ADDENDUM TO THE SAINT MARY'S COLLEGE CAMPUS MASTER PLAN ENVIRONMENTAL IMPACT REPORT

(SCH NO: 2015111060)

FOR THE

RUGBY CLUBHOUSE AND STADIUM LIGHTS PROJECT

MORAGA, CALIFORNIA

LSA

April 2025

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MORAGA, CALIFORNIA

Submitted to:

Town of Moraga
329 Rheem Boulevard
Moraga, California 94556

Prepared by:

LSA Associates, Inc.
157 Park Place
Richmond, California 94801
(510) 236-6810

LSA Project No. 20231212.03

LSA

April 2025

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LIST OF ACRONYMS AND ABBREVIATIONS

2016 SMCCMP EIR	Saint Mary's College Campus Master Plan Environmental Impact Report
µg/m3	micrograms per cubic meter
AB	Assembly Bill
ADA	Americans with Disabilities Act
AIP	Archaeological Identification Plan
AMM	Avoidance and Minimization Measure
AMP	Archaeological Monitoring Plan
ATP	Archaeological Treatment Plan
AIR DISTRICT	Bay Area Air Quality Management District
Basin Plan	Water Quality Control Plan
BMPs	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
CAP	Climate Action Plan
CAPI	Comprehensive Advanced Planning Initiative
CARB	California Air Resources Board
CBC	California Building Code
CCCSD	Central Contra Costa Sanitary District
CCTA	Contra Costa Transportation Authority
CEC	California Energy Commission
CEQA	California Environmental Quality Act

CH_4	methane
Clean Air Plan	Bay Area Air Quality Management District 2017 Clean Air Plan
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalents
College	Saint Mary's College
CRHR.	California Register of Historical Resources
dBA	A-weighted decibel
DOC	California Department of Conservation
EBMUD	East Bay Municipal Utility District
GHG	greenhouse gas
GSAs	Groundwater Sustainability Agencies
HFHSZ	High Fire Hazard Severity Zone
HVAC	heating, ventilation, and air conditioning
LED	light-emitting diode
L_{eq}	equivalent continuous sound level
LID	low-impact design
L_{max}	maximum instantaneous noise level
MLD	Most Likely Descendant
MND	Mitigated Negative Declaration
MOFD	Moraga-Orinda Fire District
MOU	memorandum of understanding
MRP Permit	Municipal Regional Stormwater Permit
MT CO2e	metric tons of carbon dioxide equivalent

N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NO_x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
OA&E Railway	Oakland, Antioch, and Eastern Railway
OPR	Governor's Office of Planning and Research
Pb	lead
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
POTWs	publicly owned treatment works
PPE	personal protective equipment
project	Saint Mary's College Campus Master Plan Update Project
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities Strategy
SGMA	California Sustainable Groundwater Management Act
SMCCMP	Saint Mary's College Campus Master Plan
SO_2	sulfur dioxide
SRA	State Responsibility Area
Standards	Secretary of the Interior's Standards for the Treatment of Historic Properties
TACs	toxic air contaminants

Technical Advisory	*Technical Advisory for Evaluating Transportation Impacts under CEQA*
TLC	Total Light Control
Town	Town of Moraga
TPZ	tree protection zone
USGS	United States Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WPRP	Wetland Protection and Replacement Program
WUI	Wildland Urban Interface

1.0 PROJECT INFORMATION

1. **Project Title:**

   Saint Mary's College Campus Master Plan Update Project

2. **Lead Agency Name and Address:**

   Town of Moraga
   329 Rheem Boulevard
   Moraga, California 94556

3. **Contact Person and Phone Number:**

   Mio Mendez, Associate Planner
   Town of Moraga Planning Department
   (925) 888-7039
   mmendez@moraga.ca.us

4. **Project Location:**

   Saint Mary's College of California Campus
   1928 St. Mary's Road
   Moraga, California, 94575

5. **Project Sponsor's Name and Address:**

   Brian Yung, Senior Project Manager
   Saint Mary's College of California, Facilities Services
   (925) 631-8811
   bky2@stmarys-ca.edu

6. **Identification of applicable Master Plan and Prior Environmental Documents:**

   Saint Mary's College Campus Master Plan, as amended, and Saint Mary's College Campus Master Plan Final EIR (State Clearinghouse Number 2015111060).

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2.0 INTRODUCTION

The following describes the proposed Rugby Clubhouse and Athletic Field Lighting Project (project), which is an Addendum to the 2016 Saint Mary's College Campus Master Plan (SMCCMP) Environmental Impact Report (2016 SMCCMP EIR). The following discusses the proposed project, relative to the requirements of the California Environmental Quality Act (CEQA). The Town of Moraga (Town) is the lead agency for environmental review and Saint Mary's College of California (Saint Mary's or College) is the project proponent.

The proposed project would include the construction of a new rugby clubhouse and associated improvements at the existing Saint Mary's Stadium and the addition of lighting to three existing sports fields. This Addendum reaffirms the conclusions of the 2016 SMCCMP EIR relative to the proposed project.

2.1 2016 SAINT MARY'S COLLEGE CAMPUS MASTER PLAN

The 2016 SMCCMP EIR[1] was certified by the Town in 2016. The SMCCMP[2] outlined a strategy for addressing needed changes to campus buildings, faculty and staff spaces, student amenities, on-campus housing, athletic facilities, open space areas, roads and pathways, and infrastructure. The 2016 SMCCMP EIR analyzed 202,881 square feet of new construction, including renovations, an increase of 1.2 percent in full-time-equivalent (FTE) undergraduate students, a 34 percent increase in graduate student enrollment, 19 percent increase in full-time faculty, a 10 percent decrease in part-time faculty, and a 3 percent increase in both full-time and part-time nonfaculty staff members through 2030. Overall, the 2016 SMCCMP EIR assumed a total increase of 7.5 percent growth in the campus population through projected buildout of the SMCCMP.

2.2 PROPOSED PROJECT RELATIONSHIP TO THE SAINT MARY'S COLLEGE CAMPUS MASTER PLAN

2.2.1 Rugby Clubhouse

The construction of a clubhouse at the Saint Mary's Stadium was previously studied in the 2016 SMCCMP EIR at a programmatic level; however, since preparation of the 2016 SMCCMP EIR, the program and location of the clubhouse was refined. The 2016 SMCCMP EIR evaluated the potential impacts associated with the development of a 5,000-gross-square-foot, two-story clubhouse that would be constructed at the southeast end of the existing Saint Mary's Stadium. The clubhouse would include restrooms, locker rooms, concession, and clubhouse features.

The 2024 proposed Rugby Clubhouse would result in minor changes compared to the clubhouse analyzed under the 2016 SMCCMP EIR. The proposed project would be located on the eastern end of the existing stadium, as opposed to the south end. In addition, the size of the structure would increase from 5,000 square feet to 9,785 square feet. Due to the proposed changes, the project

1 Moraga, Town of. 2016. *Saint Mary's College Campus Master Plan Draft Environmental Impact Report, State Clearinghouse Number 2015111060.* September.

2 Saint Mary's College of California. 2017. *Saint Mary's College of California Campus Master Plan.* May 10.

would require a 2016 SMCCMP Amendment, in addition to Design Review Board, and Grading Permit approvals from the Town.

2.2.2 Athletic Field Lighting

The 2016 SMCCMP EIR analyzed impacts associated with exterior lighting primarily consisting of security lighting, lighting along pedestrian corridors, an elevated parking structure, and lighting associated with new buildings. The proposed project would result in changes compared to the lighting and athletic field upgrades analyzed under the 2016 SMCCMP EIR. The proposed project would include additional lighting at three athletic fields (Saint Mary's Stadium; Br. Ronald Gallagher Stadium, also referred to as the baseball field; and Cottrell Field, also referred to as the softball field) throughout the campus, not previously analyzed.

2.3 PURPOSE AND SCOPE

This Addendum serves two purposes. First, this document analyzes the potential environmental effects that could result from construction and operation of the proposed project to determine, under the criteria of *State CEQA Guidelines* Section 15164, whether any proposed changes to the project could cause any new or substantially more severe significant environmental effects that were not previously examined in the 2016 SMCCMP EIR. If no new significant or substantially more severe impacts would occur, and no new mitigation measures would be required, *State CEQA Guidelines* Section 15164 provides that the proposed project can be approved by the Town, as lead agency, without preparation of a subsequent or supplemental EIR.

Second, this document makes minor technical changes and additions to the 2016 SMCCMP EIR to analyze the environmental effects of the proposed project. Portions of the proposed project were analyzed at a program and project level in the 2016 SMCCMP EIR. Subsequent to certification of the 2016 SMCCMP EIR and adoption of the SMCCMP, additional project-level details were developed. These additional project-level details do not require any major revisions to the 2016 SMCCMP EIR analysis.

Pursuant to Section 15164 of the *State CEQA Guidelines*, an addendum to a previously certified EIR could be used by the lead agency if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent or supplemental EIR have occurred. As outlined in this Addendum, the project level changes, and analysis of potential environmental impacts meet the requirements of *State CEQA Guidelines* Section 15164 for the preparation of an addendum to the 2016 SMCCMP EIR.[3]

This Addendum determines that the proposed project would not result in any new or substantially more severe significant environmental effects that were not examined in the 2016 SMCCMP EIR. Program and project level mitigation measures that were identified in the 2016 SMCCMP EIR would continue to apply to the proposed project and are outlined in this Addendum in the appropriate section.

[3] *State CEQA Guidelines* Section 15164 relies upon the criteria of Section 15162.

2.4 FORMAT OF ADDENDUM

This document is organized into the following sections:

Section 1: Project Information: Provides summary data about the proposed project.

Section 2: Introduction: Provides an overview of environmental documentation, 2016 SMCCMP background, the purpose of the Addendum, and the organization of the Addendum.

Section 3: Project Location and Description: Presents a description of the proposed project, discusses consistency with the 2016 SMCCMP EIR, and describes approvals required.

Section 4: Comparative Evaluation of Environmental Impacts: Evaluates whether the proposed project would result in significant environmental impacts that are new or substantially more severe than those significant impacts identified in the 2016 SMCCMP EIR. This section briefly summarizes under each topic area the conclusion of the earlier environmental analysis, including references to applicable mitigation measures. If the proposed project would not result in new or substantially more severe significant environmental impacts, then an Addendum may be prepared pursuant to *State CEQA Guidelines* Sections 15162 and 15164.

Section 5: Summary of CEQA Guidelines Section 15162 Analysis: Summarizes *State CEQA Guidelines* Section 15162 requirements and project compliance.

Section 6: Mitigation Measures: Identifies 2016 SMCCMP EIR mitigation measures applicable to the proposed project.

Section 7: References: Includes a list of references cited in this Addendum.

2.5 FINDINGS OF THIS ADDENDUM

This Addendum was prepared to discuss any new information, changes to the project or circumstances that may affect the prior environmental analysis prepared for the 2016 SMCCMP EIR. *State CEQA Guidelines* Section 15168(c) discusses the use of a program EIR with later activities, and states that "if the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required." *State CEQA Guidelines* Section 15162 calls for the preparation of a subsequent or supplemental EIR or Negative Declaration if certain conditions have been met. These conditions include:

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 or 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.

The Town has evaluated the proposed project relative to these conditions, and determined that, pursuant to *State CEQA Guidelines* Sections 15162, a subsequent or supplemental EIR or Negative Declaration need not be prepared because:

a. The project proposes the construction of a new rugby clubhouse and associated improvements at the existing Saint Mary's Stadium; and the addition of lighting to three existing sports fields. The project would be consistent with the 2016 SMCCMP EIR with minor changes, as amended. No new significant environmental effects or a substantial increase in the severity of previously identified significant environmental effects would occur.

b. Since the 2016 SMCCMP EIR was certified, additional projects have been proposed in the vicinity of Saint Mary's College by the College and by others. The 2016 SMCCMP EIR include analyses that cover any potential cumulative impacts that might occur because of the development of the projects along with cumulative growth in the area. The cumulative impact analysis in the 2016 SMCCMP EIR took into account known or reasonably foreseeable projects that were underway at the College. No substantial changes with respect to circumstances under which the proposed project is undertaken have occurred that have not already been accounted for or will be accounted for in updated analyses for the College and for projects in the vicinity. For example, since certification of the 2016 SMCCMP EIR, the following have occurred:

    - St. Mary's Roundabout Mitigated Negative Declaration (MND), adopted May 25, 2022;

    - Town of Moraga Comprehensive Advanced Planning Initiative (CAPI), adopted January 25, 2023; and

- Town of Moraga CAPI Phase Two EIR, certified November 13, 2024.

As noted previously, the proposed project would include the construction of a new rugby clubhouse and associated improvements at the existing Saint Mary's Stadium and the addition of lighting to three existing sports fields. The proposed project would not cause new cumulative significant impacts or substantially increase the severity of impacts previously found to be cumulatively significant impacts in any of those environmental reviews. The additional projects listed above that have been proposed in the vicinity of the Saint Mary's College Campus by the College and by others do not change the significance of impacts as previously analyzed.

In addition, the proposed project would not require new mitigation measures or result in mitigation measures that are considerably different from those analyzed in the 2016 SMCCMP EIR and adopted by the Town.

Based on the above, none of the criteria of *State CEQA Guidelines* Section 15162 requiring preparation of a subsequent or supplemental EIR have been met. The proposed project would not cause new or substantially more severe significant environmental effects that were not previously examined in the 2016 SMCCMP EIR, nor would the modified project require new mitigation measures, other than those previously identified in the 2016 SMCCMP EIR. While some of the 2016 SMCCMP EIR mitigation measures were revised, to account for updates in regulatory requirements, these are not substantially different than those analyzed in the previous EIR. There have not been any substantial changes with respect to the circumstances under which the modified project would be undertaken that would require major revisions in the 2016 SMCCMP EIR. Thus, *State CEQA Guidelines* Section 15162 provides that the modified project can be approved by the Town without preparation of a subsequent or supplemental EIR.

No further environmental documentation is required pursuant to *State CEQA Guidelines* Section 15162, and preparation of an addendum to the 2016 SMCCMP EIR is appropriate pursuant to Section 15164 of the *State CEQA Guidelines*. Findings consistent with this determination will be prepared.

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3.0 PROJECT DESCRIPTION

The following describes the proposed project (project), which would include the construction of a new rugby clubhouse and associated improvements at the existing Saint Mary's Stadium and the addition of lighting to three existing sports fields. The Town of Moraga (Town) is the Lead Agency for review of the proposed project under CEQA. The following includes the project background, an overview of the project site and surrounding land uses, and a detailed description of the proposed project.

3.1 PROJECT SITE AND EXISTING CONDITIONS

The project site is located on the Saint Mary's College campus, at 1928 St. Mary's Road in Moraga, Contra Costa County. Regional access to the campus is from State Route 24, which connects with Interstate 580 to the west and Interstate 680 to the east. The project site is located at the northeast corner of the campus (see **Figure 1, Project Location and Regional Vicinity**).

The Town of Moraga General Plan Land Use Map designates the Saint Mary's College campus as "Community Facilities."[4] The campus is zoned as "Institutional,"[5] which is intended to accommodate governmental, public utility, educational community service, or recreational facilities, and to include the campus of Saint Mary's College of California as a unique planning area.

3.1.1 Rugby Clubhouse

The project site associated with the rugby clubhouse (rugby clubhouse project site) is located east of the Recreation Turf Field and is surrounded by undeveloped, densely vegetated hillsides to the north, east, and south. The Bertain Redwood Grove is located to the east of the rugby clubhouse project site and Las Trampas Creek is located to the north. Farther north are residential uses and farther south is the Geissberger Observatory. **Figure 2, Aerial Photograph of the Project Site and Surrounding Land Uses,** depicts an aerial photograph of the rugby clubhouse project site that shows existing conditions and surrounding land uses.

The rugby clubhouse project site is located within the boundaries of Saint Mary's Stadium, which is used by the men's and women's soccer and rugby teams and the newly added community-based professional soccer organization, The Town FC. Additionally, Saint Mary's Stadium is used for the College's commencement ceremony. The stadium seats 5,500 spectators and includes other existing stadium infrastructure, such as a scoreboard, an electrical utility box, storm drainage, and landscaping. The bleachers are located on the west side of the field and open to a view of the

[4] Moraga, Town of. 2023. *Moraga General Plan Land Use Map.* July 14. Website: https://www.moraga.ca.us/DocumentCenter/View/8329/General-Plan-Land-Use-Map-PDF (accessed May 16, 2024).

[5] Moraga, Town of. n.d. *Town of Moraga: Parcel Look-Up & Layer Viewer.* Website: https://moragatown.maps.arcgis.com/apps/instant/sidebar/index.html?appid=74bdf1b3e66e40b9ae498286f976f883 (accessed May 16, 2024).

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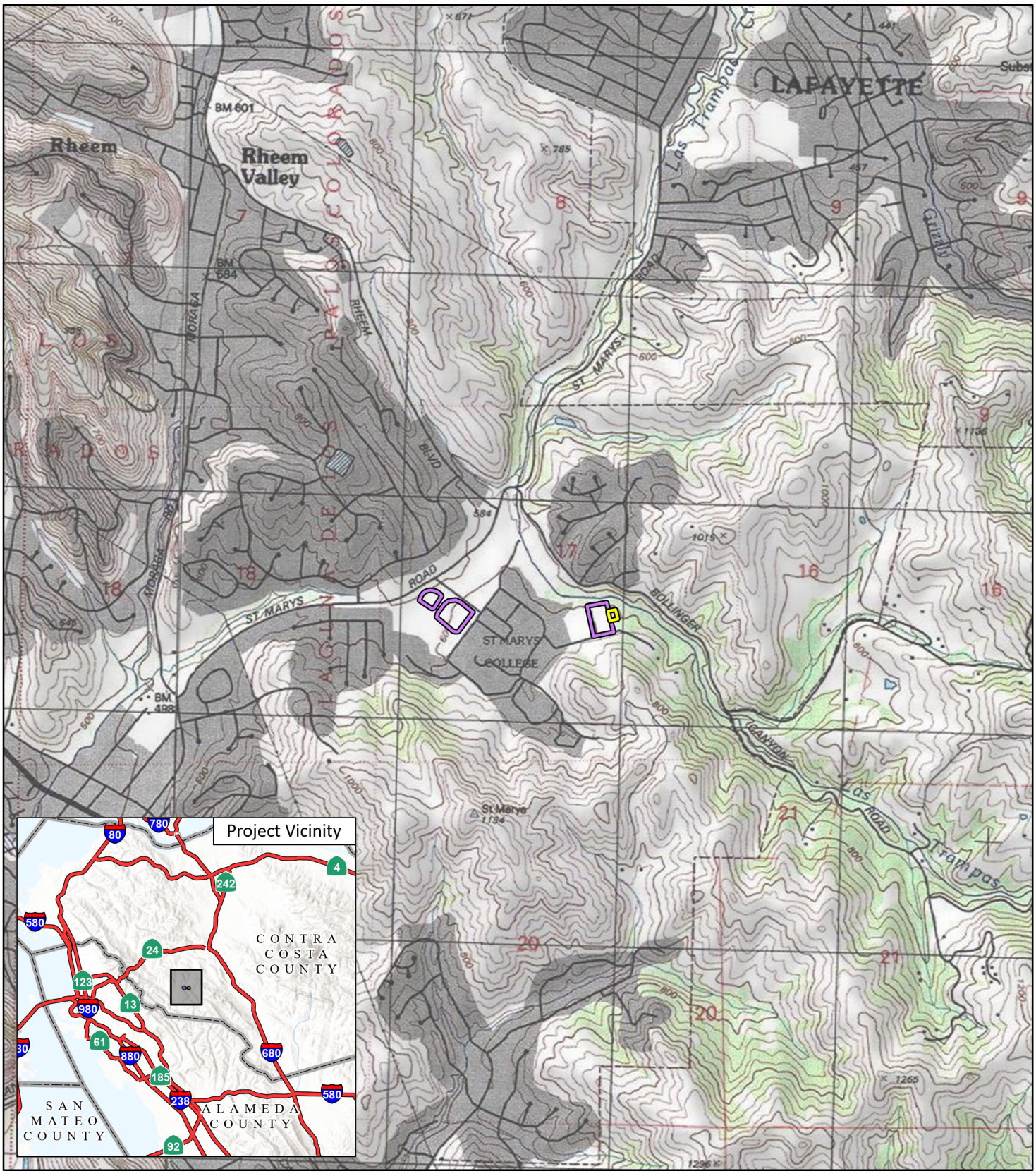

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FIGURE 1

Saint Mary's College Campus Master Plan Update Project

Project Location and Regional Vicinity

SOURCE: USGS 7.5' Quad - *Las Trampas Ridge (1993)*, CA

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Saint Mary's College of California Campus Boundary

Proposed Rugby Clubhouse Project Site

FIGURE 2a

N

0 180 360

FEET

SOURCE: Google Maps (2024)

Saint Mary's College Campus Master Plan Update Project

Aerial Photograph of Rugby Clubhouse Project Site and Surrounding Land Uses

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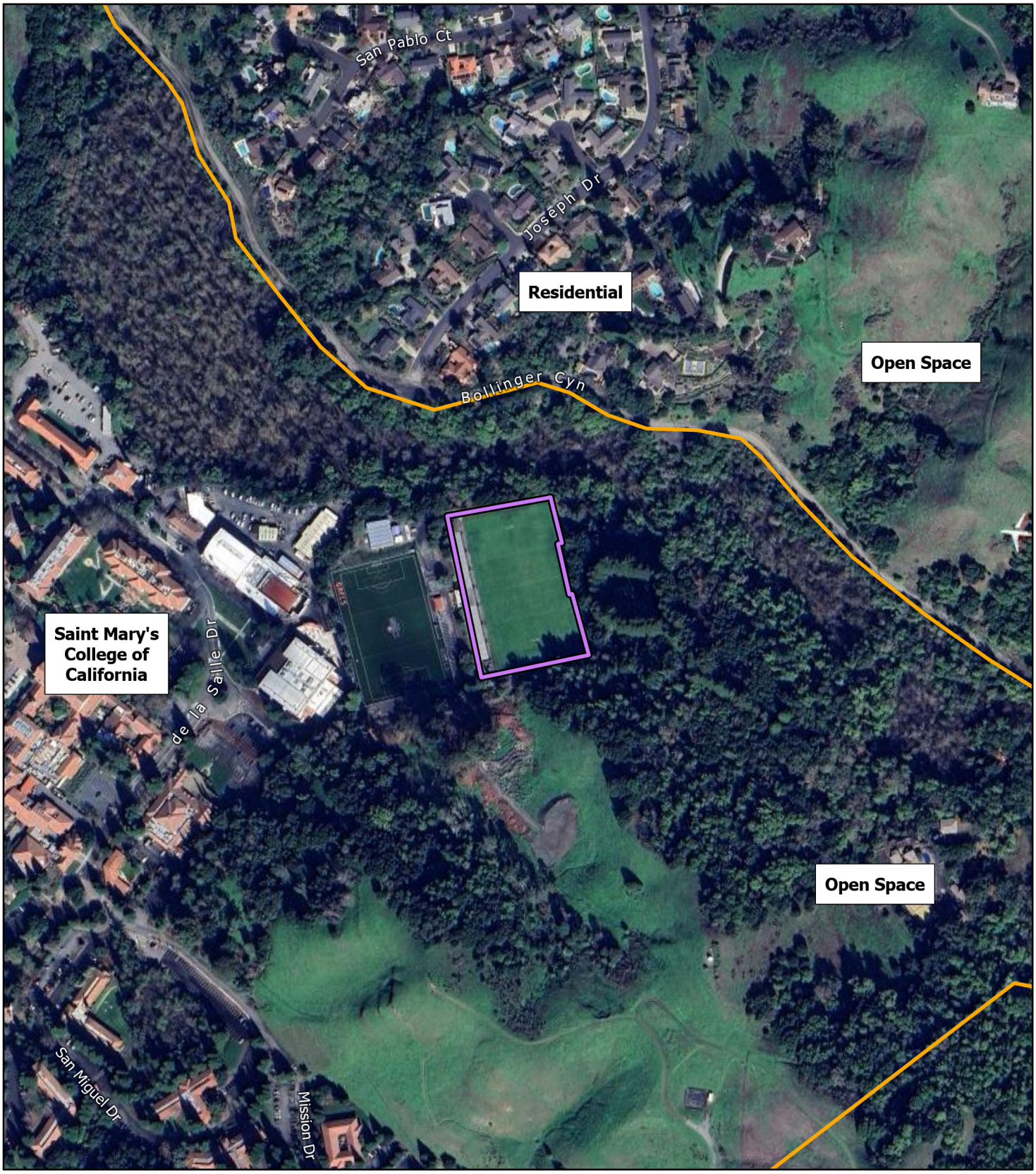

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Saint Mary's College of California Campus Boundary

Saint Mary's Stadium

FIGURE 2b

N

0 180 360

FEET

SOURCE: Google Maps (2024)

