FINAL
Supplemental Environmental Impact Report
IKEA Retail Center Project
City of Dublin, Alameda County, California
State Clearinghouse Number 2017082047

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Date: September 14, 2018
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Appendix I: Supplemental Air Quality Supporting Information
SECTION 1: INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Dublin has evaluated the comments received on the IKEA Retail Center Project Draft Supplemental Environmental Impact Report (SEIR). The responses to the comments and errata, which are included in this document, together with the Mitigation Monitoring and Reporting Program, form the Final SEIR for use by the City of Dublin in its review.

This document is organized into four sections:

- **Section 1—Introduction.**
- **Section 2—Master Responses.** Provides a single, comprehensive response to similar comments about a particular topic.
- **Section 3—Responses to Written Comments.** Provides a list of the agencies, organizations, and individuals who commented on the Draft SEIR. Copies of all of the letters received regarding the Draft SEIR and responses thereto are included in this section.
- **Section 4—Errata.** Includes an addendum listing refinements and clarifications on the Draft SEIR, which have been incorporated.

The Final SEIR includes the following contents:

- Draft SEIR (provided under separate cover)
- Draft SEIR appendices (provided under separate cover)
- Master Responses, Responses to Written Comments on the Draft SEIR, and Errata (Sections 2, 3, and 4 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)
SECTION 2: MASTER RESPONSES

Master responses address similar comments made by multiple public agencies, businesses, organizations, or individuals through written comments submitted to the City of Dublin.

2.1 - Master Response

Master Response 1—Project Merits

Summary of Relevant Comments

The City of Dublin received numerous written comments about the merits of the IKEA Retail Center Project. The majority of these comments expressed opposition citing traffic congestion, sub-optimal use of the site, public safety, and community image. None of the comments raise questions about the sufficiency of the Draft SEIR’s analysis of environmental impacts.

Response

The comments primarily express a position on the merits of the proposed project—whether or not the City should approve the project. Several letters make reference to environmental impacts of the Project identified in the EIR as a reason for not approving the Project. Some of the environmental impacts of the project referenced in the comments include traffic and aesthetics. However, the comments recite the conclusions from the SEIR, and do not offer any comments on the adequacy of the analysis itself.

With regard to comments referring to the EIR’s conclusions on traffic impacts, traffic is evaluated in detail in Section 3.6, Transportation. The evaluation assessed 31 intersections, 39 segments of I-580, 22 segments of I-680, 12 roadways, and three I-580 freeway ramps. The analysis found that the project would have a significant impact on certain intersection, freeway segment, and roadway segment operations. Mitigation was proposed for significant impacts; however, for certain intersections and roadways, the Draft SEIR concluded that traffic impacts would be significant and unavoidable because the mitigation measure is infeasible or its implementation is in the control of another agency. None of the comments challenge or dispute the analysis or conclusions in the SEIR on traffic impacts and mitigation.

Because the letters do not specifically question the adequacy of the analysis of environmental impacts in the SEIR and only address the merits of the project, no responses to these comments are required under CEQA. These comments are provided at the end of Section 3, Responses to Written Comments. They will be part of the project record and presented to the City of Dublin decision-makers for consideration prior to acting on the proposed project.

Master Response 2—Comments Raising Similar Issues

Summary of Relevant Comments

The City of Dublin received five letters that contained verbatim or near verbatim comments summarizing the SEIR’s conclusions regarding transportation and other environmental issues and expressing objection to the proposed project.
Response

To the extent these letters do not specifically address environmental issues and the adequacy of the SEIR’s analysis, no responses to these comments are required under CEQA. To the extent environmental issues are referenced in the comments, these issues are addressed in the response to individual comment letters. Also, see Master Response 1 for comments addressing the transportation analysis.
# SECTION 3: RESPONSES TO WRITTEN COMMENTS

## 3.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Draft SEIR is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Additionally, the City of Dublin received 105 comments that commented on the project but did not provide comments on any aspect of the Draft SEIR’s analysis. In accordance with CEQA Guidelines Section 15003(g), which provides “The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind”, copies of these letters are provided at the end of this section; however, because these letters do not contain comments specific to the analysis contained within the SEIR or any environmental issue, individual responses to these comments are not provided, but instead are addressed in Section 2, Master Responses.

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3.2 - Responses to Comments

3.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Dublin, as the lead agency, evaluated the comments received on the Draft SEIR (State Clearinghouse No. 2017082047) for the IKEA Retail Center Project, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final SEIR for the project in accordance with CEQA Guidelines Section 15132.

3.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.
March 15, 2018

Amy Million
Planning Department
City of Dublin
100 Civic Plaza
Dublin, CA 94568

Ikea Retail Center Project—Draft Environmental Impact Report

Dear Ms. Million:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. In tandem with the Metropolitan Transportation Commission’s (MTC) Sustainable Communities Strategy (SCS), the Caltrans Strategic Management Plan 2015-2020 includes targets to reduce Vehicle Miles Travelled (VMT), in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the Draft Environmental Impact Report (DEIR). Previous comments are incorporated by reference.

Project Understanding
The IKEA store would consist of a two-story building located over a two-level parking structure. The building would be set against the Arnold Road frontage and face Hacienda Drive. The building would stand 61 feet above finished grade. The principal loading docks would be located in the rear of the building facing Arnold Road. A recycling and refuse collection area, trash compactor, and emergency diesel generator would also be located in the rear of the store. A two-bay loading dock for home deliveries would be located on the south side of the building facing Interstate (I)-580. Covered walkways would be incorporated along the front of the building.

The eastern portion of the site would support a retail center consisting of up to 93,000 square feet of lifestyle retail-restaurant center uses. An 8,000 square-foot restaurant pad would be located at the intersection of Martinelli Way / Hacienda Drive. Multiple buildings totaling 85,000 square feet would be organized around a pedestrian plaza located directly opposite the IKEA store entrance. The project is anticipated to employ 150 employees per shift for a total of approximately 350 employees.

The IKEA store would provide 1,026 parking spaces in a two-level below-store structure. Access to the parking structure would be taken from either entrances/ exits at the north and south ends.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability."
The lifestyle retail-restaurant uses would provide 568 surface parking spaces. Regional access to these parking spaces will be provided about a thousand feet from Interstate (I-) 580/Hacienda Drive interchange.

**Transportation Impact Fees**  
Caltrans commends the Lead Agency for including the mitigation measures listed below.

**MM TRANS-2c:** Prior to issuance of the first building permit, the project applicant shall provide the City of Dublin documentation that they have worked with the City of Pleasanton and Caltrans to identify and pay the project’s proportionate share for improvements to the intersection of Santa Rita Road/I-580 Eastbound in the City of Pleasanton. The improvements shall consist of modifying the southbound approach to construct a second southbound left-turn lane in addition to re-timing the traffic signal. (ES-18)

**MM TRANS-4b:** As an ongoing effort, the City of Dublin shall coordinate with Caltrans to optimize ramp metering rates at I-580 on-ramps within the Dublin city limits. (ES-20)

**MM TRANS-8e:** Prior to issuance of building permits, the applicant shall provide the City of Dublin with fair share fees for pedestrian and bicycle improvements at the Hacienda Drive/I-580 interchange. This mitigation measure shall be coordinated with Mitigation Measure TRANS-4c. (ES-21)

However, no mitigation measures were provided for the project’s significant impact on the I-580 mainline. Caltrans recommends the developer make a major contribution to the State Highway Operations Protection Program which funds state highway improvements. Fair share fees can be deposited into an escrow account opened by the Lead Agency and can be used when a future multimodal project becomes available that will mitigate potential impacts to I-580. To begin this fair share contribution process please facilitate a Transportation Mitigation Agreement Form with Fereshta Mojaddedi, Transportation Engineer, at (510) 286-4850.

**Multimodal Planning**  
Please analyze secondary impacts on pedestrians and bicyclists that may result from any traffic impact mitigation measures. Please describe any pedestrian and bicycle mitigation measures and safety countermeasures that would therefore be needed as a means of maintaining and improving access to transit facilities and reducing traffic impacts to state highways. Lastly, we urge the Lead Agency to revise the TDM measure regarding “posting transit information in employee-only areas” to one that makes the information available to the public. Transit information is beneficial to both patrons and employees and should be shared widely.

**Lead Agency**  
As the Lead Agency, the City of Dublin is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project’s fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

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Ms. Million, City of Dublin  
March 15, 2018  
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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jannette Ramirez at 510-286-5535 or jannette.ramirez@dot.ca.gov.

Sincerely,

[Signature]

PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
State Agencies

California Department of Transportation (CALTRANS)

Response to CALTRANS-1
The agency provided introductory remarks to open the letter. No response is necessary.

Response to CALTRANS-2
The agency summarized the project. No response is necessary.

Response to CALTRANS-3
Mitigation measures were identified to mitigate the project’s impacts to the freeway system, including preparation and implementation of a transportation demand management program (MM TRANS-4a) to reduce the overall vehicle trip generation from the levels considered in the analysis, and payment of all local and regional transportation impact fees. Local fees include improvements to City of Dublin streets and intersections, and regional fees include regional roadway facilities as well as a number of Caltrans facilities. (Please see Response to ACTC Comment 7 for additional details related to the fee programs that apply to this project.) Many of the improvements noted in the SHOPP program, which is referenced in Caltrans letter, are upgrades of existing facilities that do not meet current design standards, or roadway rehabilitation, which would not mitigate the project’s impacts to the freeway system.

Caltrans should coordinate with the Tri-Valley Transportation Council to identify additional regional projects that could be included in the regional fee program, as well as develop an Integrated Corridor Management Plan for Interstate 580 (I-580) in the Tri-Valley area such that corridor improvements can be identified and programmed into the regional fee program. Caltrans prepared the Interstate 580 East Corridor System Management Plan in May 2010, which identifies a number of corridor improvements from I-880 to I-205. In the study area, none of the identified improvements would mitigate project impacts, with the exception of some interchange improvements, which have been incorporated into the regional fee program and already considered in the Draft SEIR findings.

Response to CALTRANS-4
Please refer to Response to ACTC-3 and Response to ACTC-10.

Response to CALTRANS-5
The agency noted that the City of Dublin is responsible for all project mitigation. Implementation and monitoring of mitigations will be identified in the Mitigation Monitoring and Reporting Program adopted as part of the any Project approval.

Response to CALTRANS-6
The agency provided closing remarks to conclude the letter. No response is necessary.
March 16, 2018

Amy Million  
Principal Planner  
City of Dublin  
100 Civic Plaza  
Dublin, CA 94568

SUBJECT: Response to the Draft Supplemental Environmental Impact Report for the IKEA Retail Center Project

Dear Ms. Million,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) for the IKEA Retail Center Project. The proposed project is located at 5344 and 5411 Martinelli Way in the City of Dublin. The 27.5 acre site is bounded by Arnold Road to the west, Martinelli Way to the north, Hacienda Way to the east, and I-580 to the south. The proposed project would add 432,099 square feet of commercial uses anchored by a 339,099 square foot IKEA retail store, and also includes 93,000 of retail and restaurant uses.

Alameda CTC respectfully submits the following comments on the SEIR:

- Alameda CTC did not receive a copy of the Notice of Preparation of a Supplemental Environmental Impact Report for this project. Please make sure that Alameda CTC is continued to be included in the distribution list for the environmental document preparation. The following is the contact information: Saravana Suthanthira, Principal Transportation Planner, Alameda County Transportation Commission, 1111 Broadway, #800, Oakland, CA 94607.

- The SEIR estimates that the project would generate 1,108 new weekday afternoon peak trips, mostly new automobile trips. These trips are expected to create significant impacts on many Congestion Management Program (CMP) network roads. The SEIR reports that the project would worsen the performance of a number of CMP freeway segments along I-580 and I-680 and arterial roadways such as Dublin Boulevard, Hopyard Road, Foothill Road and Isabel Avenue. These impacts are considered to be significant and unavoidable. As a potential mitigation measure, the SEIR proposes that as a part of Mitigation Measure TRANS-4a, the applicant will be required to prepare a Transportation Demand Management (TDM) Program and lists a series of example measures such as carpool matching, provisional lockers for employees, off-peak and staggered shifts, and secure bicycle lockers. Alameda CTC requests that when the TDM Program is prepared, it should be robust and that the impact of the TDM measures are quantified for employees and...
customers separately. It should also include information on how the measures will be funded and implemented.

- The SEIR does not include traffic impact analysis on the I-580 Express Lanes, which is an important infrastructure operated by Alameda CTC. Similarly, no impact analysis is included for SR-84, which is a critical roadway for the Tri Valley area connecting to the South Bay, wherein significant transportation improvements have been completed or underway. Please include traffic impact analysis for these facilities in the SEIR.

- Alameda CTC acknowledges that Table ES2, Transportation Impacts, states that as a mitigation measure the project sponsor will pay the City of Dublin a fee equal to the cost to fund the installation of Adaptive Signal Control Technologies at many major arterial roadway intersections around the project area prior to project occupation. Similarly, before issuance of the first building permit, the project sponsor would determine and pay to the appropriate city, a fair share for a few intersection modifications: Santa Rita Road/I-580 Eastbound Fallon Road/Dublin Boulevard Tassajara Road/Dublin Boulevard, and Owens Road/Hopyard Road.

- For roadway segments that exceed the LOS-F density performance threshold, with Project conditions, the SEIR shows only the maximum density threshold of 45 and not the actual density. However, it should include the actual density to show the incremental increase in impact due to the project.

- Mitigation Measure TRANS-4c indicates that before building permits are issued for the project, the applicant will contribute its “fair share” towards local and regional transportation impact fees. However, it does not include details on how that fair share will be determined and what potential mitigation measures those funds would be applied.

- Table 3.6-11 of the SEIR estimates that 20 percent of trips to non-IKEA, ancillary retail and restaurant uses, would be internally captured and that 50 percent of remaining trips to these uses are likely to be diverted or pass-by trips. However, the SEIR does not state the basis or source for these assumptions. Please update the SEIR with this information.

- The SEIR includes information on impacts to bus transit capacity and determines that it is less than significant. However, the analysis does not appear to account for impacts to transit service as a result of additional delay on nearby roads and intersections. The SEIR should include analysis regarding bus delay for routes serving the project area including any express routes which utilize freeways impacted by the proposed project.

- The SEIR considers safety impacts to vehicles entering and leaving the site but does not consider potential impacts to pedestrians or cyclists as a result of increased traffic or ingress and egress from the site. Impacts to active transportation modes should be considered in the SEIR, especially considering the proposed project’s proximity to the Iron Horse Trail and transit oriented development near the Dublin/Pleasanton BART Station.
Thank you for the opportunity to comment on this SEIR. Please contact me at (510) 208-7426 or Chris G. Marks, Associate Transportation Planner at (510) 208-7453, if you have any questions.

Sincerely,

Saravana Suthanthira
Principal Transportation Planner

cc: Chris G. Marks, Associate Transportation Planner
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Local Agencies

*Alameda County Transportation Commission (ACTC)*

**Response to ACTC-1**
The agency provided introductory remarks to open the letter. No response is necessary.

**Response to ACTC-2**
The City of Dublin has updated ACTC’s contact information to its project notification list and the agency received the notice of the availability of the Final SEIR and public meetings.

Note that the Draft SEIR evaluated ACTC regional roadways in Section 3.6 (Transportation) in Impact TRANS-5, and, therefore, the City’s intent from the outset was to ensure that ACTC’s area of jurisdiction was addressed in the document.

**Response to ACTC-3**
As part of Mitigation Measure TRANS-4a, the project applicant is required to prepare and implement a transportation demand management (TDM) plan with measures targeted to site employees as well as patrons. This plan shall be reviewed and approved by the City of Dublin, and the project applicant shall be responsible for all costs associated with developing, implementing and monitoring the plan. The plan will identify TDM goals and strategies for employees as well as patrons, with provisions for monitoring.

**Response to ACTC-4**
An evaluation of the operations of the I-580 Express Lanes were not conducted as these lanes are dynamically priced to maintain free-flow operations. Any increase in the demand for this facility by the Project would be counterbalanced by an increase in pricing to maintain the same demand before and after the Project is built. Since the demand for the Express Lanes would remain the same before and after the Project due to dynamic pricing, demand changes from the Project only affect the general purpose lanes and these impacts and mitigations are covered in the SEIR. The SEIR assesses potential project impacts on State Route 84 (SR-84) between Airway Boulevard and I-680. SR-84 is referred to as Isabel Avenue between Airway Boulevard and Vallecitos Road, and as Vallecitos Road between Isabel Avenue and I-680. A significant impact was identified on Isabel Avenue (SR-84) between Stanley Boulevard and Concannon Boulevard in the year 2040, as presented on Draft SEIR page 3.6-164, and mitigation measures were identified. No additional analysis is required.

**Response to ACTC-5**
The comment accurately describes Table ES-2. No additional response necessary.

**Response to ACTC-6**
The agency is referring to the freeway analysis, which correlates freeway density to LOS. The Highway Capacity Manual (2010) states on page 11-7 that “LOS F is identified when demand exceeds capacity because the analytic methodology does not allow the determination of density when demand exceeds capacity.” Therefore, the actual density numbers are not provided. For freeway locations that are projected to operate at LOS F, significant impacts were identified where the project added trips to the location. Since the impact is not directly tied to the increase in density, the density calculations would not change the overall findings presented in the Draft SEIR.
Response to ACTC-7
The Eastern Dublin Traffic Impact Fee (local) is calculated on a per average weekday vehicle trip basis. Funds deposited into the Eastern Dublin Traffic Impact Fee would be applied to improvements on local roads owned and maintained by the City of Dublin, including projects such as the Scarlett Drive Extension between Dougherty Road and Dublin Boulevard. Detailed information about the program can be found on the City’s website: http://www.dublin.ca.gov/1330/Fee-Schedule.

The Tri-Valley Transportation Development Fund (regional) is calculated from average peak-hour vehicle trips. Funds deposited into the Tri-Valley Transportation Development Fund would be applied to planned improvements on the regional transportation system, such as improvements to SR-84, auxiliary lanes on I-680, and safety improvements on Vasco Road. Details regarding the program are provided on the Tri-Valley Transportation Council website: http://www.tvtc-jpa.com/getattachment/f2a953a0-7122-49de-8e69-d729654a5840/TVTC-Fee-Schedule.aspx.

Mitigation Measure TRANS-4c is the fair share contribution towards the installation of an additional mixed-flow on-ramp lane from southbound Hacienda Drive to westbound I-580. The fair-share contribution will be calculated based on an estimate of the total project cost, the level of existing traffic (as the location is currently deficient), the projections of non-project added traffic, and the amount of project-added traffic. This improvement is not included in either the Eastern Dublin Traffic Impact Fee or the Tri-Valley Transportation Development Fund. Should the project be added to either fee program, payment of fees would constitute a fair share contribution.

Response to ACTC-8
Trip generation estimates for the IKEA portion of the project were developed based on surveys of three existing IKEA stores over multiple days. Trip generation estimates for the other retail uses were developed using trip generation rates in the Transportation Engineers (ITE) Trip Generation Manual, (9th Edition).

Information contained in the ITE Trip Generation Handbook and surveys of similar uses were used to estimate pass-by and diverted-link trips for the general retail portion of the project only. For general retail, the average pass-by rate is 34 percent, and the average diverted linked trip rate is 16 percent during PM peak hour (limited data is available for the AM peak hour). In other words, at a typical shopping center, approximately 50 percent of the traffic entering and exiting the site is already on the surrounding roadway system. Studies have also shown shopping centers with more than 50 percent pass-by/diverted trips. For this assessment, it was assumed that pass-by/diverted trips for the retail/restaurant portion of the project would comprise 50 percent of the trip generation on a daily basis and 30 percent on a peak-hour basis. Pass-by/diverted trips are fully captured in the analysis of project site access locations, as well as on the deviated route.

IKEA is not a typical retail store, as it attracts trips as their primary destination from a larger catchment area than typical retail centers. This creates the potential that some patrons who come to the site primarily for IKEA would also patronize the other retail/restaurant establishments. Internal capture rates from ITE for general retail land-uses (information is not available specifically for restaurant land-uses, but they are considered similar to the retail uses) estimate that at least 20 percent of retail patrons would already be at the site. For the purpose of the trip generation
estimate, it is expected that up to 20 percent of the restaurant/retail patrons would be at the site already patronizing the IKEA store, or other retail/restaurant use. This reduction was based on data and procedures contained in the ITE Trip Generation Handbook, which yielded a higher than 20 percent internal reduction. To present a conservative assessment of potential project impacts, the internal reduction was capped at 20 percent. Since IKEA does not open until after the AM peak hour, internal capture reductions were not applied to the AM peak hour. As there is limited mid-day peak-hour trip generation information available, the weekday PM peak-hour trip generation was assumed for the midday time period.

Response to ACTC-9
The City of Dublin has installed transit signal priority on Dublin Boulevard and plans to install transit signal priority at additional intersections along transit corridors to address bus delays for routes serving the project area. The City has constructed queue jump lanes on westbound Dublin Boulevard at Village Parkway, westbound Dublin Boulevard at Dougherty Road, eastbound Dublin Boulevard at Arnold Road, and on westbound Dublin Boulevard at Tassajara Road, providing an advantage to transit vehicles traveling through the corridor. The potential to construct queue jump lanes at other locations is also being evaluated by the City of Dublin along the corridor.

All intersections along Dublin Boulevard (the Rapid Bus Route) are projected to operate at LOS E (the ACTC standard) or better with the incorporation of mitigation measures in the cumulative condition with the project, and most intersections are projected to operate at LOD D or better (the City of Dublin standard).

With the availability of existing and planned queue jump lanes and existing transit signal priority, coupled with project mitigation measures which include installation of adaptive traffic signal control to provide better signal coordination along key corridors and intersection improvements, the project is not expected to add a significant amount of delay to transit vehicles on City streets.

Express buses that use the freeway system are allowed to use the Express Lane that is dynamically priced to maintain free-flow travel. Although the mainline operation of express buses on I-580 would not be affected by the project, Route 580X does enter/exit the freeway at Hacienda Drive. There is a carpool bypass lane for bus vehicles entering the freeway, and the freeway ramp terminal intersections are projected to operate at acceptable service levels. Bus operations could be slowed in the freeway merge/diverge areas of I-580 westbound at Hacienda Drive during the morning peak hour (diverge area) and I-580 eastbound at the Hacienda Drive interchange in the weekday PM peak hour (merge area). These impacts were identified in the Draft SEIR and no additional analysis is required. The project impact on this segment of Hacienda Drive was identified as less than significant in the weekday AM peak hour.

The 70X operates on I-680, north of I-580 where express lanes are provided. Similar to I-580, buses are permitted to use the Express Lanes where dynamic pricing maintains free-flow travel.

Response to ACTC-10
The Draft SEIR addresses safety impacts to pedestrians and bicyclists on pages 3.6-168 to 3.6-170, which include mitigation measures that require the applicant to provide bicycle facilities connecting
to the project site, bicycle detection at intersections that provide primary access to the project site, safe and convenient pedestrian access to the project vicinity, even during construction, and contribute to pedestrian and bicycle improvements at the I-580/Hacienda Drive interchange.

Additionally, mitigation measures that identified the need for roadway widening beyond the levels already contemplated and approved by the City of Dublin were reviewed for their secondary impact to pedestrians and cyclists. For example, potential secondary impacts to bicycles and pedestrians were identified with implementation of Mitigation Measure TRANS-4c, which would widen the Hacienda Drive on-ramp to provide additional mixed-flow vehicle storage for vehicles could result in secondary impacts to pedestrians and bicyclists by increasing pedestrian crossing distances through the interchange, and bicycle/vehicle conflicts. Mitigation Measure TRANS-8e was then identified to mitigate the secondary impact.

Response to ACTC-11
The agency provided closing remarks to conclude the letter. No response is necessary.
March 16, 2018

Amy Million, Principal Planner  
City of Dublin Community Development Department  
100 Civic Plaza  
Dublin, CA 94568

RE: City of Pleasanton Comments on IKEA Retail Center Project Draft EIR

Dear Ms. Million:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) prepared for the IKEA Retail Center Project ("proposed project"). The project site comprises approximately 27.31 acres located at 5344 and 5411 Martinelli Way in the City of Dublin.

The City of Pleasanton ("City") is concerned about the impacts to both the regional and local traffic circulation system. The proposed project will generate a significant number of vehicle trips on major arterial streets and at the following intersections:

- I-580, Hopyard Road;
- Owens Drive;
- Santa Rita Road;
- Stoneridge Drive;
- Valley Avenue; and
- El Charro Road.

These roadways have several intersections that currently operate at capacity in the AM and PM peak commute hours. The City is concerned that the proposed project will generate traffic that will lead to reduced level of service ("LOS") at the freeway interchanges and on local Pleasanton roadways. These increases will likely be centered around Hopyard Road, Santa Rita Road, and El Charro Road and may deteriorate arterial operations and local access to levels below City standards. In addition to the deterioration in LOS, lengthy queues may result at the arterial intersections and freeway interchanges. Therefore, the City submits the following comments concerning the draft EIR:
1. **Freeway Ramp Intersection Mitigations**

The cities of Pleasanton and Dublin have worked cooperatively on developments that are in close proximity and have commonly used the approach that is listed in draft EIR mitigation measure TR-5, which states:

*The Project Applicant shall contribute their fair share towards near term improvements and the Project Applicant and the City of Dublin shall work with the City of Pleasanton to identify and pay the project’s proportionate share of planned improvements.*

Similar mitigations in TR-11 and TR-15 are acceptable.

However, the City of Pleasanton does not believe this approach is sufficient when addressing Caltrans intersections. The Project Applicant should be responsible for construction of the mitigations at freeway ramp intersections. Impact/Mitigation Measures TR-8 (on page 74) and TR-17 (on page 100) identify the “fair share contribution.” This is not a sufficient measure to mitigate the identified project impacts. The proposed project would significantly impact Santa Rita Road at the eastbound I-580 ramp in the near-term PM as well as cumulative traffic in the PM peak and on Saturdays. The project applicant must be responsible for constructing the mitigation. The “Gateway” condition identified in the City of Pleasanton General Plan only applies if the mitigation identified is unnecessary or inconsistent with maintaining visual character, landscaping, and pedestrian amenities. The needed improvements at Santa Rita Road and the I-580 EB ramp is necessary and would not deteriorate visual character, landscaping, or pedestrian amenities and should therefore be included as a mitigation to be constructed by IKEA. As currently identified the freeway ramp intersection mitigations are not sufficient. TR-8 must require IKEA to construct a near-term improvement that fully mitigates the impacts of the proposed project and returns the intersection to an acceptable LOS D. Page 100 of the Dublin IKEA Transportation Assessment states that construction of TR-17 will return Santa Rita at I-580 EB ramps to an acceptable LOS, but the table on page 101 shows the Saturday LOS remaining F at this location. An appropriate mitigation must be identified and constructed with this project.

2. **Freeway and ramp operation.**

Impacts/Mitigation Measures TR-20, TR-21 and TR-22 all identify vehicle spill-back on to local roadways from the freeway on ramp lanes (Hop Yard westbound on ramp, Hacienda westbound and Hacienda eastbound on ramp). This vehicle spill-back is a direct result of traffic from the proposed project. Additionally, Impacts/Mitigation Measure TR-19 identifies that the freeway mainline between Foothill Road and El Charro Road on I-580 and between Stoneridge Drive and Alcosta Boulevard on I-680 are impacted and worsen the LOS F condition, which is considered significant. Mitigation Measures TR-20, TR-21 and TR-22 all propose to increase metering rates to solve the queue spillback. Increasing ramp metering rates is not an adequate mitigation to the impact. Additional freeway volume will further impact the freeway mainline. An acceptable mitigation is constructing additional on-ramp lanes to eliminate the queue spillback. The proposed project would
add nearly 150 vehicles to the southbound Hacienda to westbound freeway on ramp. This would increase the volume by 25% over existing volumes. Adding 25% to the existing volume is significant and the proposed project must construct the improvements to the freeway ramps.

3. Parking Demand
Page 135 of the Dublin IKEA Transportation Assessment identifies that there will be insufficient parking spaces in the month of December and during sales events. Our recent experience with overflow parking from Livermore’s Prime Outlets, where there are parking impacts from half-mile to one mile from the location, means that the draft EIR must include special event and December Parking and Circulation Plan that will identify appropriate overflow parking locations within the City of Dublin.

Thank you for your consideration of our comments. The City looks forward to our continued cooperative and proactive effort in addressing impacts of the proposed project. If you have any questions, please contact Mike Tassano, Traffic Engineer, at (925) 931-5670.

Sincerely,

Gerry Beaudin, AICP
Community Development Director

Electronic Cc: Ellen Clark, Planning Manager
Mike Tassano, Traffic Engineer
Dan Sodegren, City Attorney
Nelson Fialho, City Manager
City of Pleasanton (PLEASANTON)

Response to PLEASANTON-1
The agency provided introductory remarks to open the letter. No response is necessary.

Response to PLEASANTON-2
The agency listed six roadway facilities within the Pleasanton city limits and identified deterioration of level of service and lengthy queues as its primary concerns with these facilities. The City’s specific concerns are addressed in Response to PLEASANTON-3 through Response to PLEASANTON-5.

Response to PLEASANTON-3
The I-580 at Santa Rita Road intersection is projected to operate at a deficient LOS F during the PM peak hour in the near-term condition prior to the addition of project traffic. Based on the significance criteria identified in the Draft SEIR, a significant impact was identified. In instances where the addition of project traffic exacerbates an existing or projected deficiency, it is City of Dublin policy to require a fair-share contribution to the improvement rather than construction of said improvement.

In the cumulative condition, the project worsens Saturday peak hour LOS F conditions. The text of the Draft SEIR correctly identifies that the intersection would operate at LOS D with implementation of the improvements; Table 3.6-19 of the SEIR incorrectly indicates that the improvement would result in LOS E operations during the Saturday peak hour. This correction is noted in Section 4, Errata.

However, the range of mitigation required to return the intersection to LOS D should have also included the following: either modifying the northbound approach to construct a third eastbound left-turn lane or modifying the southbound approach to provide a third southbound through lane, in addition to re-timing the traffic signal. Section 4 Errata shows the proposed edits to Mitigation Measure TRANS-2c.

The effectiveness of modifying Mitigation Measure TRANS-2c to include constructing a third eastbound left-turn lane and associated receiving lane, or a third southbound through lane, is presented in Table 3-1 for the cumulative Saturday peak hour. As shown, the addition of this broader range of improvements would ensure that the project and cumulative impact is reduced to a less than significant level.

As indicated in the Draft SEIR, the City of Dublin and the project applicant shall work with the City of Pleasanton, Caltrans, and ACTC to identify feasible improvements at this interchange and contribute their fair share.

Table 3-1: Cumulative With Mitigation—Peak Hour Intersection Levels of Service

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Control</th>
<th>Peak Hour</th>
<th>Cumulative Without Project</th>
<th>Cumulative With Project</th>
<th>Cumulative With Project With Draft SEIR Mitigation</th>
<th>Cumulative With Project With Final SEIR Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Delay</td>
<td>LOS</td>
<td>Delay</td>
<td>LOS</td>
</tr>
<tr>
<td>Santa Rita Road/I-580 Eastbound Off-Ramp</td>
<td>Signal</td>
<td>Saturday</td>
<td>94.5</td>
<td>F</td>
<td>97.4</td>
<td>F</td>
</tr>
</tbody>
</table>

Notes:
**Bold** indicates LOS E/F; **Bold italics** indicates impacts due to the proposed project
Response to PLEASANTON-4
Mitigation measures for freeway ramp meter impacts considered a tiered approach. The first tier determined whether increasing the ramp metering rates within the allowable range by Caltrans (180 to 900 vehicles per hour) would mitigate the impact. This mitigation is identified as Mitigation Measure TRANS-4b in the Draft SEIR and was found to mitigate the impact at the southbound Dougherty Road to I-580 westbound ramp and southbound Hacienda Drive to I-580 eastbound ramp. Mitigation Measure TRANS-4b would also mitigate the impact at the southbound Hacienda Drive to westbound I-580 in the existing and near-term condition. Caltrans has agreed to work with the City of Dublin to evaluate ramp meter rates along the I-580 corridor.

To accommodate cumulative growth, an additional mitigation measure, Mitigation Measure TRANS-4c, that identifies the provision of a second mixed-flow on-ramp lane was required in the Cumulative condition for the southbound Hacienda Drive to westbound I-580 ramp.

Mitigation Measure TRANS-4c in the Draft SEIR identifies the fair-share contribution to the construction of a second mixed-flow on-ramp lane from southbound Hacienda Drive to westbound I-580. As this is an existing deficiency, fair-share payment towards improvements will be required in accordance with City of Dublin policy.

Response to PLEASANTON-5
As part of the conditions of approval, the project applicant shall be required to prepare a transportation demand management plan that also identifies parking management strategies (refer to Response to ACTC-3 for additional detail). As part of the parking management program, strategies to accommodate special events and peak holiday-season parking demand will be developed and are expected to include provision for off-site employee parking at near-by office campuses on weekends, or valet parking. The project applicant shall be responsible for developing, financing, and implementing the plan, and for securing overflow parking agreements with adjacent property owners, if needed.

Although parking is not a CEQA issue, the City recognizes that periods of peak parking demand can create excess vehicle circulation, congestion and driver frustration. The requirement to prepare a parking management plan as part of the conditions of approval, as well as provisions for plan monitoring, allows the City and project applicant to better peak travel flow to and around the project site.

Response to PLEASANTON-6
The agency provided closing remarks to conclude the letter. No response is necessary.
March 15, 2018

City of Dublin Community Development Department  
100 Civic Plaza  
Dublin, CA 94568  
Attn: Amy Million, Principal Planner

Subject: Comments on Draft Supplemental Environmental Impact Report for the IKEA Retail Center Project

Dear Ms. Million:

Thank you for providing Dublin San Ramon Services District (DSRSD) the opportunity to review and comment on the Supplemental Environmental Impact Report for the IKEA Retail Center Project. DSRSD had previously submitted comments on the planned project on September 18, 2017 via our letter “Comments on Notice of Preparation of Supplemental Environmental Impact Report and Notice of Public Scoping Meeting for the IKEA Retail Center Project.”

Page ES-4 of the Draft SEIR lists Utilities (water and wastewater) as an Area of Controversy for this project. DSRSD will be directly concerned with the utilities and service systems details of this project. The proposed project is within DSRSD’s service area for providing potable water, recycled water and wastewater collection and treatment services. Table ES-2 the Executive Summary Matrix lists Impact PSU-6 as one of the potential environmental impacts: The proposed project would not require expansion of existing or construction of new wastewater treatment facilities. The study finds this issue would have less than a significant impact on the environment and thus no mitigation is necessary. DSRSD agrees with this conclusion and the background analysis of this particular issue.

