non-age restricted housing? A) if the proposal goes through for senior housing or assisted living (or some combination), the developer cannot change it w/o a re-zoning from the City Council. ▪ Active senior vs. assisted senior living. Important to know the differences for these two groups in order to do an accurate EIR. ▪ Are you going to do an analysis why there are so many senior facilities in the community? There are already so many senior developments-you should do a study to determine if more senior housing is actually needed. ▪ RE: 500 units of housing- will the resulting blight be analyzed in the EIR? There are already vacancies at other similar developments. What happens when these new units become vacant? ▪ For the EIR- Active senior vs. assisted living residents--will you take into account the differences between the two types of residents and the associated uses? Traffic, emergency services?
Transportation/ Traffic	<ul style="list-style-type: none"> ▪ Are you going to be on site to evaluate traffic during school hours and at all other important locations? ▪ Good luck turning onto Foothill Drive with these facilities in operation. Transportation has to be looked at very closely. ▪ Traffic on Balfour Road is bad already, especially with school traffic. ▪ Traffic- kids in neighborhood- Balfour Road at Foothill Drive- will KHA measure

Table 2-2: Summary of Verbal Comments on Notice of Preparation

Topic	Summary of Comment
	<p>the traffic counts for a 24-hour, multi day to get a true assessment of counts?</p> <ul style="list-style-type: none"> ▪ Balfour Road is already bad. Hope you will coordinate with the City and traffic engineer to make sure all affected intersections and roads are studied. ▪ Traffic/EMS-550 units- need to know in the EIR – where will the access be to Kaiser? Along the Farm road? Will that be addressed in this EIR? ▪ A huge development was recently approved (4k homes?) in Antioch. They use Sand Creek Road to Deer Valley Road. They will use Shadow Lakes streets to get to the schools. This needs to be included in the traffic section and for emergency response. They will be coming through the back door of Shadow Lakes to get to schools.
Utilities/ Infrastructure	<ul style="list-style-type: none"> ▪ What about the gas pipelines? There are two of them running through the project area. Is this included in the EIR? How is the risk assessed? ▪ Looking for topics not included so far—I would like to see an evaluation of the utilities – both the electrical and Electromagnetic Fields (EMF). Right now in Shadow Lakes, it is sometimes difficult to get television and internet due to the overlay. All these new people will want television and internet-- how will the new people be affected? Evaluate the requirements. ▪ Risk assessment on the bridge project- this would require maintenance. We already need maintenance on the existing bridges. Would the City be on the hook for the cost of maintenance or liability if the developers go away at some point?

There were a number of topics raised during the NOP comment period and/or public scoping meeting that are not CEQA related topics and thus are not applicable for inclusion in the Draft EIR, as they are not directly related to the disposition of direct environmental effects of the project on the environment. These comments are; however, included in the summary of comments in Tables 2-1 and 2-2, as well as in Appendix A for the City of Brentwood decision-makers to consider during their review and deliberation of the proposed project. These include: concerns over the project applicant’s financial wherewithal, current golf course/applicant finance and business operations, ownership disposition and/or sale of the golf course, and eligibility of City Council members to vote on the proposed project. Two additional topics that were raised are also not within the scope of this EIR document: the impact of the proposed project on property values and the potential for urban blight that might result with the implementation of the proposed project. These two topics are discussed below.

As a general rule, CEQA Guideline Section 15064(e) provides that “[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment.” Section 15064(e) further specifies that economic or social effects can be considered where a physical change is caused: “Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant.” Additionally,

CEQA Guideline Section 15064 specifically discusses impacts on people and includes an example relating to an adverse effect on people. There is no evidence in the record to demonstrate that potential impacts associated with property values as a result of project implementation would have an effect on people.

Further, the City of Brentwood has not adopted any CEQA Thresholds specifically related to property values; therefore, there is no policy rationale to determine that impacts to property values as a result of proposed development is an impact under CEQA.