Saint Mary's College Campus Master Plan Update Project

Aerial Photograph of Saint Mary's Stadium and Surrounding Land Uses

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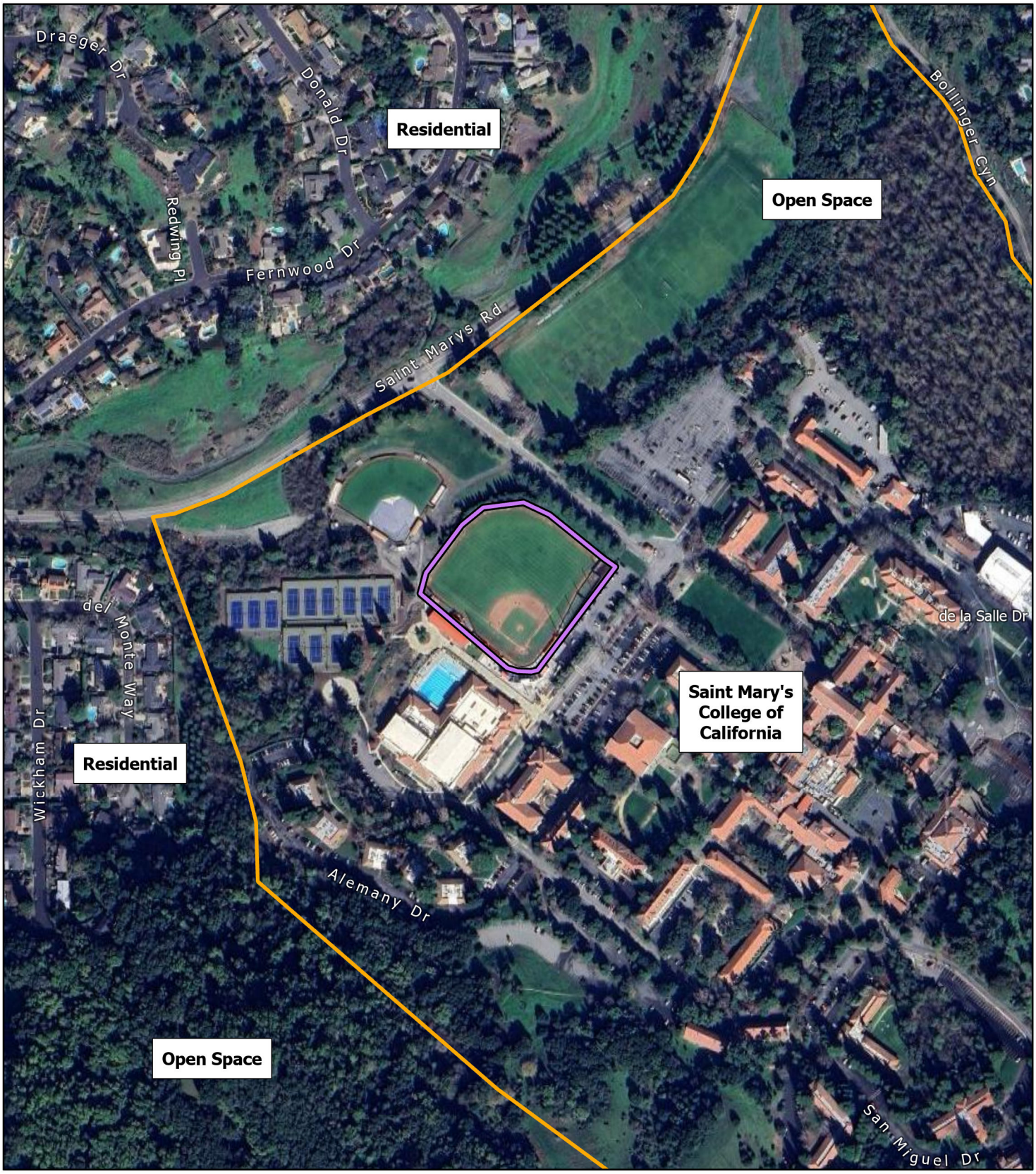

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Saint Mary's College of California Campus Boundary

Baseball Stadium

FIGURE 2c

N

0 180 360

FEET

SOURCE: Google Maps (2024)

Saint Mary's College Campus Master Plan Update Project

Aerial Photograph of Baseball Stadium and Surrounding Land Uses

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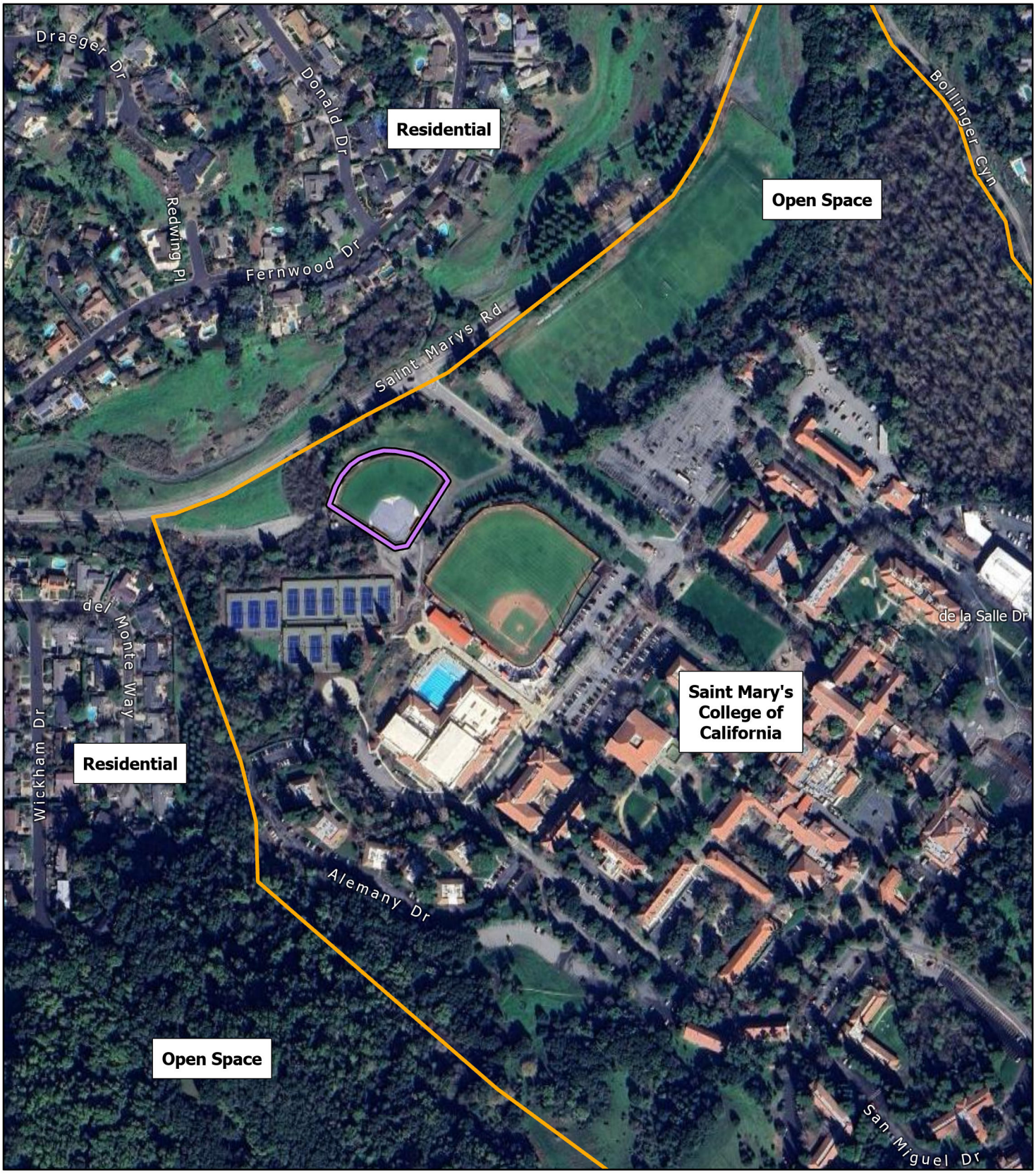

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Saint Mary's College of California Campus Boundary

Softball Stadium

FIGURE 2d

N

0 180 360

FEET

SOURCE: Google Maps (2024)

Saint Mary's College Campus Master Plan Update Project

Aerial Photograph of Softball Stadium and Surrounding Land Uses

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Moraga hills on the east. College soccer is a fall sport with games played from August through November. College rugby plays their games from November to May. The minor league soccer team plays their games from April to August. **Table A**, below, describes the various sports that play at Saint Mary's Stadium and their estimated number of home games (daytime and evening) based on the 2023 –2024 season.

Table A: Saint Mary's Stadium Estimated Home Games

Sport	Season (months)	Number of Home Games
Men's Soccer	August–November	11
Women's Soccer	August–November	10
Men's Rugby	November–May	10
Women's Rugby	November–May	5
Minor League Soccer	April–August	10

Source: Saint Mary's College of California. 2025. Facilities (Website: https://www.stmarys-ca.edu/athletics/facilities, accessed January 2025).

3.1.2 Athletic Field Lighting

The project site associated with the athletic field lighting (athletic field lighting project site) is comprised of three fields throughout the campus including Saint Mary's Stadium the baseball stadium, and softball field. The location of the Saint Mary's Stadium and existing conditions at the stadium are described above under the rugby clubhouse project site description.

Baseball Stadium

The baseball stadium is located at the entrance to and northwest corner of the campus and is bound by Saint Mary's Parkway to the north, the softball field and tennis courts to the west, and the campus on all other sides. Residential uses are located farther to the north and west.

The baseball stadium is used by the Saint Mary's College baseball program. The baseball stadium includes 14 rows of built-in permanent stadium seating that includes 648 seats, a press box, and a covered landing with a drink rail located at the top of each side of the grandstand along the first base side. The facility also includes a four-speaker sound system. College baseball is a spring sport with games played from February to May. **Table B**, below, describes the baseball schedule and the estimated number of home games (daytime and evening) that would be played at the baseball stadium based on the 2023–2024 season.

Table B: Baseball Stadium Estimated Home Games

Sport	Season (months)	Number of Home Games
Baseball	February–May	28

Source: Saint Mary's College of California. 2025. Facilities (Website: https://www.stmarys-ca.edu/athletics /facilities, accessed January 2025).

Softball Field

The softball field is located at the entrance to and northwest corner of the campus and is bound by Saint Mary's Road to the north, Saint Mary's Parkway to the east, the baseball stadium to the south, and tennis courts to the west. Residential uses located outside of the campus are farther to the north and west.

The softball field is used by the Saint Mary's College softball program. The facility has also hosted collegiate conference and high school sectional championships. College softball is a spring sport with games played from February to May. **Table C**, below, shows the softball schedule and the estimated number of home games (daytime and evening) that would be played at the softball field based on the 2023–2024 season.

Table C: Baseball Stadium Estimated Home Games

Sport	Season (months)	Number of Home Games
Softball	February–May	21

Source: Saint Mary's College of California. 2025. Facilities (Website: https://www.stmarys-ca.edu/athletics/ facilities, accessed January 2025).

3.2 PROPOSED PROJECT

This section provides a description of the proposed project, as identified in the rugby clubhouse site plans, dated January 27, 2023; and the Saint Mary's College Athletic Fields Lighting Project Design Review Board Application, dated June 2024. This section includes details of the proposed improvements, site access, and construction.

3.2.1 Rugby Clubhouse

Proposed Development

The proposed clubhouse would be a two-story, approximately 36.3-foot-tall, 9,785-square-foot building that would primarily be used as a locker room and event space on the eastern edge of the existing stadium (**Figure 3, Conceptual Site Plan**). The first story would include a training facility, locker rooms, a coach locker, restrooms, and storage space, as further detailed in **Table D**, below, and shown in **Figure 4a, Conceptual First Story Floor Plan**. The second story would include a kitchen, storage space, restrooms, and a multipurpose room that would be used for events also shown in **Table D** and **Figure 4b, Conceptual Second Story Floor Plan**. The project would also include a new 460-square-foot wooden deck that would be used during events and a wood ramp connecting the clubhouse to the Bertain Redwood Grove. The proposed structure would include white cement plaster paint on exterior walls with decorative elements, clay tile roofing, and painted wood eaves, rafter tails, and wood trim.

Potable water for the proposed project would be sourced from a new on-site groundwater well that would be stored in a 10,000-gallon tank, while fire hydrants would connect to an existing 10-inch East Bay Municipal Utility District (EBMUD) water line. The project would include a 297-square-foot bioretention area that would be located adjacent to the clubhouse on the east side.

LSA

FIGURE 3

0 50 100

FEET

SOURCE: ELS Architecture and Urban Design

Saint Mary's College Rugby Clubhouse

Conceptual Site Plan

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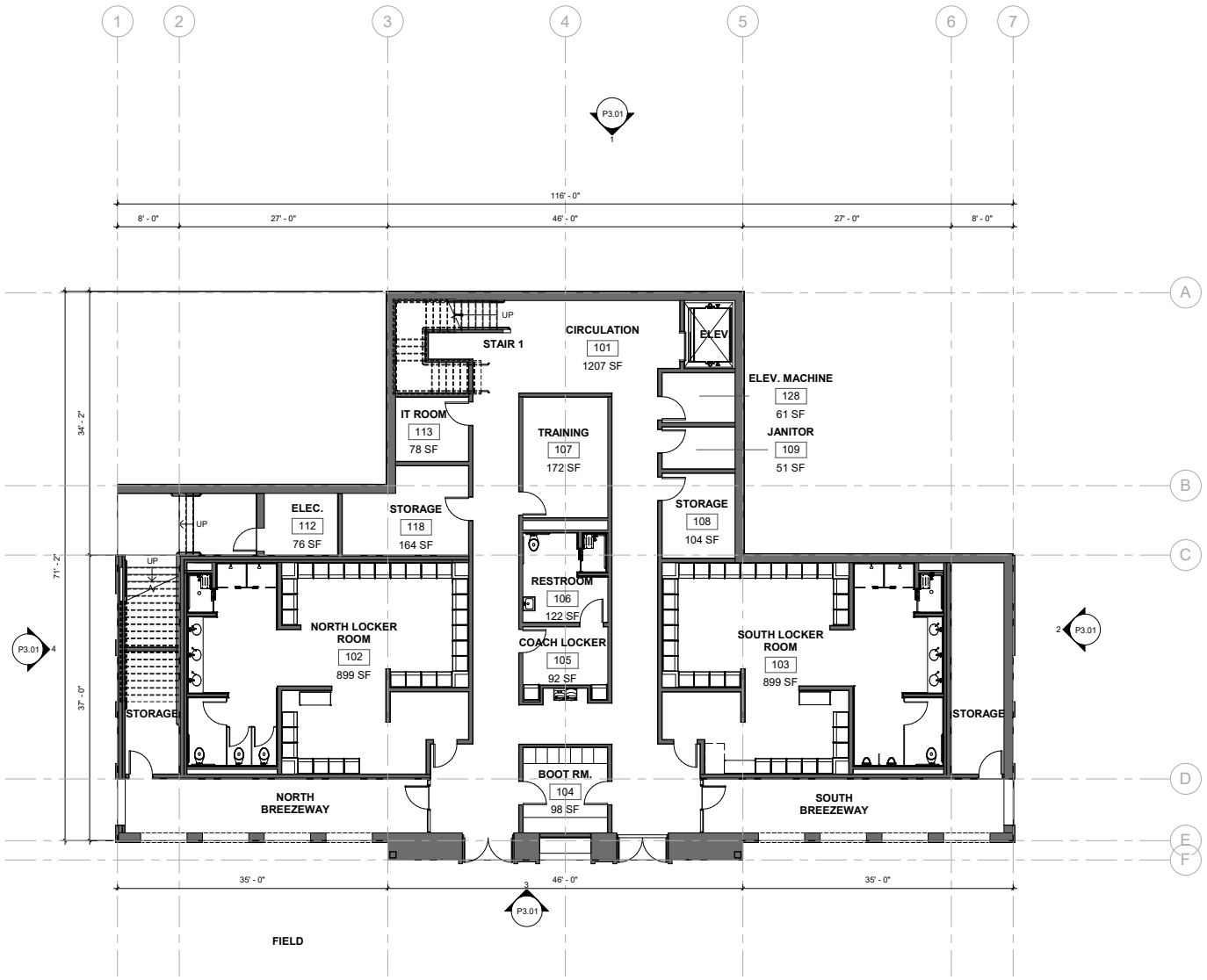

LSA

FIGURE 4a

N

0 12.5 25

FEET

SOURCE: ELS Architecture and Urban Design

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Saint Mary's College Rugby Clubhouse

Conceptual First Story Floor Plan

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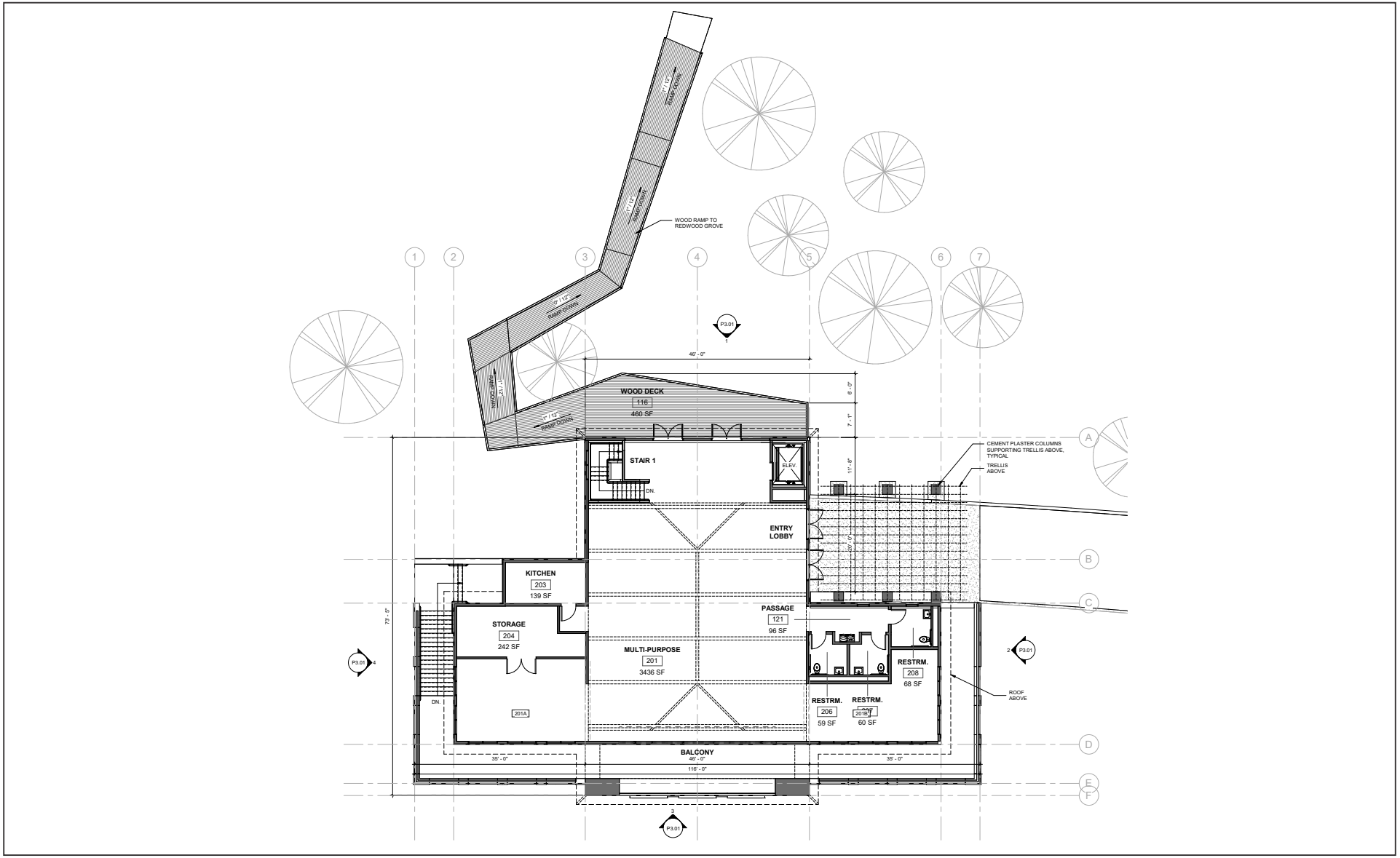

LSA

FIGURE 4b

N

0 15 30

FEET

SOURCE: ELS Architecture and Urban Design

I:\20231212.03\G\Concept_2ndStory_Floor_Plan.ai (5/30/2024)

Saint Mary's College Rugby Clubhouse

Conceptual Second Story Floor Plan

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Table D: Proposed Clubhouse Components and Square Footage

Space	Square Feet
First Story	
North Locker Room	899
South Locker Room	899
Training	172
Coach Locker	92
Restroom	122
Boot Room	98
Electrical	76
IT Room	78
Storage	268
Circulation	1,207
Elevator Machine Room	61
Janitor Room	51
Breezeways, Additional Storage, Stairways	1,147
First-Story Gross Square Feet	**5,170**
Second Story	
Multi-Purpose Event Space	3,436
Kitchen	139
Restrooms	187
Storage	242
Passage	96
Wood Deck	460
Stairway	55
Second-Story Gross Square Feet	**4,615**

Source: ELS Architecture + Urban Design, Planning Application (January 27, 2023).

Site Access

A new fire access road would be located along the southern and southeastern edges of the existing stadium and would allow access to the project site. The existing parking would be retained with one Americans with Disabilities Act (ADA) accessible parking stall to be added west of the existing stadium. Parking would primarily be accommodated at the existing Soda Activity Center parking lot, located southwest of the project site, adjacent to the Brother Rahill/McKeon Pavilion, and the Saint Mary's College Museum of Art. Project site users would park at the Soda Activity Center parking lot and walk to the clubhouse. Additional shuttles would be used for larger events, which would consist of 10-passenger or fewer vans. The parking lot immediately adjacent to the stadium would be used for emergency access and vendor loading.

3.2.2 Athletic Field Lighting

The athletic field lighting component of the proposed project would include the installation of outdoor lighting systems around the three athletic fields described above. Field lighting would consist of a light-structure system made up of a precast concrete base attached to a galvanized steel pole that supports the electrical components enclosure, wire harness, and pole-top luminaires. Lighting would consist of total light control (TLC) for light-emitting diode (LED) luminaires, which is a

new tool that minimizes disruptive glare and lighting spillover into neighboring communities.[6] The proposed lighting would meet the DarkSky Approved Outdoor Sports Lighting Program[7] standards. TLC for LED luminaires saves energy and utilizes light efficiently by directing it onto the targeted field and out of the surrounding neighborhood and night sky.

Saint Mary's Stadium

The Saint Mary's Stadium lighting component of the proposed project would include four light poles around Saint Mary's Stadium. The four poles would be located near the corners of the field. There would be two poles approximately 190 feet beyond the west side of the field, behind the bleachers, and two poles approximately 138 feet beyond the east side of the field. The proposed lighting locations for Saint Mary's Stadium are shown in **Figure 5: Saint Mary's Stadium Proposed Lighting**. The four poles would have a height of 80 feet; two poles on the east side would have a grade elevation of 6 feet; and the two poles on the west side would have a grade elevation of 20 feet. Taking the grade elevation into account, the two poles on the east side of the field would have a luminaire mounting height (the height at which the lights would be placed) of 86 feet. The two poles located behind the bleachers on the west side would have luminaires mounted at heights of 90 and 100 feet.

Baseball Stadium

The baseball stadium lighting component of the proposed project would include eight light poles. There would be two poles along the first base line, two poles along the third base line, and four poles behind the outfield. On the east side of the field, there would be one pole approximately 43 feet down the first base line, behind the first base dugout, and another approximately 206 feet down the first base line, around right field. On the west side of the field, there would be one pole approximately 43 feet down the third base line, behind the third base dugout, and another approximately 207 feet down the third base line, around left field. There would be four poles behind the outfield, two behind right field and two behind left field. On the right field side, the poles would be approximately 63 and 200 feet in from the first base line, which would be behind right field and right-center field, respectively. On the left field side, the poles would be approximately 63 and 200 feet in from the third base line, which would be behind left field and left-center field, respectively. The proposed lighting locations for the baseball stadium are shown in **Figure 6: Baseball Stadium Proposed Lighting**. The lighting poles around the baseball stadium would be various heights. The two poles behind the dugouts would have a height of 80 feet and luminaires would be mounted at heights of 15, 70, and 80 feet.