Table ES-2 also includes Impact PSU-5 as one of the potential environmental impacts: The proposed project would not require new or expanded water treatment facilities or infrastructure or additional water supply entitlements. The study finds this issue would have less than a significant impact on the environment and thus no mitigation is necessary. In the main, DSRSD agrees with this conclusion and the background analysis of this particular issue. DSRSD will provide the projected water demands for this project. DSRSD has obtained sufficient water supplies from its sources to provide sufficient domestic and landscape irrigation water for this project while meeting the same water demands for the other customers throughout its service area. The availability of source water supply currently limits the production of recycled water, particularly during peak demand periods. DSRSD anticipates resolving its current recycled water production limitations, but if the production limitations are not resolved, and if available recycled water supplies are insufficient to meet the irrigation demands for the Proposed Project, the Irrigation demands for the Proposed Project can also be met with potable water.

In addition, DSRSD operates an important potable water facility in the southeast corner of the site along Arnold Road as noted in Section 3.5.2 – Public Services and Utilities/Environmental Setting, page 3.5-11. This is a turnout facility in which DSRSD receives potable water from Zone 7, our potable water wholesaler, and directs the water to DSRSD’s distribution network. This is a critical DSRSD facility. Continued operation of the turnout facility must not be restricted or hindered in any way by construction or operation of the IKEA project.

Questions regarding these comments on the Draft SEIR, should be directed to Stan Kolodzie at (925)8875-2253 or kolodzie@dssrd.com.

Sincerely,

[Signature]

KHODORA N. BIAKTAN  
Principal Engineer

\DO\Data\VOA\ENGDEPT\CEQA\DSRSD Response to CEQA Documents\City of Dublin\2018\Comments on SEIR - IKEA Retail Center - 03-15-18.docx
SK/ST

cc: Stan Kolodzie, Associate Engineer
    Ryan Pendergraft, Junior Engineer
    Bonifacio Duenas, Engineering Tech/GIS Specialist II
Dublin San Ramon Services District (DSRSD)

Response to DSRSD-1
The agency provided introductory remarks to open the letter. No response is necessary.

Response to DSRSD-2
The agency noted that Draft SEIR’s page ES-4 identified “Utilities (water and wastewater)” as an Area of Controversy. The agency indicated that the proposed project is within the DSRSD service area and noted that the Draft SEIR concluded that impacts on water and wastewater would be less than significant. The agency concurred with this conclusion.

The “Areas of Controversy” portion of the Executive Summary is required by CEQA Guidelines Section 15123(2) and is intended to identify issues raised by agencies and the public. In this case, the City received numerous comments during the scoping process about the adequacy of infrastructure, which is the basis for identifying “Utilities (water and wastewater)” in this context. However, the Draft SEIR’s analysis found that impacts on water and wastewater were less than significant and DSRSD agrees with that conclusion.

Response to DSRSD-3
The agency referenced the Impact PSU-5 conclusion that water supply impacts would be less than significant and clarified that even if it does not have adequate recycled water supplies or infrastructure to serve the proposed project’s irrigation needs, these needs can still be met with potable water. No response is necessary.

Response to DSRSD-4
The agency referenced a statement on Draft SEIR page 3.5-11 about an important potable water facility being present in the corner of the project site along Arnold Road. The agency noted that this facility serves as a turnout (or connection point) between Zone 7 and DSRSD and that the operation of this facility cannot be restricted or hindered by construction or operation of the proposed project.

DSRSD staff advised Dublin city staff and the applicant team of the significance of this facility during the September 7, 2017 scoping meeting and it was noted in the Draft SEIR on pages 2-1, 3.5-11, and 3.5-25. As stated on page 3.5-25, implementation of the proposed project would not alter this facility.

Response to DSRSD-5
The agency provided closing remarks to conclude the letter. No response is necessary.
March 16, 2018

Via Email and Overnight Mail

Amy Million, Principal Planner
City of Dublin – Community Development Dept.
100 Civic Plaza
Dublin, CA 94568
Email: amy.million@dublin.ca.gov

Re: Comments on the Draft Supplemental Environmental Impact Report for the IKEA Retail Center Project (State Clearinghouse No. 2017082047)

Dear Ms. Million:

We are writing on behalf of Dublin Residents for Responsible Development regarding the January 2018 Draft Supplemental Environmental Impact Report ("DSEIR") prepared for the IKEA Retail Center Project ("Project"). The Project involves the development of approximately 432,099 square feet of commercial uses on 27.45 acres at 5344 and 5411 Martinelli Way. The Project would be anchored by an IKEA store of approximately 339,099 square feet and would feature up to 93,000 square feet of lifestyle retail-restaurant uses.

As explained in these comments, the DSEIR does not comply with the requirements of the California Environmental Quality Act ("CEQA") in several respects. First, DSEIR fails to adequately disclose, evaluate and mitigate impacts on biological resources at the project site, including special status plants and animals. Second, the DSEIR lacks substantial evidence to support its determination that air quality impacts from Nitrogen Oxide ("NOx") emission levels will be less than significant, as the DSEIR’s emissions calculations underestimate the Project’s construction and operational NOx emissions. Third, the DSEIR’s determination that greenhouse gas emissions will be less than significant is not supported by substantial evidence, as the DSEIR relies on an unsubstantiated and improper methodology for determining the significance of long-term GHG emissions. For
March 16, 2018
Page 2

each of these reasons, the City of Dublin (“City”) may not approve the Project until a revised document is prepared and recirculated for public review and comment.

These comments were prepared with the assistance of biological resources expert Scott Cashen and air quality experts Matt Hagemann and Hadley Nolan of Soil Water Air Protection Enterprise (“SWAPE”). Mr. Cashen’s comments are attached to this letter as Exhibit A and his curriculum vitae is attached as Exhibit B. SWAPE’s comments are attached to this letter as Exhibit C, and Mr. Hagemann’s and Ms. Nolan’s curriculum vitae are attached as Exhibit D. Mr. Cashen’s and SWAPE’s are submitted to the City in addition to the comments contained herein. The City must respond to these comments separately and individually.

I. Statement of Interest

Dublin Residents for Responsible Development (“Dublin Residents”) is an unincorporated association of individuals and labor unions that may be adversely affected by the potential environmental impacts of the Project. The association includes: City of Dublin residents Kris Gallegos, Art Mayberry, Joe Steiner, and Francisco Rosa; the International Brotherhood of Electrical Workers Local 595, Plumbers & Steamfitters Local 342, Sheet Metal Workers Local 104, and their members and their families; and other individuals that live and/or work in the City of Dublin and Alameda County.

Individual members of Dublin Residents and the affiliated unions live, work, recreate and raise their families in Alameda County, including in the City of Dublin. These members would be directly affected by the Project’s environmental and health and safety impacts. Members of Dublin Residents may also work on the Project itself. Accordingly, these individuals will be first in line to be exposed to any health and safety hazards created by the Project. Dublin Residents has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making it less desirable for businesses to locate and people to live there.
II. CEQA REQUIRES THE DISCLOSURE OF ALL POTENTIALLY SIGNIFICANT PROJECT IMPACTS AND THE INCORPORATION OF ALL FEASIBLE MITIGATION MEASURES NECESSARY TO REDUCE SUCH IMPACTS TO BELOW A LEVEL OF SIGNIFICANCE

CEQA has two basic purposes. First, CEQA is designed to inform decisionmakers and the public about the potential, significant environmental effects of a project.\(^1\) Except in certain limited circumstances, CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report (“EIR”).\(^2\) An EIR’s purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. In this respect, an EIR “protects not only the environment but also informed self-government.”\(^3\)

To fulfill this function, the discussion of impacts in an EIR must be detailed, complete, and “reflect a good faith effort at full disclosure.”\(^4\) CEQA requires an EIR to disclose all potential direct and indirect, significant environmental impacts of a project.\(^5\) In addition, an adequate EIR must contain the facts and analysis necessary to support its conclusions.\(^6\)

The second purpose of CEQA is to require public agencies to avoid or reduce environmental damage when possible by requiring appropriate mitigation measures and through the consideration of environmentally superior alternatives.\(^7\) If an EIR identifies potentially significant impacts, it must then propose and evaluate mitigation measures to minimize these impacts.\(^8\) CEQA imposes an affirmative obligation on agencies to avoid or reduce environmental harm by adopting feasible

\(^1\) CEQA Guidelines § 15002, subd. (a)(1).
\(^3\) Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.
\(^5\) Pub. Resources Code § 21100, subd. (b)(1); CEQA Guidelines § 15126.2, subd. (a).
\(^6\) See Citizens of Goleta Valley 52 Cal.3d at 568.
\(^7\) CEQA Guidelines § 15002, subds. (a)(2)-(3); see also, Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners (2001) 91 Cal.App.4th 1344, 1354; Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564; Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 391, 400.
\(^8\) Pub. Resources Code §§ 21002.1, subd. (a), 21100, subd. (b)(3).
project alternatives or mitigation measures.\textsuperscript{9} Without an adequate analysis and description of feasible mitigation measures, it would be impossible for agencies relying upon the EIR to meet this obligation.

As discussed in detail below, the DSEIR fails to meet either of these two key goals of CEQA. The DSEIR fails to adequately and completely describe the Project and the Project setting and fails to disclose and evaluate all potentially significant environmental impacts of the Project. In addition, it proposes mitigation measures that are unenforceable, vague or so undefined that it is impossible to evaluate their effectiveness. A revised DSEIR must be prepared and recirculated to comply with CEQA’s most fundamental requirements.

III. THE DSEIR FAILS TO ESTABLISH THE ENVIRONMENTAL SETTING AND TO ADEQUATELY DISCLOSE, EVALUATE, AND MITIGATE ALL POTENTIALLY SIGNIFICANT IMPACTS TO BIOLOGICAL RESOURCES

A. The DSEIR Fails to Establish the Environmental Setting Resulting in an Inadequate Assessment of Potentially Significant Impacts to Biological Resources

The DSEIR is legally inadequate because it fails to establish the environmental setting of the Project, resulting in inadequate disclosure and assessment of the Project’s potentially significant impacts on biological resources.

The environmental setting, or baseline, refers to the conditions on the ground and is a starting point to measure whether a proposed project may cause a significant environmental impact.\textsuperscript{10} Describing the environmental setting is a prerequisite to an accurate and meaningful evaluation of the Project’s environmental impacts. Without this information, an appropriate analysis cannot be performed, effective mitigation cannot be designed, and alternatives cannot be developed. Furthermore, the failure to provide a proper baseline precludes the public from evaluating the scope of potential biological impacts that may result from Project-related activities.

\textsuperscript{9} Pub. Resources Code §§ 21002-21002.1.


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\textsuperscript{3} CONT

\textsuperscript{4}
Here, the City’s biological resource analysis is based upon three “non-protocol” reconnaissance surveys of the project site. FirstCarbonSolution (“FCS”) biologists visited the Project site two times: once in spring 2016 and once and 2017.\textsuperscript{11} Additionally, the Biological Resources Assessment (“BRA”) attached to DSEIR was prepared by WRA, Inc. following a single site visit in August 2013.\textsuperscript{12} Neither the FCS nor the WRA visits included protocol-level surveys.\textsuperscript{13} As discussed in the attached expert comments of biologist Scott Cashen, these not protocol reconnaissance surveys were not adequate to establish the biological resources that may reside on or rely upon the habitat present on the Project site.\textsuperscript{14} As a result, the City lacks substantial evidence to support a determination that the proposed mitigation will be sufficient to reduce impacts to biological resources to a less than significant level.

CEQA requires that the City collect sufficient facts to enable a complete and accurate description of the Project and its impacts.\textsuperscript{15} While a City has discretion to determine what surveys may be necessary to provide a complete and accurate description of the project setting, it must exercise that discretion such that its analysis and conclusions are supported by substantial evidence. In the case at hand, additional surveys are necessary to determine if the DSEIR’s findings regarding the Project’s biological impacts and the effectiveness of proposed mitigation are supported by substantial evidence.

1. The DSEIR Fails to Disclose the Potential Presence of Vernal Pool Fairy Shrimp

The Project site lies within the Livermore Vernal Pool Region.\textsuperscript{16} Ephemeral pools in the Livermore Vernal Pool Region provide habitat for special-status branchiopods, including the vernal pool fairy shrimp and the California

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\textsuperscript{11} DSEIR at p. 3.2-15.
\textsuperscript{12} DSEIR at Appendix C.1, p. iii (WRA, Inc. Biological Resources Assessment).
\textsuperscript{13} See DSEIR at pp. 3.2-15 – 3.2-16; Exhibit A, Scott Cashen, Comments on the Draft Supplemental Environmental Impact Report Prepared for the “IKEA Retail Center Project” (March 15, 2018) (“S. Cashen Comments”), p. 2.
\textsuperscript{14} S. Cashen Comments at p. 2.
\textsuperscript{15} Sundstrom v. County of Mendocino (1988) 22 Cal.App.3d 296, 311; see also Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal. (1988) 47 Cal.3d 376, 404-05.
\textsuperscript{16} S. Cashen Comments at p. 5.
linderiella. The DSEIR notes that the Project site contains seasonal wetlands or vernal pools. Based upon the information provided in the Wetland Delineation data sheets provided, biologist Scott Cashen was able to determine that the wetlands at the project site hold water long enough to provide habitat for the federally threatened vernal pool fairy shrimp.

The DSEIR does not evaluate, or even disclose, the potential presence of vernal pool fairy shrimp at the Project site. However, the Biological Resource Assessment notes that invertebrate shells from Ostracoda were detected in two of the wetlands in 2013. As Mr. Cashen explains, the presence of these ‘seed shrimp’ at the Project site provides substantial evidence that vernal pool fairy shrimp also may occur at the Project site. The failure to disclose the potential presence of vernal pool fairy shrimp thus amounts to a failure to establish the complete environmental setting for the Project, and prevents an evaluation of potential impacts to this special status species.

Pursuant to mitigation incorporated into the Eastern Dublin General Plan Amendment and Specific Plan, species-specific surveys for special-status invertebrates in appropriate wetland habitats are required prior to approval of certain projects in the Reduced Planning Area. Here, the Project site is within the Reduced Planning Area subject to the survey requirements. However, the required surveys have not been performed. Instead, the BRA simply concluded that vernal pool fairy shrimp are “unlikely to occur in the Project Area due to the lack of vernal pool habitat and the area’s history of repeated discing, grading and leveling.” As a result, the DSEIR contains no discussion of vernal pool fairy shrimp.

As Mr. Cashen explains, the BRA’s conclusion is not supported by evidence, and it is contradicted by scientific information on vernal pool fairy shrimp habitat. In the first place, vernal pool fairy shrimp are not limited to ‘vernal pool’ habitat; they also

17 Id.
18 DSEIR at p. 3.2-1.
19 S. Cashen Comments at p. 5.
20 DSEIR, Appendix C.1, Appendix B (Wetland Delineation Data Form for sampling date 11/5/2013).
21 S. Cashen Comments at p. 5.
23 DSEIR, Appendix C.1 at p. 12.
24 S. Cashen Comments at pp. 5-6.
4174-003acp
occur in vernal pool-like habitats. Indeed, vernal pool fairy shrimp occur in a wide range of habitats, including degraded or otherwise poor-quality habitats such as pools created by tire tracks and roadside ditches. In this case, the seasonal wetlands at the Project site provide potential habitat for vernal pool fairy shrimp.

Second, according to the Wetland Delineation, the wetlands at the Project site have experienced “little disturbance” since 2008. This contradicts the statement in the BRA that the wetlands are unlikely to provide habitat because they have been subject to repeated disking, grading, and leveling. Moreover, even disking, grading, and leveling do not preclude the potential presence of vernal pool fairy shrimp. For example, in Contra Costa County, over 100 vernal pool fairy shrimp were documented occurring in a “non-vegetated depression in dirt road along tracks—partially scraped by bulldozer,” and that had “routine vehicle traffic through [the] area.”

In sum, because substantial evidence shows that potential habitat for vernal pool fairy shrimp occurs on the Project site and no protocol-level surveys have been conducted to confirm or refute their presence, the DSEIR’s failure to include vernal pool fairy shrimp as among the special-status species at the Project site is not supported. This omission amounts to a failure to establish an accurate environmental setting in violation of CEQA, and prevents evaluation of a potentially significant impact to vernal pool fairy shrimp resulting from Project-related fill activities.

2. The DSEIR Fails to Disclose the Potential Presence of California Linderiella

Like vernal pool fairy shrimp, the DSEIR fails to disclose the potential presence of California linderiella at the Project site, despite substantial evidence of their potential to occur. California linderiella occupy the same type of habitat as the vernal pool fairy shrimp. They have also been detected in seasonal wetlands

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25 Id. at p. 6.  
26 Id. at p. 6.  
27 Id.  
28 See also DSEIR at p. 3.2-1; S. Cashen Comments at p. 6.  
29 S. Cashen Comments at p. 6.  
30 Id.  
31 Id. at p. 7.  
4174-003acp
similar to those at the Project site. Mr. Cashen’s comments explain that California linderiella have the potential to occur on the Project site and that their potential presence should be disclosed in DSEIR.

The DSEIR’s failure to disclose the potential presence of California linderiella violates CEQA by failing to establish an accurate and complete environmental setting. The failure to disclose the potential presence of California linderiella also results in a failure to evaluate potentially significant impacts to this species resulting from Project-related fill activities.

3. The DSEIR Fails to Provide Critical Information Regarding Burrowing Owls at the Project Site

The DSEIR states that there is moderate potential for burrowing owls to occur at the Project site. However, the DSEIR fails to establish the scope of the burrowing owl population on the Project site, and fails to disclose the status and demography of the local and regional burrowing owl populations that may be affected by loss of this potential breeding and foraging habitat. The DSEIR also fails to accurately disclose the amount of burrowing owl habitat on the Project site, preventing a contextual assessment of impacts due to potential habitat loss.

CEQA requires a sufficient description of the Project setting to adequately inform the public and decisionmakers of the potential impacts of the Project. An accurate project setting is also necessary to permit meaningful assessment of the sufficiency of proposed mitigation measures. Here, the DSEIR acknowledges that the site provides potential burrowing owl habitat, but the surveys necessary to establish the scope of burrowing owl use of the site were never conducted. Instead, the DSEIR’s discussion is based on reconnaissance-level surveys by FCS and WRA.

As Mr. Cashen’s comments explain, burrowing owls are difficult to detect due to their cryptic coloration, extensive use of burrows, and tendency to flush (i.e., fly

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32 Id.
33 Id.
34 DSEIR at p. 3.2-6.
35 S. Cashen Comments at p. 8.
36 Id.
4174-003acp
away) when approached. Because of these characteristics, researchers and the California Department of Fish and Wildlife (“CDFW”) have concluded that four independent surveys are necessary to provide reliable information on the presence of burrowing owls, and that data from the four surveys is essential to avoiding, minimizing, and properly mitigating the impacts of a project.

For the Project here, Mitigation Measure BIO-1c requires the Applicant to retain a biologist to conduct two pre-construction surveys for burrowing owls prior to the first ground disturbing activities. Although CDFW guidelines do recommend “take avoidance” (i.e., pre-construction) surveys, the guidelines make it clear that such surveys are no substitute for the four “detection surveys” that are required to fully assess a project’s impacts and formulate appropriate mitigation. Because both FCS and WRA failed to implement the CDFW survey protocol during their site visits, the City lacks the information needed to fully disclose and evaluate the Project’s impacts to burrowing owls and to ensure effective mitigation.

The need to establish the baseline population of burrowing owls on a site prior to assessing impacts and mitigation measures is emphasized in CDFW’s 2012 *Staff Report on Burrowing Owl Mitigation*:

> Adequate information about burrowing owls present in and adjacent to an area that will be disturbed by a project or activity will enable the Department, reviewing agencies and the public to effectively assess potential impacts and will guide the development of avoidance, minimization, and mitigation measures.

In short, it is not possible to fully and effectively assess the extent of the Project’s impacts on burrowing owls until surveys that adhere to CDFW guidelines have been conducted. Accordingly, the City must require the Applicant to conduct the protocol surveys described in CDFW’s 2012 Staff Report. The results of those surveys need to be released in a revised DSEIR so that they can be thoroughly

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37 Id.
38 Id.
39 DSEIR at pp. 3.2-19 – 3.2-20.
40 S. Cashen Comments at p. 8 (citing California Department of Fish and Game (2012) Staff Report on Burrowing Owl Mitigation).
41 Id.
vetted by the public, resource agencies, and decisionmakers as a part of the CEQA review process.

Furthermore, the DSEIR’s description of the environmental setting is inadequate because it fails to disclose the extent of burrowing owl habitat on the Project site, as well as the amount of habitat that would be eliminated by the Project.42 Significantly, the DSEIR also fails to disclose the Project’s proximity to the important Camp Parks burrowing owl population and its importance to the continuing viability of burrowing owls in the region.43 This information is an essential component for the DSEIR because it, along with the scope of the population on the Project site, will enable the public and decisionmakers to evaluate the relative significance of the Project’s impacts to the overall burrowing owl population and to evaluate the sufficiency of the proposed mitigation.

As Mr. Cashen’s comments explain, burrowing owl populations have declined dramatically in the San Francisco Bay Area since the Eastern Dublin Specific Plan EIR was prepared.44 The species has been extirpated, or nearly extirpated, from six Bay Area counties (Napa, Marin, San Francisco, Santa Cruz, Sonoma, and San Mateo).45 Although burrowing owls were once abundant throughout Alameda and Contra Costa counties, they are now primarily limited to the eastern portions of those counties.46 Indeed, only two “large” breeding colonies of burrowing owls remain in Alameda County: one in the Altamont Hills, and the second in the Camp Parks area.47 The Project site is located at the periphery of the Camp Parks burrowing owl population, which is the last remaining large population of burrowing owls in the Livermore-Amador Valley.48 Because the Project would contribute to the further decline of burrowing owl habitat in the Camp Parks area – one of the few remaining core population areas in the region – the Project may have a significant effect on the overall persistence of burrowing owls in the region.49

42 See Id. at p. 9.
43 Id. at pp. 7, 9.
44 Id. at p. 7.
45 Id.
46 Id.
47 Id.
48 Id.
49 Id. at pp. 7-8.
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The City is required to disclose sufficient information to enable a complete assessment of whether additional mitigation is necessary due to the severity of impacts to a core population area. The DSEIR must be revised to establish and disclose the proximity and importance of the Camp Parks burrowing owl population so that the Project’s potential impacts to this core population area may be evaluated and appropriate mitigation identified.

4. The DSEIR Fails to Provide Information Regarding Special Status Plant Species That is Necessary to Assess Potential Impacts and the Effectiveness of Mitigation

While the DSEIR acknowledges that Congdon’s Tarplant is known to occur on approximately 6.81 acres of the Project site,50 the document fails to disclose that other special status plant species may also occur. Because no protocol-level surveys were performed sufficient to determine whether other potentially-present special status plant species actually occur on the Project site, there is no basis to conclude that these other special status plants are not present.51 The failure to disclose the potential presence of these other species and the failure to perform surveys adequate to confirm the presence or non-presence of these species is a violation of CEQA. The DSEIR failures to inform the public and decisionmakers which plants may be impacted by the Project, the scope and significance of the plant population that may be impacted, and whether effective mitigation may be designed or alternatives should be considered. The DSEIR must be revised to adequately identify what special-status plant species may occur on the site, incorporate the results of protocol-level surveys for these plants, and identify appropriate mitigation requirements.

In Mr. Cashen’s comments, he explains that at least two other special-status plant species are known occur at the Project site and neither are addressed in the DSEIR: (1) western dodder (Cuscuta occidentalis) and (2) Douglas’ fiddleneck (Amsinckia douglasiana).52 These two plants are listed as plants observed at the Project site at the time of the WRA wetland delineation.53 Both of these species are locally rare (i.e., rank “A1” and “*A1x ” by the East Bay Chapter of the California

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50 DSEIR at p. 2-1.
51 S. Cashen Comments at p. 3.
52 Id. at pp. 3-4.
53 DSEIR, Appendix C.1, Appendix A (BRA List of Observed Plant and Wildlife Species).
Native Plant Society).\(^{54}\) Locally rare plant species with an “A” designation are considered special-status species under Sections 15380 and 15125(c) of the CEQA Guidelines. The presence of Douglas’ fiddleneck at the Project site is especially significant because—until now—it was believed to be extirpated from Alameda and Contra Costa counties.\(^{55}\)

Furthermore, the BRA dismissed the potential for saline clover (*Trifolium hydrophilum*) and hairless popcorn flower (*Plagiobothrys glaber*) to occur at the Project site, though its conclusions are unsupported.\(^{56}\) According to the BRA, saline clover is unlikely to occur at the site because “[t]he existing grassland and seasonally wet depression habitat in the Project Area is heavily disturbed and of low quality.”\(^{57}\) Additionally, the BRA states that hairless popcorn flower is unlikely to occur at the Project site because “[t]his species is presumed extinct and has not been found since 1954.”\(^{58}\)

Contrary to the statements in the BRA, however, Mr. Cashen explains that saline clover has been detected in disturbed areas and “low quality” habitats.\(^{59}\) Saline clover is also known to occur in the Tassajara Area.\(^{60}\) Additionally, the BRA’s statement that hairless popcorn flower has not been found since 1954 is simply incorrect, as the species was rediscovered near Tassajara Road in Dublin during surveys conducted in 2002 and 2006.\(^{61}\) Accordingly, the DSEIR’s assumption that these plant species have no potential to be present on the Project site is not supported by substantial evidence.

Data from focused surveys is necessary to fully disclose the existing conditions at the Project site, analyze the Project’s impacts, formulate appropriate mitigation, and develop possible alternatives. Deferring the surveys until after completion of the CEQA review process fails to fully disclose potential Project impacts on special status plants and precludes the public, resource agencies, and

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\(^{54}\) S. Cashen Comments at p. 3.
\(^{55}\) Id. at p. 4.
\(^{56}\) DSEIR, Appendix C.1, Appendix B at pp. B-15, B-16 (Potential for Special-Status Species to Occur in the Project Area); *see also* S. Cashen Comments at p. 4.
\(^{57}\) Id. at p. B-15.
\(^{58}\) Id. at p. B-16.
\(^{59}\) S. Cashen Comments at p. 4.
\(^{60}\) Id. at p. 5.
\(^{61}\) Id. at pp. 4-5.

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scientific community from meaningful comment on these potential impacts, and precludes meaningful review of the Project’s impacts by decisionmakers exercising their discretion in approving entitlements and permits.

5. The DSEIR Fails to Establish Baseline Conditions for Special Status Bats at the Project Site

The DSEIR identified three special-status bat species (pallid bat, Townsend’s big-eared bat, and Yuma myotis) that have a moderate potential of roosting in the existing building at the Project site. As with the other special-status species, the Applicant did not conduct the necessary surveys to determine whether any bat species were in fact using the building as a roost site. The failure to establish baseline conditions precludes the public, resource agencies, and scientific community from being able to review and submit informed comments pertaining to the Project’s impacts and the sufficiency of proposed mitigation.

B. The DSEIR Fails to Disclose, Evaluate, and Mitigate All Potentially Significant Impacts to Biological Resources

1. The DSEIR Fails to Evaluate and Mitigate Potential Impacts to Special Status Branchiopods

As discussed in subsection (a)(1) above, the DSEIR fails to disclose that special status branchiopods including vernal pool fairy shrimp and California linderiella may be present in the seasonal wetlands at the Project site. As a result, the DSEIR also fails to evaluate the potential impacts that the Project may have on these special-status species and fails to identify any measures to mitigate potentially significant impacts. Because substantial evidence shows that potential habitat for vernal pool fairy shrimp and California linderiella exists on the Project site, the DSEIR must be revised to disclose this information and evaluate potential impacts to these special status species.

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62 DSEIR at pp. 3.2-6, 3.2-11.
63 S. Cashen Comments at p. 8.
64 Id. at p. 9.
65 Id.
2. The DSEIR Fails to Evaluate and Mitigate All Potential Impacts to Burrowing Owls

As discussed above, the DSEIR fails to adequately disclose the scope of burrowing owls and their habitat on the Project site. The DSEIR also fails to disclose the Project’s proximity to the critical Camp Parks burrowing owl population. As a result of these critical omissions, the DSEIR has failed to meaningfully evaluate and disclose the scope of potential impacts to burrowing owls from Project construction. Without such evaluation, it is impossible to fully assess the adequacy of the proposed mitigation measures. Furthermore, as Mr. Cashen’s comments demonstrate, the mitigation measures that are proposed are inadequate and do not support a finding that they would reduce Project impacts below a level of significance.66

i. The DSEIR Fails to Evaluate Impacts from Eviction

The DSEIR fails to evaluate the potential impacts to burrowing owls from the proposed eviction of burrowing owls from their burrows. Additionally, the DSEIR fails to identify mitigation measures to reduce the potential impacts of eviction to a less than significant level.

Under CDFW guidelines, passive relocation or eviction is a potentially significant impact under CEQA that must be analyzed.67 The temporary or permanent closure of burrows may result in a variety of impacts to the species, including: (1) significant loss of burrows and habitat for reproduction and other life history requirements; (2) increased stress and reduced reproductive rates; (3) increased depredation; (4) increased energetic costs; and (5) risks posed by having to find and compete for available burrows.68

Moreover, because the DSEIR fails to provide a burrowing owl exclusion plan, or fundamental details contained in such plans (e.g., location of replacement burrows and compensation habitat, whether exclusion permitted during breeding season), it is not possible for the public, resource agencies, and decisionmakers to

66 Id. at pp. 9-10.
67 Id. at p. 10.
68 Id.
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evaluate the potential impacts to owls evicted from the Project site and the adequacy of the mitigation.\textsuperscript{69}

The DSEIR must be revised to provide sufficient detail on proposed eviction activities to enable meaningful evaluation of impacts from these activities.

\section*{ii. Protective Buffer Requirements Are Vague and Unenforceable}

In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. In this case, the DSEIR’s direction to avoid disturbing or otherwise impacting occupied burrows to mitigate impacts to burrowing owls is vague and unenforceable.\textsuperscript{70} As result, the requirement does not provide substantial evidence that impacts will be mitigated below a level of significance. The DSEIR does not establish the minimum buffers that need to be implemented around burrows. Nor does the DSEIR establish monitoring that should be implemented to ensure burrowing owls are not disturbed by construction activities.

The DSEIR’s direction to avoid burrowing owls should be revised to reflect CDFW guidelines, which indicate buffers may need to be up to 500 meters, depending on the time of year and level of disturbance.\textsuperscript{71} In the absence of greater specificity, it is purely speculative to assume that the proposed mitigation will reduce impacts below a level of significance.

\section*{iii. The DSEIR Improperly Defers Mitigation}

The DSEIR violates CEQA by deferring specification of critical elements of the mitigation measures needed to reduce the Project’s potentially significant impacts to burrowing owls below a level of significance. Specifically, the DSEIR defers identifying: (1) a compensatory mitigation ratio; (2) the acceptable mitigation location and mechanism (e.g., habitat acquisition, purchase of credits at a mitigation bank, in-lieu fee, etc.); (3) site protection methods; (4) financial

\begin{itemize}
  \item \textsuperscript{69} Id.
  \item \textsuperscript{70} DSEIR at p. 3.2-20.
  \item \textsuperscript{71} S. Cashen Comments at p. 17.
\end{itemize}
assurances; (5) performance standards; and (6) monitoring requirements.\textsuperscript{72} Instead, the DSEIR relies on the establishment of mitigation requirements in a \textit{future} Burrowing Owl Mitigation Plan, which is to be reviewed and accepted by CDFW and the City prior to the first ground-disturbing activities.\textsuperscript{73}

Deferring formulation of mitigation measures to post-approval studies is generally impermissible.\textsuperscript{74} Mitigation measures adopted after Project approval deny the public the opportunity to comment on the Project as modified to mitigate impacts.\textsuperscript{75} Deferral of the specifics of mitigation is permissible only where the lead agency “commits itself to mitigation” and “lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan.”\textsuperscript{76} If identification of specific mitigation measures is impractical until a later stage in the project, specific performance criteria must be articulated and further approvals must be made contingent upon meeting these performance criteria.\textsuperscript{77} The courts have held that simply requiring a project applicant to obtain a future report and then comply with any recommendations that may be based upon the report is insufficient to meet the standard for properly deferred mitigation.\textsuperscript{78}

Here, the DSEIR’s proposed approach deprives the public of an opportunity to review and submit comments on fundamental aspects of the Project’s mitigation strategy prior to Project approval. Furthermore, neither the CDFW nor the City has an oversight approach to ensure compensatory mitigation is occurring.\textsuperscript{79}

As Mr. Cashen’s comments explain, a 1:1 ratio is not likely to be sufficient to mitigate impacts below a level of significance in this case.\textsuperscript{80} This is due to the rapid decline of the Camp Parks population and the limited availability of compensation habitat to support that population.\textsuperscript{81} A project and region specific ratio is required  

\textsuperscript{72} Id.
\textsuperscript{73} DSEIR at p. 3.2-20.
\textsuperscript{77} Id.
\textsuperscript{78} Id.
\textsuperscript{79} S. Cashen Comments at p. 17.
\textsuperscript{80} Id. at pp. 17-18.
\textsuperscript{81} Id.
in this case to support a finding that the mitigation ratio will reduce impacts below a significant level.

In this case, a regional specific mitigation ratio for loss of burrowing owl habitat has already been established, yet was never disclosed or applied in the DSEIR. The Eastern Alameda County Conservation Strategy (“EACCS”) establishes the standard for mitigation needed to conserve species and habitat in Eastern Alameda County. The EACCS requires compensatory mitigation for impacts to burrowing owl habitat to be within one-half mile of a burrowing owl nest used within the previous three years.82 Additionally, the EACCS establishes a standardized mitigation ratio of 3:1 (3.5:1 if the mitigation site is in a different core area).83 Anything lower cannot be assumed to reduce regional impacts to a less than significant level.84

The EIR should be revised to include a provision that compensatory mitigation shall be required for Project impacts to burrowing owls and their habitat at a minimum of the EACCS compensatory mitigation ratio standard for burrowing owls of 3:1 (3.5:1 if the mitigation site is in a different core area). By failing to identify the applicability of the EACCS mitigation requirements and failing to establish a performance standard based on regional mitigation needs, the DSEIR’s deferral of the specific mitigation ratio requirement violates CEQA and is not support by substantial evidence.

3. The DSEIR Fails to Adequately Evaluate and Mitigate Potential Impacts to Special Status Plants

The DSEIR requires the Applicant to conduct a focused survey to determine the presence of Congdon’s tarplant prior to construction.85 If no special-status plant species are found during this pre-construction survey, then no additional mitigation measures for special status plants will be implemented. If Congdon’s tarplant is detected during the survey, additional mitigation requirements are triggered.

