

## IV. DRAFT EIR TEXT REVISIONS

Chapter IV presents specific changes to the text of the Draft EIR and recirculated sections that are being made to clarify any errors, omissions, or misinterpretation of materials in the Draft EIR, in response to comments received during the public review periods. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined text. Text deleted from the Draft EIR is shown in ~~strikeout~~. Pages numbers correspond to the page numbers of the Draft EIR.

These revisions to the Draft EIR derive from comments raised in one or more of the comment letters received by the City of Benicia on the Draft EIR

Page 2 of the Draft EIR is modified as follows:

The 215,050 square feet of mixed uses would include a mixture of live/work, work/live units, retail and office space, and light industrial uses.

Page 5 of the Draft EIR is modified as follows:

- **Adams Street Zone:** Approximately 1.30 acres of open space and 200,100 square feet of new and redeveloped mixed uses, including office, commercial, light industrial, live/work, work/live, and limited residential uses;
- **Grant Street Zone:** Approximately 0.92 acres of open space and 32,775 square feet of redeveloped mixed uses, including office, commercial, light industrial, live/work, work/live, and limited industrial uses; and

Pages 8 through 34 of the Draft EIR are modified as follows:

**Table II-1: Summary of Impacts and Mitigation Measures**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<b>A. LAND USE AND PLANNING POLICY</b>			
<u>LU-1</u> : Residential uses developed within the Plan Area may be incompatible with existing industrial uses.	S	<u>LU-1</u> : The following changes shall be made to Action 1.5.3:  <u>Action 1.5.3</u> : Allow residential uses, including artist live/work and work/live units, where it can be demonstrated that adequate buffers exist, including noise buffers, and that the presence of residents will not significantly constrain industrial operations, including the flow of goods and materials. <u>Proposed residential uses located in areas where industrial uses can be seen or heard shall be evaluated to determine whether that they would not be incompatible with industrial uses. Site specific evaluation may include acoustical or air quality analysis as determined by the City. New work/live uses shall not be permitted along those portions of Jackson Street that are south of Grant Street and west of Park Street.</u>	LTS
<b>C. GEOLOGY, SOILS AND SEISMICITY</b>			
<u>GEO-3 (All Zones)</u> : Damage to structures or property related to shrink-swell potential of project soils and/or settlements of non-engineered fill could occur.	S	<u>Mitigation Measure GEO-3b (All Zones)</u> : Designs of all open space and park areas shall be reviewed and approved by the City of Benicia <del>Community Development Department</del> <u>Planning and Building Department</u> . The designs of all open space and park areas shall incorporate low water-need plantings to minimize the potential for damage to pavements, utilities, and structures from expansive soils. The use of similar landscaping shall be encouraged at private development parcels by providing information to new tenants regarding the relationship between irrigation and subsequent property damage. A document which describes the potential for damage from expansive soils from over-irrigation and includes solutions such as drought-tolerant plant material and drip irrigation systems shall be prepared by the applicant and provided to all occupants of the Plan Area.	LTS

Table II-1 *Continued*

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<b>F. BIOLOGICAL RESOURCES</b>			
<p><b>BIO-2 (Jefferson Ridge/Officers' Row Zone):</b> Development in the Jefferson Ridge/Officers' Row Zone (including the Clocktower Area) may result in the fill of jurisdictional wetlands that are subject to jurisdiction as waters of the United States under Section 404 of the Clean Water Act and/or are waters of the State subject to jurisdiction under the Porter-Cologne Act .</p>	S	<p><u>Mitigation Measure BIO-2b (Jefferson Street/Officers' Row Zone):</u> Applicants for individual development projects on the site of any delineated wetlands shall obtain the appropriate federal and State permits authorizing the fill of jurisdictional wetlands and other waters, including waters of the State. The applicant shall provide proof to the City of Benicia <u>Planning and Building Department</u> of compliance with the terms and conditions of the permits prior to issuance of the grading permit. All work in jurisdictional areas shall be in compliance with the terms and conditions of the federal and State permits.</p>	LTS
<b>G. TRANSPORTATION AND CIRCULATION</b>			
<p><u>Impact TRANS-2:</u> Unacceptable LOS at the intersection of <b>East 5th Street / I-780 Eastbound Ramps</b>. The effect of project traffic would result in the intersection operating at LOS E with a delay of 44.6 seconds during the PM peak hour.</p>	S	<p><u>Mitigation Measure TRANS-2:</u> The project sponsor of an individual development project shall contribute a pro-rata share to the following improvement: <u>Sponsors of development associated with buildout of the Draft Specific Plan shall together fund the entirety of this improvement.</u></p> <p>Signalize intersection as it meets the Peak Hour Volume Signal Warrant for the PM peak hour.</p> <p>Implementation of the identified improvement would result in this intersection operating at an acceptable LOS B with 14.5 seconds of delay during the PM peak hour.</p>	LTS

Page 37 of the Draft EIR is modified as follows:

(2) **Existing Conditions.** Since the Arsenal's decommissioning and further development of the industrial port, the area has continued to undergo significant changes. The presence of I-680 and I-780 have diminished the significance of the railroad as primary access to the site, and much of the built fabric of the former Arsenal that related directly to military-industrial activities has either been demolished or converted to a mix of uses. As previously noted, the Arsenal area includes four distinct historic districts listed on the National Register of Historic Places. Some of the Arsenal buildings have been converted to residential, commercial, and industrial uses, including, and live-work artist studios.