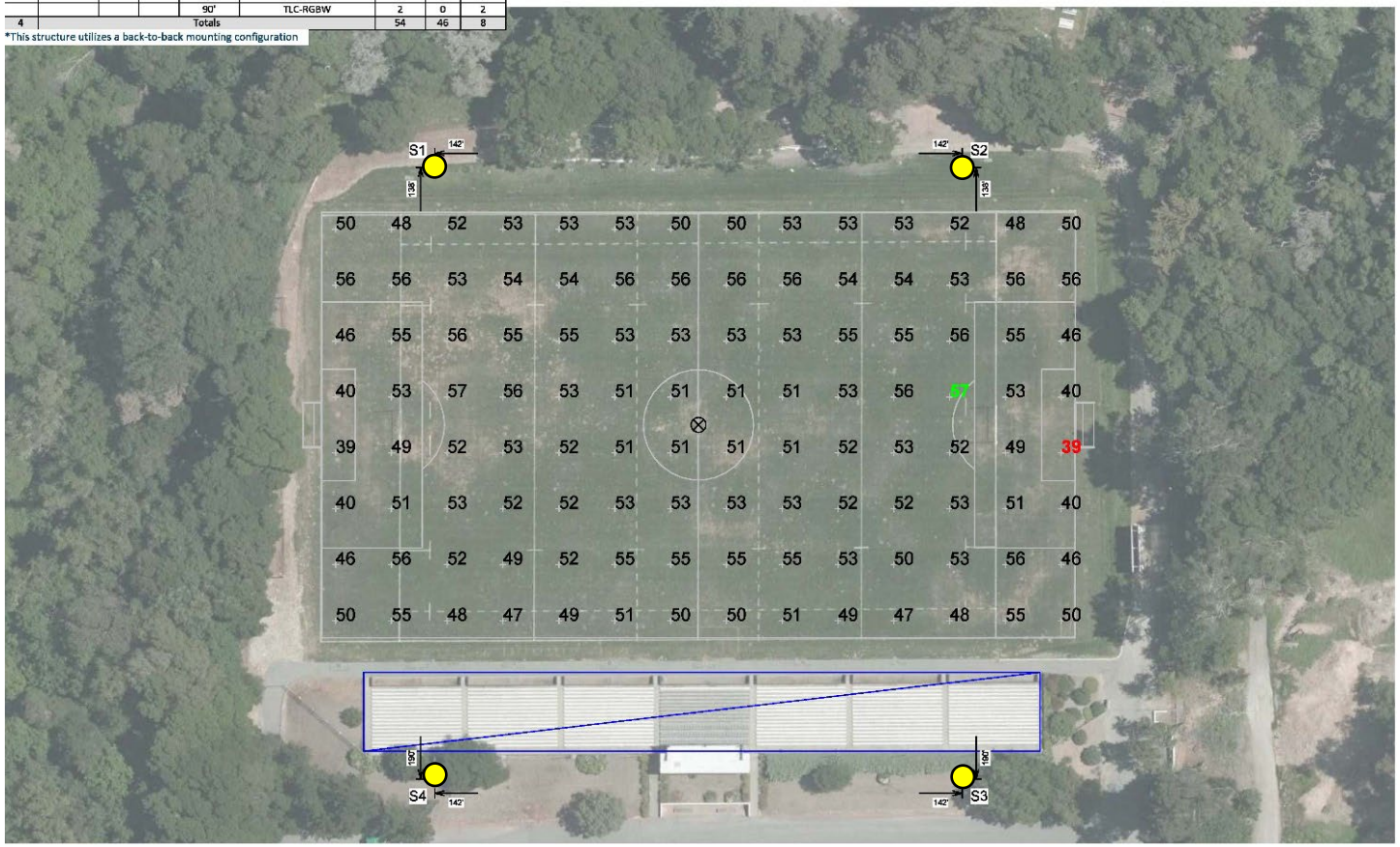
[6] Musco Lighting. 2024. *Total Light Control Technology*. Website: https://www.musco.com/total-light-control/ (accessed October 17, 2024).

[7] DarkSky. 2025. https://darksky.org/what-we-do/darksky-approved/outdoor-sports-lighting/

Equipment List For Areas Shown

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	MOUNTING HEIGHT	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	S1-S2	80'	6'	86'	TLC-LED-1500	9	9	0
				86'	TLC-LED-900	2	2	0
2	S3-S4	80'	20'	100'	TLC-LED-1500	6	6	0
				100'	TLC-LED-550	2*	0	2
				100'	TLC-LED-900	6	6	0
				90'	TLC-RGBW	2	0	2
4				Totals		54	46	8

*This structure utilizes a back-to-back mounting configuration



Saint Marys College Soccer Field

Moraga, CA

Grid Summary

Name	Soccer
Size	405' x 228'
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary

MAINTAINED HORIZONTAL FOOTCANDLE

	Entire Grid
Guaranteed Average	50
Scan Average	51.70
Maximum	57
Minimum	39
Avg/Min	1.33
Guaranteed Max/Min	2
Max/Min	1.46
UG (adjacent pts)	1.35
No. of Points	112
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	46
Total Load	56.38 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "**Musco Control System Summary**" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

LSA

LEGEND

Stadium Proposed Lighting

N

0 60 120

FEET

SOURCE: Musco Lighting

FIGURE 5

Saint Mary's College Rugby Clubhouse

Saint Mary's Stadium Proposed Lighting

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Saint Marys College Soccer Field

Moraga, CA

Grid Summary

Name	**Soccer Spill**
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary

MAINTAINED HORIZONTAL FOOTCANDLES

	Entire Grid
Scan Average	**0.0745**
Maximum	0.25
Minimum	0.00
No. of Points	74
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	**46**
Total Load	56.38 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the **"Musco Control System Summary"** for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

LSA

LEGEND

Stadium Proposed Lighting

N

0 100 200

FEET

SOURCE: Musco Lighting

FIGURE 5

Saint Mary's College Rugby Clubhouse

Saint Mary's Stadium Proposed Lighting

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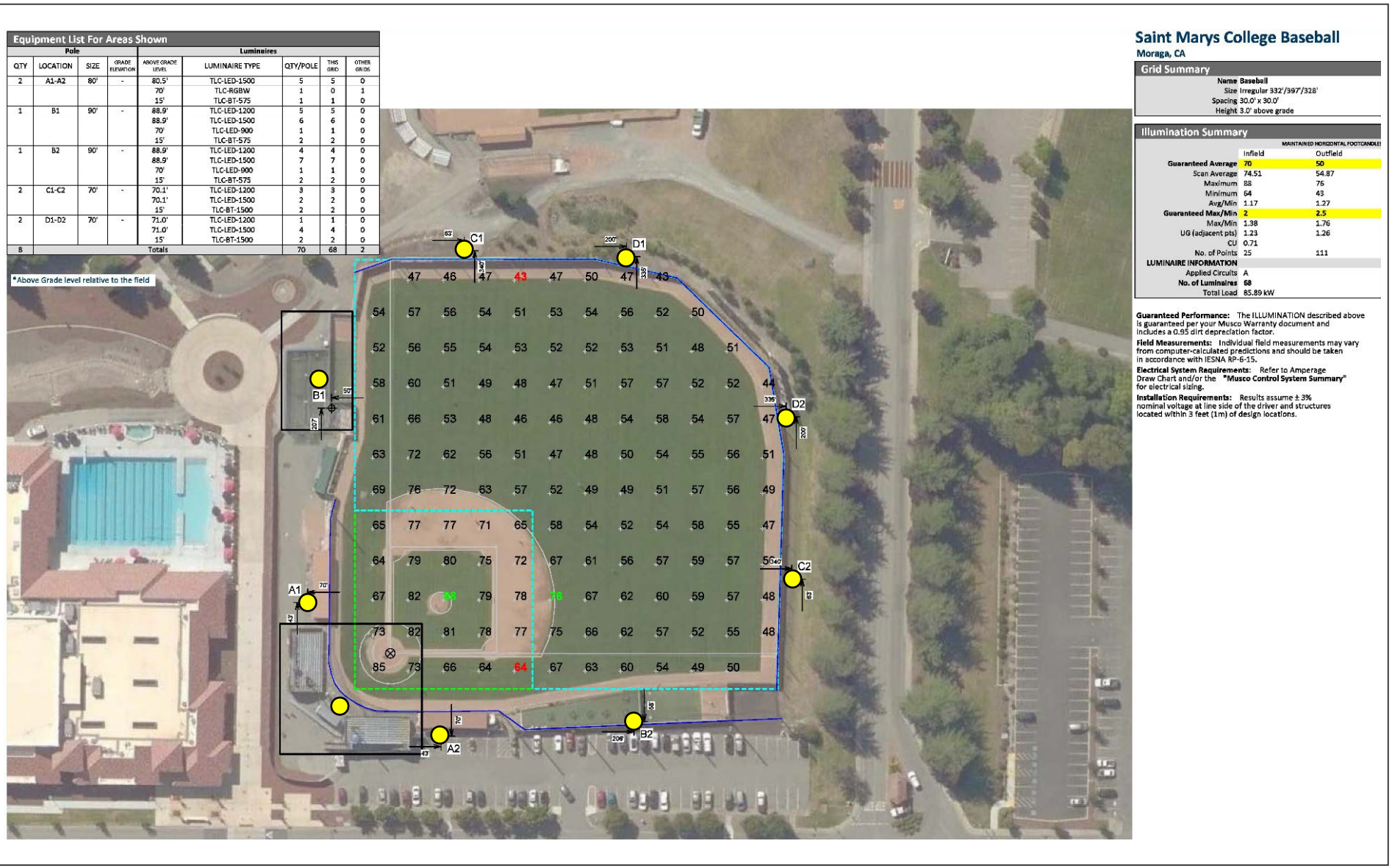

LSA

LEGEND

Baseball Stadium Proposed Lighting

FIGURE 6
Page 1 of 2

0 70 140
FEET

SOURCE: Musco Lighting

Saint Mary's College Rugby Clubhouse
Baseball Stadium Proposed Lighting

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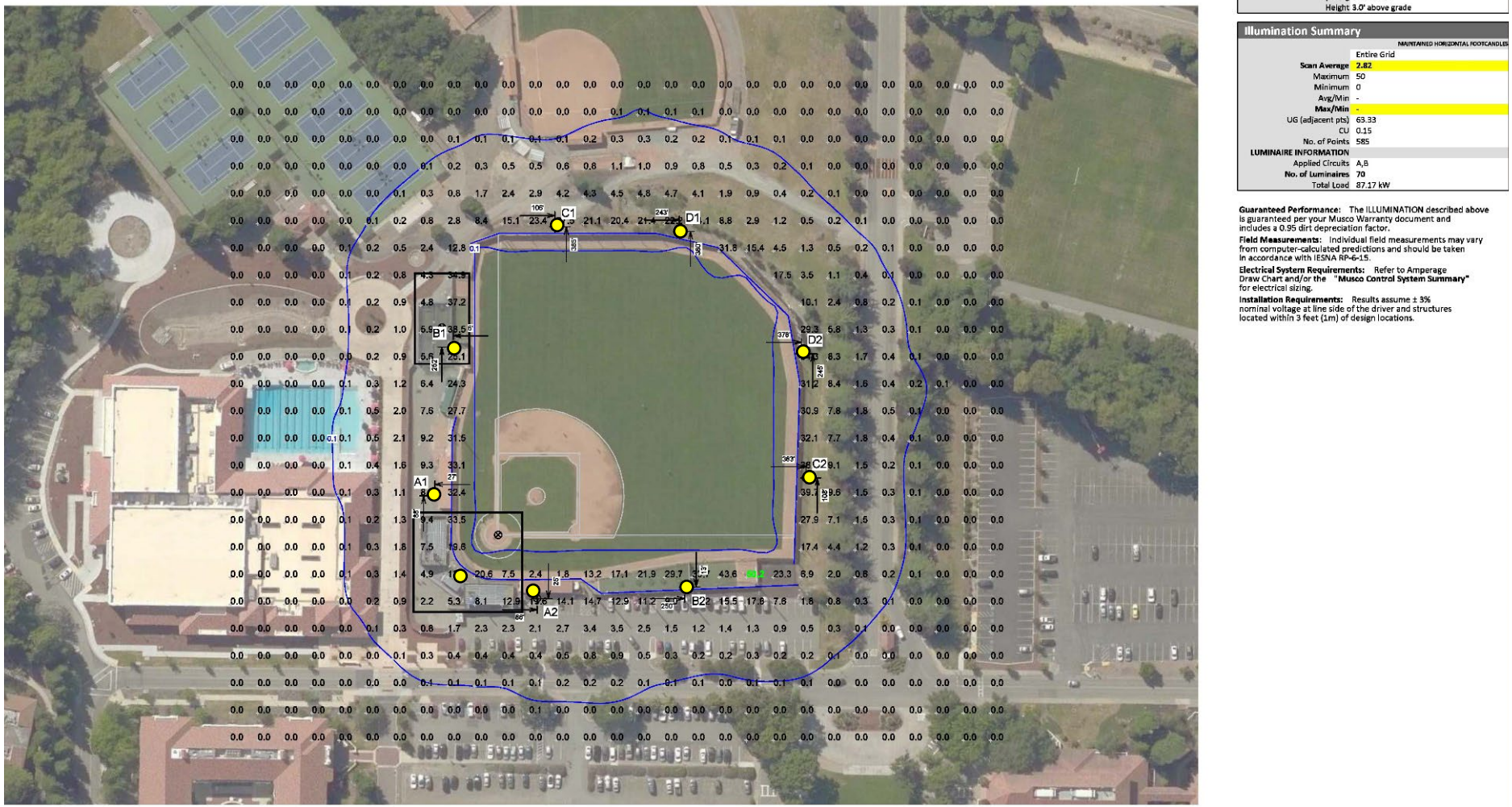

LSA

LEGEND

Baseball Stadium Proposed Lighting

N

0 100 200

FEET

SOURCE: Musco Lighting

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FIGURE 6

Saint Mary's College Rugby Clubhouse

Baseball Stadium Proposed Lighting

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The other two poles along the first and third base lines would have a height of 90 feet with luminaires mounted at heights of 15, 70, and 90 feet. All the outfield poles would have a height of 70 feet with luminaires mounted at heights of 15 and 70 feet.

Softball Stadium

The softball stadium lighting component of the proposed project would include six light poles around the softball field. There would be two poles along the first base line, two poles along the third base line, and two poles behind the outfield. On the east side of the field, there would be one pole approximately 35 feet down the first base line, behind the first base dugout, and another approximately 115 feet down the first base line, around right field. On the west side of the field, there would be one pole approximately 35 feet down the third base line, behind the third base dugout, and another approximately 115 feet down the third base line, around left field. The two poles in the outfield would be behind right and left field, approximately 75 feet in from the first and third base lines, respectively. The proposed lighting locations for the softball stadium are shown in **Figure 7: Softball Stadium Proposed Lighting**. The lighting poles around the softball field would all have a height of 60 feet. The four poles along the first and third base lines would have luminaires mounted at heights of 15, 50, and 60 feet. The two poles located behind the outfield would have luminaires mounted at heights of 15 and 60 feet.

3.2.3 Operation and Use

Rugby Clubhouse

The proposed rugby clubhouse would serve as a multipurpose facility that would provide space for a variety of events. Events would not exceed the clubhouse's capacity, and amplified sound would not be used outside of the clubhouse. The new facility would provide a new event space to accommodate existing and future events and activities planned for the campus through implementation of the SMCCMP. The clubhouse would require the addition of three full-time university staff positions. Additionally, specific events may require additional contracted personnel, the number of which would fluctuate depending on the specific event's needs. The clubhouse would accommodate an additional 30 to 35 events per year compared to existing on campus events. The space would be used for the following:

- **Intercollegiate Athletics:** The clubhouse would be used for rugby match viewing parties, pre/post-game meals, recognition ceremonies, and donor events.
- **University Ceremonies:** The clubhouse would provide VIP space for commencement ceremonies.
- **Academic Purposes:** The clubhouse could provide additional learning space for lectures, workshops, or other academic events, resulting in an additional 10 to 15 regular events per academic year.
- **Additional Events:** The clubhouse would accommodate events such as weddings, family reunions, and alumni events.

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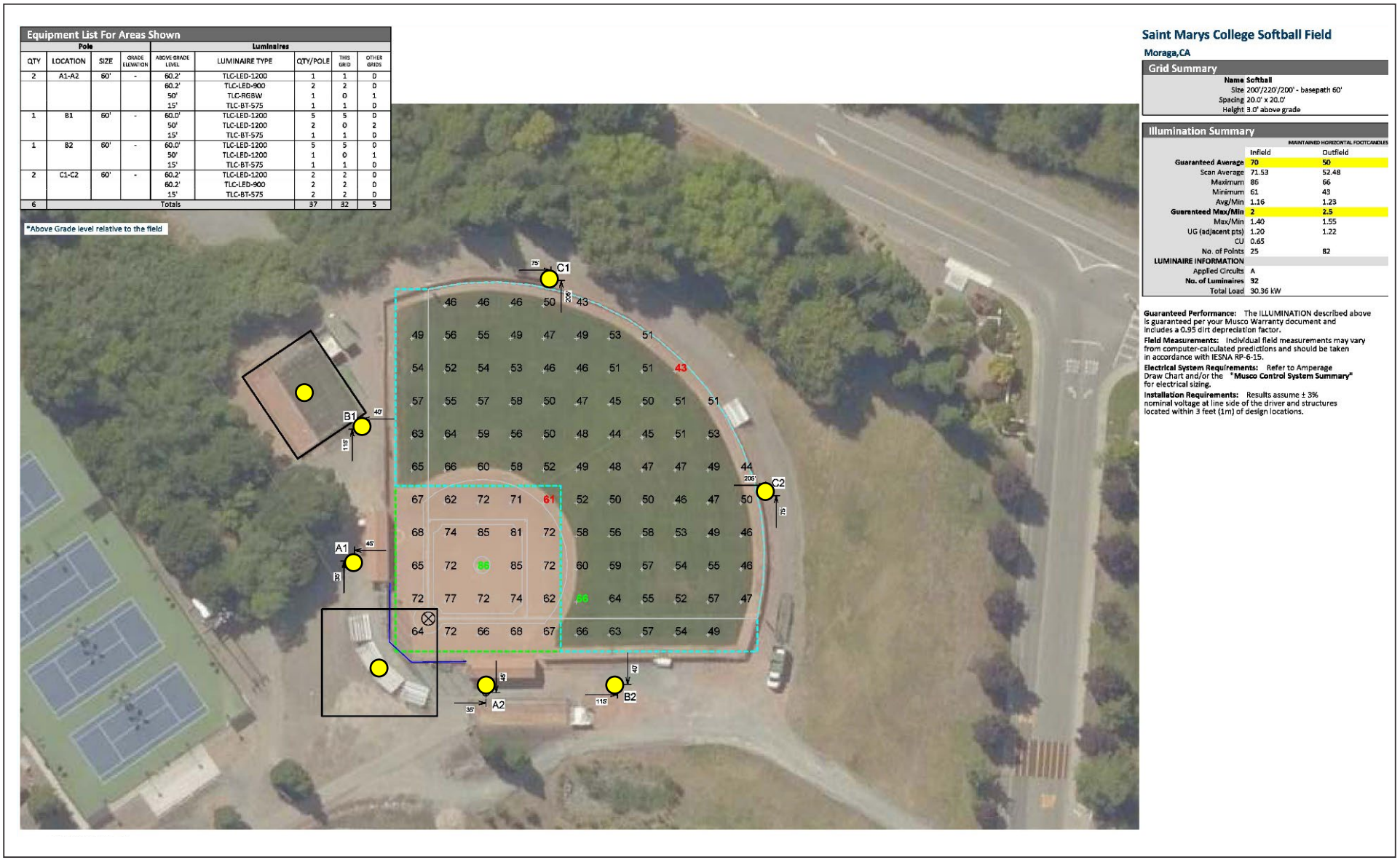

LSA

LEGEND

Softball Field Proposed Lighting

0 50 100

FEET

SOURCE: Musco Lighting

FIGURE 7

Page 1 of 2

Saint Mary's College Rugby Clubhouse

Softball Field Proposed Lighting

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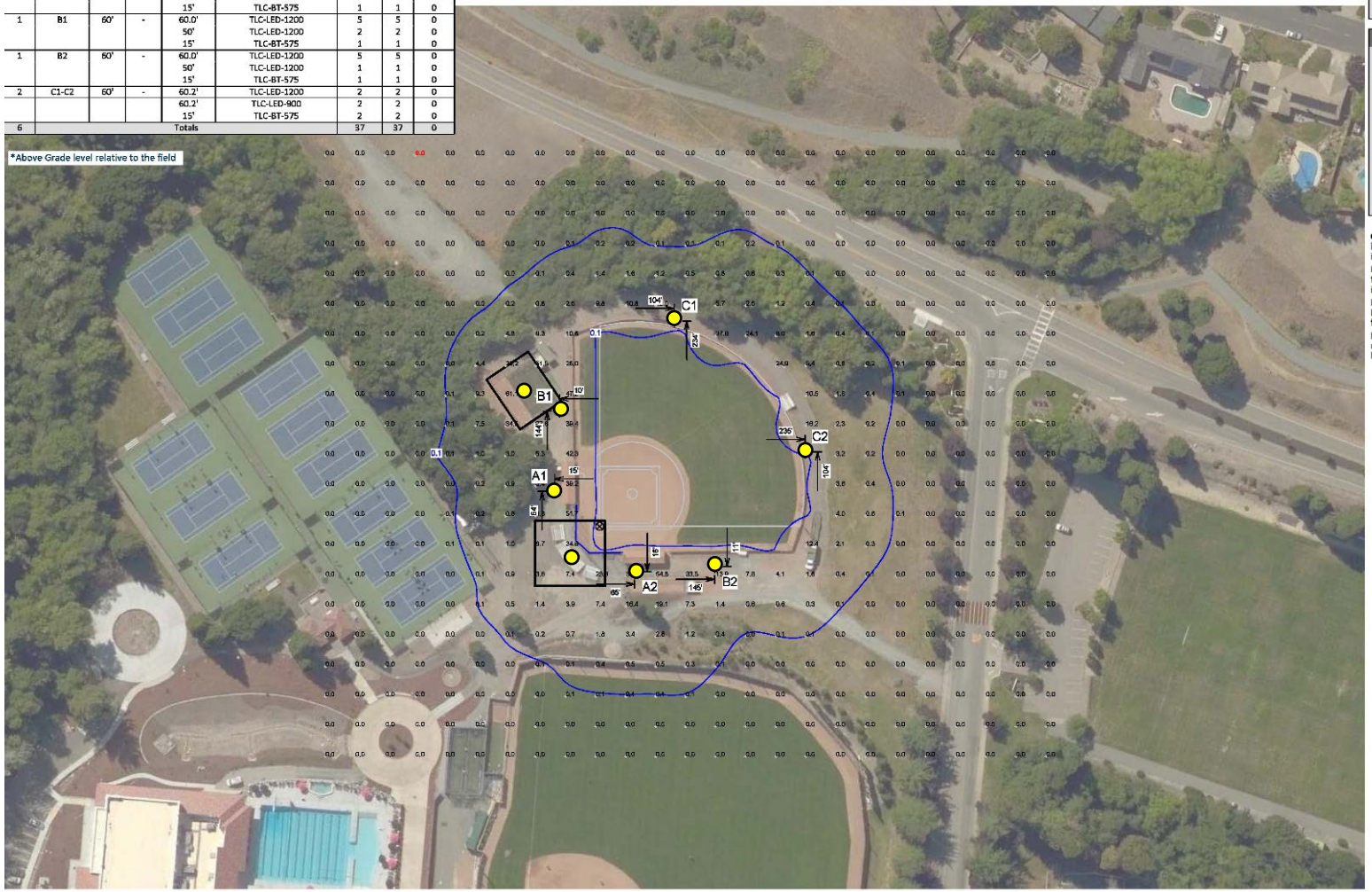
Equipment List For Areas Shown

Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
2	A1-A2	60'	-	60.2'	TLC-LED-1200	1	1	0
				60.2'	TLC-LED-900	2	2	0
				50'	TLC-RGBW	1	1	0
				15'	TLC-BT-575	1	1	0
1	B1	60'	-	60.0'	TLC-LED-1200	5	5	0
				50'	TLC-LED-1200	2	2	0
				15'	TLC-BT-575	1	1	0
1	B2	60'	-	60.0'	TLC-LED-1200	5	5	0
				50'	TLC-LED-1200	1	1	0
				15'	TLC-BT-575	1	1	0
2	C1-C2	60'	-	60.2'	TLC-LED-1200	2	2	0
				60.2'	TLC-LED-900	2	2	0
				15'	TLC-BT-575	2	2	0
6				Totals		37	37	0

*Above Grade level relative to the field



Saint Marys College Softball Field

Moraga,CA

Grid Summary

Name	Blanket Grid
Size	70' x 65'
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary

MAINTAINED HORIZONTAL FOOTCAND

	Entire Grid
Scan Average	2.44
Maximum	90
Minimum	0
Avg/Min	-
Max/Min	-
UG (adjacent pts)	1208.85
CU	0.23
No. of Points	470
LUMINAIRE INFORMATION	
Applied Circuits	A,B,C
No. of Luminaires	37
Total Load	35.15 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the **"Musco Control System Summary"** for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

LSA

LEGEND

Softball Field Proposed Lighting

N

0 100 200

FEET

SOURCE: Musco Lighting

FIGURE 7

Page 2 of 2

Saint Mary's College Rugby Clubhouse

Softball Field Proposed Lighting

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Athletic Field Lighting

In accordance with the intramural lighting agreement with the Town of Moraga, the proposed athletic field lights would be turned on manually only when needed for home games. Saint Mary's College Athletic standard procedures do not allow for the athletic field lights to be turned on for practices. Games played at the stadium and softball field would start no later than 6:30 p.m. and end no later than 10:00 p.m. In the event of extra innings, games at the baseball field would end no later than 11:00 p.m. Expected attendance would not exceed existing stadium capacity.

3.2.4 Construction

Rugby Clubhouse

Construction of the proposed rugby clubhouse would result in a total disturbed area of 38,331 square feet and would require approximately 60 cubic yards of cut, 1,245 cubic yards of fill, and 1,185 cubic yards of net fill. Project construction would also require the removal of approximately 21 trees. Construction of the proposed project is anticipated to begin in summer 2025 and would occur over approximately 18 to 24 months with the first 8 months being for site preparation.

Athletic Field Lighting

Construction of the proposed stadium lights would include site preparation and excavating, installing foundations, poles, and luminaires, connecting to existing underground utilities. Installation of the athletic lights would require excavation to a depth of approximately 10 feet for the shortest poles (60 feet) to 18 feet for the tallest poles (90 feet). Construction of the proposed athletic lights would result in a total disturbed area of approximately 162 square feet and would require approximately 134 cubic yards of cut.[8] There is expected to be no fill and the approximately 134 cubic yards of cut would be used on campus, therefore there would be no export of soil required. Construction of the proposed athletic lights would begin in summer 2025 and would occur over approximately 3 months.