82 Id. at p. 18.
83 Id.
84 Id.
85 DSEIR at p. 3.2-18.
The DSEIR’s proposed mitigation strategy is not sufficient to ensure impacts to special status plants species will be less than significant. First, the DSEIR does not require focused surveys or specify mitigation for any other special-status plant species that occur, or could occur, at the Project site. As a result, potentially significant impacts to all special-status plants besides Congdon’s tarplant remain unmitigated.

Second, Congdon’s tarplant is already known to occur at the Project site, thus compensatory mitigation should not be contingent on future surveys. This is especially true for annual plants such as Congdon’s tarplant because the presence and abundance of annual plants can fluctuate dramatically from year to year due to climatic conditions. The absence of Congdon’s tarplant from the Project site during a preconstruction survey may be the result of adverse survey conditions rather than actual absence of the species, which may in turn cause potentially significant impacts to go unmitigated.

Third, the DSEIR indicates that compensatory mitigation would not be required if activity exclusion zones can be installed around habitat occupied by Congdon’s tarplant during construction of the Project. However, based on the site plan, Mr. Cashen states that all existing plants will be directly or indirectly affected by the Project. Therefore, even if activity exclusion zones are feasible, the plant populations have no chance for long-term persistence at the site once the Project is operational.

The DSEIR must be revised to address these deficiencies in the proposed mitigation strategy and ensure all potentially significant impacts are mitigated to the extent feasible.

i. The DSEIR Defers Mitigation for Congdon’s Tarplant Impacts

The DSEIR requires that the Applicant prepare a mitigation plan if impacts to Congdon’s tarplant cannot be avoided. The DSEIR states:

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87 Id.
88 Id.
89 DSEIR at pp. 3.2-18 – 3.2-19.
90 S. Cashen Comments at p. 14.
A mitigation plan may include but is not limited to the following: the acquisition of off-site mitigation areas presently supporting the Congdon’s tarplant, purchase of credits in a mitigation bank that is approved to sell credits for the Congdon’s tarplant, or payment of in-lieu fees to a public agency or conservation organization (e.g., a local land trust) for the preservation and management of existing populations of Congdon’s tarplant.91

As proposed, the DSEIR improperly defers formulation of the mitigation plan without establishing fundamental aspects needed to ensure effectiveness and enforceability. Such fundamental aspects include: (1) the performance standards (or success criteria) for the proposed mitigation, (2) a definitive enforcement mechanism that ensures performance standards are met; (3) the contingency or remedial action measures that would be triggered if success standards are not achieved; (4) the measures that would be implemented to ensure the long-term protection and management of sensitive biological resources at mitigation sites; and (5) the required monitoring program, including the monitoring techniques, effort, and frequency.92 Because the DSEIR lacks these fundamental details, the City has failed to ensure that Project impacts to sensitive botanical resources would be reduced to a less than significant level.93

Furthermore, the DSEIR’s deferral of the mitigation plan is exacerbated by its failure to provide evidence that the proposed mitigation is feasible. As Mr. Cashen’s comments note, there do not appear to be any mitigation banks that sell credits for impacts to Congdon’s tarplant.94 Additionally, there do not appear to be any in-lieu fee programs that cover impacts to Congdon’s tarplant, and the DSEIR fails to provide evidence that sites suitable for acquisition exist.95

The City must produce a revised DSEIR to establish that the proposed mitigation is feasible. Specifically, the DSEIR should identify: (1) the potential mitigation sites, and status of Congdon’s tarplant at those sites; (2) the actual mitigation ratio proposed; (3) performance standards for the mitigation sites; (4) the required monitoring program; and, (5) measures that will be implemented to ensure

91 DSEIR at p. 3.2-19.
93 Id.
94 Id. at p. 15.
95 Id.
the long-term protection and management of Congdon’s tarplant populations at the mitigation site(s).\textsuperscript{96} Without such details, the DSEIR lacks substantial evidence to support a finding that the proposed mitigation will reduce impacts below a level of significance.

\textbf{ii. The Proposed Compensatory Mitigation is Vague and Inconsistent with the EACCS}

According to the DSEIR, the Congdon’s tarplant mitigation plan should incorporate a compensatory mitigation ratio of at least 1:1.\textsuperscript{97} However, the Eastern Alameda County Conservation Strategy (“EACCS”) establishes the standard for mitigation needed to conserve species and habitat in Eastern Alameda County, and the proposed mitigation ratio does not adhere to EACCS standards.\textsuperscript{98} The EACCS establishes a standardized mitigation ratio of 5:1 for impacts to focal plant species (e.g., Congdon’s tarplant).\textsuperscript{99}

Notably, the 1:1 ratio proposed in the DSEIR is not even consistent with other projects in the City of Dublin. For example, the City is requiring a 5:1 ratio for impacts to Congdon’s tarplant at the nearby Zeiss Innovation Center Project site.\textsuperscript{100} The DSEIR offers no explanation as to why a 5:1 ratio was needed to mitigate impacts at the Zeiss project site but the Project site here only requires a 1:1 ratio.

Because the DSEIR fails to include a sufficiently detailed mitigation strategy, and because the measures listed in the DSEIR do not comply with the EACCS, the City has failed to provide substantial evidence that the Project’s impact to Congdon’s tarplant and other special-status plant species would be reduced to a less than significant level.

4. The DSEIR Fails to Adequately Evaluate and Mitigation Potential Impacts to Special Status Bats

The DSEIR’s proposed mitigation measures fail to ensure that the Project’s impacts to special status bats are mitigated to a less than significant level. The

\textsuperscript{96} Id.
\textsuperscript{97} DSEIR at p. 3.2-19.
\textsuperscript{98} S. Cashen Comments at p. 15.
\textsuperscript{99} Id.
\textsuperscript{100} Id.
DSEIR proposes the following mitigation for potentially significant impacts to special-status bat species:

Pre-removal bat surveys of the existing on-site building shall occur no more than 30 days before its removal. If bats are found, then a qualified biologist shall develop an appropriate relocation plan consistent with USFWS, CDFW, and East Alameda County Conservation Strategy standards and policies.\(^{101}\)

However, the DSEIR fails to identify the survey techniques that should be implemented for the pre-removal surveys, and it is unclear that the listed standards and policies even exist.\(^{102}\)

As Mr. Cashen explains, establishing the required survey techniques for special status bat species is a necessary prerequisite to ensuring that potential impacts to bat species are identified and mitigated.\(^{103}\) First, bat detection often requires specialized techniques, and a technique that is effective for one species may be completely ineffective for other species.\(^{104}\) Second, pallid bats and Townsend’s big-eared bats are extremely sensitive to human disturbance, and human disturbance may cause the colony to abandon the roost (which contributes to population declines).\(^{105}\) Third, the establishment of minimum qualifications for the biologist conducting the pre-removal surveys fails is necessary to ensure the surveys will be effective and avoid additional impacts to the species.\(^{106}\) Because the DSEIR fails to establish critical performance standards for ensuring future surveys will be effective, the DSEIR’s conclusion that such surveys will reduce impacts below a level of significance is not supported by substantial evidence.

Suitable roost sites are the limiting factor for most bat populations.\(^{107}\) The DSEIR does not require the Applicant to provide replacement roosts as compensation for impacts to potential roosts at the Project site. Therefore, even if the bats are properly excluded from the existing on-site building, they may not have a suitable alternate roost in the vicinity, and the local population may be

\(^{101}\) DSEIR at p. 3.2-20 – 3.2-21.
\(^{102}\) See S. Cashen Comments at p. 19.
\(^{103}\) Id. at pp. 18-19.
\(^{104}\) Id. at p. 18.
\(^{105}\) Id.
\(^{106}\) Id.
\(^{107}\) Id. at p. 19.

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extinguished.\textsuperscript{108} This constitutes a potentially significant impact that remains unmitigated. Without ensuring that suitable replacement roosts will be available, the DSEIR lacks substantial evidence to support its finding that the proposed mitigation strategy will reduce impacts below a level of significance.

5. The DSEIR Fails to Adequately Evaluate Cumulative Impacts of the Project

The DSEIR’s analysis of cumulative impacts to biological resources fails to satisfy the requirements of CEQA for several reasons.

First, the DSEIR fails to define the geographic scope of the City’s cumulative impacts analysis beyond that it includes “the region surrounding the project site.” This description is too vague to understand the geographic scope of the analysis and prevents the public from assessing the conclusions presented in the DSEIR.

Second, the list of cumulative projects provided in the DSEIR omits the Zeiss Innovation Center Project, which is located approximately 700 feet north of the Project site. The Zeiss Innovation Center Project would impact many of the same biological resources as the proposed Project, including Congdon’s tarplant, seasonal wetlands, burrowing owl (and other raptor) habitat, and potential habitat for the vernal pool fairy shrimp and California linderiella.

Third, the DSEIR concludes the Project’s contribution to any significant cumulative impact on special-status plant species would be less than cumulatively considerable because Congdon’s tarplant would be relocated if it is found on the Project site during preconstruction surveys. However, there is no basis for this conclusion because the DSEIR does not require (or propose) relocation of Congdon’s tarplant as mitigation. Further, the DSEIR’s conclusion is not justified because the DSEIR fails to incorporate mitigation for the numerous other special-status plant species that occur, or could occur, at the Project site.

Fourth, the DSEIR acknowledges the Project would (or could) impact wetlands, special-status plants (Congdon’s tarplant), and special-status animals (nesting birds, burrowing owl, bats). However, the DSEIR fails to provide any actual

\textsuperscript{108} Id.
analysis of cumulative impacts to these resources, including whether cumulative impacts to these specific resources would be significant. As Mr. Cashen points out:

1. None of the biological resource mitigation measures are designed to alleviate the cumulative impact; all three mitigation measures are specific to the Project site and to Project activities and do not address the cumulative impact posed by other projects.

2. Habitat loss, including the incremental loss of habitat from numerous small projects, is the greatest threat to most special-status species. The DSEIR does not require habitat compensation for all of the special-status species that would (or could) be affected by the Project. As a result, the Project’s contribution to the cumulatively significant loss of habitat would not be mitigated.109

Mr. Cashen concludes that the Project’s incremental contribution to cumulative impacts to the burrowing owl and Congdon’s tarplant would be cumulatively considerable.110 Furthermore, the Project may have cumulatively considerable impacts to other species as well (e.g., vernal pool fairy shrimp, special-status bats), but DSEIR’s omission of baseline data pertaining to the presence of such species on the Project site prevents such a determination.111

C. The DSEIR Fails to Adequately Mitigate Potential Impacts to Wetlands and Improperly Defers Mitigation

The DSEIR includes two measures to mitigate potential impacts to wetlands. First, Mitigation Measure BIO-3a requires the Applicant to complete an updated wetland delineation to determine if the wetlands at the Project are subject to jurisdiction under Section 404 of the Clean Water Act.

Second, Mitigation Measure BIO-3b requires the Applicant to acquire appropriate permits under Section 404 of the Clean Water Act from the USACE if the wetlands are determined to be subject to USACE jurisdiction, and to obtain Section 401 certification from the Regional Water Quality Control Board.

109 Id. at p. 13.
110 Id. at pp. 13-14.
111 Id.
A mitigation plan shall be prepared that will establish suitable compensatory mitigation based on the concept of no net loss of wetland habitat values or acreages, to the satisfaction of the regulatory agencies. Specifically, a wetland mitigation plan shall be developed and implemented that includes creation, restoration, and/or enhancement of off-site wetlands prior to project ground disturbance. Mitigation areas shall be established in perpetuity through dedication of a conservation easement (or similar mechanism) to an approved environmental organization and payment of an endowment for the long-term management of the site.83

On the basis of these two mitigation measures, the DSEIR concludes the Project’s impacts to wetlands would be reduced to a less-than-significant level.

The DSEIR’s conclusion that impacts would be mitigated to below a level of significance is not supported by substantial evidence for two reasons:

First, the DSEIR impermissibly defers analysis and critical aspects of the wetlands mitigation strategy. Under CEQA, the City is obligated to identify the specific mitigation needed to mitigate Project impacts to less-than-significant levels. This includes the specific mitigation strategy, mitigation ratio, monitoring program, and performance standards and that will be implemented to ensure the Project would have less-than-significant impacts on the environment. Contrary to what the DSEIR suggests, the City cannot rely on deferred mitigation and the permitting requirements of other agencies to conclude impacts to wetlands would be mitigated to less-than-significant levels.

Second, compliance with regulatory permits provides no assurances that Project impacts to jurisdictional wetlands would be less-than-significant.112 To the contrary, numerous studies have demonstrated that many compensatory mitigation projects permitted under Sections 401 and 404 of the Clean Water Act are not achieving the goal of “no overall net loss” of wetland acres and functions.113

112 Id. at pp. 20-21.
113 Id.
IV. THE DSEIR’S CONCLUSION THAT AIR QUALITY IMPACTS WOULD BE LESS THAN SIGNIFICANT IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE

The DSEIR explains that Project emissions were quantified using the California Emissions Estimator Model Version CalEEMod.2016.3.2 (“CalEEMod”). When modeling a project’s emissions, CalEEMod provides the user with recommended default values based on information such as land use type, meteorological data, project type, and typical equipment associated with the project type. The user may replace default values when more site-specific information is available. However, CEQA requires that any changes to CalEEMod defaults must be supported by substantial evidence.

CalEEMod generates “output files” for each model that reveal to the viewer the parameters used when creating a given model. We retained SWAPE to review the CalEEMod output files generated for the Project. In reviewing the CalEEMod output files, SWAPE found several of the input parameters used to be inconsistent with information disclosed in the DSEIR. As further explained in the attached SWAPE letter, these changes resulted in an underestimation of the Project’s construction and operational emissions.

Because the DSEIR fails to accurately disclose and analyze the Project’s air quality impacts, the DSEIR’s conclusions that air quality impacts from Nitrogen Oxides (“NOx”) emissions during Project construction and operations will be less than significant are not supported by substantial evidence. A revised DSEIR must be prepared to include an air quality analysis that accurately discloses and evaluates the air quality impacts of the Project.

114 DSEIR at p. 3.1-1.
115 SWAPE Comments at p. 2
117 SWAPE Comments at p. 2.
118 Id.
A. The DSEIR Emission Estimates Fail to Account for Materials Export Hauling Trips

In reviewing the CalEEMod output files, SWAPE first found that the DSEIR’s emissions estimates do not account for emissions from materials hauling trips that the DSEIR states will occur during the grading phase. According to the DSEIR, the proposed project’s grading activities would involve 95,000 cubic yards of cut and 73,700 cubic yards of fill. Thus, 21,300 cubic yards would be exported off-site.” However, SWAPE’s review of the CalEEMod output files found that the Project’s construction-related emissions assume zero hauling truck trips will occur during the grading phase.

In CalEEMod modeling, hauling truck trips are estimated based on the total amount of material that will be imported or exported and assuming that a single hauling truck can transport 16 cubic yards of material per trip. CalEEMod calculates the number of hauling truck trips assuming that each hauling truck will have 2 one-way trips (e.g., a hauling truck importing material will have a loaded arrival trip and an empty return trip, while a hauling truck exporting material will have an empty arrival trip but a loaded departure trip). Accordingly, the DSEIR should have modeled the Project’s emissions assuming that there would be a total of 2,662 (2 x 1,331 hauling trips) trips in order to account for the 2 one-way truck trips. As noted above, SWAPE’s review of the output files found that zero hauling truck trips are accounted for in the DSEIR’s CalEEMod model, and no explanation is provided as to why hauling trips would not occur for the off-site soil exports.

Because the Project’s CalEEMod model assumes no hauling truck trips would occur during the grading phase of construction, SWAPE explains that the DSEIR’s CalEEMod model underestimates the actual emissions that will be generated during construction activities. NOx and fugitive dust emissions are generated as a result of haul truck trips. In this case, the DSEIR’s air quality

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119 Id. at pp. 2-3.
120 Id. at p. 2.
121 Id. at p. 3.
122 Id.
123 Id.
124 Id. at p. 2.
125 Id. at pp. 3-4.
126 Id. at p. 3.
4174-003acp
analysis shows that the Project’s construction NOx emissions are just below the BAAQMD threshold of significance (52.44 lbs/day compared to 54 lbs/day) after mitigation.\footnote{DSEIR at pp. 3.1-44 – 3.1-45.} SWAPE concludes that the inclusion of the omitted haul truck trips would very likely result in Project construction emissions exceeding the BAAQMD threshold of significance for NOx based on the total number of truck trips excluded.\footnote{SWAPE Comments at p. 4.}

Because the DSEIR’s emission model fails to account for the haul truck trips disclosed in the DSEIR, the Project’s construction emissions are underestimated and the City’s conclusion that impacts will be mitigated to below a level of significance is not supported by substantial evidence. Moreover, substantial evidence supports a finding that the Project’s construction emissions will exceed the BAAQMD threshold of significance. A revised DSEIR should be prepared to accurately disclose, evaluate, and mitigate the Project’s construction emission impacts.

\textbf{B. The DSEIR Emission Estimates Fail to Account for All Daily Vehicle Trips}

In reviewing the CalEEMod output files, SWAPE found that the DSEIR’s emissions calculations underestimate the number of daily vehicle trips during Project operations.\footnote{Id. at pp. 6-7.} As a result of this miscalculation, the Project’s operational emissions are underestimated and not supported by substantial evidence, and therefore cannot be relied on to determine the significance of the Project’s air quality impacts.\footnote{SWAPE Comments at p. 8.}

According to DSEIR Appendix B, the Project would generate a total of 16,898 vehicle trips per day.\footnote{DSEIR, Appendix B, p. 29, Table 10; see also SWAPE Comments at pp. 6-7.} However, Appendix B Table 10 erroneously represents that the total number of project vehicle trips would be 16,840 per day.\footnote{Id.} The latter figure was used in the CalEEMod model to estimate emissions from Project operations.\footnote{SWAPE Comments at p. 7.} As a result of this miscalculation, SWAPE found that the emissions

\footnote{127 DSEIR at pp. 3.1-44 – 3.1-45.} \footnote{128 SWAPE Comments at p. 4.} \footnote{129 Id. at pp. 6-7.} \footnote{130 SWAPE Comments at p. 8.} \footnote{131 DSEIR, Appendix B, p. 29, Table 10; see also SWAPE Comments at pp. 6-7.} \footnote{132 Id.} \footnote{133 SWAPE Comments at p. 7.} 4174-003acp
model underestimates the number of daily trips by approximately 60 trips per day, or 21,900 vehicle trips per year.\textsuperscript{134}

As SWAPE explains by underestimating the total number of vehicle trips expected to occur during Project operations, the DSEIR underestimates the Project’s operational mobile-source emissions.\textsuperscript{135} Moreover, this underestimation is important because the CalEEMod files demonstrate that the Project’s mitigated emissions are close to the BAAQMD’s significance threshold for operational NOx emissions.\textsuperscript{136} The DSEIR shows that the Project’s mitigated operational emissions would result in a maximum daily emission of approximately 51.54 lbs/day of NOx, or approximately 2.5 pounds below the BAAQMD’s NOx significance threshold of 54 lbs/day.\textsuperscript{137} However, because the DSEIR’s CalEEMod model underestimates the number of operational daily vehicle trips by 60 trips per day or 21,900 trips per year, SWAPE concludes it is possible that the Project’s NOx emissions would in fact exceed this threshold.\textsuperscript{138}

By failing to include total number of vehicle trips expected to occur during Project operations, the DSEIR underestimates the Project’s operational mobile source emissions.\textsuperscript{139} For this reason, the DSEIR’s emissions estimates are inaccurate and not supported by substantial evidence. New modeling must be performed to accurately disclose and evaluate the Project’s operational emissions, and to evaluate compliance with the applicable thresholds of significance.

V. THE DSEIR’S DETERMINATION THAT GLOBAL WARMING IMPACTS WOULD BE LESS THAN SIGNIFICANT IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE

In an attempt to analyze the potential impacts of the Project’s operational greenhouse gas (“GHG”) emissions, the DSEIR employs two thresholds of significance – one for operational emissions in the year 2020, and another for operational emissions after the year 2020.\textsuperscript{140} For the Project’s anticipated opening

\textsuperscript{134} Id.
\textsuperscript{135} Id.
\textsuperscript{136} Id.
\textsuperscript{137} DSEIR at p. 3.1-46.
\textsuperscript{138} SWAPE Comments at p. 8.
\textsuperscript{139} Id. at p. 6.
\textsuperscript{140} DSEIR, pp. 3.1-59 – 3.1-67.
year, 2020, the DSEIR relies on an assessment of the Project’s consistency with the City of Dublin’s 2013 Climate Action Plan Update (“CAP”). Under this threshold, the DSEIR concludes that GHG emissions from operation of the project in the year 2020 will be less than significant because the Project complies with the applicable CAP measures for meeting 2020 GHG reduction goals. It is estimated that the Project will not commence operations until at least December 2020, however, meaning that the DSEIR’s CAP analysis only supports a determination for one month of operations and does not address operational emissions for the whole of the Project’s expected lifespan.141

Because the CAP does not provide a plan for meeting GHG reduction goals beyond 2020, the DSEIR uses a separate “business as usual” (“BAU”) GHG threshold for Project emissions after 2020 that is based on the Senate Bill (“SB”) 32 2030 statewide GHG reduction goal. This secondary threshold, however, is identical to the threshold of significance that was struck down by the California Supreme Court struck down in Center for Biological Diversity v. California Department of Fish and Wildlife (“Newhall”) and is not supported by substantial evidence.142

The DSEIR’s BAU threshold assumes that operational emissions after 2020 would not be significant if the Project’s 2030 emissions would be “40 percent below 1990 levels consistent with SB 32.”143 The DSEIR concludes that the Project’s 2030 operational GHG emissions would be more than 40 percent below 1990 business as usual emissions and thus operational emissions after 2020 would have a less than significant impact on global climate change.144 The DSEIR, however, offers no evidence to support its conclusion that impacts would be less than significant solely because the Project will reduce emissions from a business-as-usual scenario by a percentage that exceeds the statewide emissions targets in SB 32. Because the DSEIR’s use of the SB 32 2030 statewide GHG BAU reduction goal as a threshold of significance for project-level impacts is not supported by substantial evidence, its finding that the Project’s post 2020 operational emissions would be less than significant also is not supported by substantial evidence.

141 See CEQA Guidelines §15378(a) (requiring evaluation of all impacts that make up the “whole” of the project); see also Natural Resources Defense Council v. City of Los Angeles (“NRDC v. LA”) (2002) 103 Cal.App.4th 268. (CEQA requires examination of the environmental impacts of “the entire project, from start to finish”).
142 Center for Biological Diversity v. California Department of Fish and Wildlife (2015) 62 Cal.4th 204.
143 DSEIR, p. 3.1-61.
144 DSEIR, p. 3.1-63.
Rather than using inapplicable and disapproved thresholds of significance, the DSEIR should have applied the GHG thresholds set by the Bay Area Air Quality Management District (“BAAQMD”). As discussed below, the project’s operational emissions greatly exceed the BAAQMD threshold of significance for operational GHG emissions. Accordingly, the DSEIR must be revised to disclose this impact and to impose all feasible mitigation.

A. The Determination that GHG Impacts Are Less Than Significant Because the Project Will Comply with the City of Dublin CAP Is Not Applicable to the Whole of the Project

In Impact Air-7, the DSEIR considers whether the Project is consistent with the City of Dublin CAP to assess the significance of the Project’s GHG emissions for its opening year, 2020. This plan consistency approach is based on CEQA Guidelines sections 15064, 15130, and 15183.5, which together provide that public agencies may analyze and mitigate significant GHG emissions in a qualified reduction plan and later tier from that analysis when considering individual projects. Lead agencies may determine that an individual project’s contribution to global climate change is not cumulatively significant if the project complies with an adopted GHG reduction plan under specified circumstances. Guidelines section 15183.5 subdivision (b)(1) sets forth the recommended steps for agencies preparing such plans:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

146 Guidelines §15183.5(b)
(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review.

BAAQMD’s CEQA Guidelines also endorse the use of a GHG reduction plan consistency analysis where appropriate and “recommend[] the Plan Elements in the state CEQA Guidelines as the minimum standards to meet the GHG Reduction Strategy Thresholds of Significance option.” Finally, Guidelines section 15064 subdivision (h)(3) specifies that such GHG reduction plans “must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process . . . .”

As explained in the DSEIR, the City’s CAP satisfies the above requirements and constitutes a qualified GHG reduction plan for purposes of CEQA for activities through 2020. However, activities and GHG emissions after 2020 are not covered by the City’s CAP. Guidelines section 15183.5 subdivision (b)(1)(B) provides that consistency with GHG reduction plans may only be used as a threshold for “activities covered by the plan.” Because the plan does not establish GHG reduction goals for emissions after 2020, it does not cover activities or emissions after 2020 and is not applicable to the Project’s post-2020 operational emissions.

The current CAP includes a total of 45 measures that the City determined would achieve its 2020 target of “15% below 2010 emissions levels by 2020.” The CAP explains that implementation of the plan’s measures and the reduction target will reduce the impact from covered activities to a less than significant level.

147 BAAQMD CEQA Guidelines (May 2017) p. 4-8.
148 DSEIR at p. 3.1-65.
150 CAP at p. 6.
However, because the current CAP was prepared to achieve the City’s 2020 reduction target only, it does not address activities, emission levels or reductions required beyond that year. More importantly, the CAP does not provide any evidence that compliance with the plan’s measures will reduce the impact from covered activities to a less than significant level beyond 2020. For that reason, the DSEIR correctly finds that the current CAP “does not contain adequate reduction measures to reduce California’s GHG emissions to the AB197 and SB32 targets of 40 percent below 1990 levels by 2030.”  

Reliance on a CAP consistency threshold for post-2020 emissions would also be flawed because the CAP no longer reflects prevailing scientific knowledge on climate change. CEQA requires a lead agency to evaluate effects based to the extent possible on scientific and factual data. 

As stated above, the DSEIR acknowledges that the current CAP does not include sufficient measures to ensure reductions consistent with SB 32. The targets of SB 32 were adopted in accordance with current scientific understanding of human contributions to climate change. They represent benchmarks, consistent with prevailing climate science, charting an appropriate trajectory forward that is in line with California’s role in stabilizing global warming below dangerous thresholds.” The “2030 target reflects the same science that informs the agreement reached in Paris by the 2015 Conference of Parties to the United Nations Framework Convention on Climate Change (UNFCCC), aimed at keeping the global temperature increase below 2 degrees Celsius (°C).” These targets are set to avoid California’s activities “contributing to an escalation of serious problems, including raging wildfires, coastal erosion, disruption of water supply, threats to agriculture, spread of insect-borne diseases, and continuing health threats from air pollution” that rising temperatures create. 

151 DSEIR at p. 3.1-60.
152 See 14 C.C.R. § 15064.4; see also Cleveland National Forest Foundation v. San Diego Assoc. of Govts. (2017) 3 Cal. 5th 497, 518-519.
153 DSEIR, p. 3.1-60.
155 Id. at 2.
156 Id. at p. ES2.
Because the CAP is based on meeting pre-AB 32 2020 GHG reduction targets, the CAP fails to incorporate sufficient measures to ensure covered projects do not contribute to the significant effects the targets of SB 32 were adopted to prevent.157

For the above reasons, consistency with the CAP was not relied upon (and could not be relied upon) by the DSEIR to support a finding that the Project’s post-2020 GHG operational emissions would be less than significant.

The DSEIR states that the Project is scheduled to open in December 2020 – but this assumes no unexpected delays. Accordingly, the Project will only have one month of 2020 operational emissions at the most, and potentially no 2020 emissions at all. Practically all of the Projects emissions will, instead, occur from 2021 to 205 (assuming a 30 year lifespan).158 The Project will continue to operate and contribute to GHG emissions for decades to come. As a result, the determination that the Project’s operational GHG emissions in 2020 would be less than significant has no relevance to the significance of impacts from GHG emissions during the overwhelming majority of the Project’s operational life.

CEQA requires that lead agencies consider long term impacts for projects with long term operations, particularly in the context of GHG emissions.159 Relying on a project’s emissions at one point in time does not meet CEQA’s requirement to assess all foreseeable impacts. Indeed, the California Supreme Court addressed this point in Newhall, noting that “over time consistency with the year 2020 goals will become a less definitive guide, especially for long term projects that will not begin operations for several years.” Here, the DSEIR’s conclusion that the Project will not result in significant impacts for the year 2020 on the grounds it is consistent with the City’s CAP does not support a determination that the Project will not result in significant greenhouse gas impacts over its operational lifespan.

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157 Cleveland National Forest Foundation, 3 Cal. 5th at 519 (“CEQA requires public agencies . . . to ensure that [greenhouse gas impact] analysis stay in step with evolving scientific knowledge and state regulatory schemes.”)

158 The IKEA store in Emeryville, California, for example, is already in its 19th year of operation with no announced plans for closure anytime soon. Emeryville Today – 1990s to 2000s, City of Emeryville, https://www.ci.emeryville.ca.us/663/Emeryville-Today-1990s-to-2000s (Noting Emeryville IKEA opened in April 2000).

159 See CEQA Guidelines, § 15126.2 (discussing impacts both during the “initial and continued phases of the project”); see also Natural Resources Defense Council v. City of Los Angeles (“NRDC v. LA”) (2002) 103 Cal.App.4th 268 (CEQA requires examination of the environmental impacts of “the entire project, from start to finish”).

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B. The Determination that Long-Term GHG Emissions Are Less Than Significant Is Not Supported By Substantial Evidence

In recognition of the limits of a CAP consistency analysis in this case, the DSEIR uses a second threshold of significance for operational GHG emissions after 2020. While the DSEIR’s characterizes the analysis for 2030 as a “City of Dublin CAP Consistency Analysis,” the threshold it applies is a SB 32 2030 statewide GHG BAU reduction goal consistency threshold. The DSEIR bases this analysis on a direct comparison of the Project’s estimated reductions from a 2000 BAU scenario to the 2030 statewide emission reduction target set in SB 32.160 In this respect, the DSEIR employs the exact same methodology the California Supreme Court struck down in Center for Biological Diversity v. California Department of Fish and Wildlife (“Newhall”). Furthermore, like in that case, the DSEIR’s assumption that impacts would be less than significant based on consistency with a statewide (rather than a project-specific) goal is not supported by substantial evidence.

In Newhall, the California Supreme Court squarely addressed the issue of using statewide GHG emission reduction targets as a threshold of significance for purposes of CEQA.161 In that case, the project at issue, Newhall Ranch, was a large development that included residential, community, and commercial uses to be developed on nearly 12,000 acres near the City of Santa Clarita. To assess the project’s GHG emissions the Newhall EIR considered whether the proposed Project’s emissions would impede the State of California’s compliance with the statutory 2020 emissions reduction mandate established by AB 32.162 Relying on a similar “business-as-usual” or “BAU” methodology as the DSEIR uses here, the Newhall EIR concluded that:

Because the EIR’s estimate of actual annual project emissions . . . is 31 percent below its business-as-usual estimate . . ., exceeding the Air Board’s determination of a 29 percent reduction from business as usual needed statewide, the . . . project’s likely greenhouse gas emissions will not impede

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160 DSEIR, p. 3.1-63, Table 3.1-21: City of Dublin CAP Consistency Analysis – Operational Year 2030. The statewide targets of AB 197 and SB32 are not a climate action plan or a qualified greenhouse reduction plan and a direct comparison between anticipated project emissions and the reduction targets is not a “CAP Consistency Analysis.” See Guidelines § 15183.5. Furthermore, the City of Dublin CAP only addresses a 2020 reduction target.


162 Id. at p. 218.
achievement of A.B. 32’s goals and are therefore less than significant for CEQA purposes.163

In Newhall, the California Supreme Court concluded that assessing a project’s consistency with statewide GHG reduction goals is not per se prohibited under CEQA, but that such an assessment required substantial evidence and analysis demonstrating that such a consistency comparison was applicable. The Newhall decision held that, in that case, the EIR failed to provide substantial evidence “that Newhall Ranch’s project-level reduction of 31 percent in comparison to business as usual is consistent with achieving A.B. 32’s statewide goal of a 29 percent reduction from business as usual . . . .”164 The EIR provided no evidence to support finding that the “required percentage reduction from business as usual is the same for an individual project as for the entire state population and economy.”165 The Court held that a straight-line comparison between statewide reduction goals and project-specific reductions from BAU, without more, does not support a conclusion that project emission will result in a less than significant impact.

Here, the DSEIR employs the exact same unsubstantiated methodology that the Court struck down in Newhall. The DSEIR states that “[t]he proposed project would meet the 40 percent reduction requirement over year 1990 by 2030, as required by AB 197 and SB 32.”166 Because of the Project’s estimated reduction over the BAU scenario, the DSEIR concludes that impacts from GHG emissions would be less than significant for the year 2030. The DSEIR’s analysis thus completely ignores the Supreme Court’s guidance in Newhall and employs the same flawed approach of directly comparing the Project’s anticipated reduction from BAU to the percentage of statewide reductions required under SB32. Furthermore, the DSEIR makes no attempt to determine the level of reduction an individual project must achieve to stay consistent with achieving statewide goals, as the Supreme

163 Id. The 2020 emission reduction target established by AB 32 has been superseded by the target in SB 32, which requires that statewide greenhouse gas emission are reduced to 40% below the 1990 level by 2030.
164 Id. at 225.
165 Id. at 225-226.
166 DSEIR, p. 3.1-63.
Court instructed would be required. The DSEIR simply assumes, without any evidence, that the Project must meet the same level of reduction set forth in statewide targets to avoid a significant impact.

Both the California Air Resources Board and the California Supreme Court have recognized that the percent reduction required to be made by specific projects in order for the state to achieve statewide GHG reduction goal is not the same as the statewide GHG reduction goal. In Newhall, the Supreme Court noted that a greater degree of reduction is likely to be needed from new land use projects as compared to the economy as a whole because it is impractical and infeasible to require or obtain uniform reductions from all sources of GHG emissions, regardless of size or type. The Court also cited California Attorney General’s Office comments that “new development must be more GHG-efficient than [the statewide ‘business as usual’ reduction goals], given that past and current sources of emissions, which are substantially less efficient than this average, will continue to exist and emit.”

New development, in particular, needs to be one of the primary sources of these greater reductions. This is because designing new buildings and infrastructure for maximum energy efficiency and renewable energy use is more feasible and more likely to occur than achieving the same savings by retrofitting older structures and systems.

In sum, the DSEIR’s determination that impacts from the Project’s GHG emissions will be less than significant for operational emissions after 2020 is not supported by substantial evidence. The DSEIR employs the same approach and reasoning the Supreme Court considered in Newhall, yet it ignores the Court’s clear direction regarding the use of statewide targets as a threshold for project level analysis. The City cannot use statewide GHG emission goals in the absence of an analysis of how those targets translate to an individual project, and no such analysis is included in the DSEIR here.