Page 44 of the Draft EIR is modified as follows:

The Draft Specific Plan proposes to redevelop the existing 526,815 square feet of mixed uses currently occupying the Plan Area with approximately 741,865 square feet of new and redeveloped mixed uses, 22 residential units, and 6.39 acres of open space. Table III-1 shows total land uses by type that would be located within each zone. To acknowledge that existing uses may be used more efficiently during and after buildout of the Draft Specific Plan, the analysis in this Draft EIR is based on the assumption that the 526,815 square feet of redeveloped mixed uses could intensify by approximately 20 percent, resulting in an *effective* net increase of 105,363 square feet of mixed uses. The 105,363 square feet of redeveloped uses would not represent actual physical development on the site; instead, this number would represent an intensification of existing uses. Therefore, *for purposes of the environmental review in this Draft EIR*, net change in development on the site would include 215,050 square feet of new mixed uses, 105,363 square feet of redeveloped uses, 22 residential units, and 6.39 acres of open space. The 215,050 square feet of mixed uses would include a mixture of live/work, work/live units, retail and office space, and light industrial uses. Refer to the Draft Specific Plan for a detailed description of the proposed vision. Figure III-4 depicts the illustrative vision for the Plan Area. As the plan is visionary in nature, the Vision Plan also depicts areas outside the immediate Plan Area that will have a key role in the revitalization of the Lower Arsenal (e.g., the Clocktower area). For purposes of environmental review, this entire area is considered as the Plan Area and is included in the analysis provided in this EIR.

Table III-1 on page 44 of the Draft EIR is modified as follows:

**Table III-1: Total Uses after Buildout of Specific Plan**

Land Use Type	Land Use by Zone (square feet)				Total
	Jefferson Ridge	Adams Street	Grant Street	South of Grant Street	
Recreation, Education, Public Assembly	103,759	8,004	4,916	52,899	169,578
Business, Financial, Professional Services	73,784	70,035	2,622	41,762	188,203
General Services	34,586	18,009	4,916	19,489	77,000
Retail	18,446	26,013	7,538	97,445	85,407
Industry, Manufacturing, Processing	---	64,032	2,622	33,410	164,099
Residential <sup>a</sup>	---	8,004	10,160	---	51,574
Transportation, Communication, Infrastructure	---	6,003	---	---	6,003
<i>Total<sup>b</sup></i>	<i>230,575</i>	<i>200,100</i>	<i>32,775</i>	<i>278,415</i>	<i>741,865</i>

<sup>a</sup> Residential uses in the Adams Street Zone are all live/work or work/live; in the Grant Street Zone, they are half live/work or work/live and half condo/apartment; in the South of Grant Zone they are half work/live and half home-occupation/condo/apartment.

<sup>b</sup> Land use totals may vary from noted square footage due to rounding.

Note: This table shows the total square footage of each use within the Plan Area after full implementation of the Draft Specific Plan. This includes existing, new, and redeveloped uses within the Plan Area.

Source: City of Benicia, 2007.

Page 47 of the Draft EIR is modified as follows:

**(2) Adams Street Zone.** The Draft Specific Plan envisions that Adams Street would continue to support a mix of industrial and industrial-compatible uses that can effectively “showcase” the area’s historic buildings. Approximately 1.30 acres of open space and 200,100 square feet of redeveloped mixed uses, including office, commercial, light industrial, live/work, work/live, and limited residential uses would be located within this zone after full implementation of the Draft Specific Plan.

**(3) Grant Street Zone.** The Draft Specific Plan envisions that Grant Street would develop as an enclave that can support a mix of uses, with an emphasis on residential uses. Artist/live work space at the western terminus of Grant Street would be considered in order to minimize conflicts with surrounding uses. Approximately 0.92 acres of open space and 18,975 square feet of new and 13,800 square feet of redeveloped and mixed uses, including office, commercial, light industrial, live/work, and work/live uses would be located within this zone after full implementation of the Draft Specific Plan.

Page 55 of the Draft EIR is modified as follows:

**(2) Adams Street Zone.** Form-based standards for this zone are intended to promote compatible building forms that can contribute to the continued, diverse combination of office, retail, light industrial, live/work, and work/live uses in the area. This main objective of the standards for this zone is that Adams Street continue to provide primary access to the Port for trucks and function as a “buffer zone” between the northern and southern districts of the Plan Area. The standards also seek to maximize the internalization of potentially conflicting land uses through the regulation of internal courtyards, and encourage the development of consistent

background buildings that enhance the Plan Area's historic buildings, which include the Guard House and the Arsenal Administration Building.

(3) **Grant Street Zone.** The Grant Street Zone is depicted in Figure III-8. The form-based code standards for this zone are intended to promote a building form that can assist in the continued, diverse combination of office, retail, light industrial, live/work, work/live, artisan, and residential uses in the area. Improvements in this zone are intended to minimize potential conflicts with neighboring industrial uses, resulting in a walkable, pedestrian-oriented, vertically-oriented, mixed-use district that can evolve over time.

