

SENT VIA EMAIL: gbeaudin@cityofpleasantonca.gov

February 2, 2018

Mr. Gerry Beaudin Director of Community Development City of Pleasanton Planning Department 200 Old Bernal Avenue Pleasanton, CA 94566

Subject: Case No. PLN20174-00087

Dear Mr. Beaudin,

On behalf of USL Pleasanton Lakes, L.P. ("USL"), I am providing the enclosed responses to the City letter, dated December 11, 2017, regarding the City's review of the draft scope for the preparation of an Environmental Impact Report (EIR) by Impact Sciences for the Arroyo Largo development proposed by USL Pleasanton Lake LP.

**Comment 1:** "As mentioned in previous letter, the project site is located within Pleasanton's Sphere of Influence. Pursuant to Program 6.2 of the 2005-2025 Pleasanton General Plan Land Use Element, the General Plan requires a Specific Plan be prepared for East Pleasanton. City staff will not support the proposal until such time a Specific Plan is prepared."

**Response to Comment 1:** The project site is unincorporated property located outside of the City's municipal boundaries. The City's general plan has no regulatory effect outside of the City's boundaries, although the City may certainly rely upon it as a statement of the City's priorities. The project site is already designated for residential uses, and the East County Area Plan includes no requirement for preparation of a specific plan. We would observe also that the City had an opportunity to prepare and consider a specific plan for the area, but abandoned that plan after years of effort, at Applicant's cost, and has refused to prioritize such a plan for further consideration.

**Comment 2:** "The existing segment of Busch Road ends at the City's eastern boundary, to the immediate west of the project site. As proposed, Busch Road would be extended east to provide access to the project site; El Charm Road would be extended from Stoneridge Drive south to Stanley Boulevard. Additionally, El Charro Road would be connected to Busch Road at the southeast quadrant of the project site. The EIR should identify impacts from the proposed development to City streets and Level of Service (LOS) at City intersections, including but not limited to Busch Road/Valley Avenue, Valley Avenue/Santa Rita Road, Santa Rita Road/Stoneridge Drive, and Valley Avenue/Stanley Boulevard."

**Response to Comment 2:** We do not propose any extension of El Charro Road in connection with this project. The Arroyo Lago EIR will evaluate local traffic-related effects.



**Comment 3:** "Both the East Bay Regional Park District Master Plan and the Zone 7 Arroyo Management Plan include planned improvements that impact the area of the proposed development:

- a. EBRPD Master Plan: Iron Horse Trail to be extended south from Busch Road to Shadow Cliffs Regional Park; and
- b. Zone 7: Arroyo Management Plan encourages the construction, operation and maintenance of public recreational trails along selected flood control channels or arroyos. The plan includes design standards for bicycle and pedestrian trails as well as staging areas.

The EIR should include analysis for location and type of trail extension and traffic control devices along Busch Road including traffic signals, pedestrian signals and possibly stop controls. The EIR should also identify any and all proposed amenities within and adjacent to the project site."

**Response to 3:** The Arroyo Lago EIR will evaluate all potential environmental impacts of the project, including agency plans that may impact the proposed development.

**Comment 4:** "The EIR should identify overall water supply and demand needs of the proposed development, and its impacts to the City and its residents; The EIR should also identify the use of recycled water for landscape irrigation."

**Response to Comment 4:** The Arroyo Lago EIR will evaluate the proposed utility and service systems required to serve the project.

**Comment 5:** "The EIR should identify the measures for the proposed stormwater treatment and retention."

**Response to Comment 5:** The Arroyo Lago EIR will evaluate the proposed utility and service systems required to serve the project.

**Comment 6:** "The Pleasanton Operations Service Department (OSD) is located to the immediate west of the project site. The eastern portion of the OSD contains outdoor storage, a fire safety training tower and related training facilities, and a police (gun/shooting) target range. These facilities present potential noise, air quality, and aesthetic compatibility issues for the proposed residential development to the cast. The EIR should fully account for these impacts."

**Response to Comment 6:** The Arroyo Lago EIR will evaluate noise, air quality and aesthetic impacts related to the project.

**Comment 7:** "The Pleasanton Garbage Service (PGS) is located to the immediate south of the project site. Its operation includes garbage, recycling, and organics collection and transfer. The EIR should address the safety, truck traffic, noise, odor, dust, air quality, and aesthetic impacts associated with this neighboring use."

**Response to Comment 7:** The Arroyo Lago EIR will evaluate all potential environmental impacts of the project.



**Comment 8:** "The project site would be located adjacent to an area where the City's General Plan Land Use Map has a land use designation of General and Limited Industrial use. Some adjacent industrial businesses will be reliant on large trucks to transport their goods. The EIR should identify measures to maintain adequate vehicular access to these businesses while minimizing conflicts with increased passenger vehicle, bicycle and pedestrian activity."

**Response to Comment 8:** The Arroyo Lago EIR will evaluate the circulation network of the project.

Additionally, the City has noted two applications currently under review:

"The City is currently reviewing an application for a conditional use permit and design review approval to construct five new industrial buildings totaling approximately 1,520,064 sq. ft. and related site improvements at 3000 Busch Road (File Nos. P17-0867 and P17-0868). The City is also reviewing an application for annexation and pre-zoning of an approximately 20.4-acre vacant parcel on the southwest corner of El Charro Road and Arroyo Mocho in Alameda County (File Nos. P17-0877 and P17-0918). The EIR should include these projects in the list of known projects for this proposal, and address the potential impacts."

The Arroyo Lago EIR will evaluate the potential cumulative impacts of the applicant owned projects under review with the City of Pleasanton. However, the conditional use permit application, consistent with existing zoning, referenced above, has been revised and resubmitted to construct three new industrial buildings totaling approximately 1,292,400 sq. ft. and related site improvements.

Please feel free to contact me should you have any questions or would like to discuss further.

Sincerely

Steven M. Dunn

Cc: Shabnam Barati, Impact Sciences
Clark Morrison, Cox, Castle & Nicholson
Rodrigo Orduna, Alameda County Assistant Planning Director
Neal Payton, Torti Gallas