See Newhall 62 Cal. 4th at 229 (explaining that a BAU comparison may be appropriate where the lead agency determines what level of reduction a particular project at the proposed location must contribute in order to comply with statewide goals.).

Id. at p. 226.
C. Substantial Evidence Shows That GHG Emissions from the Project Would Be Significant

In order to properly evaluate the significance of the Project’s GHG emissions, SWAPE performed an analysis of the Project’s GHG emissions using BAAQMD’s threshold of 1,100 metric tons of carbon dioxide equivalents per year (“MTCO2e”). Relying on the City’s CalEEMod model, SWAPE explains that Project construction would generate 63 MTCO2e per year (amortized over 30 years). Additionally, Project operations would generate 13,634 MTCO23 per year after mitigation. Combined, the Project’s annual GHG emissions amount to 13,697 MTCO2e per year, which exceeds BAAQMD’s threshold of significance by approximately 12,597 MTCO2e per year.

SWAPE’s analysis of the Project’s GHG emissions demonstrates that when using a legally valid threshold of significance, established by BAAQMD, substantial evidence shows that the Project would result in a cumulatively significant contribute to global climate change. Until an updated GHG analysis is prepared in a revised DSEIR that adequately evaluates the Project’s total GHG impact consistent with a legally valid threshold of significance, the DSEIR determination that the Project would not result in a significant GHG impact is not supported by substantial evidence.

For each of these reasons, the City of Dublin (“City”) may not approve the Project until a revised document is prepared and recirculated for public review and comment.

Sincerely,

Collin S. McCarthy

CSM:acp

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170 Id. at p. 13.
171 Id.
172 Id.
173 Id.
March 15, 2018

Mr. Collin S. McCarthy
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814

Subject: Comments on the Draft Supplemental Environmental Impact Report Prepared for the Ikea Retail Center Project

Dear Mr. McCarthy:

This letter contains my comments on the Draft Supplemental Environmental Impact Report (“DSEIR”) prepared by the City of Dublin (“City”) for the Ikea Retail Center Project (“Project”). Ikea Property, Inc. (“Applicant”) proposes the development of up to 432,099 square feet of commercial uses on 27.45 acres of mostly undeveloped land in Dublin, California.

I am an environmental biologist with 25 years of professional experience in wildlife ecology and natural resources management. I have served as a biological resources expert for over 100 projects in California. My experience and scope of work in this regard has included assisting various clients with evaluations of biological resource issues, reviewing environmental compliance documents prepared pursuant to the California Environmental Quality Act (“CEQA”) and the National Environmental Policy Act (“NEPA”), and submitting written comments in response to CEQA and NEPA documents. My work has included the preparation of written and oral testimony for the California Energy Commission, California Public Utilities Commission, and Federal courts. My educational background includes a B.S. in Resource Management from the University of California at Berkeley, and a M.S. in Wildlife and Fisheries Science from the Pennsylvania State University. A true and correct copy of my current curriculum vitae is attached hereto.

The comments herein are based on my review of the environmental documents prepared for the Project and other projects in the region, a review of scientific literature pertaining to biological resources known to occur in the Project area, consultations with other biological resource experts, and the knowledge and experience I have acquired during my 25-year career in the field of natural resources management.
ENVIRONMENTAL SETTING

FirstCarbon Solutions (“FCS”) biologists visited the Project site two times: once in the spring of 2016, and again on November 24, 2017. FCS did not conduct any focused (protocol-level) surveys for special-status plants or animals during these site visits. Instead, the primary purpose of the site visits was to obtain an overview of the existing habitat conditions within the Project site and the site’s potential to support sensitive biological resources so FCS could conduct a peer review of the Biological Resources Assessment (“BRA”) and Wetland Delineation (“WD”) conducted by WRA, Inc. in 2013. The BRA prepared by WRA was based on a single site visit (August 1, 2013) and did not include any protocol-level surveys. As a result, protocol-level surveys have never been conducted at the Project site.

Data from protocol-level surveys are required to fully assess existing conditions, analyze Project impacts, and formulate appropriate mitigation. Deferring the surveys until after completion of the CEQA review process—as proposed in the DSEIR—prevents full disclosure of Project impacts. It also precludes the public, resource agencies, and scientific community from being able to submit informed comments pertaining to Project impacts, and from having those comments vetted during the environmental review process. These sentiments are reflected in the survey protocols prepared by the California Department of Fish and Wildlife (“CDFW”), California Burrowing Owl Consortium, and California Native Plant Society.

Protocol-level survey data provide essential information on the presence, distribution, and abundance of sensitive biological resources at a project site. These data in turn facilitate proper understanding of the magnitude and severity of the project’s impacts to specific resources (e.g., various species), and thus, the feasibility of various mitigation options. Without protocol-level survey data, the City can only speculate on the presence of sensitive biological resources at the Project site. Similarly, without protocol-level data the City has no ability to assess the magnitude and severity of Project impacts to various resources, and subsequently, the ability of the proposed mitigation to reduce Project impacts to less-than-significant levels. As a result, the City has no basis for its conclusion that all potentially significant Project impacts would be mitigated to less-than-significant levels by the measures proposed in the DSEIR.

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1 DSEIR, pp. 3.2-1 and -16.
2 DSEIR, p. 3.2-16.
3 BRA, p. 1.
For example, the City has concluded that development of a mitigation plan, which would incorporate off-site habitat compensation, would effectively mitigate significant impacts to any special-status plant species that might be discovered on the Project site during preconstruction surveys.\textsuperscript{5} A conclusion of this nature relies on the presumption that all impacts can be mitigated to a less than significant level. Such a presumption is unrealistic. To illustrate this point, Douglas’ fiddleneck (\textit{Amsinckia douglasiana}) was detected at the Project site (although its presence was not disclosed in the DSEIR).\textsuperscript{6} The presence of Douglas’ fiddleneck on the Project site represents the only known occurrence in Alameda and Contra Costa counties (it was previously believed to be extirpated from both counties). As a result, Project impacts to this locally rare species would be unmitigable because there are no off-site mitigation options (i.e., properties available for acquisition as replacement habitat).

Due to the issues described above, the City needs to prepare a revised DSEIR once protocol-level surveys have been completed for the Project.

\textbf{Special-Status Plant Species}

Congdon’s tarplant (\textit{Centromadia parryi} ssp. \textit{congdonii}) is known to occur on approximately 6.81 acres of the Project site.\textsuperscript{7} However, the Applicant has not conducted protocol-level surveys to determine whether other special-status plant species occur on the Project site. Furthermore, because WRA did not conduct protocol-level surveys, and because its site visits were conducted after a period of below average rainfall (and during months that are generally not conducive to finding rare plants),\textsuperscript{8} it had no basis for concluding other special-status plants have “no potential” or are “unlikely” to occur at the Project site simply because those plants were not observed during its survey(s).\textsuperscript{9} Similarly, the City has no basis for its conclusion that Congdon’s tarplant is the only special-status plant species with a moderate to high potential of occurring at the Project site.\textsuperscript{10}

Indeed, at least two other special-status plant species occur at the Project site: western dodder (\textit{Cuscuta occidentalis}) and Douglas' fiddleneck (\textit{Amsinckia douglasiana}).\textsuperscript{11} Both of these species are locally rare (i.e., rank “A1” and “*A1x ” by the East Bay Chapter of the California Native Plant Society).\textsuperscript{12} Locally rare plant species with an “A”

\textsuperscript{5} Although the DSEIR subsequently suggests the proposed mitigation would only be applied if Congdon’s tarplant is impacted by the Project.
\textsuperscript{6} BRA, Appendix D (Plant Species Observed on 5 Nov 2013) to Appendix C.2 (Wetland Delineation).
\textsuperscript{7} DSEIR, p. 3.2-5.
\textsuperscript{8} BRA, Appendix C.2 (Wetland Delineation), p. 9 and Appendix B (Wetland Delineation Data Sheets).
\textsuperscript{9} BRA, Appendix B.
\textsuperscript{10} DSEIR, p. 3.2-17.
\textsuperscript{11} BRA, Appendix A.1 (Plant Species Observed on 1 Aug 2013) and Appendix D (Plant Species Observed on 5 Nov 2013) to Appendix C.2 (Wetland Delineation).
designations are considered special-status species under Sections 15380 and 15125(c) of CEQA. The presence of Douglas’ fiddleneck at the Project site is especially significant because—until now—it was believed to have been extirpated from Alameda and Contra Costa counties. The DSEIR fails to disclose the presence of these two species at the Project site.

The BRA dismissed the potential for saline clover (Trifolium hydrophilum) and hairless popcorn flower (Plagiobothrys glaber) to occur at the Project site. Saline clover has a Rare Plant Rank of 1B.2 and hairless popcorn flower is ranked 1A. Both species are associated with alkaline soils and vernal pools (and other mesic habitats), which are present at the Project site. According to the BRA, saline clover is unlikely to occur at the site because: “[t]he existing grassland and seasonally wet depression habitat in the Project Area is heavily disturbed and of low quality,” and hairless popcorn flower is unlikely to occur at the Project site because: “[t]his species is presumed extinct and has not been found since 1954.” Consequently, the BRA recommended no further actions (e.g., protocol-level surveys) for either species.

Saline clover has been detected in disturbed areas and “low quality” habitats. In addition, the BRA’s statement that hairless popcorn flower has not been found since 1954 is incorrect; this species was rediscovered near Tassajara Road in Dublin during surveys.

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15 BRA, Appendix B.

16 Rank 1B plants are Rare, Threatened, or Endangered in California and elsewhere. Rank 1A plants are presumed extirpated in California and either rare or extinct elsewhere. Although hairless popcorn flower was believed to be extirpated, its presence in the Dublin area was verified in 2006. See Lake D. 2018. Rare, Unusual and Significant Plants of Alameda and Contra Costa Counties [web application]. Berkeley, California: East Bay Chapter of the California Native Plant Society. Available at: <https://ebcnps.fatcow.com/cgi-bin/ebrade/ebrade.cgi>.


18 BRA, Appendix C.2 (Wetland Delineation).

19 The presence of alkali mallow (Malvella leprosa) at the Project site indicates there is at least some alkaline soil.

20 Ibid.

21 Ibid.

conducted in 2002 and 2006.\textsuperscript{23} Saline clover is also known to occur in the Tassajara Area. As a result, saline clover and hairless popcorn flower have the potential to occur at the Project site. Locally rare (i.e., A-rank) species that are known to occur in the East Dublin area (i.e., east of I-680 and north of I-580) and that have the potential to occur at the Project site include: \textit{Amaranthus palmeri}, \textit{Cuscuta indecora} var. \textit{indecora}, \textit{Limosella acaulis}, \textit{Stachys ajugoides}, \textit{Trifolium barbigerum}, \textit{Trifolium flavulum}, \textit{Trifolium gambeli}, and \textit{Triphysaria versicolor} subsp. \textit{faucibracta}.\textsuperscript{24}

\textbf{Special-Status Branchiopods}

The Project site lies within the “Livermore Vernal Pool Region.”\textsuperscript{25} Ephemeral pools in the Livermore Vernal Pool Region provide habitat for special-status branchiopods, including the federally threatened vernal pool fairy shrimp, and the California linderiella, which has a NatureServe Rank of G2G3 S2S3.\textsuperscript{26}

\textbf{Vernal Pool Fairy Shrimp}

The Project site contains seasonal wetlands (vernal pools). Based on the information provided on the Wetland Delineation data sheets, the wetlands hold water longer enough to provide potential habitat for the vernal pool fairy shrimp.\textsuperscript{27} Indeed, aquatic invertebrate shells from Ostracoda were detected in two of the wetlands in 2013.\textsuperscript{28} The presence of these “seed shrimp” at the Project site provides substantial evidence that vernal pool fairy shrimp also may occur at the Project site.

Mitigation incorporated into the Eastern Dublin General Plan Amendment and Specific Plan requires species-specific surveys for special-status invertebrates in appropriate wetland habitats prior to approval of specific projects in the Reduced Planning Area (which encompasses the Project site).\textsuperscript{29} Those surveys have not been conducted at the Project site.\textsuperscript{30} Instead, the BRA simply concluded: “[t]his species is unlikely to occur in the Project Area due to the lack of vernal pool habitat and the area’s history of repeated


\textsuperscript{24} Personal communication with D. Lake, Unusual Plant Chair, East Bay California Native Plant Society, on 2018 Mar 14.


\textsuperscript{26} G2G3 = high to moderate risk of global extinction. S2S3 = high to moderate risk of statewide extinction.

\textsuperscript{27} BRA, Appendix C.2 (Wetland Delineation), Appendix B (Wetland Delineation Data Sheets).

\textsuperscript{28} Ibid.


discing, grading and leveling.” The BRA’s conclusion is not supported by evidence and it contradicts scientific information on vernal pool fairy shrimp habitat.

Despite the moniker, vernal pool fairy shrimp are not limited to “vernal pools;” they also occur in vernal pool-like habitats such as seasonal wetlands and pools. Indeed, vernal pool fairy shrimp occur in a wide range of habitats, including degraded or otherwise poor-quality habitats such as pools created by tire tracks and roadside ditches. As a result, the seasonal wetlands at the Project site provide potential habitat for the vernal pool fairy shrimp.

According to the Wetland Delineation, the wetlands have experienced “little disturbance” since 2008. This contradicts the BRA’s argument that the wetlands are unlikely to provide habitat because they have been subject to repeated diskng, grading, and leveling. Nevertheless, diskng, grading and leveling at the Project site do not preclude the potential for vernal pool fairy shrimp. For example, in Contra Costa County, over 100 vernal pool fairy shrimp were documented in a “non-vegetated depression in dirt road along tracks—partially scraped by bulldozer,” and that had “routine vehicle traffic through [the] area.” At a minimum, the wetlands at the Project site have remained undisturbed long enough to become dominated by wetland plants. This indicates they have also remained undisturbed long enough for vernal pool fairy shrimp colonization (or recolonization).

Ultimately, the DSEIR provides no mention of the vernal pool fairy shrimp, and consequently, no analysis of potentially significant impacts to the species. Until protocol-level surveys have been conducted, filling of the site’s wetlands represents an unexamined, potentially significant impact to the vernal pool fairy shrimp.

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31 BRA, p. 12.
32 California Natural Diversity Database. 2018 Jan 2. RareFind 5. California Department of Fish and Wildlife.
34 BRA, Appendix C.2 (Wetland Delineation), Appendix B (Wetland Delineation Data Sheets). See also p. 8.
36 BRA, Appendix C.2 (Wetland Delineation).
California Linderiella (formerly California fairy shrimp)

Neither the DSEIR nor BRA mentions the California linderiella. California linderiella occupy the same types of habitat as the vernal pool fairy shrimp, and they have been detected in seasonal wetlands comparable to those found on the Project site. As a result, the California linderiella has the potential to occur at the Project site. Until protocol-level surveys have been conducted, filling of the site’s wetlands represents an unexamined, potentially significant impact to the California linderiella.

Burrowing Owl

The DSEIR fails to disclose the status and demography of the local and regional burrowing owl populations. This information is an essential component of the DSEIR because it enables the public and decision makers to evaluate the relative significance of Project impacts to the overall burrowing owl population.

Burrowing owl populations have declined dramatically in the San Francisco Bay Area (“SFBA”) since the 1992 Eastern Dublin Specific Plan EIR was prepared. The species has been extirpated, or nearly extirpated, from six SFBA counties (Napa, Marin, San Francisco, Santa Cruz, Sonoma, and San Mateo). Although burrowing owls were once abundant throughout Alameda and Contra Costa counties, they are now primarily limited to the eastern portions of those counties.

Two “large” breeding colonies of burrowing owls remain in Alameda County: one is in the Altamont Hills, and the second is in the Camp Parks area. The Project site is located at the periphery of the “Camp Parks” burrowing owl population. The Camp Parks population is the only “large” population of burrowing owls remaining in the Livermore-Amador Valley. Although the Project site provides good habitat for burrowing owls, neither WRA nor FCS conducted the surveys needed to determine presence of burrowing owls at the site.

39 E.g., See EOnx #94421 in California Natural Diversity Database. 2018 Mar 6. RareFind 5. California Department of Fish and Wildlife.
42 Ibid.
43 Ibid.
44 BRA, p. 10.
Burrowing owls can be difficult to detect due to their cryptic coloration, extensive use of burrows, and tendency to flush (fly away) when approached.\textsuperscript{45} As a result, burrowing owl researchers and the CDFW have concluded that four independent surveys are necessary to provide reliable information on the presence of burrowing owls.\textsuperscript{46} Data from the four surveys (termed “detection surveys” in CDFW’s Staff Report on Burrowing Owl Mitigation) are essential to avoiding, minimizing, and properly mitigating the direct and indirect effects of the Project on burrowing owls.

The DSEIR requires the Applicant to conduct two pre-construction surveys prior to ground-disturbing activities at the Project site. Although CDFW guidelines recommend “take avoidance” (i.e., pre-construction) surveys, the guidelines make it clear that those surveys are not a substitute for the four “detection surveys” required to assess Project impacts and formulate appropriate mitigation.\textsuperscript{47} Because FCS and WRA failed to implement the CDFW survey protocol, the City lacks the information needed to fully disclose and evaluate Project impacts to burrowing owls, and perhaps more importantly, to ensure effective mitigation.

The need to establish the baseline population of burrowing owls on a site prior to assessing impacts and mitigation measures is emphasized in CDFW’s 2012 Staff Report on Burrowing Owl Mitigation (“Staff Report”), which states:

\begin{quote}
Adequate information about burrowing owls present in and adjacent to an area that will be disturbed by a project or activity will enable the Department, reviewing agencies and the public to effectively assess potential impacts and will guide the development of avoidance, minimization, and mitigation measures.\textsuperscript{48}
\end{quote}

It is not possible to effectively assess the extent of Project impacts on burrowing owls until surveys that adhere to CDFW guidelines have been conducted. As a result, the City must require the Applicant to conduct the protocol surveys described in CDFW’s 2012 Staff Report, and the results of those surveys need to be released in a revised CEQA document so that they can be thoroughly vetted by the public, resource agencies, and decision makers during the CEQA review process.

**Special-Status Bats**

The DSEIR identified three special-status bat species (pallid bat, Townsend’s big-eared bat, and Yuma myotis) that have a “moderate” potential of roosting in the building on the Project site. As with the other special-status species, the Applicant did not conduct the

\begin{footnotes}
\item[46] See Appendix D In: California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation.
\item[47] California Department of Fish and Game. 2012. Staff Report on Burrowing Owl Mitigation.
\item[48] Ibid, p. 6.
\end{footnotes}
survey(s) necessary to determine whether any bat species were indeed using the building as a roost site. The City’s failure to establish baseline conditions precludes the public, resource agencies, and scientific community from being able to submit informed comments pertaining to Project impacts, and from having those comments vetted during the environmental review process.

PROJECT IMPACT ISSUES

Special-Status Plants

The DSEIR provides no analysis of direct impacts to special-status plants other than the statement that construction activities would directly impact Congdon’s tarplant if it is found on the Project site, and that this would be a potentially significant impact. The DSEIR fails to provide any analysis of impacts to other special-status plant species that occur, or could occur, at the Project site.

Indirect impacts associated with the Project include trampling, pollution, altered hydrology, shading, invasive plants, and pesticide drift. The DSEIR fails to provide any analysis of, or mitigation for, these potentially significant indirect impacts to special-status plants. As a result, the DSEIR lacks substantial evidence supporting its finding that Project impacts on special-status plants would be less than significant.

Special-Status Branchiopods

The DSEIR fails to provide any analysis of, or mitigation for, potentially significant impacts to special-status branchiopods (i.e., vernal pool fairy shrimp and California linderiella).

Burrowing Owl

Habitat Loss

By 2003, only two “large” breeding colonies of burrowing owls remained in Alameda County: one in the Altamont Hills, and one in the Camp Parks area. The Project site provides habitat for burrowing owls in the “Camp Parks” population, which is the only breeding population remaining in the Livermore-Amador Valley. The DSEIR fails to disclose this information. It also fails to analyze how the loss of burrowing owl habitat from the Project site may affect the Camp Parks burrowing owl population. Instead, it jumps to the conclusion that Mitigation Measure BIO-1c would mitigate impacts to burrowing owls to a less than significant level—even though Mitigation Measure BIO-1c does not provide any specific information on how the mitigation measure would, or could, mitigate significant impacts to the Camp Parks burrowing owl population.

49 DSEIR, p. 3.2-17.
Habitat loss caused by development is the most immediate threat to burrowing owls that reside in high growth areas of the San Francisco Bay Area. The further decline of burrowing owls in the few remaining core population areas—such as the Camp Parks area—will have a significant effect on the overall persistence of burrowing owls in the region. This is exemplified by the extirpation of almost all burrowing owl colonies from western Alameda and Contra Costa counties following build out in the 1980s and 1990s. The City is required to disclose this information, and provide robust mitigation that reflects the severity of impacts to a core population area.

Eviction of Owls from Occupied Burrows

The Project may involve the eviction of burrowing owls from their burrows. The DSEIR, however, fails to adequately evaluate potential impacts to burrowing owls from the temporary or permanent closure of burrows, or to identify mitigation measures sufficient to reduce such impacts below a level of significance. Consistent with CDFW guidelines, passive relocation is a potentially significant impact under CEQA that must be analyzed. Specifically, the temporary or permanent closure of burrows may result in: (a) significant loss of burrows and habitat for reproduction and other life history requirements; (b) increased stress on burrowing owls and reduced reproductive rates; (c) increased depredation; (d) increased energetic costs; and (e) risks posed by having to find and compete for available burrows. The City must disclose and thoroughly analyze the impacts associated with evicting burrowing owls from the Project site.

The need for full analysis of potential impacts from passive relocation (i.e., eviction) is further supported by research that indicates most translocation projects have resulted in fewer breeding pairs of burrowing owls at the mitigation site than at the original site, and that translocation projects generally have failed to produce self-sustaining populations. Investigators attribute the limited success of translocation to: (a) strong site tenacity exhibited by burrowing owls, and (b) potential risks associated with forcing owls to move into unfamiliar and perhaps less preferable habitats.

The DSEIR fails to provide a burrowing owl exclusion plan, or fundamental details associated with that plan (e.g., location of replacement burrows and compensation habitat). This makes it impossible for the public, resource agencies, and decision makers to evaluate the probability that there will be significant impacts to owls evicted from the Project site.

51 Ibid.
53 California Department of Fish and Game. 2012. Staff Report on Burrowing Owl Mitigation, p. 10.
54 Ibid.
56 Ibid.
Impacts to Foraging Habitat

The Project site provides suitable foraging habitat for special-status bats, the burrowing owl, and other protected bird species.\textsuperscript{57} The DSEIR’s analysis of impacts to foraging habitat for these species is limited to the statement that: “[i]t should be noted that significant impacts associated with wildlife species are associated with their potential to nest on-site; avian species can forage almost anywhere, and the loss of foraging habitat by itself does not constitute a significant impact.”\textsuperscript{58} This statement is absurd and indicates the author has minimal knowledge of the ecology associated with the special-status species that occur in the Project region.

It is well established in scientific literature and mitigation guidance issued by the CDFW that the loss or degradation of foraging habitat can have a significant impact on special-status species. For example, burrowing owls depend on foraging habitat in close proximity to burrows (nest sites).\textsuperscript{59} Indeed, CDFW’s Staff Report on Burrowing Owl Mitigation reports: “burrows and the associated surrounding habitat are essential ecological requisites for burrowing owls throughout the year and especially during the breeding season.”\textsuperscript{60} As a result, burrowing owls will be eliminated from the Project site even if their burrows are protected.

The loss of foraging habitat can also have a significant impact on bats. According to the Western Bat Working Group: “[i]n general, the long term persistence of North American bat species is threatened by the loss of clean, open water; modification or destruction of roosting and foraging habitat; and, for hibernating species, disturbance or destruction of hibernacula.”\textsuperscript{61} A considerable amount of foraging habitat in the region has already been lost to urban development and other habitat conversion activities (e.g., agricultural expansion and wind energy production). Much of the foraging habitat that remains in the region is threatened by additional development. For these reasons, the loss of bat foraging habitat at the Project site constitutes a potentially significant impact that must be scientifically analyzed in a revised DSEIR.

The DSEIR’s assertion that “avian species can forage almost anywhere” contradicts scientific facts. For example, burrowing owls only forage in areas that support a suitable prey base and that have conditions that allow for effective hunting.\textsuperscript{62} As a result, foraging is limited to areas with sufficient prey, and where vegetation is relatively short and open.\textsuperscript{63} In addition, because burrowing owls exhibit high site fidelity, they do not

\begin{itemize}
\item \textsuperscript{57} DSEIR, pp. 3.2-17 and -18.
\item \textsuperscript{58} DSEIR, p. 3.2-17.
\item \textsuperscript{59} California Department of Fish and Game. 2012. Staff Report on Burrowing Owl Mitigation.
\item \textsuperscript{60} Ibid, p. 21. [emphasis added].
\item \textsuperscript{61} Western Bat Working Group. 2005 (update). Species Accounts. p. 11. [emphasis added].
\item \textsuperscript{62} California Department of Fish and Game. 2012. Staff Report on Burrowing Owl Mitigation. p. 24.
\end{itemize}
readily colonize new habitats (including foraging habitats) if they are displaced from a project site.\textsuperscript{64}

The Project, in conjunction with other projects in the area (i.e., Boulevard and Zeiss Innovation Center), would eliminate nearly all of the raptor foraging habitat remaining in the region (Figure 1). As a result, raptor territories associated with that habitat will be eliminated, even if the actual nest sites are not destroyed. This constitutes a significant impact that must be disclosed, analyzed, and mitigated in a revised DSEIR.

![Figure 1. Cumulative impacts to raptor foraging habitat in the Project area. Virtually all remaining habitat would be eliminated by the proposed Project (yellow rectangle), Zeiss Innovation Center Project (orange rectangle), and Boulevard Project (red polygon).](image)

**Cumulative Impacts**

The DSEIR’s analysis of cumulative impacts to biological resources fails to satisfy the requirements of CEQA.

First, the DSEIR fails to define the geographic scope of the City’s cumulative impacts analysis other than it was “the region surrounding the project site.”\textsuperscript{65} This description is


\textsuperscript{65} DSEIR, p. 4-3.
too vague to understand the geographic scope of the City’s analysis, and consequently, any ability to validate the conclusions presented in the DSEIR.

Second, the list of cumulative projects provided in the DSEIR omits the Zeiss Innovation Center Project, which is located approximately 700 feet north of the Project site. The Zeiss Innovation Center Project would impact many of the same biological resources as the proposed Project, including Congdon’s tarplant, seasonal wetlands, burrowing owl (and other raptor) habitat, and potential habitat for the vernal pool fairy shrimp and California linderiella.

Third, the DSEIR acknowledges the Project would (or could) impact wetlands, special-status plants (Congdon’s tarplant), and special-status animals (nesting birds, burrowing owl, bats). However, the DSEIR fails to provide any actual analysis of cumulative impacts to these resources, nor does it provide the City’s conclusion on whether cumulative impacts to these specific resources would be significant. Instead, the DSEIR simply jumps to the conclusion that the proposed mitigation would make the Project’s contribution to “any significant cumulative impact” less than cumulatively considerable. There are two problems with the City’s rationale:

1. None of the biological resource mitigation measures are designed to alleviate the cumulative impact; all three mitigation measures are specific to the Project site and to Project activities. Therefore, they do not address the cumulative impact posed by other projects in conjunction with the proposed Project.

2. Habitat loss, including the incremental loss of habitat from numerous small projects, is the greatest threat to most special-status species. The DSEIR does not require habitat compensation for all of the special-status species that would (or could) be affected by the Project. As a result, the Project’s contribution to the cumulatively significant loss of habitat would not be mitigated.

Fourth, the DSEIR concludes the Project’s contribution to any significant cumulative impact on special-status plant species would be less than cumulatively considerable because Congdon’s tarplant would be relocated if it is found on the Project site during preconstruction surveys. The basis for this conclusion is confusing because the DSEIR does not require (or propose) relocation of Congdon’s tarplant as mitigation. Nevertheless, the DSEIR’s conclusion is not justified because the DSEIR fails to incorporate mitigation for the numerous other special-status plant species that occur, or could occur, at the Project site.

Based on my review of the scientific literature, and the City’s failure to demonstrate the proposed mitigation would offset significant impacts, it is my professional opinion that the Project’s incremental contribution to cumulative impacts to the burrowing owl and Congdon’s tarplant would be cumulatively considerable. The Project may have cumulatively considerable impacts to other species as well (e.g., vernal pool fairy shrimp, special-status bats); however, I am unable to formulate a definitive opinion in this regard.

66 DSEIR, p. 4-4.
67 DSEIR, p. 4-4.
due to the DSEIR’s omission of baseline data pertaining to the presence of those species on the Project site.

**MITIGATION ISSUES**

**Special-Status Plants**

The DSEIR requires the Applicant to conduct a focused survey to determine the presence of Congdon’s tarplant prior to construction. If no special-status plant species are found during the survey, then no additional mitigation measures will be implemented. However, if Congdon’s tarplant is detected, additional mitigation measures shall be required. 68 There are several problems with the proposed mitigation:

First, the DSEIR does not require focused surveys or mitigation for the other special-status plant species that occur, or could occur, at the Project site. As a result, potentially significant impacts to all special-status plants besides Congdon’s tarplant remain unmitigated.

Second, Congdon’s tarplant is known to occur at the Project site. Therefore, there is no basis for making compensatory mitigation contingent on the results of a future survey of unknown quality, and conducted by a biologist with uncertain qualifications. This is especially true for annual plants such as Congdon’s tarplant because the presence and abundance of annual plants can fluctuate dramatically from year to year due to climatic conditions. Thus, the absence of Congdon’s tarplant from the Project site during a preconstruction survey may be the result of adverse survey conditions rather than actual absence of the species.

Third, the DSEIR indicates that compensatory mitigation would not be required if activity exclusion zones can be installed around habitat occupied by Congdon’s tarplant during construction of the Project. Based on the site plan, all existing plants will be directly or indirectly affected by the Project. 69 Therefore, even if activity exclusion zones are feasible, the “protected” plant populations have no chance for long-term persistence at the site once the Project is operational.

**Compensatory Mitigation Strategy**

The DSEIR requires the Applicant to prepare a mitigation plan if impacts to Congdon’s tarplant cannot be avoided. According to the DSEIR: “[a] mitigation plan may include but is not limited to the following: the acquisition of off-site mitigation areas presently supporting the Congdon’s tarplant, purchase of credits in a mitigation bank that is approved to sell credits for the Congdon’s tarplant, or payment of in-lieu fees to a public agency or conservation organization (e.g., a local land trust) for the preservation and

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68 DSEIR, p. 3.2-18.
69 Indirect impacts associated with the Project include trampling, pollution, altered hydrology, shading, invasive plants, and pesticide drift.
management of existing populations of Congdon’s tarplant.”

The DSEIR cannot defer formulation of the mitigation plan unless it establishes fundamental aspects of the plan in the DSEIR. These include: (a) the performance standards (or success criteria) for the proposed mitigation, (b) a definitive enforcement mechanism that ensures performance standards are met; (c) the contingency or remedial action measures that would be triggered if success standards are not achieved; (d) the measures that would be implemented to ensure the long-term protection and management of sensitive biological resources at mitigation sites; and (e) the required monitoring program, including the monitoring techniques, effort, and frequency. Because the DSEIR lacks these fundamental details, the City has not ensured Project impacts to sensitive botanical resources would be reduced to a less than significant level.

The DSEIR’s deferral of the mitigation plan is exacerbated by its failure to provide evidence that the proposed mitigation is feasible. There do not appear to be any mitigation banks that sell credits for impacts to Congdon’s tarplant. In addition, there do not appear to be any in-lieu fee programs that cover impacts to Congdon’s tarplant. Whereas the acquisition of off-site mitigation areas supporting Congdon’s tarplant is an acceptable option, the DSEIR fails to provide evidence that sites suitable for acquisition exist—especially given the demand generated by other projects requiring compensatory mitigation for impacts to Congdon’s tarplant. As a result, the City needs to produce a revised DSEIR that identifies the: (a) potential mitigation sites, and status of Congdon’s tarplant at those sites; (b) actual mitigation ratio being proposed; (c) performance standards for the mitigation sites; (d) required monitoring program; and, (e) measures that will be implemented to ensure the long-term protection and management of Congdon’s tarplant populations at the mitigation sites.

Compensatory Mitigation Ratio

According to the DSEIR, the mitigation plan should incorporate a compensatory mitigation ratio of at least 1:1. The Eastern Alameda County Conservation Strategy (“EACCS”) establishes the standard for mitigation needed to conserve species and habitat in Eastern Alameda County. The mitigation proposed in the DSEIR does not adhere to EACCS. Specifically, the EACCS establishes a standardized mitigation ratio of 5:1 for impacts to focal plant species (e.g., Congdon’s tarplant). In addition, the 1:1 ratio proposed in the DSEIR is not consistent with other projects in Dublin. For example, the City is requiring a 5:1 ratio for impacts to Congdon’s tarplant at the Zeiss Innovation

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70 DSEIR, p. 3.2-19.
71 California Department of Fish and Wildlife. 2018. Conservation and Mitigation Banks Established in California by CDFW [website]. Available at: <https://www.wildlife.ca.gov/Conservation/Planning/Banking/Approved-Banks#r3>.
Center Project site. The DSEIR fails to explain why a 5:1 ratio was needed to mitigate impacts at the Zeiss project site, while the proposed Project only requires a 1:1 ratio—even though the City analyzed both projects at approximately the same time.

Because the DSEIR lacks a detailed mitigation strategy, and because the measures listed in the DSEIR do not comply with the EACCS, the City has not ensured Project impacts to Congdon’s tarplant and other special-status plant species would be reduced to a less than significant level.

**Burrowing Owl**

The DSEIR incorporates the following mitigation measures for Project impacts to burrowing owls: (1) a Burrowing Owl Survey and Impact Assessment that would be conducted immediately before ground-disturbing activities; (2) avoidance measures; (3) burrow exclusion if avoidance is not possible; and, (4) preparation and implementation of a Mitigation Plan if avoidance is not possible. I discuss each of these measures in the subsections below.

**Burrowing Owl Survey and Impact Assessment**

The DSEIR requires a preconstruction survey no more than 14 days prior to ground-disturbing activities, and a second survey within 48 hours of initial ground disturbance. Two preconstruction surveys during an undetermined time of year do not provide reliable information on burrowing owls that may be impacted by a project. As discussed above, the two “take avoidance” (preconstruction) surveys described in CDFW’s Staff Report are not intended to serve as a substitute for the four “detection” surveys needed to identify presence, assess impacts, and formulate appropriate mitigation. Rather, the “take avoidance” surveys are intended to confirm no new owls have colonized the site since completion of the “detection” surveys. According to CDFW’s Staff Report: “[a]ny new burrowing owl colonizing the project site after the CEQA document has been adopted may constitute changed circumstances that should be addressed in a re-circulated CEQA document.” Because the Applicant never made an attempt to establish burrowing owl occupancy at the Project site, any burrowing owls occupying the site when the preconstruction surveys are conducted would constitute changed circumstances that will need to be addressed in a re-circulated CEQA document.