Page 84 of the Draft EIR is modified as follows:

(1) **Potential Conflicts with External Land Uses.** Existing land uses within and in the vicinity of the Plan Area are shown in Figure IV.A-1. As previously described, the Plan Area is surrounded by medium to high-density residential uses and general industrial uses to the north, Port uses to the east and south, and single-family residential uses to the west. New residential, work/live, and live/work uses within the Plan Area could be incompatible with surrounding industrial and Port uses if not appropriately sited and designed. The Draft Specific Plan contains several actions that would reduce land use conflicts with surrounding Port and industrial uses, including:

Page 85 of the Draft EIR is modified as follows:

**Impact LU-1: Residential uses developed within the Plan Area may be incompatible with existing industrial uses. (S)**

In particular, non-live/work or work/live residential uses could be exposed to nuisances associated with industrial uses. Implementation of the following mitigation measure would reduce this potential impact to a less-than-significant level:

Mitigation Measure LU-1: The following changes shall be made to Action 1.5.3:

Action 1.5.3: Allow residential uses, including artist live/work and work/live units, where it can be demonstrated that adequate buffers exist, including noise buffers, and that the presence of residents will not significantly constrain industrial operations, including the flow of goods and materials. Proposed residential uses located in areas where industrial uses can be seen or heard shall be evaluated to determine whether ~~that~~ they would ~~not~~ be incompatible with industrial uses. Site specific evaluation may include acoustical or air quality analysis as determined by the City. New work/live uses shall not be permitted along those portions of Jackson Street that are south of Grant Street and west of Park Street. (LTS)

Page 86 of the Draft EIR is modified as follows:

- *Adams Street Zone.* The Draft Specific Plan envisions that Adams Street would continue to support a mix of industrial and industrial-compatible uses. Permitted uses within this zone would include office, commercial, light industrial, live/work, work/live, and limited residential uses. The Draft Specific Plan includes two actions which would reduce the

potential conflicts between uses within the Adams Street zone through the use of internal courtyards. Actions 1.3.3 and 1.3.5 require regulation to reduce land use incompatibility impacts, and creation of internal courtyards within new buildings in the Adams Street zone. These courtyards would be designed to internalize light industrial activities that could be potentially disruptive, noisy, or visually intrusive to surrounding uses. It is envisioned that internal courtyards would create a “safe haven” to minimize conflicts between adjacent uses. These courtyards would reduce potential land use conflicts; however, some residential uses could still be affected by industrial activities.

- *Grant Street Zone.* The Draft Specific Plan envisions that Grant Street would develop as an enclave that can support a mix of uses, with an emphasis on residential uses, in order to reduce conflicts with neighboring industrial uses. Action 1.4.4 seeks to improve Grant Street in a way that minimizes potential conflicts with neighboring industrial uses. Artist/live work or work/live space at the western terminus of Grant Street would be considered in order to minimize conflicts with surrounding uses. As in the Adams Street Zone, certain proposed residential uses could still be affected by industrial activities.

Page 111 of the Draft EIR is modified as follows:

**(1) Displacement of Housing or People.** Implementation of the policies and actions of the Draft Specific Plan would not directly displace existing housing. New development within the Plan Area would include up to 22 new residential units. While existing housing or informal live/work and work/live units could be converted to other uses with implementation of the Draft Specific Plan, the net result of development (including the 22 residential units and new and redeveloped live/work units) would be an increase in the number of housing units within the Plan Area. In addition, the Draft Specific Plan includes policies and actions to preserve the artists’ community within the Plan Area, and would do so by permitting live/work and work/live uses, which are currently a conditional use, within the Grant Street, Adams Street, and South of Grant Street zones. The Draft Specific Plan also includes policies and actions that would encourage the development of live/work and work/live uses, including inclusionary units for lower-income households. Therefore, implementation of the Draft Specific Plan would not displace existing housing or people within the Plan Area.

**(2) Induce Substantial Population Growth.** Based on the buildout assumptions discussed in Chapter III, it is expected that existing uses within the Plan Area would intensify by 20 percent resulting in a net increase of 320,413 square feet of new and redeveloped mixed uses (existing uses are also expected to increase by 20 percent without implementation of the Draft Specific Plan). These uses would include 22 new residential units and a mixture of live/work and work/live units, recreation and community center uses (66,044 square feet), retail and shopping center uses (63,252 square feet), office space (73,298 square feet), and light industrial/infrastructure uses (66,248 square feet).

Based on the average household size of 2.6 persons, the addition of 22 residential units would result in an increase of approximately 57 new residents within the Plan Area. This population growth would represent a substantial increase in the residential population within the Plan Area itself; however, this increase would only represent less than 0.25 percent of the City’s current (2005) and projected (2035) population. Although live/work and work/live uses would be permitted within the Plan Area, the exact number of units is not known at this time. As more of

these types of uses are developed within the Plan Area, the residential population would increase. It is expected that uses such as live/work or work/live would result in smaller household sizes and would thus not generate a substantial number of new residents within the Plan Area. Therefore, the implementation of the Draft Specific Plan would not result in substantial direct population growth beyond that planned for the City.