Best Management Practices

The following processes and best management practices would be implemented prior to and during construction, as is common practice at Saint Mary's College[9]:

- Mature trees would be identified and protected on the construction site.
- Construction would be phased to minimize disruption to the campus to the greatest extent feasible.

[8] Approximately 7.45 cubic yards of excavated soil per lighting pole * 18 lighting poles (4 lighting poles for Saint Mary's Stadium, 8 lighting poles for Br. Ronald Gallagher Stadium, and 6 lighting poles for Cottrell Field) = 134.1 cubic yards of cut.

[9] Brian Yung, Senior Project Manager, Saint Mary's College of California, Facilities Services. 2024. Personal communication with Florentina Craciun, LSA. June 26.

- All construction staging would be on campus and would not take place off site or on public roads.
- Town hall meetings or open forums would be held to address public concerns.
- A Site Safety Plan, including protocols for safe excavation practices, fall protection for workers, and proper use of personal protective equipment (PPE), would be developed and implemented.
- Security measures, including security cameras, access control systems, and patrol security personnel, would be utilized.
- Erosion and sediment controls would be implemented, including the installation of silt fences around the perimeter of the construction zone, the use of sediment traps in storm drains, and stockpiling soil on level ground with proper covers to prevent wind erosion.
- Stormwater runoff would be diverted away from construction activities through channels or swales, and detention ponds would be installed to control the flow of stormwater.
- Dust control measures would be implemented, including watering down exposed soil and haul roads, covering stockpiles of soil and construction materials, and requiring construction vehicles to use wheel washers before exiting the site.
- A Construction Waste Management Plan would be developed and implemented, and construction and demolition debris would be separated and recycled when possible. On-site recycling bins for common materials like wood, concrete, and metal would be used.
- A hazardous material inventory list would be developed, proper training would be provided for workers handling hazardous materials, and hazardous materials would be properly stored and disposed of in accordance with applicable regulations.
- Noise-generating construction, such as pile driving or demolition, would be scheduled for off-peak hours and noise barriers would be used around construction zones.
- Detour plans would be developed for pedestrians and vehicles, temporary walkways and crosswalks would be implemented, and accessibility for people with disabilities would be maintained during construction.
- To preserve aesthetics, temporary landscaping or fencing to improve the visual appeal of the construction zone would be used and sustainable design elements would be incorporated into the new building.

4.0 COMPARATIVE EVALUATION OF ENVIRONMENTAL IMPACTS

Appendix G of the *State CEQA Guidelines* provides a suggested format to use when preparing an environmental document. The checklist form is used to assist in evaluating the potential environmental impacts of the proposed project to determine whether the proposed modifications compared to the 2016 SMCCMP EIR would alter the conclusions contained in the 2016 SMCCMP EIR.

Some additional analysis is provided to highlight the changes to the proposed project or changes to the *State CEQA Guidelines*. As discussed in this document, some program level mitigation measures that were identified in the 2016 SMCCMP EIR mitigation measures are included and updated to reflect changes in regulatory requirements. Where appropriate, mitigation measures are identified and summarized at the end of this document.

4.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

The SMCCMP EIR concluded that implementation of the SMCCMP would result either in a less than significant impact or no impact and would not require mitigation measures for the following resource areas at a programmatic level: Agriculture and Forestry, Mineral Resources, Population and Housing, and Land Use and Planning. The athletic field lighting and rugby clubhouse project would be consistent with the analysis and conclusions in the 2016 SMCCMP EIR for these resource topics, and no additional analysis is needed pursuant to Section 15162 of the *State CEQA Guidelines*.

Agriculture and Forestry: The Saint Mary's College Campus and project site is located within an urban area in the Town of Moraga. The project site is currently zoned as Institutional and is classified as "Urban and Built-Up Land" by the State Department of Conservation (DOC).[10] The project site is not used for agricultural production and it does not support forestry resources. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

Mineral Resources: The Saint Mary's College Campus and project site is located within an urban area on a developed site. The Town of Moraga does not have significant mineral resources or active mining sites within its boundaries. Therefore, the proposed project would not result in the loss of availability of a known mineral resource of value to the region or residents of the State or the loss of availability of a locally important mineral resource recovery site and there would be no impact. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

Population and Housing: The proposed project would not increase student enrollment and does not include any housing. The proposed rugby clubhouse would require the addition of three full-time university staff positions, which would not significantly impact the existing population. Under existing conditions, the project site does not contain any residential uses and construction of the

[10] California Department of Conservation (DOC). 2022. Division of Land Use Resource Protection. California Important Farmland Finder. Website: maps.conservation.ca.gov/dlrp/ciff (accessed November 25, 2024).

proposed project would not displace existing residents within the nearby residential areas. Therefore, the proposed project would not result in any impacts to population and housing. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

Land Use and Planning: The Town of Moraga General Plan Land Use Map designates the Saint Mary's College campus as "Community Facilities." The Community Facilities allowable land uses are primarily educational in nature, although recreation and open space uses, and housing (for students and faculty) are also permitted, subject to a campus master plan. The campus is zoned as "Institutional," which is intended to accommodate governmental, public utility, educational community service, or recreational facilities, and to include the campus of Saint Mary's College as a unique planning area. The proposed project would be consistent with applicable land use plans, policies, and regulations. No amendments to the General Plan or zoning designations would be required. Therefore, the proposed project would not result in any impacts to land use and planning. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.1 AESTHETIC RESOURCES

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).	☒	☐	☐	☐
d. If the project is in an urbanized area, would the project conflict with applicable zoning and create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

4.1.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed aesthetics impacts associated with campus improvements and development, including the original rugby clubhouse, and concluded the following:

a. *Effects on a scenic vista:* Less than Significant Impact; No mitigation required.

b. *Damage to scenic resources within a State scenic highway:* Less than Significant Impact; No mitigation required.

c. *Effects on visual character or quality of the site and surroundings:* Less than Significant Impact with the implementation of Mitigation Measures AESTHETICS-1a through AESTHETICS-1d, which require review of the application for the proposed Entry Roundabout by the Town Design Review Board; specifications for the planting and paving materials used for the proposed Entry Roundabout; and specifications for the signage and any architectural features associated with the proposed Entry Roundabout.

d. *New sources of substantial light or glare*: Less than Significant Impact with the implementation of Mitigation Measure AESTHETICS-2, which requires the submission of lighting plans for review and approval by the Town's Design Review Board for certain types of development.

4.1.2 Discussion of Project Impacts

a. Would the project have a substantial effect on a scenic vista?

Athletic field lighting poles would be installed along three athletic fields on the campus including the athletic fields. Athletic field lighting and the rugby clubhouse are proposed in the northeast corner

of the campus, similar to the original proposed rugby clubhouse, which is not visible from any Town-designated scenic vista or corridor. Additionally, these developments would be located within the existing built area of the campus and would blend in with existing development on the campus. The baseball and softball are located in the northwestern portion of the campus, south of the Town designated scenic corridor, Saint Mary's Road. The athletic field lighting poles at the baseball and softball would vary in heights between 60 and 90 feet. The baseball would have eight light poles varying between 70 and 90 feet tall, and Softball stadium is proposed to have six light poles, all 60 feet in height.

Per Town of Moraga Municipal Code 8.132,[11] any building, exterior addition, signs, or structures 3 feet or more in height that are within 500 feet of a scenic corridor are subject to review and approval by the Design Review Board. The Baseball stadium and Softball stadium are within 500 feet of Saint Mary's Road and these improvements would be considered during the Design Review process. However, views of the sports fields and campus from Saint Mary's Road are largely obstructed by intervening mature trees and topography and the proposed developments would be located within the existing built area of the campus and would blend in with existing development on the campus. Therefore, the athletic field lighting and rugby clubhouse project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No State-designated scenic highways are located within the vicinity of the Saint Mary's College campus. The athletic field lighting and rugby clubhouse project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).

The proposed project would not result in degradation of the existing visual character or quality of the site or its surroundings. The rugby clubhouse would be designed in accordance with the Master Plan Design Guidelines, which would ensure compatibility with existing campus buildings. The athletic field lighting proposed at three fields on campus would be compatible with the overall visual character of the campus and consistent with typical use and operations of sports field facilities. As such, the proposed project would be consistent with the 2016 SMCCMP EIR conclusions, and impacts would be less than significant. Therefore, the proposed project would not change the

[11] Town of Moraga Municipal Code. Chapter 8.132 Scenic Corridors. Website: https://library.municode.com/ca/moraga/codes/municipal_code?nodeId=MOCA TIT8PLZO_ CH8.132SCCO (accessed December 2024).

conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. If the project is in an urbanized area, would the project conflict with applicable zoning and would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The proposed rugby clubhouse would include new interior and exterior lighting; however, the closest residences to the project site are located across Bollinger Canyon Road and are separated from the project site by Las Trampas Creek vegetation and other mature trees that would block any potential light source from the proposed project, similar to the originally proposed rugby clubhouse. The proposed project would be subject to Mitigation Measure AESTHETICS-2, which requires the submission of lighting plans for review and approval by the Town's Design Review Board.

The photometric study[12] that was prepared by the project applicant to meet the requirements of AESTHETICS-2 for the athletic field lights indicates that historically, light-emitting diode (LED) floodlights were used to light up fields, however LED fixtures cannot effectively control the light being emitted which leads to unintended consequences such as light spilling into the surrounding neighborhood, night sky, and into the eyes of players. The project would use Total Light Control (TLC) for LED, which allows for pinpoint precision, instant on and off, and varying light levels for different needs and sports. The luminaires would contain shields that would direct light downwards onto the fields and minimize spillover lighting beyond the Project's boundaries. Additionally, lighting would meet the DarkSky Approved Outdoor Sports Lighting Program standards. The DarkSky sports lighting program supports establishing thresholds to minimize neighborhood lighting nuisances by reducing allowable spill and glare, managing high-angle glare, establishing curfew requirements, limiting play to recreational levels, and promoting best lighting practices that minimize lumen densities.

In addition, in accordance with the intramural lighting agreement with the Town of Moraga, the lights would be turned on manually only when needed for home games and would not be on automatic timers that switch on every night. Games played at the stadium and softball field would start no later than 6:30 PM and end no later than 10 PM. In the event of extra innings, games at the baseball field would end no later than 11 PM. Field lighting can be managed manually or with automatic timers. Daily automatic timers are currently only being used for the recreational turf field located near the stadium during the academic year which goes no later than 10 PM.

Photometric studies were performed to demonstrate potential light spillover with project implementation and determined that the proposed athletic lights would not result in light spilling over to nay sensitive uses off campus, due to the distance, intervening trees and light orientations.

Based on project renderings, the exterior lights proposed for the rugby clubhouse would be pointed downward and comply with the Town's objective design standards as outlined in Town Municipal Code.

[12] ESA. June 2024. Saint Mary's College Athletic Fields Lighting Project.

Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.2 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

4.2.1 2016 Program EIR Analysis

a. *Conflict with applicable air quality plan*: Less than Significant Impact; No mitigation required.

b. *Cumulatively considerable net increase of criteria pollutant*: Less than Significant Impact; No mitigation required.

c. Expose sensitive receptors to substantial pollutant concentrations: Less than Significant Impact with the implementation of Mitigation Measure AIR-1 which would revise the Stewardship and Sustainability section of the Draft Master Plan to include measures that shall be implemented during construction to reduce the exposure of sensitive receptors to Toxic Air Contaminants (TACs).

d. *Result in other emissions such as odors affecting substantial number of people*: No impact; No mitigation required.

4.2.2 Discussion of Project Impacts

The project site is within the jurisdiction of the Bay Area Air District (Air District), which regulates air quality in the San Francisco Bay Area. Air quality conditions in the San Francisco Bay Area have improved significantly since the Air District was created in 1955. Ambient concentrations of air pollutants and the number of days during which the region exceeds air quality standards have fallen substantially. The Town of Moraga is located in the southwest edge of the Diablo Valley where the Oakland Hills to the west partially block marine air flow, giving the area a warmer, less cloudy climate in the summer and cooler temperatures in the winter compared to cities on the San

Francisco Bay. In Moraga, and the rest of the air basin, exceedances of air quality standards occur primarily during meteorological conditions conducive to high pollution levels, such as cold, windless winter nights or hot, sunny summer afternoons.

Within the Air District, ambient air quality standards for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (particulate matter less than 10 microns in size [PM_{10}], and particulate matter less than 2.5 microns in size [$PM_{2.5}$]), and lead (Pb) have been set by both the State of California and the federal government. The State has also set standards for sulfate and visibility. The Air District is under State non-attainment status for ozone and particulate matter (both PM_{10} and $PM_{2.5}$) standards. The Air District is classified as non-attainment for the federal ozone 8-hour standard and non-attainment for the federal $PM_{2.5}$ 24-hour standard.

a. Conflict with or obstruct implementation of the applicable air quality plan?

The current applicable air quality plan is the Air District 2017 Clean Air Plan (Clean Air Plan),[13] which was adopted on April 19, 2017. The Clean Air Plan is a comprehensive plan to improve Bay Area air quality and protect public health. The Clean Air Plan defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest heath risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduce greenhouse gas emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project: (1) supports the goals of the Clean Air Plan; (2) includes applicable control measures from the Clean Air Plan; and (3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan. As discussed below, the proposed project would not conflict with or obstruct implementation of the Clean Air Plan, and this impact would remain less than significant, as analyzed in the 2016 SMCCMP EIR.

The primary goals of the Bay Area Clean Air Plan are to: attain air quality standards; reduce population exposure and protect public health in the Bay Area; and reduce greenhouse gas emissions and protect climate.

The 2016 SMCCMP EIR determined that the Master Plan included policies and measures consistent with the 2010 Clean Air Plan Transportation Control Measures and Energy and Climate Measures. The 2017 Clean Air Plan contains additional measures that the proposed project would comply with below.

Clean Air Plan Control Measures. The control strategies of the Clean Air Plan include measures in the following categories: Stationary Source Measures, Transportation Measures, Energy Measures, Building Measures, Agriculture Measures, Natural and Working Lands Measures, Waste Management Measures, Water Measures, and Super-Greenhouse Gas (GHG) Pollutants Measures. The project's compliance with each of these control measures is discussed below. As discussed, the project would not conflict with the Clean Air Plan control measures.

Stationary Source Control Measures. The Stationary Source Control Measures, which are designed to reduce emissions from stationary sources such as metal melting facilities, cement kilns, refineries,

[13] Bay Area Air Quality Management District (BAAQMD). 2017. *Clean Air Plan*. April 19.

and glass furnaces, are incorporated into rules adopted by the Air District and then enforced by Air District permit and inspection programs. Because the proposed project would not include any such stationary sources, the Stationary Source Measures of the Clean Air Plan do not apply to the project.

Energy Control Measures. The Clean Air Plan also includes Energy Control Measures, which are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG intensive fuel sources for electricity generation. Because these measures apply to electrical utility providers and local government agencies (and not to individual projects), the Energy Control Measures of the Clean Air Plan are not directly applicable to the proposed project. However, the proposed project would be required to comply with all federal, State, and local requirements for energy efficiency, including the latest California Energy Code and California Green Building Standards Code (CALGreen Code) standards. Therefore, the proposed project would comply with applicable Energy Control Measures.

Building Control Measures. The Air District has authority to regulate emissions from certain sources in buildings such as boilers and water heaters but has limited authority to regulate buildings themselves. Therefore, the strategies in the control measures for this sector focus on working with local governments that do have authority over local building codes, to facilitate adoption of best GHG control practices and policies. Therefore, the Building Control Measures of the Clean Air Plan are not applicable to the proposed project. However, the proposed project would comply with California Energy Code and CALGreen Code standards.

Agriculture Control Measures. The Agriculture Control Measures are designed to primarily reduce emissions of methane. Since the proposed project does not include any agricultural activities, the Agriculture Control Measures of the Clean Air Plan do not apply to the proposed project.

Natural and Working Lands Control Measures. The Natural and Working Lands Control Measures focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to adopt ordinances that promote urban tree plantings. Because the proposed project does not include the disturbance of any rangelands or wetlands, the Natural and Working Lands Control Measures of the Clean Air Plan are not applicable to the proposed project.

Waste Management Control Measures. The Waste Management Measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. The proposed project would comply with local requirements for waste management (e.g., recycling and composting services). Therefore, the proposed project would be consistent with the Waste Management Control Measures of the Clean Air Plan.

Water Control Measures. The Water Control Measures focus on reducing emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works (POTWs), and promoting the use of biogas recovery systems. Since these measures apply to POTWs and local government agencies (and not individual projects), the Water Control Measures are not directly applicable to the proposed project.

Super GHG Control Measures. The Super-GHG Control Measures are designed to facilitate the adoption of best GHG control practices and policies through the Air District and local government agencies. Since these measures do not apply to individual projects, the Super-GHG Control Measures are not applicable to the proposed project.

As discussed above, the proposed project would implement applicable measures outlined in the 2017 Clean Air Plan. The athletic field lighting and revisions to the rugby clubhouse project would not change the conclusions of the 2016 SMCCMP EIR. The proposed athletic field lighting and rugby clubhouse would not disrupt or hinder implementation of a control measure from the Clean Air Plan, and this impact would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The Air District is currently designated as a non-attainment area for State and national ozone standards and national particulate matter ambient air quality standards. The Air District's non-attainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The following analysis assesses the potential project-level construction- and operation-related air quality impacts and CO impacts.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, hauling, and other activities. Emissions from construction equipment are also anticipated and would include CO, nitrogen oxide (NOx), reactive organic gases (ROG), directly-emitted particulate matter ($PM_{2.5}$ and PM_{10}), and TACs such as diesel exhaust particulate matter. The Air District has developed screening criteria to provide lead agencies with a conservative indication of whether a proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency would not need to perform a detailed air quality assessment of the proposed project's emissions. For construction-related criteria pollutants, the Air District screening size for College-University (4-year) land uses is 452,000 square feet. The proposed rugby clubhouse project would result in a total disturbed area of 38,331 square feet, and the proposed athletic field lighting would disturb a total of 162 square feet. Based on the Air District's screening criteria, construction activities associated with the proposed project are not anticipated to exceed

established thresholds. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project is in non-attainment under applicable federal or State ambient air quality standards. Impacts would be less than significant, consistent with the analysis in the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

Operational Emissions. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment) related to the proposed project. As discussed above, the Air District has developed screening criteria to provide lead agencies with a conservative indication of whether a proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency would not need to perform a detailed air quality assessment of the proposed project's emissions. These screening levels are generally representative without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions. For operational criteria pollutants, the Air District screening size for College-University (4-year) land uses is 779,000 square feet. The proposed rugby clubhouse project would total 9,785 square feet, and the proposed athletic field lighting would disturb a total of 162 square feet. Therefore, based on the Air District's screening criteria, operational activities associated with the proposed project are not anticipated to exceed established thresholds. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project is in non-attainment under applicable federal or State ambient air quality standards. Impacts would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

Localized CO Impacts. The Air District additionally has a screening methodology that provides a conservative indication of whether the implementation of a proposed project would result in significant CO emissions. According to the Air District's 2022 CEQA Guidelines, a proposed project would result in a less than significant impact to localized CO concentrations if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, and the regional transportation plan and local congestion management agency plans.

- Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

- The project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, or below-grade roadway).

Implementation of the proposed project would not conflict with standards established by the Contra Costa Transportation Authority (CCTA). As identified in Section 4.13, Transportation, below, the proposed project's contribution to peak-hour traffic volumes at intersections in the vicinity of the project site would be well below 44,000 vehicles per hour, the proposed project would not result in localized CO concentrations that exceed State or federal standards, and impacts would be less than significant.

As such, construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standards. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

According to the Air District, a project would result in a significant impact if it would: individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 10.0 in one million, an increased non-cancer risk of greater than 1.0 on the hazard index (chronic or acute), or an annual average ambient $PM_{2.5}$ increase greater than 0.3 micrograms per cubic meter ($\mu g/m^3$). A significant cumulative impact would occur if the project, in combination with other projects located within a 1,000-foot radius of the project site, would expose sensitive receptors to TACs resulting in an increased cancer risk greater than 100.0 in one million, an increased non-cancer risk of greater than 10.0 on the hazard index (chronic), or an ambient $PM_{2.5}$ increase greater than 0.8 $\mu g/m^3$ on an annual average basis. Impacts from substantial pollutant concentrations are discussed below.

The project site is located on the Saint Mary's College Campus, where the nearest sensitive receptors are residential communities located to the west, north, and east. The academic buildings and residence halls on campus are generally not considered sensitive receptors because children, pregnant women, the elderly, and those with illness are not expected to be present at any single facility over the entire duration of construction. However, sensitive individuals within the student and staff population could be present at campus facilities during construction of the proposed project. Therefore, the proposed project would be required to implement Mitigation Measure AIR-1, which requires the implementation of construction measures to reduce the exposure of sensitive receptors to TACs. The mitigation measure reflects current Air District standards for TAC emissions, which are similar in scope and requirements as those required for the 2016 SMCCMP EIR.

Once the proposed project is constructed, it would not be a source of substantial emissions. Therefore, with implementation of Mitigation Measure AIR-1, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during project construction or operation, and potential impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The proposed project does not include activities or operations that would generate objectionable odors as may be more commonly observed with wastewater treatment, landfills and composters, heavy manufacturers and food processors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, consistent with the programmatic 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.3 BIOLOGICAL RESOURCES

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations; or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

4.3.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed biological resources impacts associated with campus improvements and development, including the originally proposed rugby clubhouse, and concluded the following:

a. Adverse effects on special-status species: Less than Significant Impact with the implementation of Mitigation Measures BIO-1a through BIO-1e, which require an education program be conducted to explain biological concerns to any personnel involved in construction; a biological monitor be present during construction activities at the Secondary Ingress/Egress crossing; the completion of construction activities outside of avian nesting season or the completion of nesting bird surveys if construction is scheduled during the nesting season; inspection of trees or structures subject to removal by a qualified biologist for bat roosts prior to their removal; and

inspection of the Secondary Ingress/Egress by a qualified biologist for woodrat nests prior to start of construction.

b. *Adverse effects on riparian habitat*: Less than Signification Impact with the implementation of Mitigation Measure BIO-2, which requires that Best Management Practices (BMPs) to protect riparian and mesic oak woodland habitats be implemented during construction of Master Plan projects adjacent to such habitats.

c. *Adverse effects on protected wetlands*: Less than Significant Impact with the implementation of Mitigation Measure BIO-3, which requires a compensatory mitigation program be developed and implemented to provide mitigation for jurisdictional waters affected by proposed Master Plan improvements; and a Wetland Protection and Replacement Program (WPRP) be prepared by a qualified wetland specialist and implemented.

d. *Interfere with movement of native resident or migratory fish or wildlife species*: Less than Significant Impact; No mitigation required.

e. *Conflict with policies or ordinances protecting biological resources*: Less than Significant Impact with the implementation of Mitigation Measures BIO-4a through BIO-4b, which requires a tree replacement plan; tree protection zones (TPZ) in work zones; and an arborist report if construction of a Master Plan project encroaches into the dripline of a regulated tree.

f. *Conflict with habitat conservation plan*: Less than Significant Impact; No mitigation required.

4.3.2 Discussion of Project Impacts

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Construction of the proposed rugby facility could impact Alameda whipsnake, California red-legged frog, San Francisco dusky-footed woodrat, bats, and nesting birds. However, the proposed project involves construction consistent with that analyzed in the 2016 SMCCMP EIR and would be subject to Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-1e, and BIO-1f which require an education program for individuals involved in project construction, the presence of a biological monitor during initial vegetation removal and ground-disturbing activities, the completion of construction activities outside of the avian nesting season, and inspection for bat roosts prior to tree removal.

Updates to Mitigation Measures BIO-1b and BIO-1e specific to the proposed project are set forth below. The updates remove specific mention of the Secondary Ingress/Egress project alignment, which is not applicable here, and include all special-status species rather than just California red-legged frog, as required by current regulations that were implemented after 2016 SMCCMP EIR certification. Additionally, Mitigation Measure BIO-1f was added to include measures to protect Alameda whipsnakes as the species status was updated since the preparation of the 2016 SMCCMP

EIR. The revised Mitigation Measures are as follows, with additions to the measures reflected as underlined text and removals reflected as strikethrough text:

BIO-1a: An education program shall be conducted, consisting of a brief presentation to explain special-status species concerns to construction contractors, their employees, and any other personnel involved in construction on the Saint Mary's College campus. The program shall include the following: a description of relevant special-status species and their habitat needs as they pertain to the project; a report of the occurrence of these species in the project vicinity, as applicable; an explanation of the status of these species and their protection under the federal and state regulations; a list of measures being taken to reduce potential impacts on natural resources during project construction and implementation; and instructions on what to do if a special-status species is found on-site. A fact sheet conveying this information shall be prepared for distribution to the above-mentioned people and anyone else who may enter the project site. Upon completion of training, construction-related employees/contractors shall sign a form stating that they attended the training and agree to all of the conservation and protection measures.

BIO-1b: A biological monitor shall be present during initial vegetation removal and ground-disturbing activities. ~~the construction activities at the Secondary Ingress/Egress crossing of the unnamed tributary drainage. A biological monitor shall be present during the construction activities where improvements to the existing crossing or vegetation removal at the crossing are necessary~~. The biological monitor shall arrive early each morning to search the work area for special-status species ~~California red-legged~~ frog prior to the start of work and shall remain on-site until construction work stops each day. The monitor shall have the authority to stop work if a special-status species ~~California red-legged frog~~ is found in the work area. Work shall be stopped until the species has moved on its own out of harm's way. The monitor shall also have the authority to stop work if adverse impacts on the Las Trampas Creek riparian corridor ~~(approximately 50 feet from the proposed Secondary Ingress/Egress alignment)~~ occur, and identify the measures to be implemented before work can continue.