CEQA Guideline Section 15131(b) also addresses this topic and identifies two examples when social impacts could be considered when determining whether an environmental impact is significant. The examples include (1) a freeway or rail line that divides an existing community where the social effects of the division may be considered when determining significance, and (2) a road that results in noise that disturbs religious practices, where the social impact of disturbed religious practices could be considered when determining significance. All examples cited in the CEQA Guidelines include direct adverse impacts to individual people. Moreover, the examples are ones where the effect on people is a result of the diminution on the quality of the physical environment used by those people. None of the examples are similar to the proposed project where the potential adverse impact is an alleged loss of revenue.

Other sections of the CEQA Guidelines further confirm that economic impacts alone are not environmental impacts. For example, CEQA Guideline Section 15131(a) allows that an EIR may trace the cause and effect from a project to economic or social changes that in turn result in physical changes, but the *“focus of the analysis shall be on the physical changes”* (emphasis added).

In the case of urban blight, concern has been expressed in NOP comment letters received that the construction of 560 units of age-restricted housing would result in blight if they become vacant at some later date. Other commenters noted that there would be resulting blight from unoccupied open space. For the purpose of this analysis, urban decay (often times referred to as “blight”) is typically defined as extended long-term business vacancies, directly or indirectly resulting in physical deterioration to properties or structures that is so prevalent, substantial, and long lasting that it impairs the proper utilization of the properties and structures, and the health, safety, and welfare of the surrounding community. Physical deterioration can include abandoned buildings, boarded doors and windows, parked trucks and long-term unauthorized use of the properties and parking lots, extensive or offensive graffiti painted on buildings, dumping of refuse or overturned dumpsters on properties, dead trees and shrubbery, and uncontrolled weed growth. A legal CEQA definition for urban decay is as follows:

(Citing Bakersfield Citizens for Local Control v. City of Bakersfield (2004) 124 Cal.App.4th 1184.) The Court defined “urban decay” for CEQA purposes as “physical deterioration of properties or structures that is so prevalent, substantial, and lasting a significant period of time that it impairs the proper utilization of the properties and the structures, and

the health, safety, and welfare of the surrounding community. Physical deterioration includes abnormally high business vacancies, abandoned buildings, boarded doors and windows, parked trucks and long-term unauthorized use of the properties and parking lots, extensive or offensive graffiti painted on buildings, dumping of refuse or overturned dumpsters on properties, dead trees and shrubbery, and uncontrolled weed growth or homeless encampments.”

There is no evidence in the record to substantiate that implementation of the proposed project would result in triggering any of the factors that constitute urban blight or decay, and thus no further analysis is included within this EIR. CEQA Guideline Section 15064 (f)(5) provides that “Argument, speculation, unsubstantiated opinions or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by fact.” Further, the project as proposed contemplates two age-restricted housing villages with the potential for both independent and assisted living in each. Any such forecasting as to the potential for blighted conditions (as described above) resulting from project implementation would be too speculative and, therefore, cannot be reasonably evaluated in the context of this EIR.

In the case of electromagnetic fields (EMFs), concern has been expressed in NOP comment letters received that EMFs could negatively impact the new residents associated with the proposed project, this since numerous high-voltage transmission lines traverse the project area.

Electric and magnetic fields (EMF) are areas of energy that surround any electrical device. Power lines, electrical wiring, computers, televisions, hair dryers, household appliances and everything else that uses electricity are sources of EMF. The magnetic field is not blocked by buildings so outdoor sources like power lines can add to the EMF inside your home. However, the field decreases rapidly with distance so that most homes are too far from high voltage lines to matter. EMF are commonly measured in units of gauss (G) by an instrument known as a gaussmeter. A milligauss (mG) is 1000 times smaller than a gauss.

Recognizing the public’s interest and concern regarding the potential health effects from exposure to EMFs associated with electrical transmission lines in the project vicinity, the discussion below provides general background information regarding electromagnetic fields (EMF) associated with electric transmission lines. However, EMF is not addressed in this Draft EIR as an environmental impact under CEQA, since the CPUC does not consider EMF to be an environmental issue or, in the context of CEQA, an environmental impact. The following is provided for information only.