An additional problem with the City’s approach to obtaining the data needed to assess occupancy and implement mitigation is that it is based on the Applicant’s timing, rather than the timing needed to establish the ecological value of the site to burrowing owls. Many burrowing owls migrate seasonally, at least at a local scale. As a result, preconstruction surveys that are conducted during the non-breeding season would fail to detect individuals that breed at the site. This would lead to the false conclusion that the Project would have no impact on the species, and thus, compensatory mitigation is not

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74 Ibid, p. 10. [emphasis added].
required (per the conditions established in the DSEIR).

Avoidance Measures - Buffers

The DSEIR directs the Applicant to avoid disturbing or otherwise impacting burrows occupied by burrowing owls. The DSEIR, however, fails to establish any standards for the mitigation measure. For example, the DSEIR does not establish the minimum buffers that need to be implemented around burrows, or the monitoring activities that should be implemented to ensure burrowing owls are not being disturbed by construction activities. The mitigation measure should be revised to reflect CDFW guidelines, which indicate the need for buffers 50 to 500 meters, depending on the time of year and level of disturbance.\(^\text{75}\)

Exclusion and Relocation Plan

The DSEIR requires the Applicant, in consultation with the CDFW, to prepare a Burrowing Owl Relocation Plan if avoidance of burrowing owls or their burrows is not possible. This condition is appropriate if the final mitigation measure adopted by the City clarifies that the Applicant’s Burrowing Owl Relocation Plan must be approved by the CDFW prior to any ground-disturbing activities.

Mitigation Plan

The DSEIR defers critical analysis of the mitigation needed to mitigate the Project’s potentially significant impacts to burrowing owls. Specifically, it defers identifying the compensatory mitigation ratio; acceptable mitigation location and mechanism (e.g., habitat acquisition, purchase of credits at a mitigation bank, in-lieu fee, etc.); site protection methods; financial assurances; performance standards; and monitoring requirements. Instead, the DSEIR proposes to allow these critical mitigation components to be established in a subsequent Burrowing Owl Mitigation Plan, which would be reviewed and accepted by CDFW and the City prior to the first ground-disturbing activities, but would not be presented to the public prior to Project approval. This effectively robs the public from being able to submit comments on fundamental aspects of the mitigation strategy. This is extremely important because neither the CDFW nor the City has an effective oversight approach that ensures compensatory mitigation is occurring.\(^\text{76}\)

The DSEIR fails to identify a mitigation ratio, and instead proposes to allow CDFW to approve a habitat compensation ratio following Project approval. CDFW’s Staff Report on Burrowing Owl Mitigation indicates that a ratio of at least 1:1 is required to mitigate impacts to burrowing owl habitat. However, a 1:1 ratio is not likely to be sufficient to mitigate impacts below a level of significance in this case due to the rapid decline of the Camp Parks population and the limited availability of compensation habitat to support that population. Accordingly, mitigation imposed by the City should require adherence

\(^{75}\) California Department of Fish and Game. 2012 Mar 7. Staff Report on Burrowing Owl Mitigation. p. 9.

to the regional-specific Eastern Alameda County Conservation Strategy (“EACCS”). The EACCS requires compensatory mitigation for impacts to burrowing owl habitat that is within 0.5 mile of a burrowing owl nest used within the previous three years. In addition, the EACCS establishes a standardized mitigation ratio of 3:1 (3.5:1 if the mitigation site is in a different core area). As a result, the City needs to establish the mitigation ratio required for the Project, and it cannot assume that a ratio less than 3:1 would mitigate impacts to a less-than-significant level unless it provides scientific analysis justifying that determination. Because the DSEIR does not contain mitigation that adheres to the standards in the EACCS, and because the DSEIR fails to ensure that mitigation would have any benefit to the Camp Parks burrowing owl population, the Project’s impacts to the burrowing owl remain potentially significant.

Special-Status Bats

The DSEIR proposes the following mitigation for potentially significant impacts to special-status bat species:

- Pre-removal bat surveys of the existing on-site building shall occur no more than 30 days before its removal. If bats are found, then a qualified biologist shall develop an appropriate relocation plan consistent with USFWS, CDFW, and East Alameda County Conservation Strategy standards and policies.

These measures do not ensure Project impacts are mitigated to a less-than-significant level.

The DSEIR fails to identify the survey techniques that should be implemented for the pre-removal surveys. This is important for three reasons. First, bat detection often requires specialized techniques, and a technique that is effective for one species may be completely ineffective for other species. Second, pallid bats and Townsend’s big-eared bats are known to be extremely sensitive to human disturbance. For example, Townsend’s big-eared bats are so sensitive to human disturbance that simple entry into a maternity roost can cause the colony to abandon the roost (which contributes to population declines). As a result, pre-removal surveys may have a significant impact on bats if appropriate techniques are not used. Third, the DSEIR fails to establish minimum qualifications for the biologist conducting the pre-removal surveys. As a result, the City has no basis for assuming the surveys would be effective and would avoid disturbance to roost sites.

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The mitigation measure requires a qualified biologist to develop an appropriate relocation plan consistent with USFWS, CDFW, and East Alameda County Conservation Strategy standards and policies. However, the DSEIR does not cite or otherwise identify those standards and policies, nor am I aware that such standards and policies exist (the EACCS does not include any for bat relocation).

Suitable roost sites are the limiting factor for most bat populations.\(^{81}\) The DSEIR does not require the Applicant to provide replacement roosts as compensation for impacts to potential roosts at the Project site. Therefore, even if the bats are properly excluded from the existing on-site building, they may not have a suitable alternate roost in the vicinity, and the local population may be extinguished.\(^{82}\) This constitutes a potentially significant impact that remains unmitigated.

**Wetlands**

Mitigation Measure BIO-3a requires the Applicant to complete an updated wetland delineation to determine if the wetlands at the Project are subject to jurisdiction under Section 404 of the Clean Water Act. The DSEIR does not identify whether the Applicant’s subsequent conclusions pertaining to the jurisdictional status of the wetlands would be verified by the Army Corp of Engineers (“USACE”).

Mitigation Measure BIO-3b requires the Applicant to acquire appropriate permits under Section 404 of the Clean Water Act from the USACE if the wetlands are determined to be subject to USACE jurisdiction, and to obtain Section 401 certification from the Regional Water Quality Control Board (“RWQCB”). It further requires the Applicant to prepare a wetland mitigation plan that is approved by the USACE and RWQCB. According to the DSEIR, the wetland mitigation plan shall meet the following “standards”:

> A mitigation plan shall be prepared that will establish suitable compensatory mitigation based on the concept of no net loss of wetland habitat values or acreages, to the satisfaction of the regulatory agencies. Specifically, a wetland mitigation plan shall be developed and implemented that includes creation, restoration, and/or enhancement of off-site wetlands prior to project ground disturbance. Mitigation areas shall be established in perpetuity through dedication of a conservation easement (or similar mechanism) to an approved environmental organization and payment of an endowment for the long-term management of the site.\(^{83}\)

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\(^{81}\) *Ibid.*


\(^{83}\) DSEIR, p. 3.2-22.
The DSEIR concludes these actions would reduce Project impacts to wetlands to a less-than-significant level. There are two crucial reasons why the City does not have the basis for this conclusion.

First, the DSEIR impermissibly defers analysis and critical aspects of the wetlands mitigation strategy. Under CEQA, the City is obligated to identify the specific mitigation needed to mitigate Project impacts to less-than-significant levels. This includes the specific mitigation strategy (e.g., creation, restoration, or enhancement), mitigation ratio, monitoring program, and performance standards and that will be implemented to ensure the Project would have less-than-significant impacts on the environment (i.e., independent of analysis conducted by the USACE and RWQCB designed to ensure compliance with state and federal wetland regulations).

Contrary to what the DSEIR suggests, the City cannot rely on deferred mitigation and the permitting requirements of other agencies to conclude impacts to wetlands would be mitigated to less-than-significant levels. For example, in its comment letter to the lead agency for another project, the RWQCB recently stated:

> It is inappropriate to rely upon agency regulations for determining that impacts will be at insignificant levels...Water Board staff strongly discourages the County [of Kern] from attempting to defer to the later preparation of Waste Discharge Requirements (WDRs) permits to address the above issues. Such an approach would constitute deferment of mitigation. In the event that this occurs, the Water Board may require substantial modifications to the Project during the course of permitting review to ensure all water quality impacts [are] adequately mitigated. Water Board staff encourages the Project proponents to initiate detailed plans early in the process to allow for full and adequate review of the Project to address the above issues. This planning should be concurrent with the CEQA process as opposed to a sequential permitting approach.84

Second, compliance with regulatory permits provides no assurances that Project impacts to jurisdictional wetlands would be less-than-significant. To the contrary, numerous studies have demonstrated that many compensatory mitigation projects permitted under Sections 401 and 404 of the Clean Water Act are not achieving the goal of “no overall net loss” of wetland acres and functions.85 For example, Ambrose and Lee (2004) concluded: “the Section 401 program has failed to achieve the goal of no net loss of

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habitat functions, values and services.” The National Academy of Sciences (2001) conducted a comprehensive review of compensatory wetland mitigation projects in the U.S. and found that the national “no net loss” goal is not being met because: (a) there is little monitoring of permit compliance, and (b) the permit conditions commonly used to establish mitigation success do not assure the establishment of wetland functions. Ambrose et al. (2007) derived similar results after examining 143 projects permitted by the California State Water Resources Control Board. Specifically, they concluded: (a) only 46% of the projects fully complied with all permit conditions, and (b) very few wetland mitigation projects were successful, especially from the ecological perspective. Several other studies have shown that the regulatory agencies are not ensuring the success of wetland mitigation projects. Most notably, a 2005 report issued by the United States Government Accountability Office concluded that: “the Corps of Engineers does not have an effective oversight approach to ensure that compensatory mitigation is occurring.”

In summary, the DSEIR improperly defers analysis and concludes future permits issued by other agencies would ensure Project impacts to wetlands would be less-than-significant. However, substantial evidence shows that those permits have been ineffective in mitigating impacts to wetlands. Thus, the sole basis for the City’s conclusion of insignificance is not supported by evidence.

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This concludes my comments on the DSEIR. Please contact me if you would like to discuss any issues raised by these comments.

Sincerely,

Scott Cashen, M.S.
Senior Biologist
Scott Cashen, M.S.
Senior Wildlife Ecologist

Scott Cashen has 25 years of professional experience in natural resources management. During that time he has worked as a field biologist, forester, environmental consultant, and instructor of Wildlife Management. Mr. Cashen focuses on CEQA/NEPA compliance issues, endangered species, scientific field studies, and other topics that require a high level of scientific expertise.

Mr. Cashen has knowledge and experience with numerous taxa, ecoregions, biological resource issues, and environmental regulations. As a biological resources expert, Mr. Cashen is knowledgeable of the various agency-promulgated guidelines for field surveys, impact assessments, and mitigation. Mr. Cashen has led field investigations on several special-status species, including ones focusing on the yellow-legged frog, red-legged frog, desert tortoise, steelhead, burrowing owl, California spotted owl, northern goshawk, willow flycatcher, Peninsular bighorn sheep, red panda, and various forest carnivores.

Mr. Cashen is a recognized expert on the environmental impacts of renewable energy development. He has been involved in the environmental review process of over 80 solar, wind, biomass, and geothermal energy projects. Mr. Cashen’s role in this capacity has encompassed all stages of the environmental review process, from initial document review through litigation support. Mr. Cashen has provided expert witness testimony on several of the Department of the Interior’s “fast-tracked” renewable energy projects. His testimony on those projects helped lead agencies develop project alternatives and mitigation measures to reduce environmental impacts associated with the projects.

Mr. Cashen was a member of the independent scientific review panel for the Quincy Library Group project, the largest community forestry project in the United States. As a member of the panel, Mr. Cashen was responsible for advising the U.S. Forest Service on its scientific monitoring program, and for preparing a final report to Congress describing the effectiveness of the Herger-Feinstein Forest Recovery Act of 1998.

AREAS OF EXPERTISE

- CEQA, NEPA, and Endangered Species Act compliance issues
- Comprehensive biological resource assessments
- Endangered species management
- Renewable energy development
- Scientific field studies, grant writing and technical editing

EDUCATION

  Thesis: Avain Use of Restored Wetlands in Pennsylvania
B.S. Resource Management - The University of California, Berkeley (1992)
PROFESSIONAL EXPERIENCE

Litigation Support / Expert Witness

Mr. Cashen has served as a biological resources expert for over 100 projects subject to environmental review under the California Environmental Quality Act (CEQA) and/or the National Environmental Policy Act (NEPA). As a biological resources expert, Mr. Cashen reviews CEQA/NEPA documents and provides his clients with an assessment of biological resource issues. He then submits formal comments on the scientific and legal adequacy of the project’s environmental documents (e.g., Environmental Impact Statement). If needed, Mr. Cashen conducts field studies to generate evidence for legal testimony, or he can obtain supplemental testimony from his deep network of species-specific experts. Mr. Cashen has provided written and oral testimony to the California Energy Commission, California Public Utilities Commission, and U.S. district courts. His clients have included law firms, non-profit organizations, and citizen groups.

REPRESENTATIVE EXPERIENCE

Solar Energy
- Abengoa Mojave Solar Project
- Avenal Energy Power Plant
- Beacon Solar Energy Project
- Blythe Solar Power Project
- Calico Solar Project
- California Flats Solar Project
- Calipatria Solar Farm II
- Carrizo Energy Solar Farm
- Catalina Renewable Energy Project
- Fink Road Solar Farm
- Genesis Solar Energy Project
- Heber Solar Energy Facility
- Imperial Valley Solar Project
- Ivanpah Solar Electric Generating
- Maricopa Sun Solar Complex
- McCoy Solar Project
- Mt. Signal and Calexico Solar
- Panoche Valley Solar
- San Joaquin Solar I & II
- San Luis Solar Project
- Stateline Solar Project
- Solar Gen II Projects
- SR Solis Oro Loma
- Vestal Solar Facilities
- Victorville 2 Power Project
- Willow Springs Solar

Geothermal Energy
- Casa Diablo IV Geothermal Project
- East Brawley Geothermal
- Mammoth Pacific 1 Replacement
- Orni 21 Geothermal Project
- Western GeoPower Plant

Wind Energy
- Catalina Renewable Energy Project
- Ocotillo Wind Energy Project
- SD County Wind Energy Ordinance
- Searchlight Wind Project
- Shu’luuk Wind Project
- Tres Vaqueros Repowering Project
- Tule Wind Project
- Vasco Winds Relicensing Project

Biomass Facilities
- CA Ethanol Project
- Colusa Biomass Project
- Tracy Green Energy Project

Other
- DRECP
- Carnegie SVRA Expansion Project
- Lakeview Substation Project
- Monterey Bay Shores Ecoresort
- Phillips 66 Rail Spur
- Valero Benecia Crude By Rail
- World Logistics Center
Project Management

Mr. Cashen has managed several large-scale wildlife, forestry, and natural resource management projects. Many of the projects have required hiring and training field crews, coordinating with other professionals, and communicating with project stakeholders. Mr. Cashen’s experience in study design, data collection, and scientific writing make him an effective project manager, and his background in several different natural resource disciplines enable him to address the many facets of contemporary land management in a cost-effective manner.

REPRESENTATIVE EXPERIENCE

Wildlife Studies

• Peninsular Bighorn Sheep Resource Use and Behavior Study: (CA State Parks)
• “KV” Spotted Owl and Northern Goshawk Inventory: (USFS, Plumas NF)
• Amphibian Inventory Project: (USFS, Plumas NF)
• San Mateo Creek Steelhead Restoration Project: (Trout Unlimited and CA Coastal Conservancy, Orange County)
• Delta Meadows State Park Special-Status Species Inventory: (CA State Parks, Locke)

Natural Resources Management

• Mather Lake Resource Management Study and Plan – (Sacramento County)
• Placer County Vernal Pool Study – (Placer County)
• Weidemann Ranch Mitigation Project – (Toll Brothers, Inc., San Ramon)
• Ion Communities Biological Resource Assessments – (Ion Communities, Riverside and San Bernardino Counties)
• Del Rio Hills Biological Resource Assessment – (The Wyro Company, Rio Vista)

Forestry

• Forest Health Improvement Projects – (CalFire, SD and Riverside Counties)
• San Diego Bark Beetle Tree Removal Project – (SDG&E, San Diego Co.)
• San Diego Bark Beetle Tree Removal Project – (San Diego County/NRCS)
• Hillslope Monitoring Project – (CalFire, throughout California)
Biological Resources

Mr. Cashen has a diverse background with biological resources. He has conducted comprehensive biological resource assessments, habitat evaluations, species inventories, and scientific peer review. Mr. Cashen has led investigations on several special-status species, including ones focusing on the foothill yellow-legged frog, mountain yellow-legged frog, desert tortoise, steelhead, burrowing owl, California spotted owl, northern goshawk, willow flycatcher, Peninsular bighorn sheep, red panda, and forest carnivores.

REPRESENTATIVE EXPERIENCE

Biological Assessments/Biological Evaluations (“BA/BE”)

- **Aquatic Species BA/BE** – Reliable Power Project *(SF Public Utilities Commission)*
- **Terrestrial Species BA/BE** – Reliable Power Project *(SF Public Utilities Commission)*
- **Management Indicator Species Report** – Reliable Power Project *(SF Public Utilities Commission)*
- **Migratory Bird Report** – Reliable Power Project *(SF Public Utilities Commission)*
- **Terrestrial and Aquatic Species BA** – Lower Cherry Aqueduct *(SF Public Utilities Commission)*
- **Terrestrial and Aquatic Species BE** – Lower Cherry Aqueduct *(SF Public Utilities Commission)*
- **Terrestrial and Aquatic Species BA/BE** – Public Lands Lease Application *(Society for the Conservation of Bighorn Sheep)*
- **Terrestrial and Aquatic Species BA/BE** – Simon Newman Ranch *(The Nature Conservancy)*

Avian

- **Study design and Lead Investigator** - Delta Meadows State Park Special-Status Species Inventory *(CA State Parks: Locke)*
- **Study design and lead bird surveyor** - Placer County Vernal Pool Study *(Placer County: throughout Placer County)*
- **Surveyor** - Willow flycatcher habitat mapping *(USFS: Plumas NF)*
- **Independent surveyor** - Tolay Creek, Cullinan Ranch, and Guadacanal Village restoration projects *(Ducks Unlimited/USGS: San Pablo Bay)*
- **Study design and Lead Investigator** - Bird use of restored wetlands research *(Pennsylvania Game Commission: throughout Pennsylvania)*
- **Study design and surveyor** - Baseline inventory of bird species at a 400-acre site in Napa County *(HCV Associates: Napa)*
• Surveyor - Baseline inventory of bird abundance following diesel spill (LFR Levine-Fricke: Suisun Bay)

• Study design and lead bird surveyor - Green Valley Creek Riparian Restoration Site (City of Fairfield: Fairfield, CA)

• Surveyor - Burrowing owl relocation and monitoring (US Navy: Dixon, CA)

• Surveyor - Pre-construction burrowing owl surveys (various clients: Livermore, San Ramon, Rio Vista, Napa, Victorville, Imperial County, San Diego County)

• Surveyor - Backcountry bird inventory (National Park Service: Eagle, Alaska)

• Lead surveyor - Tidal salt marsh bird surveys (Point Reyes Bird Observatory: throughout Bay Area)

• Surveyor – Pre-construction surveys for nesting birds (various clients and locations)

Amphibian

• Crew Leader - Red-legged frog, foothill yellow-legged frog, and mountain yellow-legged frog surveys (USFS: Plumas NF)

• Surveyor - Foothill yellow-legged frog surveys (PG&E: North Fork Feather River)

• Surveyor - Mountain yellow-legged frog surveys (El Dorado Irrigation District: Desolation Wilderness)

• Crew Leader - Bullfrog eradication (Trout Unlimited: Cleveland NF)

Fish and Aquatic Resources

• Surveyor - Hardhead minnow and other fish surveys (USFS: Plumas NF)

• Surveyor - Weber Creek aquatic habitat mapping (El Dorado Irrigation District: Placerville, CA)

• Surveyor - Green Valley Creek aquatic habitat mapping (City of Fairfield: Fairfield, CA)

• GPS Specialist - Salmonid spawning habitat mapping (CDFG: Sacramento River)

• Surveyor - Fish composition and abundance study (PG&E: Upper North Fork Feather River and Lake Almanor)

• Crew Leader - Surveys of steelhead abundance and habitat use (CA Coastal Conservancy: Gualala River estuary)

• Crew Leader - Exotic species identification and eradication (Trout Unlimited: Cleveland NF)
Mammals

- **Principal Investigator** – Peninsular bighorn sheep resource use and behavior study *(California State Parks: Freeman Properties)*
- **Scientific Advisor** – Study on red panda occupancy and abundance in eastern Nepal *(The Red Panda Network: CA and Nepal)*
- **Surveyor** - Forest carnivore surveys *(University of CA: Tahoe NF)*
- **Surveyor** - Relocation and monitoring of salt marsh harvest mice and other small mammals *(US Navy: Skagg’s Island, CA)*
- **Surveyor** – Surveys for Monterey dusky-footed woodrat. Relocation of woodrat houses *(Touré Associates: Prunedale)*

Natural Resource Investigations / Multiple Species Studies

- **Scientific Review Team Member** – Member of the scientific review team assessing the effectiveness of the US Forest Service’s implementation of the Herger-Feinstein Quincy Library Group Act.
- **Lead Consultant** - Baseline biological resource assessments and habitat mapping for CDF management units *(CDF: San Diego, San Bernardino, and Riverside Counties)*
- **Biological Resources Expert** – Peer review of CEQA/NEPA documents *(various law firms, non-profit organizations, and citizen groups)*
- **Lead Consultant** - Pre- and post-harvest biological resource assessments of tree removal sites *(SDG&E: San Diego County)*
- **Crew Leader** - T&E species habitat evaluations for Biological Assessment in support of a steelhead restoration plan *(Trout Unlimited: Cleveland NF)*
- **Lead Investigator** - Resource Management Study and Plan for Mather Lake Regional Park *(County of Sacramento: Sacramento, CA)*
- **Lead Investigator** - Biological Resources Assessment for 1,070-acre Alfaro Ranch property *(Yuba County, CA)*
- **Lead Investigator** - Wildlife Strike Hazard Management Plan *(HCV Associates: Napa)*
- **Lead Investigator** - Del Rio Hills Biological Resource Assessment *(The Wyro Company: Rio Vista, CA)*
- **Lead Investigator** – Ion Communities project sites *(Ion Communities: Riverside and San Bernardino Counties)*
- **Surveyor** – Tahoe Pilot Project: Validation of California’s Wildlife Habitat Relationships (CWHR) Model *(University of California: Tahoe NF)*
Forestry

Mr. Cashen has five years of experience working as a consulting forester on projects throughout California. Mr. Cashen has consulted with landowners and timber operators on forest management practices; and he has worked on a variety of forestry tasks including selective tree marking, forest inventory, harvest layout, erosion control, and supervision of logging operations. Mr. Cashen’s experience with many different natural resources enable him to provide a holistic approach to forest management, rather than just management of timber resources.

REPRESENTATIVE EXPERIENCE

- Lead Consultant - CalFire fuels treatment projects (*SD and Riverside Counties*)
- Lead Consultant and supervisor of harvest activities – San Diego Gas and Electric Bark Beetle Tree Removal Project (*San Diego*)
- Crew Leader - Hillslope Monitoring Program (*CalFire: throughout California*)
- Consulting Forester – Forest inventories and timber harvest projects (*various clients throughout California*)

Grant Writing and Technical Editing

Mr. Cashen has prepared and submitted over 50 proposals and grant applications. Many of the projects listed herein were acquired through proposals he wrote. Mr. Cashen’s clients and colleagues have recognized his strong scientific writing skills and ability to generate technically superior proposal packages. Consequently, he routinely prepares funding applications and conducts technical editing for various clients.

PERMITS

U.S. Fish and Wildlife Service Section 10(a)(1)(A) Recovery Permit for the Peninsular bighorn sheep

PROFESSIONAL ORGANIZATIONS / ASSOCIATIONS

The Wildlife Society
Cal Alumni Foresters
Mt. Diablo Audubon Society

OTHER AFFILIATIONS

Scientific Advisor and Grant Writer – *The Red Panda Network*
Scientific Advisor – *Mt. Diablo Audubon Society*
Grant Writer – *American Conservation Experience*
TEACHING EXPERIENCE
Teaching Assistant: Ornithology - The Pennsylvania State University, 1996-1997

PUBLICATIONS

March 15, 2018

Collin McCarthy
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Subject: Comments on the IKEA Retail Center Project

Dear Mr. McCarthy,

We have reviewed the January 2018 Draft Supplemental Environmental Impact Report (DEIR) for the IKEA Retail Center Project (“Project”) located in the City of Dublin (“City”). The Project proposes to develop up to 432,099 square feet of commercial uses on 27.45 acres. The Project would be anchored by an IKEA store of up to 339,099 square feet and would feature up to 93,000 square feet of lifestyle retail-restaurant uses. The IKEA store would consist of a two-story building located over a two-level parking structure with the lower level partially below grade. The building would stand approximately 61 feet above finished grade. A recycling and refuse collection area, trash compactor, and emergency diesel generator would also be located at the rear of the store. A two-bay loading dock for home deliveries would be located on the south side of the building facing I-580.

Our review concludes that DSEIR fails to adequately evaluate the Project’s Air Quality and Greenhouse Gas (GHG) impacts. As a result, emissions associated with the construction and operation of the proposed Project are inadequately addressed. An updated DSEIR should be prepared to adequately assess and mitigate the potential air quality and GHG impacts the Project may have on the surrounding environment.
Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR relies on emissions calculated from the California Emissions Estimator Model Version CalEEMod.2016.3.2 ("CalEEMod").\(^1\) CalEEMod provides recommended default values based on site specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (CEQA) requires that such changes be justified by substantial evidence.\(^2\) Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters were utilized in calculating the Project's air pollutant emissions, and make known which default values were changed as well as provide a justification for the values selected.\(^3\)

When we reviewed the Project's CalEEMod output files, we found that several of the values inputted into the model were not consistent with information disclosed in the DSEIR. As a result, the Project’s construction and operational emissions are greatly underestimated. An updated DSEIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Failure to Account for Material Export During Grading Phase

The Project’s CalEEMod model fails to include the total amount of material anticipated to be exported during the Grading phase of construction, and as a result, the Project’s construction emissions are underestimated.

According to the DSEIR, “the proposed project’s grading activities would involve 95,000 cubic yards of cut and 73,700 cubic yards of fill. Thus, 21,300 cubic yards would be exported off-site” (p. 2-12). These proposed material export activities will likely produce substantial pollutant emissions, and as a result, these activities should be included in the Project’s CalEEMod model. However, review of the Project’s CalEEMod output files demonstrates that none of the material to be exported during grading was inputted into the model.

Review of the Trips and VMT table within the Project’s CalEEMod output files demonstrates that the model estimates the Project’s construction-related emissions assuming zero hauling truck trips will

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\(^3\) CalEEMod Model 2013.2.2 User’s Guide, pp. 7, 13, available at: [http://www.aqmd.gov/docs/default-source/caleemod/usersguideSept2016.pdf?sfvrsn=6](http://www.aqmd.gov/docs/default-source/caleemod/usersguideSept2016.pdf?sfvrsn=6) (A key feature of the CalEEMod program is the “remarks” feature, where the user explains why a default setting was replaced by a “user defined” value. These remarks are included in the report.)
occur during the grading phase of construction (Appendix B, pp. 63, pp. 96, pp. 130). Hauling truck trips within CalEEMod are estimated based on the total amount of material that will be imported or exported and assumes a single hauling truck can transport 16 cubic yards of material per trip.\(^4\) Therefore, assuming the Project will use 16-cubic-yard hauling trucks, approximately 1,331 hauling truck trips would be required to haul the soil off site. However, according to the CalEEMod User’s Guide, CalEEMod calculates the number of hauling truck trips assuming that one hauling truck will have 2 one-way trips (e.g., a hauling truck importing material will have a loaded arrival trip and an empty return trip, while a hauling truck exporting material will have an empty arrival trip but a loaded departure trip).\(^5\) Using this logic, the DSEIR should have modeled the Project’s emissions assuming that there would be a total of 2,662 (2 x 1,331 hauling trips) in order to account for the 2 one-way truck trips. Thus, because the Project’s CalEEMod model estimated emissions assuming no hauling truck trips would occur during the grading phase of construction, it is extremely likely that the DSEIR’s CalEEMod model significantly underestimates the actual emissions that will be generated during construction activities.

This underestimation presents a significant issue, as the inclusion of material export within the model is necessary to calculate emissions produced from material movement, including truck loading and unloading, and hauling truck trips.\(^6\) Specifically, NOx and fugitive dust emissions are generated as a result of hauling truck trips. NOx emissions are caused by fuel combustion in mobile heavy-duty diesel and gasoline-powered equipment and vehicles, while fugitive dust emissions are generated from loading and unloading material into hauling trucks.\(^7,8\) The DSEIR’s failure to include these hauling trips, therefore, underestimates the NOx and fugitive dust emissions that will be generated by the 2,662 hauling truck trips that will occur during Project construction. It is critical that the Project’s construction-related emissions are remodeled and estimated with the inclusion of the 2,662 hauling truck trips, as review of the Project’s CalEEMod output files demonstrates that the Project’s mitigated emissions, without inclusion of any hauling truck trips, are close to the Bay Area Air Quality Management’s (BAAQMD) significance threshold for NOx.

Review of the DSEIR’s air quality analysis demonstrates that the Project’s emissions, with implementation of mitigation, will emit a maximum of approximately 52.44 pounds per day (lbs/day) of NOx emissions during construction (see excerpt below) (p. 3.4-44 – 3.1-45).

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\(^7\) “Construction-Generated Criteria Air Pollutant and Precursor Emissions.” Sacramento Metropolitan Air Quality Management District, May 2016, available at: [http://airquality.org/LandUseTransportation/Documents/Ch3Construction%20FINAL5-2016.pdf](http://airquality.org/LandUseTransportation/Documents/Ch3Construction%20FINAL5-2016.pdf), p. 3-1

As shown above, the Project’s mitigated emissions would result in a maximum daily emission of approximately 52 lbs/day of NOx, which is approximately 2 pounds below the BAAQMD’s NOx significance threshold of 54 lbs/day. Given the quantity of hauling truck trips that are needed to export the 21,300 cubic yards of material from the Project site, it is highly likely that the Project’s NOx emissions would exceed this threshold if emissions were modeled correctly. As such, we conclude that the emissions generated during Project construction are underestimated, and as a result, the DSEIR’s air pollution model should not be relied upon to determine Project significance.

**Failure to Assess the Feasibility of Obtaining Tier 4 Interim Equipment**

The DSEIR fails to assess the feasibility of obtaining an entire fleet of Tier 4I equipment during Project construction. The DSEIR’s CalEEMod model proposes to equip all 30 pieces construction equipment with Tier 4I engines (Appendix B, pp. 53, pp. 86, pp. 119). Due to the limited number of Tier 4I construction equipment available, the Project should have assessed the feasibility in obtaining engines equipped with Tier 4I engines for the entire construction fleet. By failing to demonstrate how the Project will actually comply with this mitigation measure, this measure is unenforceable and thus, the DSEIR cannot claim the emissions reductions from this measure.

The United States Environmental Protection Agency’s (USEPA) 1998 nonroad engine emission standards were structured as a three-tiered progression. Tier 1 standards were phased-in from 1996 to 2000 and Tier 2 emission standards were phased in from 2001 to 2006. Tier 3 standards, which applied to engines from 37-560 kilowatts (kW) only, were phased in from 2006 to 2008. The Tier 4 emission standards were introduced in 2004, and were phased in from 2008 to 2015. These tiered emission standards, however, are only applicable to newly manufactured nonroad equipment. According to the USEPA, “if products were built before EPA emission standards started to apply, they are generally not affected by

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the standards or other regulatory requirements.”10 Therefore, pieces of equipment manufactured prior to 2000 are not required to adhere to Tier 2 emission standards, and pieces of equipment manufactured prior to 2006 are not required to adhere to Tier 3 emission standards. Construction equipment often lasts more than 30 years; as a result, Tier 1 equipment and non-certified equipment are currently still in use.11 It is estimated that of the two million diesel engines currently used in construction, 31 percent were manufactured before the introduction of emissions regulations.12

Although Tier 4I engines are currently being produced and installed in new off-road construction equipment, the vast majority of existing diesel off-road construction equipment in California is not equipped with either Tier 3 or Tier 4 Final engines.13 In a 2010 white paper, the California Industry Air Quality Coalition estimated that approximately 7% and less than 1% of all off-road heavy duty diesel equipment in California was equipped with Tier 2 and Tier 3 engines, respectively.14 Similarly, based on information and data provided in the San Francisco Clean Construction Ordinance Implementation Guide for San Francisco Public Projects, the availability of Tier 3 equipment is extremely limited. In 2014, 25% of all off-road equipment in the state of California were equipped with Tier 2 engines, approximately 12% were equipped with Tier 3 engines, approximately 18% were equipped with Tier 4 Interim engines, and only 4% were equipped with Tier 4 Final engines (see excerpt below).15

Figure 4: 2014 Statewide All Fleet Sizes (Pieces of Equipment)

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As demonstrated in the figure above, Tier 4I equipment only accounts for 18% of all off-road equipment currently available in the state of California. Thus, by stating that the Project proposes to use Tier 4I equipment during construction, the DSEIR is relying on obtaining an entire fleet of construction equipment that only accounts for 18% of all off-road equipment currently available in the state of California. Therefore, by failing to evaluate the feasibility of implementing Tier 4I mitigation into the Project’s construction phases, the Project’s construction emissions are underestimated. Thus, we find the conclusions made within the DSEIR to be incorrect and should not be relied upon to determine Project significance.

**Failure to Include All Daily Vehicle Trips**

Review of the Project’s CalEEMod output files demonstrates that the model underestimated the number of vehicle trips expected to occur during operation of the proposed Project. When we compare the total number of vehicle trips estimated in the Project’s CalEEMod output files to the vehicle estimates found in the Air Quality and Greenhouse Gas Supporting Document, we find that the model underestimated the number of operational vehicle trips per day. As a result, the Project’s operational emissions are underestimated and should not be relied upon to determine Project significance.