Population growth can also be induced by development of land uses which would generate new employment opportunities, thus increasing the demand for housing within the community. Although the development of new and redeveloped recreation and community center, retail, office, and light industrial uses within the Plan Area would stimulate economic growth within the Plan Area, these uses would not be expected to indirectly induce substantial residential growth beyond the 22 units of residential and live/work and work/live space discussed above, or beyond that planned for the City. In addition, the opportunity for further residential development within the Plan Area, beyond that envisioned by the Draft Specific Plan, does not exist due to the limited amount of land available for large-scale residential development and the limited number of buildings available for live/work and work/live conversion. Jobs created within the Plan Area may also be filled by residents who already live in the area, reducing the demand for additional housing that would otherwise develop if all employees originated outside of the Plan Area.

Page 130 of the Draft EIR is revised as follows:

Mitigation Measure GEO-3b (All Zones): Designs of all open space and park areas shall be reviewed and approved by the City of Benicia ~~Community Development Department~~ Planning and Building Department. The designs of all open space and park areas shall incorporate low water-need plantings to minimize the potential for damage to pavements, utilities, and structures from expansive soils. The use of similar landscaping shall be encouraged at private development parcels by providing information to new tenants regarding the relationship between irrigation and subsequent property damage. A document which describes the potential for damage from expansive soils from over-irrigation and includes solutions such as drought-tolerant plant material and drip irrigation systems shall be prepared by the applicant and provided to all occupants of the Plan Area. (LTS)

Page 180 of the Draft EIR is revised as follows:

Mitigation Measure BIO-2b (Jefferson Street/Officers' Row Zone): Applicants for individual development projects on the site of any delineated wetlands shall obtain the appropriate federal and State permits authorizing the fill of jurisdictional wetlands and other waters, including waters of the State. The applicant shall provide proof to the City of Benicia Planning and Building Department of compliance with the terms and conditions of the permits prior to issuance of the grading permit. All work in jurisdictional areas shall be in compliance with the terms and conditions of the federal and State permits.

Page 188 of the Draft EIR is modified as follows:

- ***Jefferson Street*** is a local two-lane, two-way roadway that extends from Military East in the west to the Clocktower parking lot in the east. The portion of the street between Park

Road and the Clocktower is privately owned and narrower than other segments of the street, which affects two-way travel. Jefferson Street is currently gated between the Commanding Officer’s Quarters and Jefferson Street Mansion.

Page 215 of the Draft EIR is revised to read as follows:

**Table IV.G-15: Existing Plus Project Conditions Intersection Impacts and Mitigation Measures**

Existing plus Project Conditions Impacts	Level of Significance	Existing plus Projects Conditions Mitigation Measures	Significance After Mitigation
Impact TRANS-2: Unacceptable LOS at the intersection of <b>East 5th Street / I-780 Eastbound Ramps</b> . The effect of project traffic would result in the intersection operating at LOS E with a delay of 44.6 seconds during the PM peak hour.	Significant	<u>Mitigation Measure TRANS-2:</u> The project sponsor of an individual development project shall contribute a pro-rata share to the following improvement: <u>Sponsors of development associated with buildout of the Draft Specific Plan shall together fund the entirety of this improvement.</u> Signalize intersection as it meets the Peak Hour Volume Signal Warrant for the PM peak hour. Implementation of the identified improvement would result in this intersection operating at an acceptable LOS B with 14.5 seconds of delay during the PM peak hour.	Less Than Significant

Source: DMJM Harris, 2007.

Pages 221 and 222 of the Draft EIR are revised to include the following tables:

**Table IV.G-19: Off-Ramp 95th Percentile Queuing – Existing plus Project Conditions**

No.	Off-Ramp	Storage Length	Peak Hour	Existing	Existing plus Project	Mitigated
1	I-780 WB Off-Ramp to East 5th Street	850'	AM	75'	325'	225'
			PM	250'	675'	325'
2	I-780 EB Off-Ramp to East 5th Street	1,100'	AM	75'	150'	225'
			PM	100'	200'	275'
7	I-680 SB Off-Ramp to Industrial Way	1,050'	AM	25'	25'	----
			PM	25'	25'	----
9	I-680 NB Off-Ramp to Bayshore Road	1,450'	AM	75'	75'	----
			PM	25'	25'	----

Note: **Bold** entries indicate queue lengths which exceed the available storage.

Source: DMJM Harris, 2007.

**Table IV.G-21: Off-Ramp 95th Percentile Queuing – Cumulative plus Project Conditions**

No.	Off-Ramp	Storage Length	Peak Hour	Cumulative	Cumulative plus Project	Mitigated
1	I-780 WB Off-Ramp to East 5th Street	850'	AM	275'	725'	300'
			PM	875'	1,250'	475'
2	I-780 EB Off-Ramp to East 5th Street	1,100'	AM	275'	525'	400'
			PM	450'	725'	400'
7	I-680 SB Off-Ramp to Industrial Way	1,050'	AM	25'	50'	----
			PM	25'	25'	----
9	I-680 NB Off-Ramp to Bayshore Road	1,450'	AM	200'	225'	----
			PM	50'	50'	----

Note: **Bold** entries indicates queue lengths which exceed the available storage.  
Source: DMJM Harris, 2007.