BIO-1c: Construction of the Master Plan projects shall take place outside of the avian nesting season (February 1 through August 31) to the extent feasible. If construction is scheduled during the nesting season of migratory birds, trees and shrubs shall be surveyed by a qualified biologist for nesting birds within the following buffers of the construction site:

a) 250 feet for nesting raptors
b) 100 feet for all other nesting birds

A qualified biologist, in consultation with the California Department of Fish and Wildlife (CDFW), shall determine the appropriate buffer size and

delineate the buffer using fencing, pin flags, and/or yellow-caution tape, as appropriate. The buffer zone shall be maintained around all active nest sites until the young have fledged and are foraging independently.

In the event that an active nest is found within the project site after the completion of pre-construction surveys and after construction begins, all construction activities shall stop until a qualified biologist has consulted the CDFW regarding the appropriate Avoidance and Minimization Measures (AMMs) and the measures have been completed

BIO-1d: A qualified biologist shall visually inspect trees or structures to be removed or demolished for bat roosts within 7 days prior to their removal. The biologist shall look for signs of bats including sightings of live or dead bats, bat calls or squeaking, the smell of bats, bat droppings, grease stains or urine stains around openings in trees or structures, or flies around such openings. Trees with multiple hollows, crevices, forked branches, woodpecker holes, or loose and flaking bark have the highest chance of occupation and shall be inspected the most carefully. If signs of bats are detected, the CDFW shall be contacted about how to proceed. Echo-location surveys may be needed to verify the presence of bats, or an exclusion zone around the occupied tree or structure may be recommended until bats leave the roost. The size of the buffer would take into account:

a) Proximity and noise level of project activities;
b) Distance and amount of vegetation or screening between the roost and construction activities; and
c) Species-specific needs, if known, such as sensitivity to disturbance.

Due to restrictions of the California Health Department, direct contact by workers with any bat is not allowed. The qualified bat biologist shall be contacted immediately if a bat roost is discovered during project construction.

BIO-1e: A qualified biologist shall search the ~~unpaved portion of the Secondary Ingress/Egress project alignment~~ work site plus a 20-foot buffer for woodrat nests within 7 days prior to the start of construction. If any woodrat nests are found within the area that would be directly affected by construction or emergency vehicle ingress/egress, the nests shall be avoided with a 5-foot buffer or removed according to the current procedures approved by the CDFW. The following is an example of what would occur:

a) Prior to any disturbance of the woodrat house, logs and branches shall be placed under the canopies of trees near, but outside of, the project site.
b) Next, all understory vegetation shall be cleared within the project site or in the area immediately surrounding the nests (but the nest itself shall not be removed at this stage).

c) After all cover (except the nests themselves) has been removed, each active nest shall be disturbed (by a qualified wildlife biologist) to the degree that woodrats leave the nest and seek refuge elsewhere.
d) The nest sticks shall be removed from the project site and piled at the base of newly placed logs and branches outside the project site.

Potential health hazards to persons moving nests shall be addressed to minimize risk of contracting diseases associated with woodrats and woodrat nests. This measure shall be performed under the direct supervision of a qualified biologist approved for this project by the CDFW. Dismantling and moving woodrat nests is limited to March and late summer/early fall; campus personnel and the contractor should be aware that it takes the CDFW time to approve a plan, and that the number of professionals with a Memorandum of Understanding (MOU) for this work is limited.

BIO-1f: Unless alternative (equivalent or more effective) measures are recommended by the approved biologist and approved by the Town of Moraga, Saint Mary's College shall install a wildlife exclusion fence (WEF) to deter Alameda whipsnakes and California red-legged frogs from entering the work site. The WEF shall be constructed as follows:

a) Plywood sheets at least three feet in height, above ground. Heavy-duty geotextile fabric or other materials approved by CDFW may also be used for the snake exclusion fence;
b) Buried four (4) to (six) 6 inches into the ground;
c) Soil back-filled against the plywood fence to create a solid barrier at the ground;
d) Plywood sheets maintained in an upright position with t-posts or stakes;
e) Ends of plywood sheets overlapped with no gaps to ensure a complete barrier;
f) Escape funnels installed in the fence every 200 linear feet;
g) The location and design of the proposed exclusion fence will be included on plans for all construction-related permits.

The fence shall be installed and remain in place throughout the construction period. All construction activities and equipment/materials/debris storage shall take place on the project side of the fence.

These additions to the existing mitigation measures are similar to the intent and performance standards required by the mitigation measures previously adopted for the 2016 SMCCMP EIR. With implementation of Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-1e, and BIO-1f, impacts to special-status species would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Construction of the proposed rugby clubhouse would require the removal of various trees, limbs, and groundcover vegetation which could result in indirect impacts to the riparian sensitive natural community along the unnamed tributary drainage to Las Trampas Creek, consistent with the analysis in the 2016 SMCCMP EIR. The proposed project would be subject to Mitigation Measure BIO-2, which requires the implementation of best management practices to protect riparian and mesic oak woodland habitats. Updates to Mitigation Measure BIO-2 reflect the proposed project's proximity to Las Trampas Creek and reflect current best management practices to be implemented by the College during construction. The revised Mitigation Measure is as follows, with additions to the measure reflected as underlined text and deleted text reflected as strikethrough text:

BIO-2: Best Management Practices (BMPs) to protect riparian and mesic oak woodland habitats (and associated special-status species) shall be implemented during construction of Master Plan projects adjacent to such habitats. Such BMPs shall include, but shall not be limited to, the following:

- Restriction of work to the dry season (April 15 through October 15) near aquatic resources.
  Prior to the start of construction, a qualified biologist shall flag the limits of the Las Trampas Creek Corridor.
- Stopping of work near aquatic resources for up to 24 hours after storm events.
- Installation and regular maintenance of a silt fence between the work area and the adjacent riparian or mesic oak woodland habitat associated with Las Trampas Creek.
- Removal of all trash from the project site at the end of each day.
- Restrictions that no vehicles may be refueled within 100 feet of riparian habitat ~~and/or aquatic resources~~.
- Maintenance of all construction equipment and regularly inspections of equipment for leaks before bringing it into the project site near riparian or wetland habitat.
- Maintenance of waste facilities such as concrete wash-out facilities, porta-potties, and hydraulic fluid containers. Waste shall be removed to a proper disposal site.
- Covering of disturbed soil areas and soil stockpiles with tarps prior to forecast rain events.
- Silt control measures shall be utilized throughout all phases of the project where silt and/or earthen fill threaten to enter Waters of the State. Silt control structures shall be monitored for effectiveness and shall be repaired or replaced as needed. Build-up of soil behind the fence shall be removed promptly and any breaches or undermined areas repaired at once.

- All exposed/disturbed areas within the project site shall be stabilized to the greatest extent possible. Erosion control measures, such as silt fences, shall be used wherever silt laden water has the potential to leave the work site and enter Las Trampas Creek. Erosion control measures shall be monitored during and after each storm event. Modifications, repairs and improvements to erosion control measures shall be made whenever it is needed. Materials used for erosion control or to repair erosion control shall not pose a risk to fish or wildlife.
- Monofilament or plastic-wrapped wattle shall not be used. The contractor shall not use temporary or permanent erosion control devices containing plastic netting, including photo- or bio-degradable plastic netting. Erosion control and landscaping specification shall only allow natural fiber for use in erosion control mats, blankets, and straw or fiber wattles.
- Preparation of a Hazardous Spill Prevention and Response Plan. The plan shall describe what actions will be taken in the event of a spill. The plan shall also incorporate preventative measures to be implemented, such as vehicle and equipment staging, cleaning, maintenance, and refueling; and contaminant (including fuel) management and storage.

Provision of adequate spill containment materials, such as oil diapers and hydrocarbon cleanup kits, on-site at all times. Containers for storage, transportation, and disposal of contaminated absorbent materials shall be provided on the project site.

These additions to the existing mitigation measures are similar to the intent and performance standards required by the mitigation measures previously adopted for the 2016 SMCCMP EIR. With implementation of Mitigation Measure BIO-2, impacts to sensitive natural communities would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No jurisdictional or non-jurisdictional wetlands are mapped or identified at the project site, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project site is located within an already developed, urban setting, with only limited habitat value to wildlife species common in urbanized areas. These species would continue to use the project site and vicinity following construction and the establishment of new landscaping and wildlife movement opportunities would not be substantially impeded on the campus. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction of the proposed rugby clubhouse would require the removal of various trees, consistent with the originally proposed rugby clubhouse. The proposed project would be subject to Mitigation Measures BIO-4a and BIO-4b, which require the preparation of a tree replacement plan, implementation of tree protection zones and the replacement of removed trees consistent with the requirements specified in Mitigation Measure BIO-4a. With implementation of Mitigation Measures BIO-4a and BIO-4b, impacts to local policies or ordinances would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no adopted habitat conservation plans, natural community conservation plans, or other applicable habitat conservation plans that encompass the campus or vicinity or that would be applicable to the proposed project. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.4 CULTURAL RESOURCES

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☒	☐	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☒	☐	☐	☐

4.4.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed cultural resources impacts associated with campus improvements and development, including the originally proposed rugby clubhouse, and concluded the following:

a. *Adverse change to historical resource*: Less than Significant Impact with the implementation of Mitigation Measures CULT-1a through CULT-1c, which require the following for construction projects located within or adjacent to the proposed California Register of Historical Resources (CRHR)-eligible Saint Mary's College Historic District: review of new buildings by the Town of Moraga for consistency with the Master Plan and EIR; compliance with the Master Plan guidelines and standards as well as the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards); and that architectural designs involving the rehabilitation of a contributing historic building shall comply with Master Plan guidelines and the Standards.

b. *Adverse change to archaeological resource:* Less than Significant Impact with the implementation of Mitigation Measures CULT-2a through CULT-2b, which require the review of construction plans by a qualified archaeologist to determine if an Archaeological Identification Plan (AIP), Archaeological Treatment Plan (ATP), and/or Archaeological Monitoring Plan (AMP) is required and the implementation of appropriate monitoring activities, construction worker training sessions, notification activities, proper procedure if an archaeological deposit is encountered, and appropriate reporting.

c. *Disturb human remains*: Less than Significant Impact with the implementation of Mitigation Measure CULT-3, which requires compliance with California Health and Safety Code Section 7050.5 and notification of the contractor(s) of the sensitivity of the project site for human remains.

4.4.2 Discussion of Project Impacts

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

The proposed project would not be located within or adjacent to any buildings included in the California Register of Historical Resources (CRHR)-eligible Saint Mary's College Historic District, as outlined in the 2016 SMCCMP EIR. Nevertheless, the proposed rugby clubhouse would be constructed consistent with the architectural design guidelines and standards included in the Saint Mary's College Campus Master Plan. As such, the proposed project would not have the potential to directly or indirectly affect the Saint Mary's College Historic District. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

A project specific records search through the Northwest Information Center was conducted on June 24, 2024, and a response was received on June 27, 2024.[14] The record search results did not identify any resources in the project area. However, the project area retains sensitivity for prehistoric resources due to its proximity to Las Trampas Creek, which supports a riparian habitat featuring resources that would have been attractive to Native Americans. In addition, the age of the college itself (1860s) suggests the potential for historic period refuse or other subsurface resources.

Construction of the proposed athletic field lighting and rugby clubhouse would require ground-disturbing activities that have the potential to cause a substantial adverse change in the significance of unrecorded archaeological resources, similar to the analysis in the 2016 SMCCMP EIR. The proposed project would be required to implement Mitigation Measures CULT-2a and CULT-2b, which require the review of construction plans by a qualified archaeologist to determine if an Archaeological Identification Plan (AIP), Archaeological Treatment Plan (ATP), and/or Archaeological Monitoring Plan (AMP) is required and the implementation of appropriate monitoring activities, construction worker training sessions, notification activities, proper procedure if an archaeological deposit is encountered, and appropriate reporting. With implementation of Mitigation Measures CULT-2a and CULT-2b, impacts to archaeological resources would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Construction of the proposed athletic field lighting and rugby clubhouse would require ground-disturbing activities that have the potential to disturb Native American human remains, similar to

[14] California Historical Resources Information System. 2024. *Saint Mary's College Rugby Clubhouse Project (LSA #20231212.03), NWIC File No.: 23-1881.* June 27.

the analysis in the 2016 SMCCMP EIR. The proposed project would be required to implement Mitigation Measure CULT-3, which requires compliance with California Health and Safety Code Section 7050.5 and notification of the contractor(s) of the sensitivity of the project site for human remains. With implementation of Mitigation Measure CULT-3, impacts to human remains would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.5 ENERGY

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

4.5.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed energy impacts associated with campus improvements and development, including the originally proposed rugby clubhouse, and concluded the following:

a) *Wasteful energy consumption during construction and operation*: Less than Significant Impacts with the implementation of Mitigation Measures ENERGY-1a through ENERGY-1b, which require revisions to the Master Plan text to remove language that suggests voluntary provisions and submission of an annual energy monitoring report to the Town of Moraga Planning Department documenting its progress in meeting energy conservation goals.

b) *Conflict with plan for energy efficiency*: Less than Significant Impacts with the Implementation of Mitigation Measure ENERGY-2, which requires the implementation of Mitigation Measures ENERGY 1a through ENERGY 1b to ensure development is consistent with the Town of Moraga and other applicable energy efficiency policies and standards.

4.5.2 Discussion of Project Impacts

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction Energy Use. The anticipated construction schedule assumes the construction of the proposed project would begin in the summer of 2025. The construction of the rugby clubhouse would occur over approximately 18 to 24 months, and the athletic field lighting construction would occur over approximately 3 months.

Construction of the proposed project would require energy for the manufacture and transportation of building materials, preparation of the site for grading activities, and building construction. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. In order to increase energy efficiency on the site during project construction, idling times would be restricted to 5 minutes or less and construction workers would be required to shut off idle

equipment, as required by the California Air Resources Board (CARB) regulations. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources.

Operational Energy Use. Typically, energy consumption is associated with fuel used for vehicle trips and electricity and natural gas use. However, the proposed project would not increase the demand for natural gas as the proposed buildings would be all electric.

In 2018, Senate Bill (SB) 100 was passed, which has committed California to generate all electricity from carbon free sources by 2045. The proposed project's all-electric design considers the context of the changing electricity grid and is designed to displace natural gas emissions over the lifetime of the building. The all-electric building design would result in decreasing emissions as California's grid becomes cleaner, and once the grid consists of 100 percent renewable generation sources, the building would have zero operational emissions associated with electricity usage. In addition to the all-electric design, the proposed project would be required to comply with the latest California Energy Code and CALGreen Code standards and would include solar panels, which would help to reduce energy and natural gas consumption.

In addition, the proposed project would result in energy usage associated with gasoline for project-related trips. The proposed project would generate fewer than 100 daily trips. Based on fuel consumption obtained from EMFAC2021, approximately 357.3 million gallons of gasoline and approximately 616.5 million gallons of diesel fuel will be consumed from vehicle trips in Contra Costa County in 2025. Therefore, based on the total fuel usage in Contra Costa County and the minimal increase in average daily trips, vehicle trips associated with the proposed project would negligibly increase the annual fuel use in Contra Costa County.[15] As such, fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Therefore, given the location of the project and proposed improvements, implementation of the proposed project would not result in a substantial increase in electricity, natural gas, or transportation-related energy, such that it would result in a wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.

As such, the proposed project would not result in the wasteful, inefficient or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment use, and transportation. Consistent with the findings of the 2016 SMCCMP EIR, this impact would be less than significant with the implementation of Mitigation Measures ENERGY-1a and ENERGY-1b. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

[15] EMission FACtor 2021 (EMFAC2021) Emissions Inventory. *Contra Costa 2025.* Website: https://arb.ca.gov/emfac/emissions-inventory/775078c43ac849a42111a9c73bf1301d74079e16 (accessed March 2025).

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As indicated above, energy usage on the project site during construction would be temporary in nature. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the State's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact to regional energy supplies would be minor, the proposed project would not conflict with California's energy conservation plans as described in the California Energy Commission (CEC) 2023 Integrated Energy Policy Report. Additionally, construction and operation of the proposed project would be subject to energy conservation provisions and would be included in the annual energy monitoring report submitted to the Town as stipulated by Mitigation Measures ENERGY-1a and ENERGY-1b. The proposed project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.6 GEOLOGY AND SOILS

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐
ii. Strong seismic ground shaking?	☒	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv. Landslides?	☒	☐	☐	☐
b. Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☒	☐	☐	☐
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

4.6.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed geology and soils impacts associated with campus improvements and development, , including the originally proposed rugby clubhouse, and concluded the following:

a. *Adverse effects involving fault rupture, ground shaking, seismic-related ground shaking, landslides*: Less than Significant Impacts; No mitigation required.

b. *Soil erosion or loss of topsoil:* Less than Significant Impacts; No mitigation required.

c. *Unstable Geologic Unit*: Less than Significant Impacts; No mitigation required.

d. *Located on expansive soils:* Less than Significant Impacts; No mitigation required.

e. *Incapable soils to support disposal of wastewater*: No impact; No mitigation required.

f. *Destroy unique paleontological resource or unique geologic feature*: Less than Significant Impact with the implementation of Mitigation Measure CULT-4, which requires the preparation of a Paleontological Resource Mitigation Plan and a Paleontological Resource Monitoring to be undertaken by a qualified paleontologist.

4.6.2 Discussion of Project Impacts

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The campus is not located within or near Alquist Priolo Fault traces or zones.[16] The proposed project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

ii. Strong seismic ground shaking?

Although the proposed project is located in a seismically active region, all new buildings are required to comply with applicable building codes and local ordinances. In compliance with Town requirements, new buildings must be constructed using guidance from the 2022 California Building Code (CBC) in order to minimize damage from an earthquake.[17] Compliance with these existing requirements would reduce impacts to a less-than-significant level, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

16 Department of Conservation (DOC). n.d. California Geological Survey Earthquake Zones of Required Investigation Map. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d8e4b825-layer-21%3A1980 (accessed January 2025).

17 Moraga, California – Municipal Code. n.d. Title 15 – Buildings and Construction, Chapter 15.04 Building Codes.

iii. Seismic-related ground failure, including liquefaction?

As discussed in the 2016 SMMCMP EIR, the campus was mapped as having low potential for liquefaction hazards. Additionally, the proposed project would be required to prepare a site-specific geotechnical report and would be constructed in accordance with both Town and CBC requirements, which include seismic safety design requirements and would reduce potential adverse effects from liquefaction and other seismic-related ground failure to a less-than-significant level. The project would be consistent with the 2016 SMCCMP EIR and impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

iv. Landslides?

According to the U.S. Landslide Inventory and Susceptibility Map,[18] the proposed project is located in an area of probable and possible landslides. As required by the CBC, the proposed project would include the preparation of a geotechnical report to identify potentially significant landslide and slope stability hazards. The implementation of geotechnical investigation recommendations would reduce potential landslide impacts to a less than significant level and the project would be consistent with the 2016 SMCCMP EIR. Impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Grading during construction activities could result in soil erosion and loss of topsoil. However, construction of the proposed project would be subject to Town grading requirements for erosion control plans and a stormwater control plan, consistent with the analysis in the 2016 SMCCMP EIR.[19,20] The erosion control plan would state the methods of erosion prevention and erosion control on-site during construction, while the stormwater control plan would incorporate site design characteristics, landscape features, and BMPs that minimize imperviousness, retain/detain stormwater, slow runoff rates, and reduce pollutants in the post-development runoff. Compliance with these plans and existing requirements would reduce the potential for erosion or loss of topsoil impacts to a less-than-significant level, consistent with the 2016 SMCCMP EIR. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

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18 United States Geological Survey (USGS). n.d. U.S. Landslide Inventory and Susceptibility Map. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d (accessed December 2024).

19 Moraga, California – Municipal Code. n.d. Title 14 – Grading, Chapter 14.24 – Issuance of Grading Permits.

20 Moraga, California – Municipal Code. n.d. Title 14 – Grading, Chapter 14.52 – Stormwater Management.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

As discussed in the 2016 SMCCMP EIR, surface soils at the Saint Mary's College Campus consist of clayey and silty soils. Expansive and unstable soils may cause damage to proposed buildings that could endanger property. However, as required by the CBC, the proposed project would require the preparation of a geotechnical report and implementation of its recommendations, which would reduce potential impacts from unstable soils to a less-than-significant level. The project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

As discussed in the 2016 SMCCMP EIR, surface soils at the Saint Mary's College Campus consist of clayey and silty soils, which are considered expansive. However, as required by the 2022 CBC, the proposed project would require the preparation of a geotechnical report and implementation of its recommendations, which would reduce potential impacts from expansive soils to a less-than-significant level. The project would be consistent with the 2016 SMCCMP EIR and impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed project would not require the use of septic tanks or alternative wastewater disposal system needs. The rugby clubhouse project would connect to existing sewer mains on the Saint Mary's College campus, consistent with the originally proposed clubhouse. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As discussed in the 2016 SMCCMP EIR, fossils have not been identified on or adjacent to the campus, although Mullholland Formation deposits are of sufficient age to include fossils. If geotechnical reports indicate the potential for the athletic field lighting and rugby clubhouse updates project to disturb the existing bedrock, the proposed athletic field lighting and rugby clubhouse updates project would be subject to Mitigation Measure CULT-4, which requires the preparation of a Paleontological Resource Mitigation Plan and a Paleontological Resource Monitoring to be undertaken by a qualified paleontologist. With implementation of Mitigation

Measure CULT-4, impacts to paleontological resources would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.7 GREENHOUSE GASES

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

4.7.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed greenhouse gases impacts associated with campus improvements and development, and concluded the following:

a. *Generation of GHG Emissions*: Less than Significant Impacts; No mitigation required.

b. *Conflict with Applicable GHG Plan, Policies, Regulations:* Less than Significant Impact; No mitigation required.

4.7.2 Discussion of Project Impacts

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

In April 2023, the Air District adopted the 2022 CEQA Guidelines[21] which identify applicable GHG significance thresholds. These thresholds evaluate a project based on its effect on California's efforts to meet the State's long-term climate goals. Applying this approach, the Air District identifies and provides supporting documentation, outlining the necessary requirements that new land use development projects must implement to achieve California's long-term climate goal of carbon neutrality by 2045. Based on the analysis, the Air District found that new land use development projects need to incorporate specified design elements to contribute their "fair share" toward implementation of the goal of carbon neutrality by 2045. If a project is designed and built to incorporate the identified design elements, then it would contribute its portion of what is necessary to achieve California's long-term climate goals—its "fair share"—and an agency reviewing the project under CEQA can conclude that the project will not make a cumulatively considerable contribution to global climate change. The document concludes that if a project does not incorporate these design elements, it should be found to result in a significant climate impact because it would hinder California's efforts to address climate change.

[21] Bay Area Air Quality Management District (BAAQMD). 2023. *California Environmental Quality Act Air Quality Guidelines.* April.

According to Air District's 2022 CEQA Guidelines, a project would have a less than significant impact related to GHG emissions if it would:

a. Include, at a minimum, the following project design elements:

1) Buildings

   a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).

   b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*.

2) Transportation

   a. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

      1) Residential projects: 15 percent below the existing VMT per capita

      2) Office projects: 15 percent below the existing VMT per employee

      3) Retail projects: no net increase in existing VMT

   b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

b. Or be consistent with a local GHG reduction strategy that meets the criteria under *State CEQA Guidelines* Section 15183.5(b).

Construction Activities. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

According to the 2016 SMCCMP EIR, Phase 1 construction GHG emissions were quantified using California Emissions Estimator Model (CalEEMod) Version 2013.2.2, and construction period emissions were computed to be a maximum of 558 metric tons of carbon dioxide equivalent (MT CO_2e) per year during 2016. This estimate was based on 14 projects within Phase 1 of the Master

Plan that would last approximately five years. The proposed project consists of the construction of the rugby clubhouse and athletic field lighting at three fields on campus, that is within the scope of construction outlined in the 2016 2016 SMCCMP EIR. In addition, per Air District guidelines outlined above, if a project meets certain criteria it would have a less than significant impacts related to GHG emissions. The proposed project would meet applicable criteria and as such would continue to have a less than significant impact as it relates to construction GHG emissions, consistent with the 2016 SMCCMP EIR.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Town of Moraga's Climate Action Plan (CAP) does not meet the State's requirements for a local GHG reduction strategy; therefore, the Town's CAP would not be applicable for CEQA streamlining under the Air District thresholds. Therefore, this section evaluates the proposed project's consistency with the Air District's project design elements and whether there are any new impacts not addressed in the 2016 SMCCMP EIR.

Natural Gas Usage. According to the Air District, a less than significant GHG impact would occur if the project does not include natural gas appliances or natural gas plumbing. The proposed project would be all-electric and would not include the use of natural gas. Therefore, the proposed project would be consistent with the Air District's project design element related to natural gas and would be consistent with the Air District's GHG emission thresholds. As such, the proposed project would not generate significant GHG emissions that would have a significant effect on the environment.

Energy Usage. The project must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*. Energy use consumed by the proposed project would be associated with electricity consumption and fuel used for vehicle trips associated with the project and would not be wasteful or inefficient. See Section 4.5, Energy, above.

Vehicle Miles Traveled. To meet the Air District's vehicle miles traveled (VMT) threshold, the project must achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory). As discussed in Section 4.13, Transportation, the proposed project is considered a small project generating fewer than 100 daily trips. Therefore, the proposed project is screened from a VMT analysis with the presumption of a less than significant transportation impact, and no VMT mitigation is required.