Electric Fields

Electric fields are present whenever voltage exists on a wire, and are not dependent on current. The magnitude of the electric field is primarily a function of the configuration and operating voltage of the power line and decreases with the distance from the source (power line). The

electric field can be shielded (i.e., the strength of the electric field can be reduced) by any conducting surface, such as trees, fences, walls, buildings, and most types of structures.

Magnetic Fields

Magnetic fields are present whenever current flows in a power line, and are not dependent on the power line's voltage. The strength of these fields also decreases with distance from the source. However, unlike electric fields, most common materials have little shielding effect on magnetic fields. Therefore, the magnetic field strength is a function of both the current flowing through the transmission line and the design of the system. Magnetic field strengths do diminish with distance. As a result, a common measure to minimize EMF exposure includes raising the overall heights of transmission lines to increase the distance between the ground surface and the transmission line.

The magnetic field levels of overhead and underground transmission lines will vary depending upon customer power usage. There are no long-term, health-based State or Federal government EMF exposure standards. State regulations for magnetic fields have been developed in New York and Florida (150 mG and 200 mG at the outer edge of the utility corridor, also referred to as the right-of-way). However, these exposure levels are based on limiting exposure from new facilities so that levels are not greater than those associated with existing facilities.

Possible Health Effect

The consensus among the medical and scientific communities is that there is insufficient evidence to conclude that EMF causes adverse health effects. Neither the medical nor scientific communities have been able to provide any foundation upon which regulatory bodies could establish a standard or level of exposure that is known to be either safe or harmful. Laboratory experiments have shown that magnetic fields can cause biologic changes in living cells, but scientists are not sure whether any risk to human health can be associated with them. Some studies have suggested an association between surrogate measures of magnetic fields and certain cancers while others have not.

2.6 EIR Scope, Issues, Concerns

This Draft EIR addresses the potential environmental effects of the project and was prepared following input from the public and the responsible and affected agencies, through the EIR scoping process, as discussed previously. The contents of this Draft EIR were established based on the findings in the NOP and public and agency input (as identified in Tables 2-1 and 2-2). Based on the findings of the NOP, a determination was made that an EIR was required to address potentially significant environmental effects on the following resources:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural/Tribal Resources
- Energy Conservation
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Population and Housing
- Public Services and Recreation
- Transportation and Circulation
- Utilities and Service Systems

Through the completion of the City's Environmental Checklist for this proposed project, the City has determined that the project would not require the assessment of agricultural and timberland resources or mineral resources in the EIR. No portion of the project site is covered by a Williamson Act Contract or located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance according to the 2007 California Department of Conservation Farmland Mapping and Monitoring Program. The project site is not zoned for agriculture. Additionally, the site does not include forest resources, including timberlands. No mineral resources are present on the project site.

2.7 Report Organization

Pursuant to the State CEQA Guidelines, Section 15120(c), this Draft EIR contains the information and analysis required by Sections 15122 through 15131. Each of the required elements is covered in one of the EIR chapters and appendices, organized as follows.

- **Executive Summary.** A summary description of the proposed project, the alternatives, their respective environmental impacts, and the Environmentally Superior Alternative.
- **Introduction.** A discussion of the background, purpose, and need for the proposed project, briefly describing the proposed project, and outlining the public agency use of the EIR.
- **Project Description.** Detailed description of the proposed project.
- **Environmental Analysis.** A comprehensive analysis and assessment of impacts and mitigation measures for the proposed project. This chapter is divided into separate chapters for each environmental resource and contains the environmental settings and impacts of the proposed project. A description of the approach to cumulative impacts analysis is presented in Chapter 4, and cumulative impacts are analyzed at the end of each environmental resource.
- **Alternatives.** This chapter provides a description of the alternatives evaluation process, as well as a description of alternatives considered but eliminated from further analysis

and the rationale thereof. This chapter also includes an analysis and assessment of impacts for alternatives retained, including the No Project Alternative and the Environmentally Superior Alternative.