Page 304 of the Draft EIR is modified as follows:

New development is required to provide necessary funding and/or capital facilities for the school system, as determined by applicable State-mandated development impact fees. The proposed development would be subject to a developer mitigation fee of \$2.63 per residential unit<sup>1</sup> and \$0.42 per square foot for commercial development; no development fee is required for industrial or live/work and work/live development.

Page 308 of the Draft EIR is modified as follows:

**(3) Public Schools.** As discussed in Section IV.B, Population, Employment and Housing, the addition of 22 residential units would result in an increase of approximately 57 new residents within the Plan Area. Additional increases in the residential population would occur due to the development of live/work and work/live units, although the exact number of units or square footage of this type of development is not available at this time. Although the development of new and redeveloped recreation and community center, retail, office, and light industrial uses within the Plan Area would stimulate economic growth within the Plan Area, these uses would not be expected to indirectly induce substantial residential growth beyond the 22 residential and live/work and work/live uses anticipated as part of the Draft Specific Plan, or beyond that planned for the City. The additional residential population that would occur through buildout of the Draft Specific Plan would not substantially increase the demand for school facilities.

**(4) Libraries.** As discussed above, under Public Schools, and in Section IV.B, Population, Employment, and Housing, the proposed project would add approximately 57 new residents (not including residents generated by live/work and work/live uses) to the Plan Area, thereby increasing the demand for library services. Although the project would increase the demand for library services, the demand for these services would be met by existing library facilities. In addition, individual residential developers would pay the required \$213 library book fee to the City of Benicia. Implementation of the Draft Specific Plan would not require the construction of new library facilities and would not cause or accelerate the physical deterioration of existing library facilities.

<sup>1</sup> Benicia, City of, 2007. Building Inspection Division: Residential Development Fees. May.

(5) **Parks.** The Benicia General Plan and the Parks, Trails, and Open Space Master Plan establish park standards that call for 2.5 acres of community parks per 1,000 residents and 3.5 acres of neighborhood parks per 1,000 residents. The Master Plan identifies a citywide parks deficiency of approximately 35 acres of neighborhood parks and 18 acres of community parks. Implementation of the Draft Specific Plan would increase the demand for neighborhood and community parks due to the increase in the residential population generated by new development (57 new residents plus additional live/work and work/live residents). An incremental increase in the weekday demand for parks and recreational facilities resulting from the presence of new employees and visitors to the Plan Area would also occur.

Page 324 of the Draft EIR is modified as follows:

As shown in Table IV.N-1, the Draft Specific Plan scores a relatively high sustainability rating. Specifically, the Draft Specific Plan would result in a land use pattern and circulation system that would promote alternative transportation, including walking and bicycling. The viability of alternative transportation is one of the foundations of sustainability in that it has the potential to substantially reduce the use of non-renewable energy sources. The use of alternative transportation would be supported by a land use pattern of moderately dense mixed-use development, with identifiable neighborhoods, interesting historic buildings, and safe pedestrian paths. The Draft Specific Plan would encourage the development of multiple kinds of housing, ranging from live/work and work/live units for artists, to apartments over ground-floor retail spaces, to townhomes and condominiums. A diverse range of housing types would increase habitation options for Benicia residents and should accommodate a broad range of income groups.

Page 333 of the Draft EIR is modified as follows:

**b. Population, Employment and Housing.** The alternative would likely result in a slightly lower population growth rates compared to the proposed project, as residential projects are constructed on buildable parcels and live/work and work/live uses occupy former manufacturing spaces. However, without a comprehensive plan for the area, the mix of housing and jobs may not be as balanced as it would be under the Draft Specific Plan (i.e., under market conditions, and taking into account unceasing demand in the Bay Area for housing, residential uses could predominate across the Plan Area).

Page 342 of the Draft EIR is revised as follows:

**a. Land Use and Planning Policy.** The Senior Housing alternative would not result in the construction of incompatible land uses. Senior housing and townhouse uses would be generally compatible with the existing uses on Jefferson Ridge, which is quiet and relatively isolated from existing industrial uses compared to the other zones. The senior residential uses would not be well-served by existing services; most trips – to a grocery store or medical services – would require a bus or car ride, at least in the near-term. However, this lack of access would not result in significant environmental impacts. The location of the senior apartment building appears compatible with the Commanding Officer's Quarters, although its position would result in an Officers' Square that is smaller than the one proposed as part of the Draft Specific Plan. The five townhouse buildings would be placed conspicuously on Jefferson Ridge, and would likely

detract from the character of existing open space. Compared to the Draft Specific Plan, the alternative would likely result in more damage to the heritage cork oak trees in the southeastern corner of the ridge. The alternative would require the removal or transplant of certain cork oak trees from the open space, has a greater potential to damage remaining heritage cork oak trees on Jefferson Ridge through root compaction, and thus would compromise the land use character of the area.

**b. Population, Employment and Housing.** Compared to the proposed project, the Senior Housing alternative would increase housing on the site by approximately 80 units, and would reduce commercial space on the site by approximately 185,000 square feet. Like the proposed project, the alternative would not displace housing or divide an established community. The alternative would substantially increase the City's supply of affordable housing, which would benefit Benicia. In addition, the City's General Plan Housing Element identifies the Jefferson Ridge/Officer's Row Zone as a potential location for the development of senior housing within the City. Based on an average household size of 2.6 persons, the alternative would increase the population of the site by approximately 208 persons (although a population increase of this magnitude would probably not be realized since the average household size of senior units would be below the City's average). This population increase would not be considered substantial. The alternative would contribute to the City's existing jobs/housing imbalance, and would reduce the potential for the Lower Arsenal to be a truly mixed use environment. However, these impacts would not be considered significant.