Electric Vehicle Requirements. This criterion requires that the project achieve compliance with off-street electric vehicle requirements in the most recently adopted version of the CALGreen Code Tier 2 measures. The proposed project would not provide any vehicle parking spaces; therefore, this project design feature would not be applicable to the proposed project.

As discussed above, the proposed project would not conflict with the Air District's project design elements related to natural gas, energy, VMT, or electric vehicle requirements. Therefore, the proposed project would be consistent with the Air District's GHG emission thresholds. As such, the proposed project would not generate GHG emissions that would have a significant effect on the environment and this impact would be less than significant, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

In 2020 Saint Mary's College launched its CAP[22] to inventory the College's past GHG emissions and set goals for reducing hose emissions by a given time frame. Some applicable goals outlined in the College CAP include:

- 100 percent LED lighting by 2030
- Switch all energy accounts to all renewable energy portfolio
- 50 percent on-site renewable energy by 2050

The proposed project consists of the construction of a new rugby clubhouse and athletic field lighting at three existing athletic fields. Best management practices such as sustainable design elements would be implemented during construction and operation of the proposed rugby clubhouse as required by the 2022 California Energy Code and CALGreen Code standards. The proposed athletic field lighting would consist of Total Light Control (TLC) for LED luminaires, which save energy and utilize light efficiently by keeping it onto the targeted field and out of the surrounding neighborhood and night sky.

Given the above, the proposed project would be consistent with the Town's CAP and the College's CAP. As discussed in Section 4.2, Air Quality, the proposed project would be consistent with the Air District 2017 Clean Air Plan. Therefore, consistent with the 2016 SMCCMP EIR, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. This impact would remain less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

[22] Saint Mary's College of California. 2020. *Climate Action Plan*.

4.8 HAZARDOUS MATERIALS

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☒	☐	☐	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
g. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☒	☐	☐	☐

4.8.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed hazardous materials impacts associated with campus improvements and development, including the originally proposed rugby clubhouse, and concluded the following:

a. *Routine transport, use, or disposal of hazardous materials*: Less than Significant Impact; No mitigation required.

b. *Hazardous materials upset and accident*: Less than Significant Impact; No mitigation required.

c. *Hazardous materials emissions within one-quarter mile of school*: No Impact; No mitigation required.

d. *Hazardous materials site:* No Impact; No mitigation required.

e. *Airport Safety Hazards*: No Impact; No mitigation required.

f. *Interference with emergency response or evacuation plans*: Less than Significant Impact; No mitigation required.

g. *Wildland fire hazards*: Less than Significant Impact; No mitigation required.

4.8.2 Discussion of Project Impacts

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Hazardous materials used during construction of the proposed project would be managed in accordance with existing requirements and programs, including the Town of Moraga Grading Permit requirements.[23] Requirements include, but are not limited to, BMPs for hazardous material storage and soil stockpiles, inspections, maintenance, and containment of releases to prevent runoff. Additionally, a hazardous material inventory list would be developed, proper training would be provided for workers handling hazardous materials, and hazardous materials would be properly stored and disposed of in accordance with applicable regulations.[24] Operation of the rugby clubhouse project would require small quantities of the same types of custodial and maintenance materials currently used at the campus. As such, the athletic field lighting and rugby clubhouse would not create a significant hazard through routine transport, use, or disposal of hazardous materials, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

During construction, hazardous materials such as fuels, sealants, paint, and adhesives would be transported and used on the campus, creating the potential for small releases of these materials to occur during construction activities. However, requirements discussed under Section 4.8.2.a would reduce these impacts to a less-than-significant level, consistent with the 2016 SMCCMP EIR. Requirements include, but are not limited to, BMPs for hazardous material storage and soil stockpiles, inspections, maintenance, and containment of releases to prevent runoff. Additionally, a hazardous material inventory list would be developed, proper training would be provided for workers handling hazardous materials, and hazardous materials would be properly stored and

[23] Moraga, California – Municipal Code. n. d. Title 14 – Grading.
[24] Personal communication between Florentina Craciun LSA and Brian Yung, June 26, 2024.

disposed of in accordance with applicable regulations.[25] No large quantities of hazardous materials would be present during operation of the proposed project that would present a significant risk of hazardous materials upset and accident. Consistent with the 2016 SMCCMP EIR, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

There are no elementary schools or secondary schools within one-quarter mile of the project site. Consistent with the 2016 SMCCMP EIR, the athletic field lighting and rugby clubhouse project would not result in significant impacts related to hazardous emission, materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The campus does not include any hazardous materials sites, including sites compiled pursuant to Government Code Section 65962.5. Consistent with the 2016 SMCCMP EIR, the athletic field lighting and rugby clubhouse updates project would have a less than significant impact related to hazardous materials sites. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The campus is not located within an airport land use plan. The nearest public airport is Oakland International Airport, located approximately 10 miles southwest of the project site. Consistent with the 2016 SMCCMP EIR, the athletic field lighting and rugby clubhouse updates project would have less than significant impacts related to an airport land use plan. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

[25] Personal communication between Florentina Craciun LSA and Brian Yung, June 26, 2024.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Moraga-Orinda Fire District (MOFD) would review the project to ensure it meets the standards for emergency vehicle access and emergency response needs. This would reduce any impacts related to impairment or interference with an emergency response or evacuation plan to a less-than-significant level, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

g. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project is located within the Wildland-Urban Interface and would be required to comply with Town of Moraga General Plan Policy PS2.13, which requires the application of special fire protection standards to new development, implementation of fire prevention measures, and use of fire resistant exterior materials consistent with applicable building codes and standards. Additionally, the proposed project would be subject to review by MOFD and required to comply with measures to prevent the ignition and spread of wildfires and protect the projects from wildland fire hazards. Furthermore, new building construction is required to comply with Chapter 7A of the CBC, including specifications for roofing, attic ventilation, exterior walls, decking and floors, and ancillary buildings and structures. Consistent with the 2016 SMCCMP EIR, wildland fire hazards would remain at a less-than-significant level. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.9 WATER QUALITY AND HYDROLOGY

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in a substantial erosion or siltation on- or off-site;	☒	☐	☐	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☒	☐	☐	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☒	☐	☐	☐
iv. impede or redirect flood flows?	☒	☐	☐	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☒	☐	☐	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.9.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed water quality and hydrology impacts associated with campus improvements and development, and concluded the following:

a. *Violation of water quality standards or other degradation of water quality*: Less than Significant; No mitigation required.

b. *Groundwater supplies/recharge impacts*: No Impact; No mitigation required.

c. *Alteration of drainage patterns resulting in erosion or siltation; contribution of runoff exceeding capacity:* Less than Significant; No mitigation required.

d. *Risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone:* No Impact; No mitigation required.

e. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan:* The 2016 Program EIR did not analyze this impact.

4.9.2 Discussion of Project Impacts

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Because the proposed project would disturb more than 50 cubic yards of soil, the proposed project would require a grading permit and the preparation and implementation of an erosion control plan as stipulated by Section 14.24 of the Town's Municipal Code. Additionally, the proposed project would be required to prepare and implement a stormwater control plan to minimize water quality impacts during construction as stipulated by Section 14.52 of the Town's Municipal Code. Furthermore, as the proposed project would create more than 5,000 square feet of impervious surface, the incorporation of post-construction stormwater management provisions including site design measures and low-impact design (LID) standards would be required, as stipulated by the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (MRP).[26] Compliance with the Town's Municipal Code (Sections 14.24 and 14.52) and the MRP regulations would ensure that the proposed project would not violate any water quality standards or waste discharge requirements, and impacts would remain less than significant consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Potable water for the rugby clubhouse would be sourced from a new on-site groundwater well that would be stored in a 10,000-gallon tank, while fire hydrants would connect to an existing 10-inch East Bay Municipal Utility District (EBMUD) water line. The well would be used exclusively for the proposed rugby clubhouse and therefore would not substantially decrease groundwater supplies. Any groundwater dewatering required during project construction would be limited in scope and extent and would be subject to permitting from the Central Conta Costa Sanitary District (CCCSD) and the Regional Water Quality Control Board (RWQCB). Although the proposed rugby clubhouse would result in increases in impervious surfaces, it would not divert precipitation in a manner that would significantly interfere with groundwater recharge, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related

[26] California Regional Water Quality Control Board San Francisco Bay Region. 2022. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008.* May 11.

to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

As discussed above, the proposed project would be subject to requirements of the Town's Municipal Code (Sections 14.24 and 14.52) and the MRP. Compliance with existing regulatory requirements would ensure that the proposed project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation, result in flooding on-or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Impacts would be less than significant consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

As discussed in the 2016 SMCCMP EIR, the project site is not located within a flood hazard, tsunami, or seiche zone. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Subsequent to 2016 SMCCMP EIR, the CEQA checklist was updated to assess whether a project could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. In the Bay Area, including the project site, the State Water Quality Control Board is responsible for implementation of the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan), which establishes beneficial water uses for waterways and water bodies within the region. As previously discussed, the proposed project would comply with existing NPDES permit requirements, including the MRP, and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff as required by the Town's Municipal Code (Sections 14.24 and 14.52). Compliance with these regulatory requirements would ensure that the proposed project would not degrade or alter water quality, causing the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As such, the proposed project would not result in water quality impacts that would conflict with the Basin Plan.

Construction and operational impacts related to a conflict with the Basin Plan would be less than significant.

The Sustainable Groundwater Management Act (SGMA), which was enacted in September 2014, requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. The SGMA requires the formation of local Groundwater Sustainability Agencies (GSAs), which are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins. The project site is not located within a groundwater basin that is subject to SGMA. Therefore, there would be no impact related to conflict with or obstruction of a sustainable groundwater management plan. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.10 NOISE

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☒	☐	☐	☐

4.10.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed noise impacts associated with campus improvements and development, including the originally proposed rugby clubhouse, and concluded the following:

a. *Generation of temporary or permanent noise increases*: Less Than Significant Impact with the implementation of Mitigation Measures NOISE-1a through NOISE-1c and NOISE-2a through NOISE-2d, which add measures to the Master Plan Noise Standards that avoid baseball games with high attendance capacity during evening hours; notify nearby residences of stadium in advance of any stadium activity; implement of mechanic equipment selection and acoustical shielding; limit construction during set hours; require that use of heavy construction equipment use noise reduction measures; submit procedures for review to the Town of Moraga; and schedule construction activities when classes are not in session.

b. *Groundborne vibration or noise*: Less than Significant Impact with the implementation of Mitigation Measures NOISE-3a through NOISE-3b, which adds the measures to the Master Plan Noise Standards that require the College to notify occupants of the construction activity involving pile driving withing 1,000 feet of an academic building; and the preparation of a vibration impact assessment prior to start of pile driving.

c. *Airport noise*: Less than Significant Impact; No mitigation required.

The information and analysis in this section is based, in part, on the *Noise Impact Analysis Memorandum for the Saint Mary's College Campus Improvements in Moraga California* (Noise Impact Analysis Memorandum)[27] (Appendix A) prepared by LSA Associates, Inc. on April 9, 2025.

4.10.2 Discussion of Project Impacts

a. Would the project cause generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction. Construction of the proposed project would result in a temporary increase in ambient noise levels in the immediate vicinity of the project site. Saint Mary's Stadium is located approximately 300 feet south of the nearest residences (off-site residential communities along Bollinger Canyon Road), the softball field is approximately 370 feet southeast of the nearest residences (off-site residences along Fernwood Drive), and the baseball stadium is approximately 300 feet northwest of the nearest residences (on-campus residences [Augustine Hall]). Additionally, all construction activities associated with the proposed project are located greater than 250 feet from on-campus academic buildings and residence halls. The proposed project would be required to implement Mitigation Measure NOISE-2a that limits construction activities to the hours of 8:00 a.m. to 5:00 p.m. on weekdays, with no construction permitted on Saturdays, Sundays, or holidays unless otherwise approved by the Town. Additionally, the project would be required to implement Mitigation Measure NOISE-2b, which requires the implementation of noise reduction measures during construction. With implementation of Mitigation Measures NOISE-2a and NOISE-2b, temporary impacts to ambient noise levels would be less than significant consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

Operation. Games played at the stadium and softball field would start no later than 6:30 p.m. and end no later than 10 p.m. In the event of extra innings, games at the baseball field will end no later than 11 p.m. Potential impacts associated with the proposed project would occur if extending baseball games into the nighttime hour past 10:00 p.m. would cause a 5 A-weighted decibels (dBA) increase in ambient noise. Using information from the 2016 SMCCMP EIR, typical baseball game noise level when adjusted for distance would approach 37.2 dBA equivalent continuous sound level (Leq) at the nearest residences to the north. This level would be below the measured quietest nighttime ambient noise level of 38 dBA Leq, thus, resulting in an increase of less than 3 dBA and would not reach the perceptible threshold. Typical sporting events generate noise levels of up to about 57 dBA Leq at a distance of 100 feet from the infield with maximum noise levels of about 65 dBA at 100 feet. While noise levels can fluctuate based on attendance, noise levels generated by the sound system or balls being hit would be about the same regardless of the number of people in attendance. Noise levels generated during 'typical' games would not be anticipated to change from existing levels. Larger events, approaching the 950-seat capacity at the baseball stadium, are anticipated to occur once or twice a year –once for the high school playoffs and once if the St.

[27] LSA. 2025. *Noise Impact Analysis Memorandum for the Saint Mary's College Campus Improvements in Moraga California.*

Mary's College team makes the NCAA playoffs and hosts the event. While atypical games could occur once or twice a year, these games would not be anticipated to generate significant impacts with the implementation of Mitigation Measure NOISE-1a and NOISE-1b, both of which add standards to the Draft Master Plan Noise Standards. The proposed project would not generate any new or worse impacts as compared to those analyzed in the 2016 SMCCMP EIR.

Additionally, based on the October 2024 noise measurement presented in the Noise Impact Analysis Memorandum (Appendix A), the loudest measured noise level of the existing activities at the Saint Mary's Stadium is up to 60.1 dBA Leq near the closest sensitive receptors to the north during the measured soccer match, compared to the 59.1 dBA Leq for daytime noise levels. The measured data indicates that noise impacts at the surrounding sensitive uses as compared to levels without stadium activities would be less than 5 dBA above ambient conditions, during the allowed hours of operation.

The proposed rugby clubhouse may include mechanical equipment such as heating, ventilation, and air conditioning (HVAC) systems that would generate noise which could potentially affect sensitive off-site and on-campus receptors. However, Mitigation Measure NOISE-1c, which requires the implementation of mechanic equipment selection and acoustical shielding, would reduce this potentially significant impact to a less-than-significant level. In addition, as outlined in Section 3.0 Project Description, the rugby clubhouse would not include any amplified noise outside of the structure, therefore noise impacts at the surrounding sensitive uses as compared to levels without the clubhouse would be similar to existing conditions. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines.*

b. Would the project cause generation of excessive groundborne vibration or groundborne noise levels?

Construction. Construction of the proposed rugby clubhouse and athletic field lighting would not require pile driving and all nearby on-site and off-site residences are located greater than 300 feet away from all of the proposed construction sites. At this distance, none of the nearby off-site residences or sensitive receptors would be expected to experience vibration damage or human annoyance impacts. Additionally, there are no on-campus buildings within 50 feet of the proposed construction sites. As such, the potential for students and staff to be disturbed by construction-generated vibration would remain less than significant, consistent with the 2016 SMCCMP EIR.

Operation. Once operational, the proposed project would not include uses or equipment that would generate perceptible vibration or result in excessive vibration impacts. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines.*

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

As addressed in the 2016 SMCCMP EIR, the Saint Mary's College campus is not located within an area covered by an airport land use plan, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.11 PUBLIC SERVICES

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?	☒	☐	☐	☐
ii. Police protection?	☒	☐	☐	☐
iii. Schools?	☐	☒	☐	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

4.11.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed public services impacts associated with campus improvements and development, , including the originally proposed rugby clubhouse, and concluded the following:

i. Impacts on fire protection: Less than Significant Impact; No mitigation required.

ii. Impacts on police protection: Less than Significant Impact; No mitigation required.

iii. Impacts on schools: The 2016 Program EIR did not analyze this impact.

iv. Impacts on parks: The 2016 Program EIR did not analyze this impact.

v. Other public facilities: The 2016 Program EIR did not analyze this impact.

4.11.2 Discussion of Project Impacts

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. Fire protection?

As set forth in the 2016 SMCCMP EIR, development in accordance with the 2016 SMCCMP EIR could increase the demand for fire protection services, but not to the extent that new or physically altered fire stations would be needed. The proposed project would draw additional participants at the project as part of games and college events. However, the proposed project would not increase participants over existing stadium capacities.

The project is located within the Wildland-Urban Interface and would be required to comply with Town of Moraga General Plan Policy PS2.13, which requires the application of special fire protection standards to new development, implementation of fire prevention measures, and use of fire resistant exterior materials consistent with applicable building codes and standards. Additionally, the proposed project would be subject to review by MOFD and required to comply with measures to prevent the ignition and spread of wildfires and protect the projects from wildland fire hazards. Furthermore, new building construction is required to comply with Chapter 7A of the CBC, including specifications for roofing, attic ventilation, exterior walls, decking and floors, and ancillary buildings and structures. Compliance with these measures would ensure that the proposed project implements appropriate fire protection and emergency access. Therefore, fire protection services would not substantially increase, affecting service ratios, response times, or performance objectives. Consistent with the 2016 SMCCMP EIR, the athletic field lighting and rugby clubhouse updates project would have a less than significant impact on fire protection services. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

ii. Police protection?

As set forth in the 2016 SMCCMP EIR, development in accordance with the 2016 SMCCMP could increase the demand for police protection services, but not to the extent that new or physically altered police stations would be needed. The athletic field lighting portion of the project would likely draw additional spectators for night sports games, which would primarily consist of students and local residents. In addition, the proposed project would facilitate additional events at the rugby clubhouse, as described in Section 3.0, Project Description. However, the College currently holds similar events at the campus and provides on campus security services. The proposed project would not increase sports events on campus and any increase in events would comply with existing events policies. As such, the need for police protection services would not substantially increase, affecting service ratios, response times, or performance objectives. Consistent with the 2016 SMCCMP EIR, the proposed project would have a less than significant impact on police protection services. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

iii. Schools?

The proposed project would not increase the demand for school facilities to the extent that new or physically altered schools would be needed. The proposed project would serve the Saint Mary's College and Town-sponsored events. Construction and operation of the proposed project would occur on the College campus and would not generate additional elementary, middle, and high

school students that would affect the Moraga School District serving K–8th grade students, or Acalanes Union High School District serving 9th–12th grade students. Therefore, the athletic field lighting and rugby clubhouse updates project would have no impact on local public schools in the Town of Moraga. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

iv. Parks?

The proposed project would include the construction of a new rugby clubhouse, and the addition of lighting to three existing sports fields. The 2016 SMCCMP EIR analyzed modernization and recreational facility improvements. With the proposed improvements, on-campus recreational facilities are expected to adequately serve the needs of the Saint Mary's College population. Therefore, impacts would be less than significant as the project would not increase the demand for parks to the extent that new or physically altered park or recreational facilities would be needed. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

v. Other public facilities?

The athletic field lighting and rugby clubhouse updates project would not increase the demand for other public facilities to the extent that new or physically altered facilities would be needed. The proposed project would serve the Saint Mary's College and Town-sponsored events. Construction and operation of the proposed project would occur on the College campus and would not generate an additional population beyond the existing student, faculty, staff, and Town population. Therefore, the athletic field lighting and rugby clubhouse updates project would have less than significant impacts on public facilities in the Town of Moraga. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.12 RECREATION

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐

4.12.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed recreation impacts associated with campus improvements and development, , including the originally proposed rugby clubhouse, and concluded the following:

a. *Increase existing parks or recreational facilities*: Less than Significant Impact; No mitigation required.

b. *Include recreational facilities or require construction*: Less than Significant Impact with the implementation of Mitigation Measure REC-1, which requires compliance with all mitigation measures in the 2016 Program EIR.

4.12.2 Discussion of Project Impacts

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed project would include the construction of a new rugby clubhouse, and the addition of lighting to three existing sports fields. The 2016 SMCCMP EIR analyzed modernization and recreational facility improvements. With the proposed improvements, on-campus recreational facilities are expected to adequately serve the needs of the Saint Mary's College population. Therefore, the project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, compliance with all mitigation measures identified in this Addendum would ensure that the impact of the proposed recreational facilities would be reduced to a less-than-significant level. Consistent with the 2016 SMCCMP EIR, impacts would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related

to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.13 TRANSPORTATION

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d. Result in inadequate emergency access?	☒	☐	☐	☐

4.13.1 2016 Program EIR Analysis

The 2016 Program EIR analyzed transportation impacts associated with campus improvements and development, including the originally proposed rugby clubhouse, and concluded the following:

a. *Conflict with circulation plans, ordinances, or policies*: Less than Significant with the implementation of Mitigation Measures TRAFFIC-1 and TRAFFIC-2, which require the preparation of a construction management plan with information about construction work hours, staging areas, and measures to reduce construction worker single-occupant vehicle travel. Mitigation Measure TRAFFIC-2 requires that the College prepare and update an Event Traffic Management Plan. Mitigation Measures TRAFFIC-3a through TRAFFIC-3b require revision to the Master Plan Design Guidelines and Master Plan Facilities Plan.

b. *Conflict with CEQA Guidelines 15064.3*: The 2016 Program EIR Analysis did not analyze this Impact.

c. *Hazard due to geometric design feature*: Less than Significant Impact with the implementation of Mitigation Measures TRAFFIC-4a through TRAFFIC-4b, which require collaboration between Town of Moraga Planning Department and Public Works Department in the design of the roundabout at Saint Mary's Road/Saint Mary's Parkway; and collaboration in the design of the roundabout at Saint Mary's Parkway/De La Salle Drive.

d. *Emergency Access Impacts*: Less than Significant Impacts; No mitigation required.

The information and analysis in this section is based, in part, on the *Transportation Analysis for the Saint Mary's College Campus Master Plan Update Project in Moraga, California*[28] (Appendix B) prepared by LSA Associates, Inc., on February 18, 2025.

4.13.2 Discussion of Project Impacts

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Construction. Construction activities associated with the proposed project would increase traffic on the roadways serving the campus, which could increase congestion and queues, potentially impacting pedestrian, bicycle, and transit mobility and efficiency during construction, similar to the analysis in the 2016 SMCCMP EIR. However, the proposed project would be required to implement Mitigation Measure TRAFFIC-1, which requires the preparation of a construction management plan for submission to the Town for review and comment. With implementation of Mitigation Measure TRAFFIC-1, construction-related impacts to the existing circulation system would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

Operation. The proposed project may change the expected attendance at sports events, however any increase would not be above the approved stadium capacity studied in the 2016 SMCCMP EIR. The clubhouse is expected to accommodate approximately 30 to 35 events per year, which include game watch parties and special events such as weddings and celebrations. Such events already occur on campus; the clubhouse would provide additional locations and options. Most of these events would be associated with existing sporting events already occurring on campus, which were analyzed in the 2016 SMCCMP EIR. However, the clubhouse would include an increase of approximately 4,000 square feet of space. ITE Community Center (ITE Code 495) was assumed to approximate the potential trip generation rates for this increase, with a typical generation rate of 6.24 trips per 1,000 square feet. As such, the proposed project would generate approximately 25 new daily trips

Project trips would generally occur within a concentrated period immediately before and after scheduled events. As outlined in the 2016 SMCCMP EIR the proposed project would be required to implement Mitigation Measure TRAFFIC-2, that requires the implementation of an Events Traffic Management Plan. These measures are anticipated to reduce peak-hour trip generation rates by approximately 10 to 20 percent. Given the intermittent nature of special events, the relatively limited frequency and duration of such events, the anticipated trip generation, and the implementation of trip reduction measures, special event traffic would not result in a significant transportation impact under CEQA.

As detailed above the proposed stadium lights would not increase trips to the project site than those already analyzed in the 2016 SMCCMP EIR. The proposed special events are consistent with existing on-site activities, primarily attracting attendees from the local community, which results in

[28] LSA. 2025. *Transportation Analysis for the Saint Mary's College Campus Master Plan Update Project in Moraga, California*.

low vehicle miles traveled (VMT) generation rates. To further minimize VMT, the project includes an event management traffic plan that promotes carpooling and other strategies, as outlined in Mitigation Measure TRAFFIC-2. Given the local draw of these events and the implementation of VMT-reducing measures, the project is expected to result in a less than significant VMT impact. Therefore, the proposed project does not require a VMT analysis with the presumption of a less than significant transportation impact, and no VMT mitigation is required.

The proposed project does not include any changes to the existing public transportation, bicycle, or pedestrian facilities on the campus. As such, the proposed project would not conflict with a program, plan, ordinance or policy addressing transit, roadway, bicycle or pedestrian facilities. With implementation of Mitigation Measure TRAFFIC-2, operation-related impacts to the existing circulation system would be less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

California revised its *State CEQA Guidelines* on December 28, 2018. Among the revisions, vehicle delay and LOS were removed from consideration under CEQA. The current *State CEQA Guidelines* prescribe the evaluation of transportation impacts on a project's effect on VMT. As part of the certification of the current *State CEQA Guidelines*, a deadline of July 1, 2020, was established for jurisdictions to adopt thresholds for evaluation of transportation impacts according to VMT. The *State CEQA Guidelines* Section 15064.7(c) states the following:

> When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency is supported by substantial evidence.