According to the Air Quality and Greenhouse Gas Supporting Document, which can be found in Appendix B, the Project would generate a total of 16,898 vehicle trips per day (see excerpt below) (Table 10, Appendix B, p. 29).

<table>
<thead>
<tr>
<th>Building</th>
<th>Vehicle Type</th>
<th>Number of Vehicle Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td>IKEA</td>
<td>Passenger Cars</td>
<td>5,580</td>
</tr>
<tr>
<td></td>
<td>Light-heavy Duty Trucks (2-axles)</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td>Heavy-heavy Duty Trucks (4-axles)</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>Total IKEA Trips</td>
<td>6,010</td>
</tr>
<tr>
<td>Retail Center</td>
<td>Passenger Cars (2)</td>
<td>10,830</td>
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<tr>
<td></td>
<td>Light-heavy Duty Trucks (2-axles)</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Heavy-heavy Duty Trucks (4-axles)</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>Total Retail Center Trips</td>
<td>10,801</td>
</tr>
<tr>
<td></td>
<td><strong>Total Project Trips</strong></td>
<td><strong>16,840</strong></td>
</tr>
</tbody>
</table>


As you can see in the table above, Table 10 claims that the Project would have a total of 16,840 trips per day. This, however, is incorrect. When the Total IKEA Trips, Retail Center Passenger Cars, Retail Center Light-heavy Duty Trucks, and Retail Center Heavy-heavy Duty Trucks are added together, the Project would actually generate a total of 16,898 trips per day (6,010 + 10,830 + 50 + 8 = 16,898). Table
10 fails to include the 58 truck trips generated by the retail center when calculating the total number of vehicle trips. Therefore, to remain consistent with the daily vehicle trip estimates provided by the Air Quality and Greenhouse Gas Supporting Document, the CalEEMod model should have estimated emissions assuming that the IKEA building would generate a total of 6,010 trips per day and that the proposed retail/restaurant land use would generate a total of 10,888 trips per day, for a total of 16,898 daily trips. Review of the DSEIR’s CalEEMod model, however, demonstrates that this was not the case (see excerpt below) (Appendix B, pp. 77, pp. 110, pp. 144).

4.2 Trip Summary Information

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Average Daily Trip Rate</th>
<th>Unmitigated</th>
<th>Mitigated</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Weekday</td>
<td>Saturday</td>
<td>Sunday</td>
</tr>
<tr>
<td>Enclosed Parking with Elevator</td>
<td>30.76</td>
<td>30.76</td>
<td>30.76</td>
</tr>
<tr>
<td>Free-Standing Discount Superstore</td>
<td>5,973.33</td>
<td>5,973.33</td>
<td>5,973.33</td>
</tr>
<tr>
<td>High Turnover (Self-serve Restaurants)</td>
<td>7,406.84</td>
<td>7,406.84</td>
<td>7,406.84</td>
</tr>
<tr>
<td>24-Hour Convenience Store</td>
<td>56.80</td>
<td>56.80</td>
<td>56.80</td>
</tr>
<tr>
<td>Full Sit Down Restaurant</td>
<td>3,376.08</td>
<td>3,376.08</td>
<td>3,376.08</td>
</tr>
<tr>
<td>Total</td>
<td>15,832.74</td>
<td>15,832.74</td>
<td>15,832.74</td>
</tr>
</tbody>
</table>

As you can see in the excerpt above, the DSEIR’s CalEEMod model underestimates the number of daily trips the Project will generate by approximately 60 trips per day, or approximately 21,900 vehicle trips per year.

By underestimating the total number of vehicle trips expected to occur during Project operation, the DSEIR underestimates the Project’s operational mobile-source emissions. According to Appendix A of the CalEEMod User’s Guide, CalEEMod uses the average daily trip rate when estimating a proposed project’s annual air pollutant emissions. Therefore, if the DSEIR underestimates the number of daily vehicle trips expected to occur throughout operation, then the proposed Project’s operational mobile-source emissions are also underestimated. It is critical that the Project’s operational emissions are modeled assuming a total of 16,898 daily trips, rather than a total of 16,840 daily trips will occur, as review of the Project’s CalEEMod output files demonstrates that the Project’s mitigated emissions are close to the BAAQMD’s significance threshold for operational NOx emissions (see excerpt below) (Appendix A, pp. 61).

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As shown above, the Project’s mitigated emissions would result in a maximum daily emission of approximately 46 lbs/day of NOx, which is approximately 8 pounds below the BAAQMD’s NOx significance threshold of 54 lbs/day. Seeing as the DSEIR’s CalEEMod model underestimates the number of operational daily vehicle trips by 60 trips per day or 21,900 trips per year, it is possible that the Project’s NOx emissions would exceed this threshold if emissions were modeled correctly. As a result, we find the DSEIR’s CalEEMod model to be unreliable and should not be relied upon to determine Project significance. An updated air quality analysis must be prepared in an updated DSEIR that adequately evaluates the Project’s air quality impact, and additional mitigation measures should be implemented, if necessary.

**Greenhouse Gas**

**Failure to Adequately Determine Significance of Greenhouse Gas Impacts**

The DSEIR determines the significance of the Project’s GHG impact for the Project’s opening year in 2020 by demonstrating compliance with the City’s Climate Action Plan (CAP), which has a GHG reduction target of 15 percent below 2010 levels by 2020 (p. 3.1-60). Additionally, the DSEIR states that because the CAP was adopted prior to Assembly Bill 197 (AB 197) and Senate Bill 32 (SB 32) being codified into law, the Project’s GHG impact was also evaluated by calculating the Project’s emissions in the year 2030 and comparing the emissions to year 2000 levels, in order to determine if the Project would achieve a GHG reduction of 40 percent below 1990 levels by 2030, as mandated in AB 197 and SB 32 (p. 3.1-60 – 3.1-61). Review of the DSEIR’s GHG analysis demonstrates that: (1) the Project fails to demonstrate compliance with the City’s CAP and; (2) the DSEIR’s method of using a statewide GHG reduction goal as a CEQA threshold to determine whether the proposed Project has significant GHG emissions is incorrect. As a result, we find the DSEIR’s conclusion that the Project would result in a less than significant GHG impact to be unsubstantiated and incorrect.
Failure to Demonstrate Consistency with the City’s Climate Action Plan

As previously stated, the DSEIR determines the significance of the Project’s GHG impact in 2020 by evaluating the Project’s consistency with the City’s CAP. The DSEIR states,

“To address this potential impact for 2020, project consistency with the City of Dublin CAP is used for this analysis. The CAP is a qualified Greenhouse Gas Reduction Strategy under CEQA, which can be used to determine the significance of GHG emissions from a project (CEQA Guidelines section 15183.5). BAAQMD also recognizes the use of a CAP as a significance threshold for a project’s GHG emissions. Therefore, if the project is consistent with the CAP, then the project would result in a less than significant cumulative impact to global climate change in 2020” (p. 3.1-65).

Therefore, in order to determine Project compliance, the DSEIR provides a consistency checklist, Table 3.1-23, which includes a list of proposed measures that the Project will implement at Project build out (see table below) (Table 3.1-23, DSEIR, p. 3.1-66 – 3.1-67).
<table>
<thead>
<tr>
<th>CAP Measure</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1.4 Bicycle Parking Requirements</td>
<td>Consistent. Bicycle parking requirements are implemented during the site development review process. Under the City’s Off-Street Parking and Loading Regulations, parking lots with 20 or more spaces in nonresidential zoning districts are required to provide bicycle parking. Pursuant to the Zoning Ordinance, one bicycle parking space in a bicycle rack is required for every 40 vehicular parking spaces. Bicycle lockers are also required to be provided. Recommendation 9 provided in the TIA requires a total of 80 short-term and 80 long-term bicycle parking spaces at the proposed project. This will be incorporated into the project design and therefore need not be separately included as mitigation.</td>
</tr>
<tr>
<td>A.1.5 Streetscape Master Plan</td>
<td>Consistent. The Zoning Ordinance has requirements for planting trees in parking lots (minimum of one tree for every four parking spaces). The project would comply with this mandatory requirement.</td>
</tr>
<tr>
<td>A.1.8 General Plan Community Design and Sustainability Element</td>
<td>Consistent. The Community Design and Sustainability Element established design principles, policies, and implementation measures to enhance the livability of Dublin and encourages a high level of quality design that supports sustainability. The Community Design and Sustainability Element applies to new development and redevelopment throughout the City. The project incorporates a number of features that promote sustainability including energy efficiency design, water efficiency design, and accessibility to alternative modes of transportation, which will be incorporated into the project design or are required by Title 24 and therefore need not be separately included as mitigation.</td>
</tr>
<tr>
<td>A.1.9 Work with Livermore Amador Valley Transit Authority (LAVTA) to Improve Transit</td>
<td>Consistent. As part of the review process for proposed development projects, the City and project proponents will work with LAVTA on planning future bus stops locations and extending service routes.</td>
</tr>
<tr>
<td>A.2 Energy Measures</td>
<td>Consistent. The City has developed a LED streetlight specification that requires all future development projects to install LED streetlights. The project would comply with this requirement.</td>
</tr>
</tbody>
</table>
According to the CAP, however, although a CEQA review for a proposed project must identify the specific CAP measures applicable to the project, “if the measures are not otherwise binding and enforceable, they must be incorporated as conditions of approval or as mitigation measures applicable to the project”.\(^\text{17}\) Review of the Project Design Features (PDFs) and mitigation measures listed in the DSEIR’s Executive Summary Matrix, however, demonstrates that the reduction measures outlined in Table 3.1-23 were not included as PDFs, mitigation measures, or as mandatory conditions of approval (Table ES-2, p. ES-7 – ES-8; p. 3.1-35). As a result, it is unclear what measures will actually be implemented once the Project is approved, and it is unclear whether implementation of these measures would satisfy requirements set forth by the CAP. Additionally, the City’s CAP states, “identification of implementation steps and parties responsible for ensuring implementation of each action shall be included in approval documents for each project”.\(^\text{18}\) Review of the DSEIR and associated appendices demonstrates that this information has not been provided.

By failing to include the measures proposed in the checklist above as mitigation or mandatory conditions of approval, these measures are not enforceable. Until the Project includes the checklist items as mitigation or mandatory conditions of approval, the Project is not consistent with the CAP and cannot claim that it is. Additionally, by failing to identify who will be responsible for implementing these measures, the Project fails to comply with the requirements set forth in the CAP. An updated DSEIR should be prepared to adequately demonstrate compliance with the CAP, must identify specific measures the Project will implement within the CAP and who will implement these measures, and must include these measures as conditions of Project approval or as mitigation.


\(^{18}\) Ibid, p. 50.
Failure to Demonstrate Consistency with the City’s Climate Action Plan

As stated above, in an effort to comply with CEQA, AB 197, and SB 32 the DSEIR compares the Project’s construction and operational GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures, also known as a Business As Usual scenario (BAU). Using this method, the DSEIR concludes that if the Project achieves a minimum of a 40 percent reduction in GHGs between the BAU and As Proposed scenarios for 2030, which is consistent with the AB 197 and SB 32 statewide reduction goals, then the Project would have a less than significant GHG impact (p. 3.1-63).

The use of this threshold to determine whether or not the Project would result in a significant GHG impact, however, is flawed and should not be relied upon to determine impact significance, as a recent law made by the California Supreme Court case Center for Biological Diversity et al. v. California Department of Fish and Wildlife and the Newhall Land and Farming Company 2015 Cal. LEXIS 9478 (Newhall Case), makes clear that this approach utilized in the DSEIR to achieve compliance with AB 197 and SB 32 is improper. The Newhall Case concludes that lead agencies cannot use the statewide GHG emission reduction percentage as the CEQA threshold to determine whether a specific project-level proposed Project has significant GHG emissions. As a result, this method of determining Project significance is incorrect and should not be relied upon.

The DSEIR incorrectly relies on the BAU method to determine the Project’s GHG impacts. According to the DSEIR, the Project would have to achieve a 40 percent reduction from BAU that is consistent with the CARB Scoping Plan to result in a less than significant GHG impact. By modeling the Project’s emissions within CalEEMod for the year 2000, the DSEIR takes the statewide reduction goal for 2030 and calculates the percent reduction from BAU compared to the proposed Project, and subsequently compares the total percent reduction to the statewide GHG reduction goal (p. 4.0-40). Using a straight-line comparison between Project-specific and statewide GHG emission reductions, the Ikea Retail Center Project would reduce its GHG emissions by 48 percent, which, according to the DSEIR, is consistent with the statewide reduction goal (p. 3.1-63). As a result, the DSEIR concludes that the Project would have a less than significant GHG impact (p. 3.1-63). The use of a “straight-line” comparison between Project-specific and statewide GHG emissions, both by the Newhall Ranch EIR and the Ikea Retail Center Project DSEIR, however, is flawed, because the percent reduction required by the proposed Project at the project-level is not directly comparable to the percent reduction required to meet the statewide goal. Since the Newhall Case prohibits this approach, the City cannot rely on this method for its GHG assessment. The City must identify an acceptable method of compliance with CEQA, AB 197, and SB 32 for the Project’s GHG emissions, and must determine a Newhall-compliant alternative threshold for the Project-specific GHG emissions.

Updated Greenhouse Gas Analysis Demonstrates Significant Impact

As previously discussed, the use of a BAU comparison method to determine the Project’s GHG impacts is entirely flawed. Furthermore, the DSEIR fails to demonstrate compliance with the City’s CAP. In order to evaluate the Project’s GHG impact, we prepared a simple analysis of the Project’s GHG emissions using

the BAAQMD’s threshold of 1,100 metric tons of carbon dioxide equivalents per year (MT CO2e/year). When we utilized this threshold, rather than the incorrect BAU method used in the DSEIR, we find that the Project’s GHG emissions would result in a significant impact. As such, additional feasible mitigation should be applied to the Project in an effort to mitigate the Project’s GHG emissions to the maximum extent possible.

When the emissions estimated in the DSEIR’s model are compared to this threshold, we find that the Project’s GHG emissions would exceed the BAAQMD’s 1,100 MT CO2e/year threshold. The DSEIR’s model’s annual emissions demonstrate that construction of the Project would generate 63 MT CO2e per year (when amortized over 30 years) with mitigation and operation of the Project would generate 13,634 MT CO2e per year with mitigation. When the Project’s amortized construction emissions and operational emissions are combined, we find that the Project’s GHG emissions would exceed the BAAQMD’s screening threshold of 1,100 MT CO2e per year (see table below).21

<table>
<thead>
<tr>
<th>DSEIR’s Annual Greenhouse Gas Emissions</th>
<th>MT CO2e/year</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Construction</strong></td>
<td>63</td>
</tr>
<tr>
<td><strong>Operation</strong></td>
<td>13,634</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>13,697</strong></td>
</tr>
<tr>
<td><strong>BAAQMD Significance Threshold</strong></td>
<td><strong>1,100</strong></td>
</tr>
<tr>
<td><strong>Threshold Exceeded?</strong></td>
<td><strong>Yes</strong></td>
</tr>
</tbody>
</table>

As you can see in the table above, when the proposed Project’s GHG emissions are compared to the BAAQMD’s project-level threshold of 1,100 MT CO2e/year, we find that the Project would exceed this threshold by approximately 12,597 CO2e/year, resulting in a significant impact. Until an updated GHG analysis is prepared in a revised DSEIR that adequately evaluates the Project’s total GHG impact, the conclusions made within the DSEIR’s Air Quality and Greenhouse Gas Analysis should not be relied upon to determine Project significance.

Mitigation Available to Reduce Operational Emissions

The results of our GHG analysis demonstrates that operation of the Project would result in significant GHG emissions. Therefore, in an effort to reduce the Project’s operational emissions, we identified several additional mitigation measures that are applicable to the Project, which can be found in CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures.22 Mitigation for criteria pollutant emissions should include consideration of the following mobile mitigation measures in an effort to reduce the Project’s emissions to below thresholds.

Reduce VMT by Increasing Transit Accessibility

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Making transit more accessible encourages the use of other modes of transportation and therefore reduces VMT. According to CAPCOA, implementation of this mitigation measure would reduce mobile source emissions by 0.5 to 24.6 percent. The Project would need to include, at a minimum, the following design features:

- A transit station/stop with high-quality, high-frequency bus service located within a five to ten-minute walk, or roughly a quarter of a mile from stop to edge of development
- Or a rail station located within a 20-minute walk or roughly half a mile from station edge to development
- Fast, frequent, and reliable transit service connecting to a high percentage of regional destinations
- Neighborhood designed for walking and bicycling

**Provide Electric Vehicle Parking**

This mitigation measure implements accessible electric vehicle parking to reduce tailpipe emissions. Design features include conductive/inductive electric vehicle charging stations and signage prohibiting parking of non-electric vehicles.

**Limit Parking Supply**

This mitigation measure will change parking requirements and types of supply within the Project site to encourage “smart growth” development and alternative transportation choices by Project residents and employees, resulting in less VMTs. This will be accomplished in a multi-faceted strategy:

- Elimination (or reduction) of minimum parking requirements
- Creation of maximum parking requirements
- Provision of shared parking

**Implement Commute Trip Reduction (CTR) Program**

The Project could implement a voluntary Commute Trip Reduction (CTR) program with employers to discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The main difference between a voluntary and a required program is:

- Monitoring and reporting is not required
- No established performance standards (i.e. no trip reduction requirements)

The CTR program will provide workers with assistance in using alternative modes of travel. The CTR program should include all of the following to apply the effectiveness reported by the literature:

- Carpooling encouragement
- Ride-matching assistance
- Preferential carpool parking
• Flexible work schedules for carpools
• Half time transportation coordinator
• Vanpool assistance
• Bicycle end-trip facilities

*Implement Subsidized or Discounted Transit Program*

This Project could provide subsidized/discounted daily or monthly public transit passes. The Project may also provide free transfers between all shuttles and transit to participants. These passes can be partially or wholly subsidized by the employer or development. Many entities use revenue from parking to offset the cost of such a Project.

*Implement Commute Trip Reduction Marketing*

The Project can implement marketing strategies to reduce commute trips. Information sharing and marketing are important components to successful commute trip reduction strategies. Implementing commute trip reduction strategies without a complementary marketing strategy will result in lower VMT reductions. Marketing strategies may include:

• New employee orientation of trip reduction and alternative mode options
• Event promotions
• Publications

*Implement Preferential Parking Permit Program*

The Project can provide preferential parking in convenient locations (such as near public transportation or building front doors) in terms of free or reduced parking fees, priority parking, or reserved parking for commuters who carpool, vanpool, ride-share or use alternatively fueled vehicles. The Project should provide wide parking spaces to accommodate vanpool vehicles.

*Price Workplace Parking*

The Project can implement workplace parking pricing at its employment centers. This may include: explicitly charging for parking for its employees, implementing above market rate pricing, validating parking only for invited guests, not providing employee parking and transportation allowances, and educating employees about available alternatives.

*Implement Employee Parking “Cash-Out”*

The Project may require employers to offer employee parking “cash-out.” The term “cashout” is used to describe the employer providing employees with a choice of forgoing their current subsidized/free parking for a cash payment equivalent to the cost of the parking space to the employer.

*Implement Transit Access Improvements*
This Project can improve access to transit facilities through sidewalk/crosswalk safety enhancements and bus shelter improvements.

When combined, these measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduces emissions released during Project operation. A revised DSEIR must be prepared to include additional mitigation measures, as well as include an updated air quality analysis to ensure that the necessary mitigation measures are implemented to reduce Project emissions to below thresholds. Furthermore, the Project Applicant needs to demonstrate commitment to the implementation of these measures prior to Project approval, to ensure that the Project’s emissions are reduced to the maximum extent possible.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Hadley Nolan
Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:
M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:
California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:
Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA’s Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:
- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 – 2003);
• Executive Director, Orange Coast Watch (2001 – 2004);
• Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
• Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
• Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
• Instructor, College of Marin, Department of Science (1990 – 1995);
• Geologist, U.S. Forest Service (1986 – 1998); and

Senior Regulatory and Litigation Support Analyst:
With SWAPE, Matt’s responsibilities have included:

• Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
• Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
• Expert witness on numerous cases including, for example, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
• Technical assistance and litigation support for vapor intrusion concerns.
• Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
• Manager of a project to evaluate numerous formerly used military sites in the western U.S.
• Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
• Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

• Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
• Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
• Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
• Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
• Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
• Expert witness testimony in a case of oil production-related contamination in Mississippi.
• Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
• Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:
As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:
As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:
• Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
• Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
• Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:
• Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
• Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted
public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor’s investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.

**Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA’s national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA’s scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region’s 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific
principles into the policy-making process.

- Established national protocol for the peer review of scientific documents.

**Geology:**
With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

**Teaching:**
From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

**Invited Testimony, Reports, Papers and Presentations:**


**Hagemann, M.F., 2004.** Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).
Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.


Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.


Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.


Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.


Other Experience:
Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.
EDUCATION

UNIVERSITY OF CALIFORNIA, LOS ANGELES  B.S. ENVIRONMENTAL SCIENCES & ENVIRONMENTAL SYSTEMS AND SOCIETY  JUNE 2016

PROJECT EXPERIENCE

SOIL WATER AIR PROTECTION ENTERPRISE  SANTA MONICA, CA

AIR QUALITY SPECIALIST

SENIOR PROJECT ANALYST: CEQA ANALYSIS & MODELING

- Modeled construction and operational activities for proposed land use projects using CalEEMod to quantify criteria air pollutant and greenhouse gas (GHG) emissions.
- Organized presentations containing figures and tables that compare results of criteria air pollutant analyses to thresholds.
- Quantified ambient air concentrations at sensitive receptor locations using AERSCREEN, a U.S. EPA recommended screening level dispersion model.
- Conducted construction and operational health risk assessments for residential, worker, and school children sensitive receptors.
- Prepared reports that discuss adequacy of air quality and health risk analyses conducted for proposed land use developments subject to CEQA review by verifying compliance with local, state, and regional regulations.

SENIOR PROJECT ANALYST: GREENHOUSE GAS MODELING AND DETERMINATION OF SIGNIFICANCE

- Evaluated environmental impact reports for proposed projects to identify discrepancies with the methods used to quantify and assess GHG impacts.
- Quantified GHG emissions for proposed projects using CalEEMod to produce reports, tables, and figures that compare emissions to applicable CEQA thresholds and reduction targets.
- Determined compliance of proposed land use developments with AB 32 GHG reduction targets, with GHG significance thresholds recommended by Air Quality Management Districts in California, and with guidelines set forth by CEQA.

PROJECT ANALYST: ASSESSMENT OF AIR QUALITY IMPACTS FROM PROPOSED DIRECT TRANSFER FACILITY

- Assessed air quality impacts resulting from implementation of a proposed Collection Service Agreement for Exclusive Residential and Commercial Garbage, Recyclable Materials, and Organic Waste Collection Services for a community.
- Organized tables and maps to demonstrate potential air quality impacts resulting from proposed hauling trip routes.
- Conducted air quality analyses that compared quantified criteria air pollutant emissions released during construction of direct transfer facility to the Bay Area Air Quality Management District’s (BAAQMD) significance thresholds.
- Prepared final analytical report to demonstrate local and regional air quality impacts, as well as GHG impacts.

PROJECT ANALYST: EXPOSURE ASSESSMENT OF LEAD PRODUCTS FOR PROPOSITION 65 COMPLIANCE DETERMINATION

- Calculated human exposure and lifetime health risk for over 300 lead products undergoing Proposition 65 compliance review.
- Compiled and analyzed laboratory testing data and produced tables, charts, and graphs to exhibit emission levels.
- Compared finalized testing data to Proposition 65 Maximum Allowable Dose Levels (MADLs) to determine level of compliance.
- Prepared final analytical lead exposure Certificate of Merit (COM) reports and organized supporting data for use in environmental enforcement statute Proposition 65 cases.

ACCOMPLISHMENTS

- Academic Honoree, Dean’s List, University of California, Los Angeles  MAR 2013, MAR 2014, JAN 2015, JAN 2016
Organizations

Adams Broadwell Joseph & Cardozo (AB)

Note to reader: This law firm is representing Dublin Residents for Responsible Development, International Brotherhood of Electrical Workers Local 595, Plumbers & Steamfitters Local 342, and Sheet Metal Workers Local 104.

Response to AB-1
The organization provided introductory remarks and provided a summary of its comments.

The organization's specific comments are addressed in detail in Response to AB-4 through Response to AB-27.

Response to AB-2
The organization provided a statement of interest. No response is necessary.

Response to AB-3
The organization provided standard language about CEQA requirements and asserted that the Draft SEIR fails to meet CEQA standards.

The organization's specific comments are addressed in detail in Response to AB-4 through Response to AB-27.

Response to AB-4
CEQA Guidelines Section 15384(b) indicates: “Substantial evidence shall include facts, reasonable assumptions predicated on facts, and expert opinion supported by facts.”

The Draft SEIR’s biological analysis is based on multiple separate biological surveys of the project site performed by two separate firms between 2013 and 2017. The first survey was conducted by WRA on August 1, 2013 and the findings were summarized in the Biological Resources Assessment (Draft SEIR Appendix C). The second survey was conducted in spring 2016 by FCS and served to confirm the findings of the WRA assessment. The third survey was conducted by FCS on November 24, 2017—approximately 2 months prior to the release of the Draft SEIR—and also served to confirm the findings of the WRA assessment. These surveys were the basis for the Draft SEIR’s description of the baseline biological conditions of the project site and thus constitute substantial evidence. Furthermore, CEQA Guidelines Section 15384(b) is silent regarding specific requirements for any technical analyses that constitute substantial evidence; as such, there is no legal basis for the claims that reconnaissance-level biological surveys are inadequate to constitute substantial evidence.

The Draft SEIR discloses that the project site is largely disturbed and lacks a diversity of native species. The site is mostly composed of weedy plant species that are common and typically occur in developed areas, and the site is extensively disturbed (including regular weed abatement). Thus, the project site’s biological attributes could be fully characterized with a reconnaissance level survey. Protocol surveys are neither required nor necessary to provide further insight into the baseline biological conditions.
Response to AB-5
The WRA Biological Resources Assessment (Draft SEIR Appendix C) indicated that vernal pool fairy shrimp are unlikely to occur on the project site because of the lack of vernal pool habitat and the site's history of repeated discing, grading, and leveling. FCS reconfirmed this finding during the 2016 and 2017 surveys. As such, the Draft SEIR appropriately did not identify the potential presence of vernal pool fairy shrimp as a significant impact.

Furthermore, the WRA Biological Resources Assessment (Draft SEIR Appendix C) noted that all seasonal depressions were man-made and formed by construction activities on the project site in 2008 and generally have limited biological value. The 12 Wetland Delineation Data Sheets provided in Appendix B of the WRA Biological Resources Assessment document the conditions of the sampling point with photographs. The photographs demonstrate that the project site has been disced and graded and certain features may have been substantially disturbed by these activities. Furthermore, the photographs show no evidence of vernal pools or vernal pool fairy shrimp.

Finally, an FCS biologist conducted an additional field survey on March 28, 2018 after several recent rain events, and noted that there was no prolonged inundation present on the project site. Given that prolonged inundation is an element necessary for vernal pool habitat, this reconfirms the Draft SEIR's findings.

In sum, substantial evidence supports the Draft SEIR's conclusion that vernal pool fairy shrimp is unlikely to occur on the project site.

Response to AB-6
California linderiella (or California fairy shrimp) occurs in the same habitat as vernal pool fairy shrimp (refer to Response to AB-5, above). Thus, because vernal pool fairy shrimp is unlikely to occur, California linderiella is also unlikely to occur. See Response to AB-5 above.

As previously noted, an FCS biologist conducted an additional field survey on March 28, 2018 after several recent rain events, and noted that there was no prolonged inundation present on the project site. Given that prolonged inundation is an element necessary for vernal pool habitat, this reconfirms the Draft SEIR's findings.

Response to AB-7a
The WRA Biological Resources Assessment (Draft SEIR Appendix C) indicated that burrowing owl had moderate potential to occur, although no indications of the species were observed. FCS reconfirmed this finding during the 2016 and 2017 surveys. The Draft SEIR stated on page 3.2-6 that, “The site exhibits good qualities for burrowing owl habitat, as it contains disturbed soils from discing and a healthy ground squirrel population.” Because burrowing owl were determined to have the potential to occur, Mitigation Measure BIO-1c was proposed, requiring a burrowing owl survey prior to ground disturbing activities. Specifically, the mitigation measure requires compliance with CDFW-accepted protocols and reduces this impact to less than significant if burrowing owls are found on-site.

Thus, the Draft EIR concluded that this species could occur on-site, which is a conservative finding. Protocol-level surveys would not yield better information that could potentially change this finding.
Finally, as a practical matter, FCS’s biological surveys indicate that the project site is covered with weedy plant species and disturbed by regular weed abatement activities. The combination of extensive groundcover and routine disturbance make the project site poorly suited to constitute burrowing owl habitat. For these reasons, there is no basis to require protocol-level surveys.

Response to AB-7b
Camp Parks is located approximately 760 feet northwest of the IKEA project site, with Martinelli Way (a four-lane divided roadway), Arnold Road (a four-lane divided roadway), Persimmon Place (a retail center), and Dublin Boulevard (a six-lane divided roadway) located in between. The project site is more than 700 feet away from the boundary of Camp Parks and is not contiguous to the property. Additionally, the proposed project does not propose any development or land use activities within Camp Parks. Given the urban character of the project vicinity, the project site is not part of the burrowing owl breeding colony associated with Camp Parks. Thus, no project-related impacts would occur to burrowing owl habitat within Camp Parks and there is no basis for the biological scope of the Draft SEIR to encompass this area.

Refer to Response to AB-7a for discussion of the project site’s environmental setting.

Response to AB-8a
The WRA Biological Resources Assessment (Draft SEIR Appendix C) indicated that the Congdon’s tar plant was present on-site. FCS reconfirmed this finding during the 2016 and 2017 surveys. The Draft SEIR concluded that the potential for occurrences of the Congdon’s tar plant was significant and set forth Mitigation Measure BIO-1a, which requires a focused survey for this species and measures to reduce this impact to a level of less than significant. Thus, the Draft EIR concluded that this species occurs on-site, which is a conservative finding. Protocol-level surveys would not yield better information that could potentially change this finding.

The field survey for the WRA Wetland Delineation was performed on November 5, 2013. Douglas’ fiddleneck was a plant species reported to be observed during the field survey. However, this species blooms between March and May; it would be highly unlikely to observe this individual in November. Moreover, FCS’s biologist observed the more common, non-native Rancher’s fiddleneck throughout the project site during their biological surveys. These two plant species resemble each other and can be mistaken for one another. Thus, FCS concluded that the reported occurrence of the Douglas’ fiddleneck in November 2013 was in error. Thus, Draft SEIR did not identify this as a special-status species that was present on the project site.

Finally, the WRA Wetland Delineation did not identify the western dodder as being present on the project site. Thus, there are no statements in the Wetland Delineation or Draft SEIR that support the organization’s claims.

Response to AB-8b
The WRA Biological Resources Assessment (Draft SEIR Appendix C) indicated that saline clover is unlikely to occur on the project site because the grassland and seasonally wet depression habitat is heavily disturbed and of low quality. The WRA Biological Resources Assessment indicated that hairless popcorn flower is unlikely to occur on the project site due to the lack of meadows and seeps and the lack of coastal salt marshes and swamps. FCS reconfirmed these findings during the 2016
and 2017 surveys. As such, the Draft SEIR appropriately did not identify the potential presence of saline clover and hairless popcorn flower as significant impacts.

Moreover, both saline clover and hairless popcorn flower occur on alkali soils. The project site lacks these soils, which further supports the finding that these species are unlikely to occur on the project site.

Finally, the statement about hairless popcorn flower having not been found in Dublin since 1954 was based on a California Natural Diversity Database (CNDDB) query. The CNDDB is a screening tool used by biologists to determine what special-status species have been previously recorded to be present within a defined geographical area. Thus, it is entirely possible that amending the CNDDB query parameters to encompass a broader area would yield different results, including more recent occurrences of the hairless popcorn flower. However, a CNDDB query is not a substitute for a field survey, and any findings from the field survey would take precedence over the database search. As previously noted, the project site was surveyed on multiple occasions between 2013 and 2017 and hairless popcorn flower was not observed. Thus, the findings of the field surveys are the basis for the Draft SEIR’s conclusions about the hairless popcorn flower.

Response to AB-9
The Draft SEIR’s biological resources section discloses the potential presence of bats and assigns appropriate mitigation measures to reduce impacts to less than significant levels. The Draft SEIR states on page 3.2-11 that, “The marketing building on the project site may provide night roosting habitat, and the bat may use the project site for foraging habitat.” This observation was based on multiple surveys of the project site that occurred between 2013 and 2017. Because special-status bats were determined to have the potential to occur, Mitigation Measure BIO-1d was proposed requiring pre-removal bat surveys prior to demolition of the building. Mitigation Measures BIO-1d indicates that if bats are found to be present, a relocation plan shall be developed in accordance with USFWS, CDFW, and EACCS standards and policies. Referencing agency standards and policies are clear and unequivocal performance standards. Thus, Mitigation Measure BIO-1d is adequate as written and does not need to be revised. As such, the Draft SEIR did in fact disclose the baseline conditions for special-status bats at the project site and provided appropriate mitigation.

Response to AB-10
Refer to Response to AB-5 and Response to AB-6.

Response to AB-11
Refer to Response to AB-7a and Response to 7b.

Response to AB-12
Mitigation Measure BIO-1c sets forth avoidance as the first option for burrowing owl impacts. Under this scenario, burrowing owl nests would be protected with a buffer until the individuals have departed. If avoidance is not possible, Mitigation Measure BIO-1c requires the applicant to develop a detailed mitigation plan in consultation with CDFW. The mitigation plan must be developed in accordance with the methodology set forth in CDFW’s Staff Report on Burrowing Owl Mitigation Appendix A and must be reviewed and approved by CDFW.
In summary, Mitigation Measure BIO-1c includes performance standards that would reduce any adverse impacts associated with burrowing owl eviction to less than significant.

Response to AB-13
Refer to Response to AB-14.

Response to AB-14
CEQA Guidelines Section 15126.4 sets forth considerations for mitigation measures. The section states that mitigation measures “may specify performance standards,” “must be fully enforceable,” and “must be ‘roughly proportional’ to the impacts of the project.” In this case, Mitigation Measure 1c requires the applicant to retain a qualified biologist to conduct a burrowing owl survey and impact assessment. There are clear and unequivocal performance standards within this mitigation measure that are fully enforceable and roughly proportional to project impacts; for example:

“Prior to the first ground disturbing activities . . .”

“The surveys shall be conducted in accordance with the California Department of Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation”

“. . . the project applicant shall implement the following avoidance measures . . .”