Page 345 of the Draft EIR is revised as follows:

**c. Biological Resources.** The Senior Housing alternative would result in the removal of protected trees (possibly including heritage cork oaks), and direct impacts to seasonal wetlands, sensitive plant species which may occur on the site, and breeding bird and bat habitat. Because the senior apartment building would not be built to the northern boundary of the site, some impacts to seasonal wetlands may be avoided compared to the proposed project. However, compared to the proposed project, the alternative would have more widespread impacts on the grove of trees in the southeastern portion of Jefferson Ridge ~~(and would result in more vegetation removal overall).~~

Page 347 of the Draft EIR is modified as follows:

The primary purpose of the Draft Specific Plan is to guide investment and future development projects in order to realize the community's goals for the Plan Area. As discussed in Chapter III, after implementation of the Draft Specific Plan there would be a net increase of 320,413 square feet of new and redeveloped mixed uses in the Plan Area. These uses would include 22 new residential units and a mixture of live/work and work/live units, retail and office space, and light industrial uses. The addition of 22 residential units would result in an increase of approximately 57 new residents within the Plan Area (not including additional residents generated by new live/work uses). This represents less than 0.25 percent of the City's projected population at buildout of the Draft Specific Plan; additional live/work and work/live residents are not expected to generate a substantial number of new residents. In addition, although the development of new and redeveloped recreation and community center, retail, office, and light industrial uses within the Plan Area would stimulate economic growth within the Plan Area and

Benicia as a whole, these uses would not be expected to indirectly induce substantial residential growth beyond the 22 residential units and the live/work and work/live space that would result from implementation of the Draft Specific Plan. This growth would not exceed that planned to occur in the City under the existing General Plan. Therefore, the proposed project would not directly induce substantial population growth.

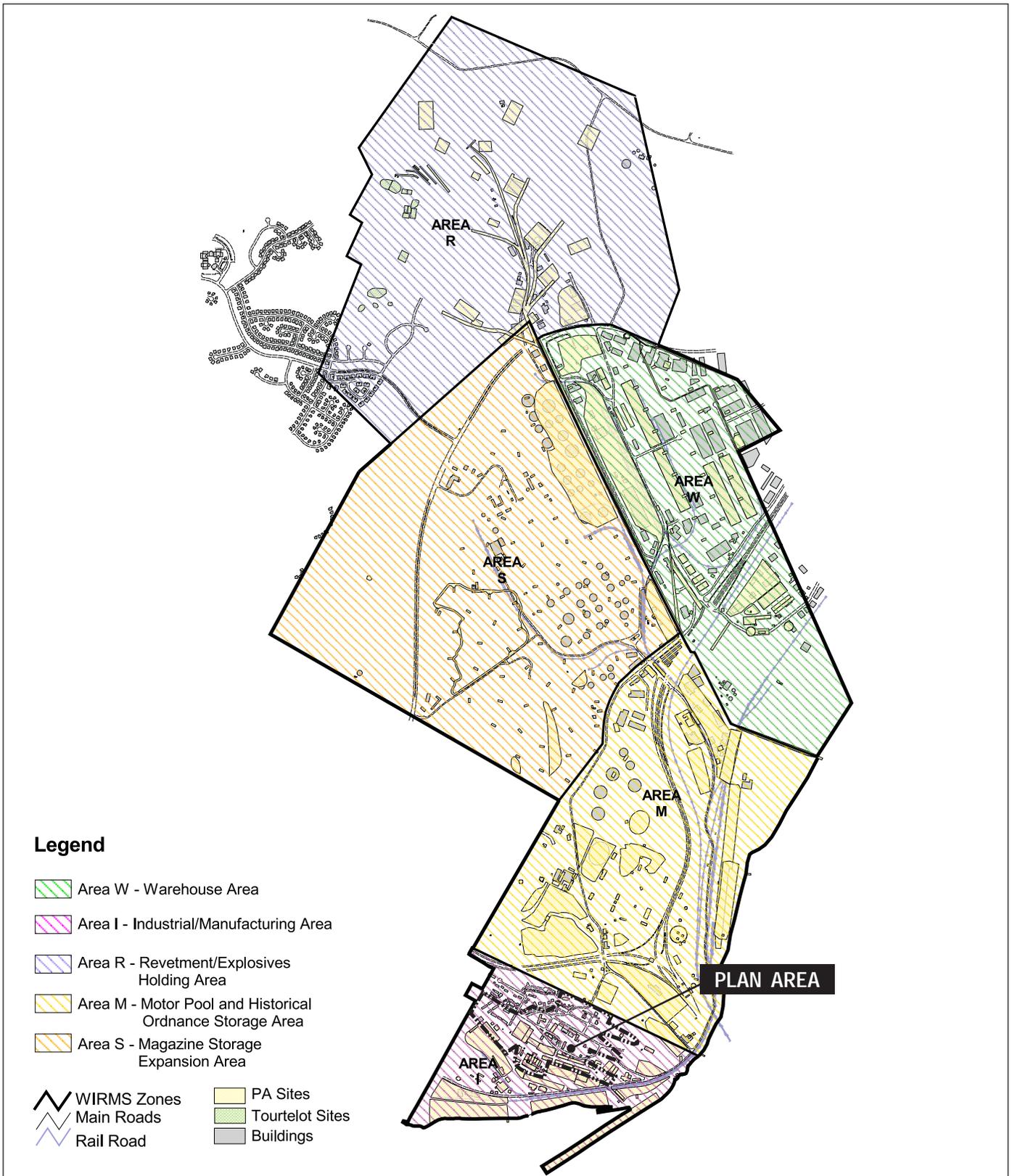
Page 65 of the recirculated Section IV.E, Hazards and Hazardous Materials is modified as follows:

DTSC, 2007. Meeting between DTSC (Donn Diebert and Christine Parent), City of Benicia (Charlie Knox and Heather McLaughlin), and LSA Associates, Inc. (Dennis Brown). December 3.

U.S. Army Corps of Engineers, 2008. Meeting between U.S. Army Corps of Engineers (Mike Shields and Kathy Greene), Brown and Caldwell (Wendy Linck), City of Benicia (Charlie Knox and Heather McLaughlin), and LSA Associates, Inc. (Dennis Brown). January 9.

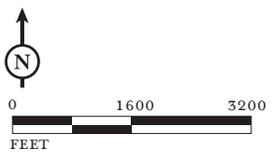
Figures IV.E-1, IV.E-2, and IV.E-3 (mistakenly referred to as Figures V.E-1, V.E-2, and V.E-3) in recirculated Section IV.E, Hazards and Hazardous Materials are revised as follows:





LSA

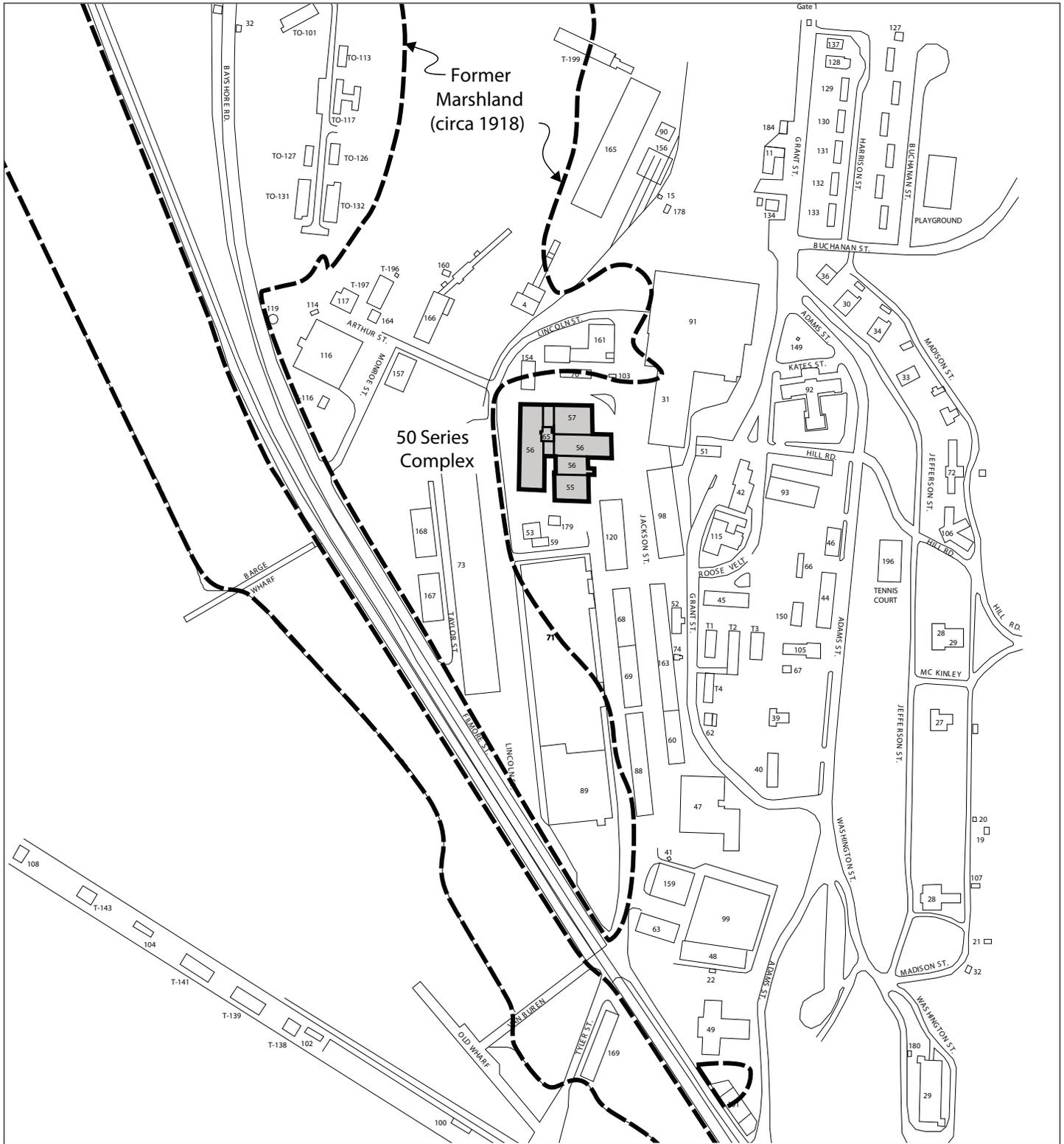
FIGURE IV.E-1



Lower Arsenal Mixed Use Specific Plan EIR  
Preliminary Assessment (PA) Study Areas