- **Other CEQA Considerations.** A discussion of growth-inducing effects, long-term implications of the proposed project, and significant environmental effects which cannot be avoided if the proposed project is implemented.
- **EIR Preparers, Glossary, Acronyms, and Abbreviations**
- **Appendices.** The appendices include the NOP for the Draft EIR, comments received in response to the NOP and the City's scoping activities, and background technical studies prepared for the project.

2.8 Project Sponsors and Contact Persons

The City of Brentwood is the Lead Agency for preparation of this EIR. Inquiries regarding the EIR should be directed to the City. The project applicant is Deer Ridge & Shadow Lakes Golf, L.P.

Lead Agency: City of Brentwood
Community Development Department
150 City Park Way
Brentwood, CA 94513
Contact: Erik Nolthenius, Planning Manager
Phone: (925) 516-5137
Fax: (925) 516-5407
enolthenius@brentwoodca.gov

2.9 Availability of the Draft EIR

Notice of the availability of the Draft EIR has been provided to the public, agencies, organizations, and interested groups and persons for comment during a 45-day review period in accordance with Section 15087 of the CEQA Guidelines. Thus, the official public review period for this Draft EIR will extend between February 7, 2018 and March 23, 2018. During this period, public agencies and members of the public may provide written comments on the analysis and content of the Draft EIR.

In reviewing a Draft EIR, readers should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and on ways in which the significant effects of the project might be avoided or mitigated. In order to elicit a written response for inclusion within the Final EIR, all comments on this Draft EIR must be received by 5:00 PM on March 23, 2018.

Further, the City is expected to hold public hearings on the Final EIR in the spring of 2018. All interested parties are invited to attend the public hearings to provide either verbal or written

comments on the Final EIR. The time and location of the public hearings will be noticed in accordance with applicable noticing requirements and procedures.

The Notice of Completion for the Draft EIR has also been distributed as required by CEQA. This Draft EIR and the full administrative record for the project, including all studies, is available for review during normal business hours Monday through Friday, 8:00 AM to 5:00 PM, at the City of Brentwood Community Development Department, located at 150 City Park Way.

Additionally, copies of the Draft EIR and technical appendices are available at the reference desk of the following libraries and on the City's website.

City of Brentwood

Community Development Department
150 City Park Way
Brentwood, CA 94513
Phone: (925) 516-5405

Brentwood Library

35 Oak Street
Brentwood, CA 94513

The Draft EIR and technical appendices can also be accessed at the City's website: <http://www.brentwoodca.gov/gov/cd/planning/drs/ devpri.asp>. The City will subsequently respond to each comment on the Draft EIR received in writing during the public review period through a Responses to Comments document for the Final EIR. All persons who commented on the Draft EIR will also be notified of the availability of the Final EIR and the date of public hearings before the City.

2.10 Final EIR Process

Following the close of the public comment period, a Final EIR will be prepared to respond to all substantive comments related to environmental issues surrounding the content of the Draft EIR. Pursuant to Section 15088.5(f)(2) of the CEQA Guidelines, the City will request that reviewers limit their comments to the content of the Draft EIR and will respond to all comments related to the disposition of environmental effects made during the Draft EIR public review period.

The Final EIR will be available prior to Planning Commission and City Council public hearings to consider this Draft EIR and the proposed project.

Concurrent with the City's consideration of the Final EIR, the City Council will also consider the merits of the project itself. This consideration may render a request to revise the project, or an approval or denial. If the project is approved, the City Council may require mitigation measures specified in this Draft EIR as conditions of project approval. Alternatively, the City Council could

require other mitigation measures deemed to be effective mitigations for the identified impacts, or it could find that the mitigation measures cannot be feasibly implemented. For any identified significant impacts for which no mitigation measure is feasible, or where mitigation would not reduce the impact to a less-than-significant level, the City Council would be required to adopt a finding that the impacts are considered acceptable because specific overriding considerations indicate that the project's benefits outweigh the impacts in question.