“The mitigation plan shall be based on the requirements set forth in Appendix A of the CDFW 2012 Staff Report on Burrowing Owl Mitigation Appendix A and the Plan shall be reviewed and accepted by CDFW . . .”

For these reasons, the Mitigation Measure BIO-1c meets the applicable requirements of CEQA Guidelines Section 15126.4.

Regarding the claims that the mitigation measure is deferred because it does not include a compensatory mitigation ratio, acceptable mitigation location and mechanism, site protection mechanisms, financial assurances, or monitoring requirements, all of these items (to the extent that they are applicable) would be determined as part of the consultation with CDFW required by the mitigation measure. The performance standards are contained in CDFW 2012 Staff Report on Burrowing Owl Mitigation. Because of the uncertainty associated with the outcome of the burrowing owl survey, it would be premature to make any commitments regarding these items. Requiring focused or pre-construction surveys prior to release of the Draft SEIR is contrary to sound biological practice, as the purpose of these surveys is to identify impacted individuals immediately prior to development and ensure that impacts are avoided, relocated, or otherwise mitigated. Conducting these surveys months or years before development activities would occur would not serve any meaningful purpose, particularly since these species have already been determined to have the potential to occur on the project site. Thus, identifying focused or pre-construction surveys as mitigation measures is consistent with CEQA Guidelines Section 15126.4 Mitigation Measure BIO-1c appropriately cites the CDFW Staff Report on Burrowing Owl Mitigation as the basis for any mitigation that may be necessary.
Additionally, Page 9 the CDFW Staff Report on Burrowing Owl Mitigation sets forth buffer setback distances based on the time of year and level of disturbance of the project site. Because the exact timing of ground disturbance is not known, referencing the CDFW Staff Report is sufficient and affords the qualified biologist discretion in determining the appropriate distance.

As for the East Alameda County Conservation Strategy (EACCS), this applies only to public projects, not private projects in the City of Dublin. Thus, City of Dublin has the discretion to apply different mitigation ratios on a project-by-project basis. The City has modified Mitigation Measure BIO-1c to include a minimum 1:1 ratio.

Response to AB-15
This project site has been surveyed for special-status plants multiple times between 2013 and 2017. Only Congdon’s tar plant was found to be present; no other special-status plants have been documented to occur. Thus, the Draft SEIR appropriately set forth Mitigation Measure BIO-1a, requiring focused surveys for the Congdon’s tarplant. If found to be present, Mitigation Measure BIO-1a outlines multiple options for mitigating impacts including exclusion/avoidance and purchase of credits at a mitigation bank. It is appropriate to identify multiple options for mitigation, particularly when none have been officially eliminated. Furthermore, if in fact the project characteristics preclude exclusion/avoidance, purchasing credits at a mitigation bank is feasible. For these reasons, the analysis and mitigation in the Draft SEIR complies with CEQA standards and there is no legal basis to revise the Draft SEIR.

Response to AB-16
CEQA Guidelines Section 15126.4 sets forth considerations for mitigation measures. The section states that mitigation measures “may specify performance standards,” “must be fully enforceable,” and “must be ‘roughly proportional’ to the impacts of the project.” In this case, Mitigation Measure BIO-1a requires the applicant to retain a qualified biologist to conduct a focused survey for the Congdon’s tarplant and, if found to be present, implement one of two mitigation options (avoidance/exclusion or purchase of credits at a mitigation bank). There are clear and unequivocal performance standards within this mitigation measure that are fully enforceable and roughly proportional to project impacts. For these reasons, Mitigation Measure BIO-1a meets the applicable requirements of CEQA Guidelines Section 15126.4.

Regarding the claims that there are no existing mitigation banks that sell credits for the Congdon’s tarplant, the Kaiser Dublin Medical Center entered into an agreement to purchase credits for this species at a mitigation bank. Thus, if the Congdon’s tarplant is found on the project site, it would be expected that the applicant could also purchase credits at this mitigation bank. Regardless of this specific mitigation bank’s availability, the mitigation measure includes other mitigation options and requires consultation with, and approval by, the CDFW and the City of the mitigation plan prior to the commencement of any activities that would impact Congdon’s tar plant.

Response to AB-17
Mitigation Measure BIO-1a employs a standard of “a minimum ratio of 1:1,” which does not preclude a higher ratio and as stated, the mitigation ratio shall be development in consultation with, and approved by, the CDFW and the City. Moreover, as previously noted, EACCS is advisory for private
development projects, and the City of Dublin has the discretion to apply different mitigation ratios on a project-by-project basis.

Response to AB-18
Refer to Response to AB-9.

Response to AB-19
There are several species that have been determined to potentially occur and have appropriate corresponding mitigation to reduce impacts to less than significant. Furthermore, the site mostly represents an island of ruderal vegetation in the midst of extensive commercial development. For these reasons with the implementation of required mitigation, cumulative impacts to biological resources would be less than significant.

The Zeiss Innovation Center Project has been added to the list of cumulative projects in Table 4-1. This change is noted in Section 5, Errata. However, it should be noted that the Draft SEIR is a supplement to the Eastern Dublin Specific Plan EIR, which encompassed both the IKEA and Zeiss project sites. The Eastern Dublin Specific Plan EIR contemplated development on both sites, and, thus, development at the Zeiss site was contemplated in a prior round of environmental review. This renders the omission of the Zeiss Innovation Center Project immaterial.

Response to AB-20
The site has 1.92 acres of wetlands under State law subject to RWCQB jurisdiction. Since the site design will impact these areas, the impacts and mitigation measures identify a detailed permitting process under Section 401 that identifies mitigation to ensure no net loss of wetland resources. If delineation finds that wetlands are subject to federal jurisdiction, the mitigation measure also requires that the project obtain a 404 permit.

Response to AB-21
The organization’s specific comments will be addressed in Response to AB-22 through Response to AB-27.

Response to AB-22
The preliminary information provided by the applicant and utilized in the CalEEMod model runs was that the project site would be balanced with no export or import of dirt during grading of the proposed project. However, during development of the Draft SEIR, more refined grading assumptions were developed, which found that 21,300 cubic yards of dirt would need to be exported during grading of the project. The required export of 21,300 cubic yards during grading was included in Section 2.3, Project Characteristics of the Draft SEIR but was not included in the Air Quality modeling assumptions provided in Appendix B or in the CalEEMod model runs performed for the proposed project.

For the air modeling in the Final SEIR to be consistent with the most current version of the project description that includes the export of 21,300 cubic yards of dirt during grading of the project, the CalEEMod Model was re-run and the CalEEMod output files are included as Appendix I to the Final SEIR. In addition, the revised Table 3.1-7 and revised Table 3.1-8 are provided in Section 4, Errata.
As shown the revised Tables 3.1-7 and 3.1-8, the addition of the export of 21,300 cubic yards to the grading phase in the CalEEMod model does not result in any new impacts not previously discussed in the Draft SEIR and no new mitigation measures are required. The entire project site is proposed to be graded in one phase. Although building construction activities may be staggered, the SEIR's air quality analysis assumed a worst-case scenario of all buildings being constructed simultaneously. Thus, staggered building construction would result in a lower amount of emissions being spread over a longer period, which would be less severe than what was modeled in the SEIR.

The claim that the additional emissions created from the export of dirt during grading activities may result in an exceedance of the BAAQMD thresholds does not have factual basis since grading (and soil export) would not overlap with building construction, paving and architectural coating activities, which are well below the BAAQMD thresholds for the mitigated conditions.

**Response to AB-23**

Table 10 from Appendix B included a typo for the Retail Center Passenger Cars of 10,830 daily trips. The 10,830 daily trips came from Table 3.6-10 of the DSEIR and represents the total gross daily trips generated from the Non-IKEA land uses. The 10,830 daily trips should have been entered on the row for Total Retail Center Trips and the Passenger Cars should have been 10,772 daily trips, which is calculated by subtracting the truck trips from the total daily trips. The Total Project Trips shown in Table 10 of 16,840 daily trips is the correct amount for the project and is what was analyzed in the CalEEMod model runs. The corrected version of Table 10 is provided in Section 4, Errata. This does not change any impact conclusion or result in any new impacts not previously discussed in the Draft SEIR.

**Response to AB-24**

The organization claimed that the Draft SEIR's determination that global warming impacts would be less than significant is not supported by substantial evidence.

Although the DSEIR does not reference the California’s 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by the California Air Resource Board (CARB) in November 2017 (which was prepared two months before publication of the DSEIR), the 2017 Scoping Plan was prepared by CARB in order to provide a pathway for the State to meet the GHG emission reduction goals provided in AB 197 and SB 32, and provides substantial evidence for the threshold utilized in the DSEIR for the year 2030 GHG emissions analysis.

The 2017 Scoping Plan provides guidance for local agencies in California to meet the AB 197 and SB 32 climate goal of 40 percent below 1990 levels by year 2030, and provides the following text of how local agency climate action plans should be updated to meet the new 2030 and 2050 climate goals:

> Numerous local governments in California have already adopted GHG emissions reduction goals for year 2020 consistent with AB 32. CARB advises that local governments also develop community-wide GHG emissions reduction goals necessary to reach 2030 and 2050 climate goals. Emissions inventories and reduction goals should be expressed in mass emissions, per capita emissions, and service population emissions. To do this, local governments can start by developing a community-wide GHG emissions target consistent with the accepted protocols as
outlined in OPR’s General Plan Guidelines Chapter 8: Climate Change. They can then calculate GHG emissions thresholds by applying the percent reductions necessary to reach 2030 and 2050 climate goals (i.e., 40 percent and 80 percent, respectively) to their community-wide GHG emissions target. Since the statewide per capita targets are based on the statewide GHG emissions inventory that includes all emissions sectors in the State, it is appropriate for local jurisdictions to derive evidence-based local per capita goals based on local emissions sectors and population projections that are consistent with the framework used to develop the statewide per capita targets. The resulting GHG emissions trajectory should show a downward trend consistent with the statewide objectives. The recommendation for a community-wide goal expands upon the reduction of 15 percent from “current” (2005–2008) levels by 2020 as recommended in the 2008 Scoping Plan. (Emphasis added).

As stated above in the 2017 Scoping Plan, local agencies can “calculate GHG emissions thresholds by applying the percent reductions necessary to reach 2030 and 2050 climate goals (i.e., 40 percent and 80 percent, respectively) to their community-wide GHG emissions target.” As such, the year 2030 GHG emissions threshold of 40 percent below 1990 levels by year 2030 that was utilized in the DSEIR is substantiated by evidence provided in the 2017 Scoping Plan.

In addition, the project contains many differences from the “Newhall” project that consisted of a mostly residential project located in an undeveloped area and would be considered a “leapfrog” development. First, the project consists of an infill commercial retail project with residential uses located within walking distance and existing transit (both bus and light rail stations) within walking distance to the project site. The proposed project has also committed to implementation of:

- Project Design Feature 1, which requires development of an on-site walkway/bikeway system to promote non-vehicular transportation;
- Project Design Feature 2, which requires the IKEA store to be designed to achieve a LEED Silver or higher rating; and
- Project Design Feature 3, which requires the installation of a minimum 1,200-kilowatt PV solar panel system on the IKEA store building.

With implementation of Project Design Features 1, 2, and 3 and consideration of the placement of the proposed project as an in-fill development that is transit accessible, the proposed project currently complies with the City’s CAP and meets the GHG emissions reduction targets provided in 2017 Scoping Plan implementing SB 32.

Response to AB-25
The commenter claims that a typical project should be analyzed for a 30-year lifespan (2020 to 2050). However, as explained above in Response to AB-24, the project’s 2020 emissions were analyzed in accordance with the CAP. The Project’s post-2020 emissions were analyzed in accordance with standards under SB 32 and the 2017 Scoping Plan.
Response to AB-26
Refer to Responses to AB-24 and AB-25.

Response to AB-27
The organization asserted that substantial evidence exists demonstrating that greenhouse gas emissions from the project would be significant. The organization referenced modeling performed by its consultant indicating that the project would generate 63 metric tons of carbon dioxide equivalents (MTCO$_2$e) during construction and 13,634 MTCO$_2$e during operation annually, which exceed the BAAQMD’s threshold of 1,100 MTCO$_2$e annually. The organization stated that the greenhouse gas emissions analysis must be revised and recirculated with a legally valid threshold of significance.

The BAAQMD’s CEQA Air Quality Guidelines, prepared May 2017, details a few different thresholds that may be utilized in the analysis of a project’s GHG emissions. The BAAQMD’s thresholds are detailed on page 3.1-60 of the DSEIR. It is important to note that in the CEQA Air Quality Guidelines, the BAAQMD utilizes the word “or” in detailing the different thresholds, which means that a project only needs to be found less than significant for one of the thresholds in order to provide a determination of less than significant in the DSEIR. Since the City has adopted a CAP, the DSEIR determined that compliance with the CAP is the most applicable threshold for the proposed project, and it is the threshold that was utilized in the DSEIR. See Responses to AB-24 and AB-25 for the discussion of post-2020 thresholds of significance for GHG emissions used in the DSEIR.

Response to AB-28
For the reasons provided in Response to AB-1 through Response to AB-27, there is no legal basis to revise and recirculate the Draft SEIR.

Response to AB-A-1
The following comment consists of a letter prepared by Scott Cashen, an independent biological resources consultant, that is referenced by the preceding comments. Topics addressed include baseline biological setting, Congdon’s tarplant, saline clover, hairless popcorn flower, vernal pool fairy shrimp, California Linderiella, the burrowing owl, and special-status bats.

Refer to Response to AB-4 through Response to AB-20.

Response to AB-A-2
The author disputed a statement in the Draft SEIR that the loss of foraging habitat does not constitute a significant impact, and asserted that the development of the proposed project would result in significant impacts on the burrowing owl and bats.

The Draft SEIR’s statement regarding the wide availability of foraging habitat on page 3.2-17 was provided in the context of raptors such as the white-tailed kite. The purpose was to illustrate the difference between nesting and foraging habitat, and note that mitigation for loss of foraging habitat is typically not required because of its ubiquity and, therefore, is less than significant under CEQA.

Refer to Response to AB-11 through Response to AB-7a, AB-7b, and AB-9 for discussion of the burrowing owl and bats.
Response to AB-A-3
The following comments were referenced in the preceding comments. Topics addressed include cumulative impacts, special-status plants, compensatory mitigation, the burrowing owl, special-status bats, and wetlands.

Refer to Response to AB-4 through Response to AB-20.

Response to AB-B-1
This comment consists of Scott Cashen’s resume. No response is necessary.

Response to AB-C-1
This comment consists of general statements describing what the remainder of the letter will analyze without providing any specific claims.

The commenter’s specific comments are addressed in detail in Response to AB-C-2 through Response to AB-C-8.

Response to AB-C-2
Refer to Response to AB-22.

Response to AB-C-3
Refer to Response to LD-3

Response to AB-C-4
Refer to Response to AB-23.

Response to AB-C-5
This commenter incorrectly claims that in order for the project to be consistent with the CAP that the DSEIR needs to include mitigation measures or mandatory conditions of approval; however, the DSEIR was able to demonstrate consistency with the CAP through Project compliance with city and state regulations.

Response to AB-C-6
This comment was addressed above in Response to AB-24.

Response to AB-C-7
This comment was addressed above in Response to AB-27.

Response to AB-C-8
The Draft SEIR found through implementation of Mitigation Measures AIR-3a, AIR-3b, AIR-3c, TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, TRANS-1e, TRANS-1f, TRANS-4a, TRANS-7a, TRANS-7b, and TRANS-7c, and implementation of Project Design Features 1, 2 and 3, that the air quality and greenhouse gas emissions would be reduced to less than significant levels. As such, no additional mitigation is required for the proposed project.

Response to AB-D-1
This comment consists of Matthew Hagemann’s and Hadley Nolan’s resumes. No response is necessary.
City of Dublin - Community Development Department
Amy Million, Principal Planner
100 Civic Plaza
Dublin, CA 94568

Submitted electronically: amy.million@dublin.ca.gov

March 16, 2018

RECEIVED
MAR 16 2018
DUBLIN PLANNING

Regarding: Comments on Draft Supplemental Environmental Impact Report (SEIR) for IKEA Retail Center (PLPA-2016-00016) in City of Dublin.

Dear Principal Planner Amy Million:

The following are the comments of the California Native Plant Society, East Bay Chapter (EBCNPS) on the Draft Supplemental Environmental Impact Report (SEIR) for the proposed project IKEA Retail Center, in City of Dublin.

The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons and professional botanists organized into 34 chapters throughout California. The Society’s mission is to increase the understanding and appreciation of California’s native plants and to preserve them in their natural habitat through scientific activities, education, and conservation. Pursuant to the mission of protecting California’s native flora and vegetation, EBCNPS submits the following comments:

The Draft SEIR for the proposed IKEA Retail Center is inadequate because it provides an incomplete description of current conditions for the project area. The Draft SEIR:

- does not contain comprehensive botanical surveys, only limited focused surveys;
- does not identify all plants found to taxonomic level necessary to determine rarity;
- does not discuss several locally rare plant species with potential to occur on site;
- does not perform required surveys in habitat deemed of undefined “low quality;”
- does not provide adequate justification for “low likelihood,” no surveys for some species.

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We recommend performing full, protocol-level surveys of the entire study area, which is the preferred approach for survey and assessment for special-status plants, animals, and natural communities in California, according to the Department of Fish and Wildlife (Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities, 2009): “Surveys should be comprehensive over the entire site, including areas that will be directly or indirectly impacted by the project.” Plant surveys must be seasonally appropriate and floristic in nature. A determination of “low quality” habitat does not preclude the requirement for comprehensive field surveys in these areas, and refugia of rare plants may be found in pockets of adequate habitat.

We recommend identifying all plants found to the taxonomic level necessary to determine rarity. This is a vital part of performing comprehensive surveys. We found at least one example in the DSEIR of a native plant found during surveys and only identified to the genus level, when in fact, rare species of this genus have potential to occur on the project site. Surveyors found fiddleneck (Amsinckia sp.) in the project area: “A dead, unidentified species of Amsinckia was found in the Project Area, but... it is likely one of the common fiddlenecks (e.g. A. menziesii) (sic),” (Draft SEIR, Appendix C [Appendix A1 & Appendix B]).

We recommend including additional potential special status species in comprehensive surveys of the project site: saline clover (Trifolium hydrophilum, 1B.2) and hairless popcornflower (Plagiobothrys glaber, 1A) were found several years ago not far north of the site on Tassajara Road. Both are found in alkaline soil, and since alkali-mallow (Malvella leprosa) occurs on the project site, there is at least some alkaline soil there, and thus some potential for these two species. Other locally rare species ranked “A” by East Bay CNPS and occurring in only 2 or fewer regions in the East Bay are known from that area and could have the potential to occur at the site, including but not limited to the following: California dodder (Cuscuta occidentalis), Palmer’s amaranth (Amaranthus palmeri), large-seeded dodder (Cuscuta indecora var. indecora), broad leaved mudwort (Limosella acaulis), hedge nettle (Stachys ajugoides), bearded clover (Trifolium barbigerm) plus several other native Trifolium sp., and yellow owl’s clover (Triphysaria versicolor subsp. faucibarbata). Surveys and impact analyses are needed for these rare native plants. East Bay CNPS A-ranked locally rare species are subject to consideration under CEQA (sections 15380 and 15125c). (Database of Rare, Unusual and Significant Plants of Alameda and Contra Costa Counties, Lake, 2018; Personal Correspondence, Dianne Lake, 2018.)

The California Environmental Quality Act (CEQA) requires assessment of all CNPS Rank 1 and 2 plants, which are considered rare, threatened or endangered, or even presumed extirpated, within California. Impacts on these special-status plants are potentially significant [CEQA Guidelines §15125 (c) and §15380)]. In addition, unusual and significant plants may have local or regional significance, which is another potential impact requiring evaluation (CEQA Appendix G, Environmental Checklist). All special-status plants as well as locally rare plants, are likely indicative of sensitive natural communities protected by California Department of Fish and Wildlife (CDFW).
When surveys are incomplete, the impact analysis, thresholds of an impact's significance, and the proposed mitigations are muddled (and thus inadequate). On this point, the Draft SEIR:

- does not analyze all potential direct and indirect impacts to native plants;
- does not assure mitigation for 6.81 acres (or more) of Congdon’s tarplant, instead defers confirmation of presence to pre-construction surveys, which in turn defers whether any mitigation at all will be implemented (an inappropriate deferral of analysis of impacts).

More avoidance, mitigation of Congdon's tarplant necessary in SEIR

Congdon's tarplant (*Hemizonia parryi* ssp. *congdonii*, CNPS Rare Plant Rank 1B.1) is an increasingly rare California endemic plant species. Thousands of Congdon’s tarplants amounting to 6.81 acres total were mapped in the western portion of the project site (Draft SEIR, Appendix C, Figure 3, Congdon’s Tarplant Locations in the Project Area). This overlaps most of the seasonal wetlands also documented (Draft SEIR, Exhibit 3.2-I, Biological Communities Map). According to the proposed site plans, the IKEA building would completely occupy this mapped occurrence and thus destroy this population (Draft SEIR, Exhibit 2-4, Conceptual Site Plan).

We recommend project avoidance or mitigation is secured now for the currently known and mapped element occurrence of Congdon’s tarplant. Mitigation Measure BIO 1-a (MM BIO 1-a) proposes pre-construction surveys in lieu of providing adequate comprehensive surveys now for the EIR analysis: “Prior to any vegetation removal or ground-disturbing activities, a focused survey shall be conducted to determine the presence of Congdon’s tarplant with potential to occur in the project site... If no special-status plant species are found, then the project will not have any impacts to the species and no additional mitigation measures are necessary. If the Congdon’s tarplant are found on-site and cannot be avoided, the following measures shall be required...” From this, we understand that if Congdon’s tarplant is not found in subsequent surveys, then there is the possibility of zero mitigation for direct impacts to this already-documented special-status species occurrence. The Draft SEIR does offer a 1:1 mitigation (mitigation: impact, but only if detected in these proposed subsequent surveys). Deferring all future surveys for this special-status species to presence/absence determinations in the pre-construction phase introduces a possibility for a false absence detection, which could subsequently allow for zero mitigation if it is “not found.” This proposed mitigation is completely inadequate and requires revision so that Congdon’s tarplant is mitigated.

We recommend also the Draft SEIR incorporate more guidance offered by East Alameda County Conservation Strategy (EACCS) especially regarding impacts and mitigations for Congdon’s tarplant. The Draft SEIR acknowledges the project site is within the boundaries of EACCSS and the City of Dublin uses this document as guidance for mitigating impacts in the city. Congdon’s tarplant is an EACCS focal plant species and EACCS recommends a standardized mitigation ratio of at least 5:1 (mitigation: impact). We recommend increasing the mitigation ratio to 5:1 for Congdon’s tarplant.
Congdon’s tarplant is a special-status species already documented on the project site, thus requiring tangibly certain mitigations for the population as currently documented. As well, if a larger area or greater number of plants is detected during comprehensive surveys as recommended above, then those additional Congdon’s tarplants will require mitigation as well. But the mitigation certainly cannot be less, or zero.

If you have any questions, please contact me at conservation@ebcnps.org or 510-734-0335.

Karen Whitestone

Conservation Analyst
California Native Plant Society, East Bay Chapter
California Native Plant Society (CNPS)

Response to CNPS-1
The organization provided introductory remarks to open the letter. No response is necessary.

Response to CNPS-2
The organization summarized its comments regarding the Draft SEIR’s evaluation of special-status plant species impacts. The agency’s specific comments are addressed in Response to CNPS-3 through Response to CNPS-8.

Response to CNPS-3
Refer to Response to AB-4 and AB-5.

A detailed plant inventory was prepared as part of the WRA Wetland Delineation (Draft SEIR Appendix C). The only special-status plant species observed was Congdon’s tarplant. FCS confirmed the findings of WRA’s 2013 surveys in 2016 and 2017. Given that the project site is isolated and in a highly disturbed state, additional protocol-level surveys would not yield any further insights into the potential presence of plants on the project site.

Response to CNPS-4
The EIR and supporting documentation does include identification of species to the taxonomic level. Regarding the one unidentified species of Amsinckia, reported in the WRA August and November 2013 reports, FCS biologists conducted a field survey in Spring 2016, which is the appropriate blooming period for the species. FCS biologists observed Rancher’s fiddleneck (Amsinckia intermedia), a common non-native weedy species, throughout the project site during our biological survey. FCS biologists did not observe any Douglas’ fiddleneck (Amsinckia douglasiana).

The commenter is correct that WRA reported that Douglas’ fiddleneck (Amsinckia douglasiana) was reported during the field survey performed by WRA on November 5, 2013. However, this species blooms between March and May; it would be highly unlikely to observe this individual in November. Moreover, these two plant species resemble each other and can be mistaken for one another. Thus, FCS concluded that the reported occurrence of the Douglas’ fiddleneck in November 2013 was in error, and therefore the Draft SEIR did not identify this as a special-status species that was present on the project site.

Response to CNPS-5
Refer to Response to AB-4.

A detailed plant inventory was prepared as part of the WRA Wetland Delineation and is provided in Appendix C of the Draft SEIR.

The project site was surveyed on multiple occasions by qualified biologists between 2013 and 2017. The only special-status plant species observed during the surveys was Congdon’s tarplant. The other species cited by the organization (California dodder, Palmer’s amaranth, large-seeded dodder, broad leaved mudwort, hedge nettle, bearded clover, and yellow owl’s clover) were not observed during any of the biological surveys. Thus, it is not necessary to perform another survey for these species. Refer to Response to AB-8b.
Response to CNPS-6
All CNPS rankings were considered under the combined habitat assessment and wetland delineation efforts that constitute an exhaustive assessment for special-status plants.

Response to CNPS-7
As discussed in Responses to AB-4 and AB-5, the project site was surveyed on multiple occasions by qualified biologists between 2013 and 2017. The Draft SEIR disclosed the potential impact of up to 6.81 acres of Congdon’s tarplant and requires protocol-level surveys to determine the current extent of this species on the site prior to disturbance. The project site is isolated, disturbed, and currently supports a large monoculture of field mustard, a weedy species. Given these site characteristics, the avoidance or compensatory mitigation requirements set forth in Mitigation Measure BIO-1a would fully mitigate all direct and indirect impacts on the Congdon’s tarplant associated with the proposed project. Thus, there are assurances that all potential impacts on Congdon’s tarplant would be fully mitigated.

Response to CNPS-8
Mitigation Measure BIO-1a requires either avoidance or compensatory mitigation for this species in accordance with CDFW-guidance. In the outlined mitigation strategy, the measures clearly require preservation of the species on the site if found in their original, less than, or greater than states.

Furthermore, EACCS guidance is advisory for private-sector projects and the City of Dublin has the discretion to determine the appropriate mitigation ratio. In this case, Mitigation Measure BIO-1a establishes a floor of minimum 1:1, which for a disturbed, infill site, is appropriate.

Response to CNPS-9
The organization provided closing remarks to conclude the letter. No response is necessary.
March 16, 2018

City of Dublin - Community Development Department
Amy Million, Principal Planner
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Dublin, CA 94568
email: amy.million@dublin.ca.gov

RE: Draft Supplemental Environmental Impact Report (Draft EIR)
IKEA Retail Center Project (State Clearing House Number 2017082047)

Dear Ms. Million:

I am writing on behalf of Laborers' International Union of North America Local Union No. 304, and its many members living in an around the City of Dublin concerning the Draft Supplemental Environmental Impact Report ("DEIR") prepared for the IKEA Retail Center Project (State Clearing House Number 2017082047) ("Project"). After reviewing the DEIR, it is clear that the document fails to comply with CEQA, and fails to adequately analyze and mitigate the Project's impacts. LIUNA urges the City to revise the EIR to adequately describe, analyze, and mitigate the Project and its impacts.\(^1\) A revised EIR should be recirculated to allow public review and comment.

I. PROJECT DESCRIPTION

IKEA Retail Center (PLPA-2016-00016). The proposed project involves the development of approximately 432,099 square feet of commercial uses on 27.45 acres. The project would be anchored by an IKEA store of approximately 339,099 square feet and feature up to 93,000 square feet of lifestyle retail-restaurant uses. The Project will be located at 5344 and 5411 Martinelli Way - Assessor Parcel Number 986-0033-005-02 & 986-0033-006-00. The Project site includes almost 2 acres of wetlands. (DEIR, p. 3.2-2).

\(^1\) We reserve the right to supplement these comments at later hearings and proceedings for this Project. (See, Galante Vineyards v. Monterey Water Dist. (1997) 60 Cal. App. 4th 1109.)
II. STANDING

Members of Local Union No. 304 ("LIUNA") live, work, and recreate in the immediate vicinity of the Project site. These members will suffer the impacts of a poorly executed or inadequately mitigated Project, just as would the members of any nearby homeowners association, community group, or environmental group. Hundreds of LIUNA Local Union No. 304 members live and work in areas that will be affected by traffic, air pollution, and water pollution generated by the Project.

In addition, construction workers will suffer many of the most significant impacts from the Project as currently proposed, such as from air pollution emissions from poorly maintained or controlled construction equipment, possible risks related to hazardous materials on the Project site, and other impacts. Therefore, LIUNA Local Union No. 304 and its members have a direct interest in ensuring that the Project is adequately analyzed and that its environmental and public health impacts are mitigated to the fullest extent feasible.

III. LEGAL STANDARDS

A. EIR

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances). (See, e.g., Pub. Resources Code, § 21100.) The EIR is the very heart of CEQA. (Dunn-Edwards v. BAAQMD (1992) 9 Cal.App.4th 644, 652.) "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (Communities for a Better Environment v. Cal. Resources Agency (2002) 103 Cal.App.4th 98, 109 ("CBE v. CRA").)

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. (14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1).) "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal. 3d 553, 564.) The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." (Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs. (2001) 91 Cal. App. 4th 1344, 1354 ("Berkeley Jets"); County of Inyo v. Yorty (1973) 32 Cal.App.3d 795, 810.)

Second, CEQA requires public agencies to avoid or reduce environmental damage when "feasible" by requiring "environmentally superior" alternatives and all
feasible mitigation measures. (CEQA Guidelines, § 15002(a)(2) and (3); See also, Berkeley Jets, supra, 91 Cal. App. 4th at p. 1354; Citizens of Goleta Valley, supra, 52 Cal.3d at p. 564.) The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to “identify ways that environmental damage can be avoided or significantly reduced.” (CEQA Guidelines, §15002(a)(2).) If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns.” (Pub. Resources Code, § 21081; CEQA Guidelines, § 15092(b)(2)(A) & (B).)

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position. A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” (Berkeley Jets, 91 Cal. App. 4th at p. 1355 (emphasis added), quoting, Laurel Heights Improvement Assn. v. Regents of University of California, 47 Cal. 3d 376, 391 409, fn. 12 (1988).) As the court stated in Berkeley Jets, 91 Cal. App. 4th at p. 1355:


**B. SUPPLEMENTAL EIR**

Recirculation of an EIR prior to certification is required “when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented (cf. CEQA Guidelines, § 15162, subd. (a)(1), (3)(B)(1)); (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance (cf. CEQA Guidelines, § 15162, subd. (a)(3)(B)(2)); (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project’s proponents decline to adopt (cf. CEQA Guidelines, § 15162, subd. (a)(3)(B)(3), (4)); or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless.” (Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal. 4th 1112, 1130, citing Mountain Lion Coalition v. Fish & Game Comm’n (1989) 214 Cal.App.3d 1043.)
Significant new information requiring recirculation can include:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(CEQA Guidelines, § 15088.5(a).)

The DEIR fails to analyze significant environmental impacts pertaining to the Project and to fully consider available mitigation measures to address those impacts. A revised EIR is required to be prepared and recirculated to address these deficiencies.

IV. THE DEIR FAILS TO ANALYZE AND MITIGATE ALL POTENTIALLY SIGNIFICANT IMPACTS.

An EIR must disclose all potentially significant adverse environmental impacts of a project. (Pub. Resources Code, § 21100(b)(1); CEQA Guidelines, § 15126(a); Berkeley Jets, 91 Cal. App. 4th 1344, 1354.) CEQA requires that an EIR must not only identify the impacts, but must also provide “information about how adverse the impacts will be.” (Santiago County Water Dist. v. County of Orange (1981) 118 Cal.App.3d 818, 831). The lead agency may deem a particular impact to be insignificant only if it produces rigorous analysis and concrete substantial evidence justifying the finding. (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692 (“Kings County”).)

CEQA requires public agencies to avoid or reduce environmental damage when feasible by requiring mitigation measures. (CEQA Guidelines, § 15002(a)(2) and (3); See also, Berkeley Jets, supra, 91 Cal. App. 4th at p. 1354; Citizens of Goleta Valley, supra, 52 Cal.3d at p. 564.) The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to “identify ways that environmental damage can be avoided or significantly reduced.” (CEQA Guidelines, §15002(a)(2).) If the project will have a significant effect on the
environment, the agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." (Pub. Resources Code, § 21081; CEQA Guidelines, § 15092(b)(2)(A) & (B).)

In general, mitigation measures must be designed to minimize, reduce, or avoid an identified environmental impact or to rectify or compensate for that impact. (CEQA Guidelines, § 15370.) Where several mitigation measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. (I.d., at § 15126.4(a)(1)(B).) A lead agency may not make the required CEQA findings unless the administrative record clearly shows that all uncertainties regarding the mitigation of significant environmental impacts have been resolved.

CEQA requires the lead agency to adopt feasible mitigation measures that will substantially lessen or avoid the Project's potentially significant environmental impacts (Pub. Resources Code, §§ 21002, 21081(a)), and describe those mitigation measures in the CEQA document. (Pub. Resources Code, § 21100(b)(3); CEQA Guidelines, § 15126.4.) A public agency may not rely on mitigation measures of uncertain efficacy or feasibility. (Kings County, supra, 221 Cal.App.3d at p. 727 (finding groundwater purchase agreement inadequate mitigation measure because no record evidence existed that replacement water was available).) "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (CEQA Guidelines, § 15364.) To demonstrate economic infeasibility, "evidence must show that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." (Citizens of Goleta Valley v. Board of Supervisors (1988) 197 Cal.App.3d 1167, 1181.) The EIR must provide evidence and analysis to show project cannot be economically implemented. (Kings County, supra, 221 Cal.App.3d at pp. 734-737.) This requires not just cost data, but also data showing insufficient income and profitability. (See Burger v. County of Mendocino (1975) 45 Cal.App.3d 322, 327 (infeasibility claim unfounded absent data on income and expenditures showing project unprofitable); San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656, 694 (upholding infeasibility finding based on analysis of costs, projected revenues, and investment requirements).) Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. (CEQA Guidelines, § 15126.4, subd. (a)(2).)