SOURCE: FORSGREN ASSOCIATES/BROWN AND CALDWELL, 2007

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LSA

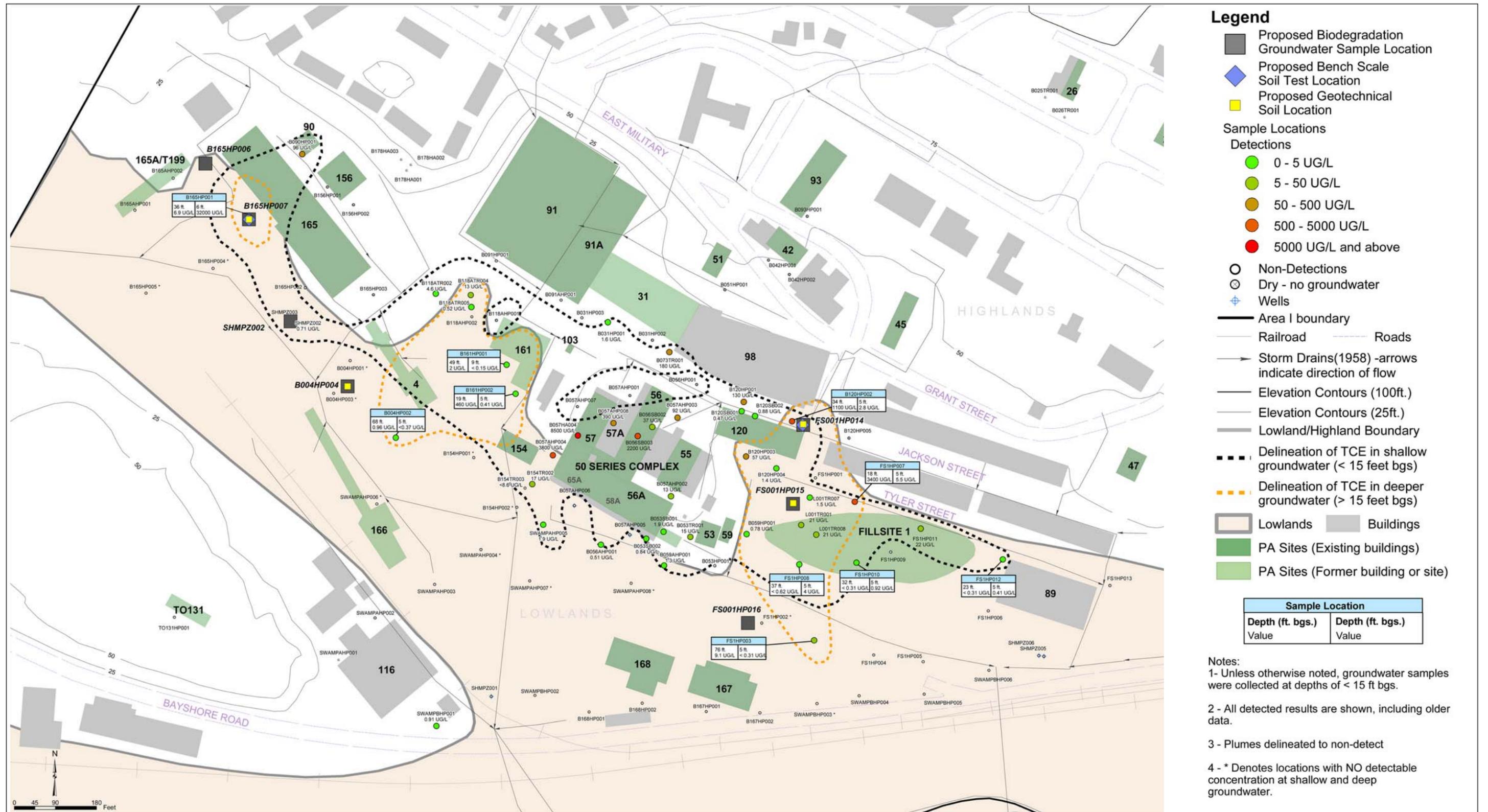
FIGURE IV.E-2

  
 NOT TO SCALE

*Lower Arsenal Mixed Use Specific Plan EIR*  
 50 Series Complex

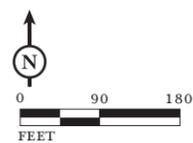
SOURCE: FORSGREN ASSOCIATES/BROWN AND CALDWELL, 2004

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FIGURE IV.E-3



Lower Arsenal Mixed Use Specific Plan EIR  
Trichloroethene Detected in Groundwater  
and Proposed Treatability Locations

SOURCE: BROWN AND CALDWELL, 2005

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