Simultaneous with clearance of the current *State CEQA Guidelines*, the Governor's Office of Planning and Research (OPR) released the *Technical Advisory for Evaluating Transportation Impacts under CEQA* (Technical Advisory) (2018). The OPR Technical Advisory includes screening criteria for various project types that can be screened from project-level assessment because they are presumed to have a less-than-significant impact. The examples of projects that could be screened include projects in transit priority areas, projects in low VMT areas, and certain project types that are local-serving or generate a small number of trips. Per the OPR Technical Advisory:

> Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.

Neither the Town nor the County of Contra Costa has adopted its own VMT guidelines. As such, the OPR Technical Advisory was utilized for VMT assessment purposes. The proposed project (i.e., new

rugby clubhouse and the addition of lighting) would not increase student enrollment capacity and would only generate approximately 25 new daily trips based on the 4,000 square feet increase in space compared with the 2016 SMCCMP EIR. As such, the proposed project is considered a small project generating fewer than 110 daily trips per the OPR Technical Advisory.

In addition, as outlined in Section 2.0 and 3.0 the clubhouse would be used for events related to sports events, as well as other events like weddings or celebrations, that already take place on campus. These events would only take place on an occasional basis and would not increase regional VMT.

Therefore, the proposed project is screened from a VMT analysis with the presumption of a less than significant transportation impact, and no VMT mitigation is required. Further, the proposed project would not change the conclusions of the 2016 SMCCMP EIR and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project does not include any changes to existing roadways or transportation-related infrastructure. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. Would the project conflict result in inadequate emergency access?

The proposed project does not include any changes to existing roadways or transportation-related infrastructure and would not substantially increase traffic to and from the campus and thus would not affect emergency response times. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.14 TRIBAL CULTURAL RESOURCES

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

4.14.1 Discussion of Project Impacts

The 2016 SMCCMP EIR did not analyze impacts on tribal cultural resources, as this topic was not mandated for inclusion under CEQA until 2016.

Under the 2016 SMCCMP EIR Section 4.4, Cultural Resources, a Sacred Lands File check was conducted through the National American Heritage Commission (NAHC) on July 27, 2015. The NAHC responded with negative results, as there was no identification of any resources in the project area. A list of individuals was contacted with information on the projects under the Master Plan, yet only one individual responded, stating she had no concerns regarding the projects.

Construction and operational impacts of the proposed project would be the same or similar to those impacts identified in the 2016 SMCCMP EIR. As discussed in Section 4.4, Cultural Resources, of the 2016 SMCCMP EIR, archaeological resources have not been identified at the Saint Mary's campus site and the campus site has been extensively modified over time, and the likelihood of discovering archaeological resources would be low. Additionally, there are no known human remains, including those interred outside of formal cemeteries located at the Saint Mary's campus site. Nevertheless, the proposed project would be subject to Mitigation Measures CULT-2a through CULT-2b, which require the review of which require the implementation of appropriate monitoring activities,

construction worker training sessions, notification activities, proper procedure if an archaeological deposit is encountered, and Mitigation Measure CULT-3, which requires specific actions to take in the event of accidental discovery of human remains during construction. Implementation of these mitigation measures would reduce potential impacts on tribal cultural resources to a less-than-significant level, consistent with the 2016 SMCCMP EIR. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

4.15 UTILITIES AND SERVICE SYSTEMS

Would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

4.15.1 2016 Program EIR Analysis

a. *Require construction of new water, wastewater treatment, electric, natural gas facilities:* Less than Significant Impact with the implementation of Mitigation Measures UTIL-1a through UTIL-1b, and Mitigation Measure UTIL-3, which require contact with the East Bay Municipal Utility District (EBMUD) New Business Office to request water service estimate; that building construction and renovations maintain integrity of existing EBMUD distribution lines and Aqueduct No. 2; and compliance with the Central Contra Costa Sanitary District (CCCSD) design and plan review standards to address wastewater facility impacts

b. *Have sufficient water supplies*: Less than Significant Impact with the implementation of Mitigation Measures UTIL-2a through UTIL-2b, which require compliance with California Code ordinances and EBMUD regulations; and a "will serve" letter from EMBUD prior to issuance of first building permit.

c. *Adequate capacity to serve project wastewater demand*: Less than Significant Impact; No mitigation required.

d. *Solid waste in excess*: Less than Significant Impact; No mitigation required.

e. *Comply with solid waste regulations*: Less than Significant Impact with the implementation of Mitigation Measures UTIL-4a through UTIL-4b, which require the preparation of a Waste Management plan for the construction phase of each project; and that each site plan provides facilities for ongoing recycling and waste collection after project is in operation.

4.15.2 Discussion of Project Impacts

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water: Potable water for the proposed rugby clubhouse would be sourced from a new on-site groundwater well that would be stored in a 10,000-gallon tank, while fire hydrants would connect to an existing 10-inch EBMUD water line. The proposed project would be required to comply with Mitigation Measures UTIL-1a and UTIL-1b, which require a water service estimate from EBMUD and that design drawings be submitted to EBMUD to ensure the integrity of existing EBMUD distribution pipelines are maintained. These measures would ensure that construction of the proposed clubhouse and associated improvements including the proposed EBMUD connection would not result in any significant environmental effects. The proposed groundwater well would be permitted by the Contra Costa County Land Use Program and would be constructed in compliance with all applicable land use regulations and therefore would not result in any significant environmental effects. The athletic field lighting portion of the proposed project would not require the consumption of additional water than what was originally analyzed in the 2016 SMCCMP EIR, as it would not increase stadium capacity.

Wastewater: The proposed rugby clubhouse facility would connect to existing sewer mains within the Saint Mary's College campus and would be subject to Mitigation Measure UTIL-3, which requires CCCSD review and approval of construction plans. The athletic field lighting portion of the proposed project would not generate additional needs for wastewater facilities than what was originally analyzed in the 2016 SMCCMP EIR, as it would not increase stadium capacity.

Stormwater: The proposed project would include a 297-square-foot bioretention area that would be located adjacent to the proposed rugby clubhouse on the east side. On-site stormwater drainage infrastructure would be designed consistent with the requirements of the MRP[29] and would be constructed in conformance with the Town's standards. The proposed drainage infrastructure needed to accommodate stormwater runoff would be appropriately sized such that expanded stormwater facilities would not be required.

[29] California Regional Water Quality Control Board San Francisco Bay Region. 2022. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008.* May 11.

Electric Power: The proposed project would connect to existing electric facilities and would not require the construction of additional electric power facilities as it would include sustainability features to minimize usage of electric power.

Because the proposed project would connect to existing utility services within or adjacent to the project site, and there is sufficient excess capacity within those systems to accommodate project demands, the relocation or reconstruction of new or expanded water, wastewater treatment or stormwater drainage, electric power, or telecommunications facilities would not be required. No modifications to utility infrastructure would be necessary outside of the immediate project site footprint. Therefore, the proposed project would be consistent with the 2016 SMCCMP EIR, and impacts associated with the construction or expansion of utility line facilities would be less than significant with the implementation of Mitigation Measures UTIL-1a, UTIL-1b, and UTIL-3. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potable water for the rugby clubhouse project would be sourced from a new on-site groundwater well that would be stored in a 10,000-gallon tank, while fire hydrants would connect to an existing 10-inch EBMUD water line. EBMUD's water demand projections indicate that EBMUD can typically serve all development within its service area during wet years and imposes water rationing during dry years; therefore, water supplies are expected to be adequate to serve new development associated with the Master Plan. However, water demand fluctuates over time and the Master Plan has a 15-year horizon so water availability would need to be confirmed for future development. The proposed project would be subject to Mitigation Measures UTIL-2a and UTIL-2b, which require compliance with the "Model Water Efficient Landscape Ordinance" and a "will-serve" letter by EBMUD to ensure that sufficient water supplies would be available to serve the proposed project. The athletic field lighting portion of the proposed project would not require the consumption of additional water than what was originally analyzed in the 2016 SMCCMP EIR, as it would not increase stadium capacity. Therefore, the proposed project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant with the implementation of Mitigation Measures UTIL-2a and UTIL-2b. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

c. Would the project result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As described in the 2016 SMCCMP EIR, wastewater generation from implementation of the entire Master Plan would represent less than 1 percent of the plant's discharge capacity and Central Contra Costa Sanitary District (CCCSD) anticipates that its treatment plant will have sufficient capacity for its service area for several decades. The athletic field lighting portion of the project would not require wastewater treatment services, and the CCSD has adequate capacity to serve the

proposed rugby clubhouse. The proposed project would be consistent with the 2016 SMCCMP EIR, and impacts would remain less than significant. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

d. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid waste would be generated during both the construction and operation of the proposed project. As discussed in the 2016 SMCCMP EIR, solid waste from the Saint Mary's College Campus is disposed of at the Keller Canyon Landfill. The Keller Canyon Landfill has a daily throughput of 3,500 tons with a remaining capacity of 63,408,410 cubic yards and an estimated ceased operation date of 2050.[30] As discussed in the 2016 SMCCMP EIR, the Keller Canyon Landfill would have sufficient capacity to accommodate the solid waste disposal needs of the construction and operation of the Master Plan. The proposed project would not increase the need for solid waste disposal beyond that already analyzed. Therefore, the proposed project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant. The proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Construction and operation of the proposed project would generate solid waste. However, the proposed project would be subject to Mitigation Measures UTIL-4a and UTIL-4b, which require the preparation of a Waste Management Plan and the provision of facilities for ongoing recycling and collection of other wastes. The proposed project would be consistent with the 2016 SMCCMP EIR, and impacts would be less than significant with the implementation of Mitigation Measures UTIL-4a and UTIL-4b. Therefore, the proposed project would not change the conclusions of the 2016 SMCCMP EIR related to this topic and no further environmental analysis is required pursuant to Section 15162 of the *State CEQA Guidelines*.

[30] CalRecycle. 2025. *SWIS Facility/Site Activity Details, Keller Canyon Landfill (07-AA-0032).* Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4407?siteID=228 (accessed March 27, 2025).

4.16 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Project Impact Adequately Addressed in Earlier Environmental Document	Impact not Examined in 2016 Program EIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

4.16.1 2016 Program EIR Analysis

The 2016 Program EIR did not analyze wildfire impacts, as this topic was not mandated for inclusion under CEQA until 2018.

4.16.2 Discussion of Project Impacts

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Town of Moraga's Emergency Operations Plan[31] and the College's Emergency Preparedness and Response Plan[32] establish emergency protocols applicable to the Town and Saint Mary's College. The project site on the Saint Mary's College Campus is located outside of the State Responsibility Area

[31] Moraga, Town of. 2018. *Town of Moraga Emergency Operations Plan*. Website: https://www.moraga.ca.us/255/Emergency-Operations-Plan#:~:text=The%20Town%20of%20Moraga%20has,Costa%20County%20Community%20Warning%20System (accessed November 27, 2024).

[32] Saint Mary's College. 2019. *Emergency Preparedness and Response Plan.* Website: https://www.stmarys-ca.edu/sites/default/files/2023-01/SMC%20Emergency%20Preparedness%20Plan.pdf (accessed November 27, 2024).

(SRA) but is within two miles of High and Very High Fire Hazard Severity Zones.[33] In addition, the project is within the Wildland Urban Interface (WUI), a zone of transition between unoccupied land and human development. The athletic field lighting and rugby clubhouse updates project would not increase capacity at the Saint Mary's College campus and would not increase traffic congestion which could result in delays on evacuation routes. The MOFD would review the project to ensure it meets the standards for emergency vehicle access and emergency response needs, which would reduce any impacts related to impairment or interference with an emergency response or evacuation plan to a less than significant level.

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The proposed project is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) but is adjacent to a VHFHSZ and a High Fire Hazard Severity Zone (HFHSZ). The proposed project is located within the WUI, a zone of transition between unoccupied land and human development. The Town of Moraga 2040 General Plan identifies various policies relevant to the proposed project including Policies S-3.3, S-3.5, S-3.6, S-3.7, S-3.8, S-3.10, and S-3.12, which requires fire protection measures for new development, minimum fire flow requirements for new development, fire-resistant construction, development review by the MOFD, adequate emergency access, fire protection standards for new developments in wildland-urban interface areas, and fire-resistant landscaping.[34] The proposed project would implement BMPs during construction, such as a safety and security plan, would minimize fire risk during construction. The construction and operation of the athletic field lighting and rugby clubhouse updates project would not exacerbate existing environmental conditions and impacts would be less than significant.

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The proposed project would include installation of a new on-site groundwater well that would be stored in a 10,000-gallon tank and fire hydrants that would connect to an existing 10-inch EBMUD water line. A new fire access road is also proposed along the southern and southeastern edges of the existing Saint Mary's Stadium. The athletic field lighting poles would connect to existing underground utilities. The project would not include installation of infrastructure that would exacerbate fire risk. The athletic field lighting and fire hydrants would connect to existing utilities on site. Therefore, the proposed project would not exacerbate wildfire risk in a manner that would

[33] California Department of Forestry and Fire Protection (CAL FIRE). n.d. Fire Hazard Zone Viewer. Website: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008 (accessed November 27, 2024).

[34] Moraga, Town of. 2040. *Town of Moraga General Plan 2040.* Website: https://www.moraga.ca.us/DocumentCenter/View/9733/Moraga-General-Plan-2040-PDF (accessed April 8, 2025).

require the installation of associated infrastructure and project impacts would be less than significant.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

According to the U.S. Landslide Inventory and Susceptibility Map,[35] the project is located in an area of probable and possible landslides. Structures built in landslide zones would be exposed to an existing risk of landslides or, if improperly constructed, could exacerbate landslide risks. Town General Plan policies such as Policies PS4.6 and PS4.7 establish construction standards that ensure any new construction projects are built to standards with respect to geologic safety.[36] The athletic field lighting and rugby clubhouse would both be constructed in existing developed areas with existing structures such as the athletic fields. Therefore, the project would not exacerbate significant risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts related to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be less than significant.

[35] United States Geological Survey (USGS). n.d. U.S. Landslide Inventory and Susceptibility Map. Website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d (accessed December 2024).

[36] Moraga, Town of. 2002. *Moraga General Plan*. Website: https://www.moraga.ca.us/455/Planning-Documents (accessed December 2024).

5.0 APPLICABLE 2016 PROGRAM EIR MITIGATION MEASURES

Following is the 2016 Program EIR Summary Table of impacts and mitigation measures applicable to the proposed project (**Table E**).

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
Aesthetics			
AESTHETICS-2: The Master Plan would result in increased lighting that could be visible to nearby residents. Such lighting could result in glare if not properly shielded.	Potentially Significant	AESTHETICS-2: As part of any application, the College shall submit lighting plans for review by the Town's Design Review Board to ensure that no significant lighting impacts would occur at off-site locations, especially residences. Such plans shall provide all information, such as photometric analysis, fixture type, location and specifications, as determined necessary by the Planning Director, to document the conditions resulting from the new lighting, as compared to current conditions. Lighting shall be consistent with the Town's Design Guideline ID6. Alternatively, the Design Review Board may delegate approval of lighting plans to the Town's Planning Director. Design review shall occur, at a minimum, for the lighting of any sports fields, outdoor seating areas for the stadium, and any parking areas. Such review would not be required for individual buildings that do not have significant areas of outdoor lighting.	Less than Significant
Air Quality			
AIR-1: Implementation of the Master Plan could expose sensitive receptors to substantial pollutant concentrations.	Potentially Significant	AIR-1: The following text shall be added to the Stewardship and Sustainability section of the Draft Master Plan. The following measures shall be implemented during all construction to reduce the exposure of sensitive receptors to Toxic Air Contaminants (TACs): • All construction equipment, diesel trucks, and generators shall be equipped with Best Available Control Technology (U.S. EPA-certified Tier 4 engine or Engines that are retrofitted with a California Air Resources Board [CARB] Level 3 Verified Diesel Emissions Control Strategy) for emission reductions of oxides of nitrogen (NOx) and particulate matter (PM). • Clear signage at all construction sites shall be posted indicating that diesel equipment standing idle for more than 5 minutes shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate, or other bulk materials. Rotating drum concrete trucks could	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		keep their engines running continuously as long as they were onsite or adjacent to the construction site. • The contractor shall install temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g., compressors). • Stationary petroleum-fuel power equipment shall be positioned as far away from sensitive receptors as possible. • All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • A Certification Statement that the Contractor agrees to comply fully with the diesel particulate matter (DPM) reduction measures described above and acknowledges that a significant violation of the measures shall constitute a material breach of contract shall be submitted to the Town of Moraga's Planning Department prior to any grading or construction. The implementation of Mitigation Measure AIR-1 would reduce this impact to a less-than-significant level.	
Biological Resources			
BIO-1: Master Plan implementation may result in adverse impacts on special-status species known or suspected to occur in the vicinity of the campus. These include a number of special-status animal species and bird nests in active use.	Potentially Significant	BIO-1a: (AMM-1 in Biological Resources Report) An education program shall be conducted, consisting of a brief presentation to explain special-status species concerns to construction contractors, their employees, and any other personnel involved in construction on the Saint Mary's College campus. The program shall include the following: a description of relevant special-status species and their habitat needs as they pertain to the project; a report of the occurrence of these species in the project vicinity, as applicable; an explanation of the status of these species and their protection under the federal and state regulations; a list of measures being taken	Less Than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		to reduce potential impacts on natural resources during project construction and implementation; and instructions on what to do if a special-status species is found on-site. A fact sheet conveying this information shall be prepared for distribution to the above-mentioned people and anyone else who may enter the project site. Upon completion of training, construction-related employees/contractors shall sign a form stating that they attended the training and agree to all of the conservation and protection measures. BIO-1b: (AMM-2 in Biological Resources Report) A biological monitor shall be present during initial vegetation removal and ground-disturbing activities. ~~the construction activities at the Secondary Ingress/Egress crossing of the unnamed tributary drainage. A biological monitor shall be present during the construction activities where improvements to the existing crossing or vegetation removal at the crossing are necessary.~~ The biological monitor shall arrive early each morning to search the work area for special-status species ~~California red-legged frog~~ prior to the start of work and shall remain on-site until construction work stops each day. The monitor shall have the authority to stop work if a special-status species ~~California red-legged frog~~ is found in the work area. Work shall be stopped until the species has moved on its own out of harm's way. The monitor shall also have the authority to stop work if adverse impacts on Las Trampas Creek riparian corridor~~(approximately 50 feet from the proposed Secondary Ingress/Egress alignment)~~ occur, and identify the measures to be implemented before work can continue. BIO-1c: (AMM-3 in Biological Resources Report) Construction of the Master Plan projects shall take place outside of the avian nesting season (February 1 through August 31) to the extent feasible. If construction is scheduled during the nesting season of migratory birds, trees and shrubs shall be surveyed by a qualified biologist for nesting birds within the following buffers of the construction site:	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		250 feet for nesting raptors 100 feet for all other nesting birds ~~nesting passerines~~ A qualified biologist, in consultation with the California Department of Fish and Wildlife (CDFW), shall determine the appropriate buffer size and delineate the buffer using fencing, pin flags, and/or yellow-caution tape, as appropriate. The buffer zone shall be maintained around all active nest sites until the young have fledged and are foraging independently. In the event that an active nest is found within the project site after the completion of pre-construction surveys and after construction begins, all construction activities shall stop until a qualified biologist has consulted the CDFW regarding the appropriate Avoidance and Minimization Measures (AMMs) and the measures have been completed. BIO-1d: (AMM-4 in Biological Resources Report) A qualified biologist shall visually inspect trees or structures to be removed or demolished for bat roosts within 7 days prior to their removal. The biologist shall look for signs of bats including sightings of live or dead bats, bat calls or squeaking, the smell of bats, bat droppings, grease stains or urine stains around openings in trees or structures, or flies around such openings. Trees with multiple hollows, crevices, forked branches, woodpecker holes, or loose and flaking bark have the highest chance of occupation and shall be inspected the most carefully. If signs of bats are detected, the CDFW shall be contacted about how to proceed. Echo-location surveys may be needed to verify the presence of bats, or an exclusion zone around the occupied tree or structure may be recommended until bats leave the roost. The size of the buffer would take into account: Proximity and noise level of the project activities; Distance and amount of vegetation or screening between the roost and construction activities; and	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		Species-specific needs, if known, such as sensitivity to disturbance Due to restrictions of the California Health Department, direct contact by workers with any bat is not allowed. The qualified bat biologist shall be contacted immediately if a bat roost is discovered during project construction. BIO-1e: (AMM-5 in Biological Resources Report) A qualified biologist shall search the ~~unpaved portion of the Secondary Ingress/Egress project alignment~~ work site plus a 20-foot buffer for woodrat nests within 7 days prior to the start of construction. If any woodrat nests are found within the area that would be directly affected by construction or emergency vehicle ingress/egress, the nests shall be avoided with a 5-foot buffer or removed according to the current procedures approved by the CDFW. The following is an example of what would occur: Prior to any disturbance of the woodrat house, logs and branches shall be placed under the canopies of trees near, but outside of, the project site. Next, all understory vegetation shall be cleared within the project site or in the area immediately surrounding the nests (but the nest itself shall not be removed at this stage). After all cover (except the nests themselves) has been removed, each active nest shall be disturbed (by a qualified wildlife biologist) to the degree that woodrats leave the nest and seek refuge elsewhere. The nest sticks shall be removed from the project site and piled at the base of newly placed logs and branches outside the project site. Potential health hazards to persons moving nests shall be addressed to minimize risk of contracting diseases associated with woodrats and woodrat nests. This measure shall be performed under the direct supervision of a qualified biologist	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		approved for this project by the CDFW. Dismantling and moving woodrat nests is limited to March and late summer/early fall; campus personnel and the contractor should be aware that it takes the CDFW time to approve a plan, and that the number of professionals with a Memorandum of Understanding (MOU) for this work is limited. BIO-1f: Bio-1f: Unless alternative (equivalent or more effective) measures are recommended by the approved biologist and approved by the City of Moraga, the project applicant will install a wildlife exclusion fence (WEF) to deter Alameda whipsnakes and California red-legged frogs from entering the work site. The WEF will be constructed as follows: a. Plywood sheets at least three feet in height, above ground. Heavy-duty geotextile fabric or other materials approved by CDFW may also be used for the snake exclusion fence; b. Buried four (4) to (six) 6 inches into the ground; c. Soil back-filled against the plywood fence to create a solid barrier at the ground; d. Plywood sheets maintained in an upright position with t-posts or stakes; e. Ends of plywood sheets overlapped with no gaps to ensure a complete barrier; f. Escape funnels installed in the fence every 200 linear feet; h. The location and design of the proposed exclusion fence will be included on plans for all construction-related permits. i. The fence will be installed and remain in place throughout the construction period. All construction activities and equipment/materials/debris storage will take place on the project side of the fence. The combination of the measures above would reduce this impact to a less-than-significant level.	

BIO-2: Master Plan implementation may result in adverse impacts on the riparian sensitive natural community along the unnamed tributary drainage to Las Trampas Creek, unless adequate controls are taken during construction of access improvements associated with the Master Plan.	Potentially Significant	BIO-2: (AMM-6 in Biological Resources Report) Best Management Practices (BMPs) to protect riparian and mesic oak woodland habitats (and associated special-status species) shall be implemented during construction of Master Plan projects adjacent to such habitats. Such BMPs shall include, but shall not be limited to, the following: • Restriction of work to the dry season (April 15 through October 15) near aquatic resources. Prior to the start of construction, a qualified biologist will flag the limits of the Las Trampas Creek Corridor. • Stopping of work near aquatic resources for up to 24 hours after storm events. • Installation and regular maintenance of a silt fence between the work area and the adjacent riparian or mesic oak woodland habitat associated with Las Trampas Creek. • Removal of all trash from the project site at the end of each day. • Restrictions that no vehicles may be refueled within 100 feet of riparian habitat ~~and/or aquatic resources~~. • Maintenance of all construction equipment and regularly inspections of equipment for leaks before bringing it into the project site near riparian or wetland habitat. • Maintenance of waste facilities such as concrete wash-out facilities, porta-potties, and hydraulic fluid containers. Waste shall be removed to a proper disposal site. • Covering of disturbed soil areas and soil stockpiles with tarps prior to forecast rain events. • Silt control measures shall be utilized throughout all phases of the project where silt and/or earthen fill threaten to enter Waters of the State. Silt control structures shall be monitored for effectiveness and shall be repaired or replaced as needed. Build-up of soil behind the fence shall be removed promptly and any breaches or undermined areas repaired at once. • All exposed/disturbed areas within the project site shall be stabilized to the greatest extent possible. Erosion control measures, such as silt fences, shall be used wherever silt	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		laden water has the potential to leave the work site and enter Las Trampas Creek. Erosion control measures shall be monitored during and after each storm event. Modifications, repairs and improvements to erosion control measures shall be made whenever it is needed. Materials used for erosion control or to repair erosion control shall not pose a risk to fish or wildlife. • Monofilament or plastic-wrapped wattle shall not be used. The contractor shall not use temporary or permanent erosion control devices containing plastic netting, including photo- or bio-degradable plastic netting. Erosion control and landscaping specification shall only allow natural fiber for use in erosion control mats, blankets, and straw or fiber wattles. • Preparation of a Hazardous Spill Prevention and Response Plan. The plan shall describe what actions will be taken in the event of a spill. The plan shall also incorporate preventative measures to be implemented, such as vehicle and equipment staging, cleaning, maintenance, and refueling; and contaminant (including fuel) management and storage. • Provision of adequate spill containment materials, such as oil diapers and hydrocarbon cleanup kits, on-site at all times. Containers for storage, transportation, and disposal of contaminated absorbent materials shall be provided on the project site. This measure would reduce the impact to a less-than-significant level.	
BIO-3: Master Plan implementation may affect jurisdictional waters associated with the unnamed tributary drainage to Las Trampas Creek and may require authorizations from regulatory agencies.	Potentially Significant	BIO-3: A compensatory mitigation program shall be developed and implemented to provide adequate mitigation for any jurisdictional waters affected by proposed Master Plan improvements. A jurisdictional wetland delineation shall be prepared by a qualified wetland specialist and submitted for verification by the U.S. Army Corps of Engineers (Corps). A Wetland Protection and Replacement Program (WPRP) shall	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		be prepared by the qualified wetland specialist and implemented to provide compensatory mitigation at a minimum 2:1 ratio where wetland habitat is affected, shall minimize disturbance to unvegetated waters, and shall be reviewed and approved by regulatory agencies. The WPRP shall include appropriate implementation measures to prevent inadvertent loss and degradation of jurisdictional waters to be protected, and replacement for those wetland features eliminated or modified as a result of development. The WPRP shall contain the following components: • Where verified waters of the U.S. are present and cannot be avoided, authorization for modifications to these features shall be obtained from regulatory agencies with jurisdiction. These agencies may include the Corps through the Section 404 permitting process where waters of the United States are affected by the project and the Regional Water Quality Control Board (RWQCB) as part of the Section 401 Certification process. All conditions required as part of the authorizations by the Corps, RWQCB, and California Department of Fish and Wildlife (CDFW) shall be implemented as part of the project. • Consultation or incidental take permitting may be required under the State of California and federal Endangered Species Acts. The College shall obtain all legally required permits or other authorizations from the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NOAA Fisheries), and CDFW for the potential "take" of protected species under the Endangered Species Acts. • Orange construction fencing shall be installed between the edge of the Las Trampas Creek riparian corridor and ~~around the boundary of all wetland areas and waters to be preserved at the interface with~~ the proposed fills and grading so that the riparian corridor ~~y are~~ is not disturbed during construction. The fencing shall be placed a	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		minimum of 25 feet out from the boundary of the wetlands/waters but may need to be adjusted if restoration activities are to be conducted within this area. Grading, construction, and restoration work within the wetland/waters buffer zones shall be conducted in a way that avoids or minimizes disturbance of existing wetlands and aquatic habitat. • A qualified biologist/restoration specialist shall be available during construction to provide situation-specific riparian corridor ~~wetland~~ avoidance measures or planting recommendation, as needed. • Success criteria, maintenance and long-term management responsibilities, monitoring requirements, and contingency measures in the WPRP should be specified. Monitoring shall be conducted by the qualified wetland specialist for a minimum of 5 years and continue until the success criteria are met. Permanent monitoring transects shall be established as part of the program and vegetation data collected in the spring and summer months when plant identification is possible. Photo stations shall be established along each monitoring transect, and photographs taken every year during the required monitoring period. • Annual monitoring reports shall be prepared by the qualified wetland specialist and submitted to resource agency representatives and the Town of Moraga Planning Department by December 31 of each monitoring year for a minimum of 5 years or until the defined success criteria are met. The annual report shall summarize the results of the monitoring effort, performance standards, and any required contingency measures, and shall include photographs of the monitoring transects and program success. Maps shall be included in the monitoring report	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		to show the location of monitoring transects and photo stations. This measure would reduce the impact to a less-than-significant level.	
BIO-4: Master Plan implementation has the potential to conflict with local regulations related to tree protection.	Potentially Significant	BIO-4a: (AMM-7 in Biological Resources Report) All trees with a diameter breast height (DBH) of 4.0 inches or greater that are removed during implementation of the Master Plan projects shall be replaced as follows: • All removed trees regulated by the Town of Moraga Tree Preservation Ordinance (native, orchard or historic) shall be replaced in-kind, or with native trees, with a 48-inch box size. • All other (general) trees shall be replaced with native trees at a 1:1 ratio if the replacement trees are of 36-inch box size. • All other (general) trees shall be replaced with native trees at a 3:1 replacement if the replacement trees are of 5- to 15-gallon size. A tree replacement plan shall be prepared and shall be reviewed by a qualified biologist to ensure that lost habitat is adequately replaced. General trees (not regulated by the Town of Moraga Tree Preservation Ordinance) shall be of native species and provide similar habitat values as the tree being replaced in terms of structure and food sources. Replacement trees may be planted throughout the project area as space permits; they need not be replaced in the same area they were removed from if space is limited by new construction. All replacement trees used shall be healthy and sourced from a reputable nursery, and guaranteed to be pathogen-free in order not to introduce the Sudden Oak Death pathogen to the campus. Replacement trees shall be monitored at least twice annually in spring and fall for a minimum of 3 years, and dead or unhealthy replacement trees shall be removed and	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		replaced with healthy new trees. If all replacement trees are healthy after 3 years of monitoring, monitoring may cease. BIO-4b: (AMM-8 in Biological Resources Report) Regulated and other trees on the campus shall be retained to the maximum extent feasible given tree health and project space needs. Trees in work zones to be retained shall be enclosed in a tree protection zone (TPZ) to prevent direct damage to the trees and their growing environment. Temporary fencing shall be installed for each tree or group of trees at their drip line or at a radial distance ratio of 1 foot for each inch of diameter of the tree at DBH, whichever is greater. No heavy machinery shall be allowed to pass through or park within this area, nor shall debris, tools, or other materials be stored within the TPZ or against tree trunks. If the canopy of a tree within the TPZ is to be pruned to allow equipment passage, this work must be performed by a qualified arborist. Consistent with the Town of Moraga Tree Preservation Ordinance (Municipal Code Section 12.12), if construction of a Master Plan project may encroach into the dripline of any regulated tree, an arborist report shall be prepared. This report shall contain special construction directions to allow the roots to breathe and obtain nutrients and water, as necessary, to minimize damage of the existing ground surface within the dripline. Excavation, cuts, fills, or compaction of the existing ground surface within the dripline shall minimize damage to the root system. Tree wells may be used where consistent with good standards of cultivation. Pruning shall not cause permanent injury or destroy any tree. The combination of the measures above would reduce this impact to a less-than-significant level.	
Cultural Resources			
CULT-2: Ground-disturbing activities associated with the Master Plan have the potential to cause a substantive	Potentially Significant	CULT-2a: An archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology shall be retained for any project involving ground disturbing activity. Prior to the initiation of any project-	Less Than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
adverse change in the significance of unrecorded archaeological resources.		related ground-disturbing activity, this individual shall review construction plans to determine if archaeological resources or human remains may be affected by construction. If, after reviewing the construction plans, the archaeologist determines that construction is unlikely to affect archaeological resources, the archaeologist shall document the finding in a letter report to the Town of Moraga. If the archaeologist determines the construction may affect archaeological resources, the archaeologist shall, in consultation with the Town of Moraga, develop and carry out an Archaeological Identification Plan (AIP). The purpose of the AIP would be to identify archaeological resources at the project site. This may involve Geoprobe coring or trenching using a backhoe. If archaeological resources are discovered, the archaeologist shall, in consultation with the Town of Moraga, develop and carry out the Archaeological Treatment Plan (ATP) specified in Mitigation Measure CULT-2b to reduce the effects of the project to a less-than-significant level. CULT-2b: Prior to the initiation of any project-related, ground-disturbing activity, if the archaeologist determines that construction may affect archaeological resources the archaeologist shall develop an Archaeological Monitoring Plan (AMP) in consultation with the Town of Moraga. The AMP shall 1) establish a schedule for monitoring during ground-disturbing activities based on the archaeological sensitivity of the project location, 2) define the types of resources that may be encountered (including human remains), 3) describe the protocols to be followed and individuals to be contacted if suspected resources are discovered, 4) describe the conditions under which a paid Native American monitor shall be present on site, and 5) specify the creation of an Archaeological Monitoring Report that shall be prepared at the conclusion of monitoring. The Archaeological Monitoring Report shall describe the monitoring process, discoveries, and treatments. A copy of the Archaeological Monitoring Report	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		shall be sent to the Northwest Information Center at Sonoma State University. The archaeologist shall administer a short training session (sometimes known as a "tailgate training") for construction workers before ground-disturbing activities begin. If construction occurs in chronologically discrete phases, the training shall be repeated for new construction teams as appropriate. Saint Mary's College shall inform its contractor(s) of the sensitivity of the project area for archaeological deposits and shall verify that the following directive has been included in the appropriate contract documents such as contract specifications that shall be reviewed and approved by the Town of Moraga Planning Department prior to the start of construction: "This construction site may contain archaeological artifacts and other deposits. If archaeological deposits are encountered during project subsurface construction, all ground-disturbing activities within 25 feet of the find shall be redirected and a qualified archaeologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any archaeological materials. Archaeological deposits can include shellfish remains, bone, flakes and tools made from obsidian, chert, and basalt, as well as mortars and pestles" If an archaeological deposit is encountered during construction activities, all ground-disturbing activities within 25 feet shall be redirected and the discovery protected in place until the archaeologist has assessed the situation, consulted with the appropriate agencies, and made recommendations to the Town of Moraga for the treatment of the discovery. If the archaeologist in consultation with the Town of Moraga finds that the deposit appears eligible for listing in the California Register of Historical Resources, the archaeologist shall prepare an Archaeological Treatment Plan	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		(ATP), which shall specify actions such as recording of the archaeological deposit, archaeological data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. If prehistoric archaeological material is discovered, the archaeologist shall consult with a Native American individual or group listed on the Native American Heritage Commission's contact list and the landowner to determine appropriate treatments. Upon completion of the mitigations, the archaeologist shall prepare a Data Recovery Report (DRR) based on the outline of the State Office of Historic Preservation's Archaeological Resources Management Reports (1990). A draft of the DRR shall be submitted to Saint Mary's College and the Town of Moraga for review. The final DRR shall be submitted to the Northwest Information Center. Archaeological artifacts shall be treated as specified in the State Office of Historic Preservation's Guidelines for the Curation of Archaeological Collections (1993). Archaeological artifacts and associated field notes, maps, and other information shall be submitted to a permanent curation facility and used for public interpretive displays, as appropriate and in consultation with the Native American consultant. Implementation of the above mitigation measures would reduce the potential impact on undiscovered archaeological deposits to a less-than-significant level.	
CULT-3: Ground-disturbing activities associated with the proposed project have the potential to disturb Native American human remains.	Potentially Significant	CULT-3: All human remains encountered during project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5 and Mitigation Measures CULT-2a and CULT-2b. Saint Mary's College shall inform its contractor(s) of the sensitivity of the project site for human remains by including the following directive in contract specifications: *"Human remains include whole bones, bone fragments, and teeth. If suspected human remains are uncovered, work within 25 feet of the discovery shall be redirected. Project personnel*	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		shall not collect or move any suspected human remains or associated materials, but should protect them in place. At the same time, an archaeologist or human osteologist shall be contacted to determine whether or not the remains are human. If the remains appear to be human, the County Coroner shall be notified immediately. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission would identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations to the landowner for the proper treatment of the remains and associated grave goods. Work within 25 feet of the discovery can resume only after the archaeologist, MLD (if available), and the landowner have been consulted, and an appropriate treatment has been devised." Implementation of this measure would reduce the impact to a less-than-significant level.	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
CULT-4: Ground disturbing activities associated with the Master Plan have the potential to directly or indirectly destroy unique paleontological resources.	Potentially Significant	Mitigation Measure CULT-4: Should a project require subsurface construction activities that would encounter bedrock, the following three-part mitigation shall be untaken: 1) a Paleontological Resource Mitigation Plan shall be prepared, 2) Paleontological Resource Monitoring shall be undertaken by a qualified paleontologist during any subsurface construction activities potentially affecting bedrock, and 3) should paleontological resources be encountered during project subsurface construction activities, Paleontological Resource Reporting shall be undertaken by a qualified paleontologist. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: 1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; 2) at least 2 years of professional experience related to paleontology; 3) proficiency in recognizing fossils in the field and determining their significance; 4) expertise in local geology, stratigraphy, and biostratigraphy; and 5) experience collecting vertebrate fossils in the field. Implementation of the above mitigation measure would reduce the potential impact on unique paleontological resources to a less-than-significant level. (LTS)	Less than Significant
Energy			
ENERGY-1: Development in accordance with the Master Plan would increase demands for electricity and natural gas, potentially resulting in a substantial increase in overall or per capita energy consumption and wasteful or unnecessary consumption of energy.	Potentially Significant	Mitigation Measure ENERGY-1a: The text of the Master Plan shall be revised as follows (new text shown in underline; deleted text shown in ~~strikeout~~): • In accordance with the College's mission, future campus improvements shall incorporate sustainable design and construction practices as required to meet the current California Green Standards Building Code (CGSBC) and local ordinances. In addition, projects shall	Less Than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		~~strive~~ to incorporate feasible sustainability measures, especially those which will reduce water and energy consumption. • LEED–equivalent designs ~~encouraged, but not~~ shall be required, for projects at Saint Mary's College. ~~Whether certified or not~~, LEED criteria and checklists, ~~or similar third-party evaluation systems~~, provide an effective and industry-recognized system for evaluating sustainable design and construction and an effective tool for compliance with the California Green Building Standards Code (CGBSC). • New construction and renovation projects shall ~~should strive~~ to incorporate building-integrated photovoltaic (PV) products such as: • PV panels at roof wells or over flat roof areas where they are not visible from adjacent grade levels; • PV panels over parking areas that are not in the primary view corridor approaching the Chapel; and/or • PV overlays at appropriate windows and skylights. • Establish campus-wide targets for reduced resource use/GHG emissions (including electricity, water, heating, cooling, plug-loads, lighting, transportation, air travel).	

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		• Establish a campus-wide energy conservation goal of maintaining energy use at or below existing (2014) levels. Mitigation Measure ENERGY-1b: Saint Mary's College shall submit an annual energy monitoring report to the Town of Moraga Planning Department documenting its progress in meeting energy conservation goals of the Master Plan as well as the Town of Moraga General Plan and Climate Action Plan and other applicable programs, including the Association for the Advancement of Sustainability in Higher Education (AASHE) STARS® (Sustainability Tracking, Assessment & Rating System) program. The combination of the above measures would ensure that the energy consumption impact would be reduced to a less-than-significant level. (LTS)	
Geology and Soils			
There are no mitigation measures related to geology and soils that are applicable to the proposed project.			
Greenhouse Gas Emissions			
There are no mitigation measures related to greenhouse gas emissions that are applicable to the proposed project.			
Hazards and Hazardous Materials			
There are no mitigation measures related to hazards and hazardous materials that are applicable to the proposed project.			
Hydrology and Water Quality			
There are no mitigation measures related to hydrology and water quality that are applicable to the proposed project.			
Noise			
NOISE-1: Development under the Master Plan could expose persons to or generate a permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Potentially Significant	NOISE-1a: The following measure shall be added to the Draft Master Plan Noise Standards: *The College shall avoid scheduling baseball games where the number of spectators are anticipated to exceed 800, such as playoff games, during evening or nighttime hours.* NOISE-1b: The following measure shall be added to the Draft Master Plan Noise Standards:	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		The College shall notify neighbors and students located in residences within 1,500 feet of the stadium at least 72 hours in advance of any baseball stadium activity where more than 800 spectators are anticipated. Notification could include providing neighbors and students with the game schedule at the beginning of the season, posting the schedule online in an easily accessible public location, or individual e-mail or letter notification of activities. NOISE-1c: The following measure shall be added to the Draft Master Plan Noise Standards: *Mechanical equipment selection and acoustical shielding shall be used so that noise levels from future building operations would not exceed 70 dBA L_{max} at 10 feet. Controls that would typically be incorporated to attain this outcome include locating equipment indoors when feasible; selecting quiet equipment; and providing sound attenuators on fans, sound attenuator packages for cooling towers and emergency generators, acoustical screen walls, and equipment enclosures.* The implementation of Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c would reduce the Master Plan ambient noise impact to a less-than-significant level.	
NOISE-2: Development under the Master Plan could generate temporary or periodic increases in ambient noise levels in the project vicinity above levels existing without the project and in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Potentially Significant	NOISE-2b: The following measure shall be added to the Draft Master Plan Noise Standards *The College shall require all construction activities under the Master Plan that require the use of heavy construction equipment to implement the following noise reduction measures:* • Use alternatives to impact pile driving, such as vibratory pile drivers or oscillating or rotating pile installation methods.	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		• Use jetting or partial jetting of piles into place using a water injection at the tip of the pile. • Construct or use temporary noise barriers, as needed, to shield on-campus construction and demolition noise from noise-sensitive areas. To be most effective, the barrier should be placed as close as possible to the noise source or the sensitive receptor. Examples of barriers include portable acoustically lined enclosure/housing for specific equipment (e.g., jackhammer and pneumatic-air tools, which generate the loudest noise), temporary noise barriers (e.g., solid plywood fences or portable panel systems, minimum 8 feet in height), and/or acoustical blankets. • Establish construction staging areas at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. • Ensure that construction equipment and trucks will utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible.	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		• Use "quiet" models of air compressors and other stationary noise sources where technology exists. • Prohibit all unnecessary idling of internal combustion engines and equip all internal combustion engine-driven equipment with mufflers that are in good condition and appropriate for the equipment. • Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from noise-sensitive land uses. Muffle the stationary equipment, and enclose within temporary sheds or surround by insulation barriers, if feasible. • Notify all adjacent all residences and residence halls that are located within 200 feet of the project site of the construction schedule in writing. • Control noise from construction workers' radios to a point where they are not audible at existing campus residences or other noise-sensitive spaces. NOISE-2c: The following measure shall be added to the Draft Master Plan Noise Standards: The College shall submit to the Town of Moraga for review and approval a set of procedures for responding to and tracking complaints received pertaining to construction noise, and shall implement the procedures during construction. At a minimum, the procedures shall include:	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		a) Designation of an on-campus construction complaint and enforcement manager for the project; b) Protocols specific to receiving, responding to, and tracking received complaints; and c) Maintenance of a complaint log that records received complaints and how complaints were addressed, which shall be submitted to the Town of Moraga for review upon request. The College shall apply these procedures to all projects that require the use of heavy construction equipment within 250 feet of on-campus noise sensitive receptors. The contact information of the on-campus construction complaint and enforcement manager shall be posted in conspicuous locations at the fence line of the construction site. The College shall notify the Town of Moraga when the information has been posted and provide the Town with a copy of the posting. NOISE-2d: The following measures shall be added to the Draft Master Plan Noise Standards: To the maximum extent practicable, the College shall schedule construction activities that require the use of heavy construction equipment within 250-feet of an academic building (i.e., a building where classes are held or where students reside or study) during periods when classes are not in session, such as summer, school breaks, and after class dismissal. Construction activities that require the use of heavy construction equipment shall not be allowed within 250 feet of an academic building or residence hall during final exam periods. For construction activities that require the use of heavy construction equipment within 250 feet of an academic building or residence hall, the College shall submit a	

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		Construction Noise Management Plan prepared by a qualified acoustical consultant to the Town of Moraga for review and approval. The Construction Noise Management Plan shall contain a set of project-specific noise attenuation measures to reduce exterior construction noise at the nearest academic building or residence hall to below 70 dBA L_{eq} or to the maximum extent practicable.	
Public Services			
There are no mitigation measures related to public services that are applicable to the proposed project.			
Recreation			
REC-1: The Master Plan would include recreational facilities that might have an adverse physical effect on the environment.	Potentially Significant	REC-1: Saint Mary's College shall comply with all mitigation measures identified in this EIR. Compliance with these measures would ensure that the impact of recreational facilities included in the Master Plan would be reduced to a less-than-significant level	Less than Significant
Transportation and Traffic			
TRAFFIC-1: The Master Plan could conflict with an applicable plan, ordinance, or policy establishing measures for the performance of the circulation system during construction.	Potentially Significant	TRAFFIC-1: Saint Mary's College shall prepare a construction management plan template for all projects to be developed under the Master Plan, for review and comment by Town staff. The template shall include information about construction work hours, with a goal of avoiding the peak AM and PM commute hours; construction worker and materials staging areas; measures to reduce construction worker single-occupant vehicle travel; sample traffic control plans for work involving the St. Mary's Road right-of-way; and other items to be defined in coordination with Town staff. The template shall be used to develop project-specific construction management plans for each project developed under the Master Plan, and the College shall submit each project-specific construction management plan to Town staff for review and comment prior to commencing work.	Less than Significant
TRAFFIC-2: The Master Plan could conflict with an applicable plan, ordinance, or policy establishing measures for the performance of the	Potentially Significant	TRAFFIC-2: Saint Mary's College shall prepare and update annually an Events Traffic Management Plan in collaboration with Town staff, identifying the anticipated events that have the potential to generate off-campus spillover parking and	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
circulation system due to increased size or frequency of special events.		identifying measures to minimize the impact of these events on St. Mary's Road congestion and safety. Measures could include identification of off-site parking lots with a shuttle connection; identification of temporary on-campus parking areas and/or valet parking to allow vehicle stacking; improved travel and parking guidance for visitors unfamiliar with the campus; and traffic management to be provided by the Town of Moraga Police Department.	
Utilities and Service Systems			
UTIL-1: Development in accordance with the Master Plan would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	Potentially Significant	UTIL-1a: As plans for individual projects under the Master Plan are finalized, the College shall contact the East Bay Municipal Utility District (EBMUD) New Business Office to request a water service estimate to determine costs and conditions for providing additional water service to the project. The need for new and expanded water facilities, including off-site pipelines or other improvements, would be determined at that time. In accordance with standard practice, it is anticipated that EBMUD would be responsible for environmental review for any off-site water facility improvements. UTIL-1b: Building construction and renovation shall maintain the integrity of existing EBMUD distribution pipelines and the Moraga Aqueduct No. 2. Any proposed construction activity in EBMUD rights-of-way shall be subject to the terms and conditions determined by EBMUD, including relocation of water mains and/or rights-of-way at the College's expense. Design drawings for any project encroachment (roadway, utility, facility, etc.) or restoration projects crossing or within the Moraga Aqueduct No. 2 right-of-way shall be submitted to EBMUD for review and approval. Design drawings shall also be submitted to EBMUD for review of possible drainage, site grading, fencing, construction access, or other conditions that may affect EBMUD right-of-way. For construction encroaching on EBMUD property, contractors shall 1) attend a pre-construction meeting with EBMUD, and 2) secure an	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
		encroachment permit from EBMUD before mobilizing or starting construction work. The above measures, combined with other measures in this EIR, would reduce the environmental impact of on-site changes to water facilities to a less-than-significant level Potential off-site water improvements necessary to serve Master Plan development have not yet been identified in detail, however, and therefore it is not possible to evaluate the environmental impacts of these improvements. This EIR therefore conservatively assumes that environmental impacts from these potential off-site water improvements would be significant and unavoidable	
UTIL-2: Development in accordance with the Master Plan may have insufficient water supplies available from existing entitlements and resources, or require new or expanded entitlements.	Potentially Significant	UTIL-2a: As a condition of approval of the Master Plan and subsequent projects under the Master Plan, the Town shall require that the College comply with the "Model Water Efficient Landscape Ordinance" (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495). Section 31 of the East Bay Municipal Utility District (EBMUD) Water Service Regulations that requires that new or expanded water service shall not be furnished unless all applicable water efficiency measures are installed at the project sponsor's expense. UTIL-2b: Prior to the issuance of the first building permit for any project under the Master Plan, the College shall provide the Town of Moraga with a "will-serve" letter from EBMUD indicating that an adequate water supply is available to serve the project. The combination of the above measures would ensure that this impact would be reduced to a less-than-significant level.	Less than Significant
UTIL-3: Development in accordance with the Master Plan would require or result in the construction of new wastewater facilities or expansion of existing facilities, the construction of	Potentially Significant	UTIL-3: Saint Mary's College shall comply with all mitigation measures identified in this EIR, including those pertaining to construction impacts. In addition, to ensure that the College's private sewer system conforms to Central Contra Costa Sanitary District (CCCSD) design and plan review standards, the Master Plan (Chapter Three: Facilities Plan, Sanitary	Less than Significant

Table E: Summary of 2016 Program EIR Impacts and Applicable Mitigation Measures

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Environmental Impact
which could cause significant environmental effects.		Sewer, Actions) shall be revised to state as follows (new wording underlined): "2. Ensure that the CCCSD reviews and approves any construction plans involving work on the public or private sewer prior application for any Building Permit." Compliance with these measures would ensure that the impact of on-site wastewater facilities changes included in the Master Plan would be reduced to a less-than-significant level. In addition, water conservation measures included in the Master Plan and recommended in Mitigation Measure UTIL-2a would reduce the flows to the sanitary sewer system, helping to reduce the need for future sewer system improvements.	
UTIL-4: Development in accordance with the Master Plan would comply with federal, state, and local statutes and regulations related to solid waste. However, debris from building demolition and construction and materials discarded by campus occupants after development is completed have the potential to create conflicts with the Town of Moraga's state-mandated waste diversion goals.	Potentially Significant	UTIL-4a: Saint Mary's College shall ensure that contractors prepare a Waste Management Plan for the construction phase of each Master Plan-related project in accordance with the requirements stated in Chapter 15.08 of the Moraga Municipal Code. Each Waste Management Plan shall identify how 50 percent or more of the project's waste materials would be diverted from the landfill through recycling and salvage methods. Each Waste Management Plan shall be submitted to the Town of Moraga for approval prior to the issuance of building permits. UTIL-4b: Saint Mary's College shall ensure that each project site plan provides facilities for ongoing recycling and collection of other wastes after the project is in operation. The combination of the above measures would reduce the impact to a less-than-significant level.	Less than Significant

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