A lead agency may not conclude that an impact is significant and unavoidable without requiring the implementation of all feasible mitigation measures to reduce the impacts of a project to less than significant levels. (CEQA Guidelines, §§ 15126.4, 15091.)
A. THE DEIR FAILS TO ADEQUATELY MITIGATE TRAFFIC IMPACTS.

The DEIR admits that the Project will have many significant impacts on traffic. However, the document fails to impose feasible mitigation measures to reduce or eliminate traffic impacts. For example, the DEIR states:

The proposed project would contribute new trips to the intersection of Hacienda Drive and Martinelli Way causing a queue impact under Existing With Project Conditions. While mitigation measures are proposed to fully mitigate the impact, the proposed mitigations may not be feasible. Therefore, the residual significance is significant and unavoidable. (DEIR p. ES-3).

Additionally, extending the length of the northbound left-turn pocket by approximately 100 feet through median modifications and widening along the project frontage in order to provide a second eastbound left-turn pocket at the intersection of Hacienda Drive and Martinelli Way would reduce the queue impact to less than significant. Should the widening along the project frontage to provide a second eastbound left-turn pocket not be feasible, the eastbound left turn movement queue impact would remain significant and unavoidable. (DEIR p. 3.6-70).

The proposed project would contribute new trips to freeway facilities that would operate at unacceptable levels (freeways and major arterials). All feasible mitigation measures are proposed to mitigate impacts; however, in certain cases, they would not fully mitigate the impact to a level of less than significant. In other cases, no feasible mitigation is available. Lastly, certain feasible mitigation measures require the cooperation of third-party agencies, which is not assured. Therefore, the residual significance is significant and unavoidable. (DEIR, p. ES-3).

The DEIR properly identifies mitigation measures capable of reducing certain traffic impacts to less than significant. However, the DEIR fails to impose those measure, determining that they may not be feasible. This fails to comply with CEQA.

CEQA defines "feasible" as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors. (Pub. Res. Code § 21061.1.) The guidelines add "legal" considerations as a fifth factor that must be taken into account when determining whether a mitigation measure or project alternative is feasible. (CEQA Guidelines § 15364.) Neither the statute nor the guidelines provide any substantive insights on how to analyze the economic feasibility of an alternative or measure. The cases discussed below provide some insight as to how the courts have determined whether an alternative or measure is economically feasible.
Citizens of Goleta Valley v. Board of Supervisors (1988) 197 Cal.App.3d 1167, 1181 held that “evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.” See also, Kings County Farm Bureau v. Hanford, 221 Cal.App.3d at 734-737 (EIR must provide evidence and analysis to show project cannot be economically implemented). For a private project, this requires not just cost data, but also data showing insufficient income and profitability. Burger v. Mendocino, 45 Cal.App.3d at 327 (infeasibility claim unfounded absent data on income and expenditures showing project unprofitable).

The DEIR does not demonstrate that the identified mitigation measures are infeasible. Unless there is an adequate showing of infeasibility, the City must impose the mitigation measures to reduce the Project’s significant traffic impacts.

B. THE DEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE AIR QUALITY IMPACTS.

The DEIR concludes that Project construction will have significant air quality impacts due to NOx and ROGs far above CEQA significance thresholds. (DEIR p. 3.1-44). The DEIR recommends mitigation measures, including Tier 4 construction equipment and ultra-low VOC paints. These measures are projected to reduce emissions to slightly below significance thresholds – approximately 52 pounds per day compared to a significance threshold of 55 pounds per day.

However, there is no showing that there is adequate availability of Tier 4 construction equipment to implement this measure. Also, the Project will have significant cumulative construction emissions together with other projects in the immediate vicinity. This includes the Carl Zeiss project and the Boulevard project (formerly the Dublin Crossing Project). The IKEA project will have significant cumulative construction emissions when considered together with the Zeiss and Boulevard projects. We incorporate the CEQA documents for the Zeiss and Boulevard projects by reference. Since all of the documents are in the City of Dublin’s possession, they should be included in the record for this IKEA Project.

An EIR must discuss significant cumulative impacts. CEQA Guidelines section 15130(a). This requirement flows from CEQA section 21083, which requires a finding that a project may have a significant effect on the environment if “the possible effects of a project are individually limited but cumulatively considerable. . . . ‘Cumulatively considerable’ means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” “Cumulative impacts” are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines section 15355(a). “[I]ndividual effects may be changes resulting from a single project or a number of separate projects.” CEQA Guidelines section 15355(a).
"The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." Communities for a Better Environment v. Cal. Resources Agency ("CBE v. CRA"), (2002) 103 Cal.App.4th 98, 117. A legally adequate cumulative impacts analysis views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable probable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b).

As the court stated in CBE v. CRA, 103 Cal. App. 4th at 114:

Cumulative impact analysis is necessary because the full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact.

(Citations omitted).

In Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d at 718, the court concluded that an EIR inadequately considered an air pollution (ozone) cumulative impact. The court said: "The [ ] EIR concludes the project's contributions to ozone levels in the area would be immeasurable and, therefore, insignificant because the [cogeneration] plant would emit relatively minor amounts of [ozone] precursors compared to the total volume of [ozone] precursors emitted in Kings County. The EIR's analysis uses the magnitude of the current ozone problem in the air basin in order to trivialize the project's impact." The court concluded: "The relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting emissions, but whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin." The Kings County case was reaffirmed in CBE v. CRA, 103 Cal.App.4th at 116, where the court rejected cases with a narrower construction of "cumulative impacts."

Since the IKEA Project will have significant cumulative air quality impacts, the DEIR must analyze additional mitigation measures to reduce emissions.
C. THE DEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE BIOLOGICAL IMPACTS.

The DEIR fails to properly identify several species that will be directly affected by the Project. The Project site includes almost 2 acres of wetlands. (DEIR Exhibit 3.2-1). This is a new circumstance since the wetland acreage almost doubled from 2016 to 2017. (DEIR, p. 3.2-16).

The DEIR admits the presence of habitat suitable for numerous special status flora and fauna species. However, the documents relies on deferred mitigation, which is prohibited by CEQA. For example, the DEIR states:

One special-status plant species and four special-status wildlife species have a moderate or high potential to occur within the project site. The project site supports Congdon’s tarplant, while burrowing owl, pallid bat, Townsend’s big-eared bat, and Yuma myotis are considered to have a moderate potential to occur on the project site. It should be noted that significant impacts associated with wildlife species are associated with their potential to nest on-site; avian species can forage almost anywhere, and the loss of foraging habitat by itself does not constitute a significant impact. If any of the species are found on the project site, construction activities would directly affect these species. This would be a potentially significant impact.

... If Congdon’s tarplant is found on-site during a future survey, and if impacts cannot be avoided, then mitigation will be required. Mitigation would involve the protection and enhancement of populations or suitable habitat elsewhere, as determined appropriate by the CDFW and USFWS.

(DEIR, p. 3.12-17).

The DEIR fails to identify how impacts to the species will be mitigated. Instead, the document states that “appropriate” mitigation will be developed at a later time. CEQA prohibits such deferred mitigation.

"[M]itigation measure[s] [that do] no more than require a report be prepared and followed” do not provide adequate information for informed decisionmaking under CEQA. *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 794; Guidelines § 15126.4(a)(1)(B). Feasible mitigation measures for significant environmental effects must be set forth in an EIR for consideration by the lead agency’s decision makers and the public before certification of the EIR and approval of a project. The formulation of mitigation measures generally cannot be deferred until after certification of the EIR and approval of a project. Guidelines, section 15126.4(a)(1)(B) states: "Formulation of mitigation measures should not be deferred until some future
time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way."

"A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA." (Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 307.) "[R]eliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decisionmaking; and[,] consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." (Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 92 (Communities).)

A Revised EIR must be prepared to identify specific mitigation measures that will be implemented to protect special status species.

In addition, the DEIR fails to identify special status species likely to be found on the Project site. In a recent site inspection of the Carl Zeiss Project site, which is very close to the IKEA Project site, wildlife biologist Dr. Shawn Smallwood, identified red-tailed hawks and white-tailed kites. These species are protected under California law. Dr. Smallwood's comments are attached hereto as Exhibit A. Given the presence of these birds on the nearby Zeiss Project site, it is a near certainty that they exist on the IKEA site.

A Revised EIR must be prepared to analyze impacts to red-tailed hawks and white-tailed kites and to propose all feasible mitigation measures.

D. THE DEIR FAILS TO ADEQUATELY ANALYZE AND MITIGATE HAZARDOUS MATERIALS IMPACTS.

The DEIR admits that the Project site includes soil contaminated with highly toxic chemicals. The DEIR states:

The project site is listed on several hazardous materials databases compiled pursuant to Government Code Section 65962.5. These listings are associated with the project site's past military use associated with Camp Parks. Several hazardous material investigations have occurred during the past 20 years and have identified the following issues: former fuel depot, former rail spur, metals and soil stockpiles.

(DEIR, p. 3.3-17).
The DEIR offers only improper deferred mitigation to address this impact. The DEIR states:

Prior to issuance of the first grading permit, the project applicant shall retain a qualified hazardous materials contractor to sample any soil stockpiles that may be present for polycyclic aromatic hydrocarbons (PAHs), diesel and oil range petroleum hydrocarbons, and polychlorinated biphenyls (PCBs). If sampling determines that concentrations of these substances exceed acceptable human health exposure levels, the applicant shall retain a qualified hazardous materials contractor to properly remove and dispose of the impacted soils. If sampling determines that concentrations of these substances do not exceed acceptable human health exposure levels, no further action is required.

(DEIR p. 3.3.-17).

The DEIR may not mitigate this significant impact by relying on a clean-up and removal plan that will be developed after Project approval. As discussed above, CEQA does not allow such deferred mitigation. This is of particular importance to LIUNA since construction workers will suffer the highest levels of exposure from contaminated soil disturbed during Project construction. A Revised EIR is required to propose specific mitigation measures to address the hazardous materials impacts.

V. CONCLUSION

For the foregoing reasons, LIUNA Local Union No. 304 and its members living in the City of Dublin and the surrounding areas, urge the City to require preparation of a supplemental EIR addressing the Project’s significant impacts and mitigation measures. Thank you for your attention to these comments. Please include this letter and all attachments hereto in the record of proceedings for this project.

Sincerely,

Richard T. Drury
Lozeau Drury LLP
Attorneys for LIUNA Local Union No. 304
EXHIBIT A
Shawn Smallwood, PhD  
3108 Finch Street  
Davis, CA 95616

Martha Battaglia, Associate Planner  
City of Dublin  
Community Development Department  
100 Civic Plaza  
Dublin, CA 94568  

RE: Zeiss Innovation Center  

5 March 2018

Dear Ms. Battaglia,

I write again to comment on the Initial Study and supplemental mitigated negative declaration prepared for the proposed Zeiss Innovation Center (Kimley-Horn 2017). These comments are additional to those I prepared on 9 February 2018. My qualifications for preparing expert comments were summarized in my 9 February comment letter.

SECOND SITE VISIT

On 2 March 2018, I visited the proposed project site for a second time. I saw most of the same species I saw on 8 February (Table 1), although the behaviors of some species were more indicative of breeding. I observed a pair of killdeer (Figure 1), which demonstrated site tenacity typical of nesting birds; they would not leave upon my close approach. I saw male western meadowlarks flying to prominences and calling, typical of nest territory establishment (Figure 2). I saw three red-tailed hawks, which foraged on site (Figure 3) and interacted in manners typical of nesting. An American crow attacked the red-tailed hawks (one at a time), a risky behavior that is performed in nest defense (Figure 4).

This time I observed ground squirrels across the entirety of the site, though the highest concentration appeared to be located at the northwest corner (Figure 5). Desert cottontails occurred on site, as well (Figure 6). A road-killed desert cottontail laid on the project side of Arnold Blvd.

I observed a white-tailed kite (*Elanus leucurus*) fly by the west side of the proposed project site. This sighting refutes Kimley-Horn’s (2017) determination that the occurrence of this species is unlikely. White-tailed kites are California Fully Protected species, and their occurrence in the project area warrants the determination of significant project impacts on biological resources. Another significant effect includes the occurrence of red-tailed hawks, which are protected under California Department of Fish and Wildlife Code 3503.5 (Birds of prey). Additional significant effects include nesting by multiple species of bird protected under the international Migratory Bird Treaty Act and by California Department of Fish and Wildlife Code protecting nests.
Table 1. Species of wildlife I observed from 10:50 to 11:05 hours on 8 February 2018 and 11:19 to 12:53 on 2 March 2018 at the site of the proposed Zeiss Innovation Center, where Site refers to the proposed project site, west side refers to the graded property west of Arnold and immediately west of the site, east side refers to developer property immediately east of the site, and east edge refers to trees and buffer between project site and developed area east of the site.

<table>
<thead>
<tr>
<th>Species</th>
<th>Scientific name</th>
<th>Visit</th>
<th>Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Black-tailed jackrabbit</td>
<td>Lepus californicus</td>
<td>Feb 8</td>
<td>West side</td>
</tr>
<tr>
<td>Desert cottontail</td>
<td>Sylvilagus auduboni</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>California ground squirrel</td>
<td>Spermophilus beecheyi</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>Canada goose</td>
<td>Branta canadensis</td>
<td>Feb 8</td>
<td>Site</td>
</tr>
<tr>
<td>Killdeer</td>
<td>Charadrius vociferus</td>
<td>Mar 2</td>
<td>South side</td>
</tr>
<tr>
<td>California gull</td>
<td>Larus californicus</td>
<td>Feb 8</td>
<td>Site</td>
</tr>
<tr>
<td>Turkey vulture</td>
<td>Cathartes aura</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>Red-tailed hawk</td>
<td>Buteo jamaicensis</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>White-tailed kite</td>
<td>Elanus leucurus</td>
<td>Mar 2</td>
<td>West of site</td>
</tr>
<tr>
<td>American robin</td>
<td>Turdus migratorius</td>
<td>Feb 8</td>
<td>East edge</td>
</tr>
<tr>
<td>Cedar waxwing</td>
<td>Bombycilla cedrorum</td>
<td>Feb 8</td>
<td>East edge</td>
</tr>
<tr>
<td>Mourning dove</td>
<td>Zenaida macroura</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>Rock pigeon</td>
<td>Columba livia</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>American crow</td>
<td>Corvus brachyrhynchos</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>California towhee</td>
<td>Pipilo fuscus</td>
<td>Feb 8</td>
<td>Site</td>
</tr>
<tr>
<td>White-crowned sparrow</td>
<td>Zonotrichia leucophrys</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>Red-winged blackbird</td>
<td>Agelaius phoenicus</td>
<td>Feb 8</td>
<td>Site</td>
</tr>
<tr>
<td>Western meadowlark</td>
<td>Sturnella neglecta</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>American goldfinch</td>
<td>Carduelis tristis</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
<tr>
<td>House finch</td>
<td>Carpodacus mexicanus</td>
<td>Feb 8, Mar 2</td>
<td>Site</td>
</tr>
</tbody>
</table>

My site visit was restricted to the outside perimeter, just outside the fence. Without walking onto the site, I was unable to survey effectively for burrowing owls. California ground squirrels occupy the site and on 2nd March I learned that squirrels are more widespread than I observed on 8th February. Because California ground squirrels occupy the site, it is quite possible that burrowing owls find winter refuge there or even nest on site. Detection surveys should be performed according to the CDFW (2012) survey guidelines. So far there is no defensible basis for determining absence of burrowing owls on the site, because detection surveys have yet to be done.

I noticed pools of standing water on the site, so there is potential for vernal pool fairy shrimp to occur on site. One of these pools was where I located a pair of killdeer.
Figure 1. One of a pair of killdeer tenaciously holding to a likely breeding location on the proposed project site, 2 March 2018.

Figure 2. A western meadowlark in breeding plumage calls from the perimeter fence of the proposed project site, 2 March 2018.
**Figure 3.** A red-tailed hawk dives on a prey item on the proposed project site, 2 March 2018. Three red-tailed hawks hunted the site intensely. This particular attack was unsuccessful.

**Figure 4.** An American crow defends its nesting territory against the female member of a nesting pair of red-tailed hawks flying over the proposed project site, 2 March 2018. I observed two crows mobbing red-tailed hawks multiple times.
**Figure 5.** A California ground squirrel serves as the colony sentinel against a backdrop of newly built townhouses, leaving little remaining connection to open space around the proposed project site, 2 March 2018.

**Figure 6.** A desert cottontail on the proposed project site, 2 March 2018. Another cottontail lay dead nearby – the victim of auto traffic on Arnold Blvd.
WILDLIFE MOVEMENT

Since my comments of 9 February 2018, development of the property west of the proposed project site has advanced to the point where desert cottontails and other wildlife species can find no cover in the area other than what little cover remains on the proposed project site. Some of the desert cottontails I encountered on the project site ran around in a futile search for refuge (Figure 7), which might help explain the intense foraging over the site by three red-tailed hawks and the frequent flyover by a turkey vulture. I have many times witnessed this situation in which wildlife are forced onto an increasingly isolated patch of habitat as residential, commercial or industrial projects are developed across the surrounding area. If the project goes forward, then the City of Dublin ought to require the capture of desert cottontails and California ground squirrels, and their translocation to suitable habitat nearby.

Figure 7. A desert cottontail runs for cover on the proposed project site, 2 March 2018.

Also, as I commented on 9 February, an impact assessment is needed on the project’s impacts on stop-over habitat of migrating birds. Many of the birds currently stopping over on the site to rest during migration will fly through the area post-construction with two new hazards: One hazard consisting of reduced opportunity for finding natural stop-over habitat, and the other hazard introduced by the extensive use of transparent glass on the Zeiss Innovation Center.
WINDBLOW COLLISIONS

To my 9 February 2018 assessment of likely project impacts caused by window collisions, I must add that these impacts would be much greater for the Zeiss Innovation Center as compared to the previously proposed project on the site, which was the Cisco Systems office complex. The previously proposed project would have included a parking garage and two office buildings. Although the office buildings would have made extensive use of glass as an exterior material, there was no indication that those buildings would have used transparent glass across nearly the entirety of each façade. Compared to the Cisco Systems office complex, the proposed Zeiss Innovation Center would introduce substantially more extensive transparent glass siding. This increased use of transparent glass façade would kill many more birds than the Cisco Systems office complex considered earlier. If built as proposed, the Zeiss Innovation Center would likely kill hundreds of birds per year for as many years as the building stands.

CUMULATIVE IMPACTS

Adding to my comments of 9 February 2018, I wish to add that instead of providing no cumulative effects analysis, the City of Dublin could have at least provided some simple analysis. For example, I applied an indicator approach to get a sense of how much habitat fragmentation has already taken place within the local area. Using Google Earth I extended mile-long (1,602 m) transects to the north, east, south, and west of the project site and I measured the extent of open space and the number of patches of open space along each of the transects (Figure 8). To the north I measured 585 m of open space along 2 patches. To the east I measured 66 m of open space along 1 patch of riparian corridor. To the south I measured 398 m along 2 patches. To the west I measured 133 m along 1 patch of open space. Altogether I measured 18% of the four transects remain in open space within 6 patches. In other words, 82% of habitat in the area has already been converted to houses, commercial buildings and roadways. The project site is one of only three or four patches of habitat within a mile that are large enough to support a breeding colony of burrowing owls. Losing it would nearly eliminate the breeding capacity of burrowing owls in the area, thereby qualifying the project’s cumulative effects as considerable and highly significant.

This exercise should be repeated at a regional scale to get a better sense of habitat fragmentation and cumulative effects. Repeating this exercise using 4-mile transect instead of 1-mile transects extending north, south, east, west from the project site, the cumulative transect overlapping open space increases to 18% to 35%. Where open space used to occur contiguous 4 miles in every direction from the project site, now only a third of the area remains in 16 fragments of open space useful to special-status species of wildlife as habitat. The average habitat fragment is a mere 554 m across with an average anthropogenic landscape separation of 1,048 m. The level of habitat fragmentation in the project area is nothing short of catastrophic for dozens of special-status species of wildlife, including burrowing owl. Cumulative impacts must be assessed appropriately, and mitigation formulated.
Figure 8. Indicators approach to assessing habitat fragmentation along 1-mile (red lines) transect extended from the project site to the north, south, east, and west from the proposed project site. The approach measures lengths of transect overlapping open space.

MITIGATION MEASURES

MM Bio-1 Burrowing Owl Survey and Impact Assessment

The CDFW (2012) guidelines on burrowing owl detection surveys need to be implemented. Detection surveys need to be performed using methods that achieve the standards of CDFW (2012). Detection surveys are needed to estimate project impacts, to enhance the efficacy of preconstruction take-avoidance surveys, and to formulate appropriate mitigation. All of this needs to be completed and included in an EIR so that an informed public can meaningfully participate.

MM BIO-3 Protect Birds Covered by the Migratory Bird Treaty Act

The species I observed on site at the beginning of their breeding seasons reinforce my 9 February comment that detection surveys are needed in addition to preconstruction take-avoidance surveys. Killdeer eggs are notoriously camouflaged to resemble the
stony ground upon which they are laid (Figure 9). The nests are most effectively found by first detecting the adult birds and then watching their behavior to pinpoint the nest location. The same is true for multiple other species of ground-nesting birds. It is very difficult to find the nests of these birds, so it would be misleading to give the public the impression that preconstruction surveys would avoid take of any more than one or a few nests. Detection surveys are needed to identify nesting territories of each pair for each species. Only after detection surveys, following available protocols or survey guidelines appropriate for each species, can preconstruction surveys hold any promise of finding and removing nests or chicks in harm’s way.

**Figure 9.** Killdeer nest in Alameda County, 2012. Up close the eggs can be seen, but from a standing position they are very difficult to detect.

MITIGATING WINDOW COLLISIONS

In my 9 February 2018 comment letter, I suggested that window collisions could be partly mitigated by funding a before-after, control-impact (BACI) experimental design to measure the effects of window treatments on avian collisions. This measure would not prevent all collision fatalities on the project site, but it would contribute to scientific knowledge on causal factors and mitigation measures that could be applied to buildings worldwide for years to come. Here I elaborate on the design.

Figure 10 depicts a hypothetical layout of window glass treatments, including the desired transparent windows. It also depicts the fatality monitoring transects around the perimeter of the building and across areas remaining in grassland as a control. The fatality transects would be searched weekly until construction begins, and again weekly for two years post-construction. The fatality monitor would also be tested for carcass detection rates by another biologist periodically placing trial carcasses within the fatality search areas. The fatality searcher would be blind to the trial carcass placements, but would record and remove the placed carcasses upon discovery. These trials would inform of the proportion of fatalities not found due to removal by scavengers or pedestrians intending to clean up, and due to searcher detection error. If after two years
the fatality monitoring detected no increased mortality due to the transparent glass, then Zeiss would replace marked glass with transparent glass if desired.

Figure 10. Hypothetical before-after, control-impact experimental design for testing the effects of marked versus the desired transparent glass façades, where yellow lines denote transparent glass and green lines denote marked glass to increase avian safety, and black lines denote fatality transects to be searched before and after the building is constructed. In this design, the north-south effects of the transparent glass would occur at three levels, including the highest transparency on the west side where views from the north would extend through the building to the south, the middle level in the middle where views from the north would occlude at the marked windows on the south side, and lowest at the east end where marked glass would occlude views from north or south.
This monitoring would also inform of the wildlife injury rate. This rate could serve as the basis for the other mitigation measure I recommended on 9 February 2018, which was contributing funds to wildlife rehabilitation facilities.

Another appropriate mitigation approach would be to skip the BACI experimental design and instead universally implement the building design standards recommended by Orff et al. (2007), San Francisco Planning Department (2011), and Sheppard and Phillips (2015).

Thank you for your attention,

Shawn Smallwood, Ph.D.

REFERENCES CITED


San Francisco Planning Department. 2011. Standards for bird-safe buildings. San Francisco Planning Department, City and County of San Francisco, California.

Lozeau Drury (LD)

Note to reader: This law firm is representing Laborer’s International Union of North America Local Union No. 304.

Response to LD-1
The organization provided introductory remarks and stated that the Draft SEIR fails CEQA requirements and should be revised and recirculated.

The organization’s specific comments are addressed in Response LD-7 through Response to LD-14.

Response to LD-2
The organization summarized the Draft SEIR’s project description. No response is necessary.

Response to LD-3
Regarding impacts to construction workers, the Draft SEIR Mitigation Measure AIR-3a limits idling to no more than 5 minutes and requires that construction equipment be properly tuned and maintained in accordance with the manufacturer’s specifications. Additionally, Mitigation Measure AIR-3b requires that all construction equipment greater than 50 horsepower meet United States Environmental Protection Agency Tier 4 interim off-road emissions standards. These mitigation measures would protect the health of construction workers and others from air pollution. Thus, there is no basis for the claim that construction workers would suffer adverse health effects from poorly maintained or controlled construction equipment.

As for hazardous materials, the Draft SEIR disclosed that the project site contains two soil stockpiles with detectable concentrations of petroleum hydrocarbons, poly aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs). Draft SEIR Mitigation Measure HAZ-2 requires the applicant to retain a qualified hazardous materials contactor to sample these soil stockpiles for these substances prior to grading activities and properly remove them if detectable concentrations of these hazardous materials are found to be present. Thus, any hazardous materials in soil would be abated prior to grading; thus, there is no basis for the claim that construction workers would suffer adverse health effects from hazardous materials on the project site.

Response to LD-4
The organization provided standard language about CEQA requirements. The Draft SEIR complies with the requirements of CEQA in every respect. No response is necessary.

Response to LD-5
The organization provided standard language about CEQA requirements for Supplemental EIRs and asserted that the Draft SEIR fails to analyze significant environmental impacts pertaining to the project and fully consider available mitigation measures. The organization reiterated its previous comments that the Draft SEIR should be revised and recirculated.

The organization’s specific comments about the Draft SEIR’s alleged deficiencies are addressed in Response LD-7 through Response to LD-14.
Response to LD-6
The organization provided standard language about CEQA requirements for analyzing and disclosing all potentially significant impacts. No response is necessary.

Response to LD-7
The Draft SEIR identifies impacts to intersections, local and regional roadway segments, and freeway facilities. Mitigation measures were identified for all impacts. Implementation of many mitigation measures can be assured as the improvements are already planned by the City of Dublin, or would be constructed as part of the project. For other impacts, feasible improvements have been identified but coordination with and approval from other agencies is required and neither the City of Dublin nor the project applicant can ensure their implementation. For other impacts, such as to the regional freeway system, other parallel improvements would provide other travel routes, and alternative travel modes for travel through the corridor. However, the effectiveness of these measures cannot be fully quantified. For some impacts, such as at the Dougherty Road at Dublin Boulevard Intersection, insufficient right-of-way is available to construct identified improvements. Therefore, the Draft SEIR concludes that some impacts could be significant and unavoidable as there are no assurances regarding the timing of implementation, nor the effectiveness of such measures.

As part of the project approval process, a Statement of Overriding considerations must be prepared when there are significant and unavoidable impacts. This statement acknowledges the balancing of competing public objectives (including environmental, legal, technical, social, and economic factors), and allows for a project that could have significant and unavoidable environmental impacts to be approved.

Response to LD-8
CEQA Guidelines Section 15126.4 sets forth considerations for mitigation measures. The section states that mitigation measures “may specify performance standards,” “must be fully enforceable,” and “must be ‘roughly proportional’ to the impacts of the project.” In this case, Mitigation Measure AIR-3b requires that all construction equipment greater than 50 horsepower meet United States Environmental Protection Agency Tier 4 interim off-road emissions standards and obligates the applicant to provide the City of Dublin with documentation verifying this at the time of issuance of grading permits. The mitigation measure identifies a clear and unequivocal performance standard that is fully enforceable and roughly proportional to project impacts. As such, Mitigation Measure AIR-3b meets the applicable requirements of CEQA Guidelines Section 15126.4.

Regarding cumulative construction criteria pollutant emissions from the simultaneous construction of the IKEA Retail Center, Boulevard, and the Zeiss Innovation Center projects, this is unlikely to occur. As of June 2018, the Boulevard Project site is 1,500 feet northwest of the IKEA Retail Center project site and is currently under construction; the Zeiss Innovation Center Project site is approximately 760 feet north of the IKEA site and is approved and expected to commence construction in the second half of 2018. Since the IKEA Retail Center project has not yet been considered for approval and cannot begin any construction until after approval and issuance of permits, the IKEA construction is unlikely to overlap with these other projects. In addition, none of the three sites are contiguous to each other. Criteria pollutant air emissions constitute a very short-term, localized phenomenon and are heavily influenced by factors such as weather. Moreover,
construction activities are temporary and cease when the project is completed. Thus, for a worst-case cumulative criteria pollutant impact to occur in the context of construction, all three projects would have to be under construction simultaneously on a hot, sunny day with little to no wind. Given the staggered schedules of the three projects and the distance between each one, this is remote and unlikely to occur. Therefore, it is too speculative to evaluate.

**Response to LD-9**

As discussed in Response to LD-8, there is no basis for assuming that Mitigation Measure AIR-3b will not be effective at mitigating impacts from the IKEA construction or assuming that the IKEA Retail Center, Boulevard, and Zeiss Innovation Center projects will be implemented on similar construction schedules. The mitigation measure will ensure that the construction impacts from the IKEA project will be less than cumulatively considerable.

**Response to LD-10**

Draft SEIR page 3.2-2 indicated that the on-site seasonal features may be exempt from jurisdiction under Section 404 of the Clean Water Act because they appear to be isolated and do not drain to a navigable waterway. Moreover, the Draft SEIR consistently indicates that the seasonal features are 1.92 acres in area; the statement on page 3.2-16 about the seasonal wetland acreage increasing from 1.17 to 1.92 reflected the values contained in the WRA Biological Resources Assessment dated August 2013 (1.17 acres) and the WRA Delineation of Waters of the U.S. dated November 2013 (1.92 acres); they do not reflect 2016 versus 2017 values. In all cases, the Draft SEIR referenced the higher value of 1.92 acres when discussing existing conditions and impacts.

CEQA Guidelines Section 15126.4 sets forth considerations for mitigation measures. The section states that mitigation measures “may specify performance standards,” “must be fully enforceable,” and “must be ‘roughly proportional’ to the impacts of the project.” In this case, the mitigation measures for Congdon’s tarplant (Mitigation Measure BIO-1a), nesting birds (Mitigation Measure BIO-1b), burrowing owl (Mitigation Measure BIO-1c), bats (Mitigation Measure BIO-1d), and wetlands (Mitigation Measures BIO-3a and BIO-3b) all identify clear and unequivocal performance standards that are fully enforceable and roughly proportional to project impacts. As an example, Mitigation Measure BIO-1a indicates that (1) a focused survey for the Congdon’s tar plant must be completed prior to vegetation removal or ground disturbing activities; (2) must be conducted in accordance with the CDFW’s Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities; and (3) specific avoidance or compensatory mitigation must be implemented if individuals are found to be present.

In regard to requiring focused or pre-construction surveys prior approval of a project, please refer to Response AB-14.

**Response to LD-11**

The Smallwood inspection is addressed in Response to LD-14.

**Response to LD-12**

CEQA Guidelines Section 15126.4 sets forth considerations for mitigation measures. The section states that mitigation measures “may specify performance standards,” “must be fully enforceable,” and “must be ‘roughly proportional’ to the impacts of the project.” In this case, Mitigation Measure HAZ-2
requires the applicant to retain a qualified hazardous materials contractor to sample these soil stockpiles for these substances prior to grading activities and properly remove them if detectable concentrations of these hazardous materials are found to be present. There are clear and unequivocal performance standards within this mitigation measure that are fully enforceable and roughly proportional to project impacts, such as:

“Prior to issuance of the first grading permit . . .”

“If sampling determines that concentrations of these substances exceed acceptable human health exposure levels . . .”

“. . . the applicant shall retain a qualified hazardous materials contractor to properly remove and dispose if impacted soil . . .”

For these reasons, Mitigation Measure HAZ-2 meets the applicable requirements of CEQA Guidelines Section 15126.4 and the claims that construction workers would be exposed to hazardous materials are not supported by substantial evidence.

**Response to LD-13**

As discussed in these responses, the Draft SEIR meets all applicable CEQA requirements and there is no legal basis to revise and recirculate the Draft SEIR.

**Response to LD-14**

This comment consists of a letter authored by Shawn Smallwood, Ph.D., dated March 5, 2018 regarding the Zeiss Innovation Center Project site located east of Arnold Road and north of Dublin Boulevard. Dr. Smallwood indicated that he performed a 15-minute site visit on February 8, 2018 and a 94-minute visit on March 2, 2018. He indicated that both visits were restricted to the outer perimeter of the Zeiss Innovation Center Project site and that he did not actually walk the site. He reported observing a red-tailed hawk and a white-tailed kite and suggested that their behavior was indicative of nesting. He also inferred burrowing owls may be present because of the presence of ground squirrels. His letter then delves into topics specific to the Zeiss Innovation Center Project that have no relevance to the IKEA Retail Center project.

As should be clear, Dr. Smallwood did not survey the IKEA Retail Center project site. The Zeiss Innovation Center Project site is located approximately 760 feet north of the IKEA Retail Center project site, with Martinelli Way (a four-lane divided roadway), Persimmon Place (a retail center), and Dublin Boulevard (a six-lane divided roadway) located in between. The two sites are non-contiguous. Unlike the Zeiss Innovation Center Project site, the IKEA Retail Center project site supports paved areas and buildings.

Moreover, Dr. Smallwood’s methods would not be consistent with those for a reconnaissance level biological survey, or for that matter, CEQA-level evaluation of biological resources. Moreover, his initial February 8, 2018 survey of the approximately 10-acre site Zeiss Innovation Center Project site consisted of a 15-minute visit, which seems to be a bit abbreviated for a site of this size. His suggestion that that red-tailed hawks, white-tailed kites, or burrowing owls are nesting on-site are completely unsupported by any actual direct evidence that such nests are present. Lastly, using a
biologist’s observations for one project site as a proxy for a completely separate site would not meet any widely accepted standard for biological assessments. Overall, Dr. Smallwood’s letter provides limited biological insight into the Zeiss Innovation Center Project site and absolutely no biological insight into the IKEA Retail Center site.

Regardless, the IKEA Retail Center project site was surveyed on multiple occasions between 2013 and 2017 by several biologists from separate firms and was determined to provide suitable habitat for nesting birds (including raptors such as the red-tailed hawks and white-tailed kites) and the burrowing owl. Accordingly, the Draft SEIR set forth Mitigation Measures BIO-1b and BIO-1c to address impacts to these species. As such, there is no basis to revise and recirculate the Draft SEIR based on Dr. Smallwood’s letter.
Folks,

Please do the right thing and don’t move forward with this awful idea.

The traffic is a nightmare now, The report confirms it would be MUCH worse.

Just say no.

---

The Environmental report shows Dublin & Pleasanton exits (Hacienda, Santa Rita, Hopyard to Owens will be affected by proposed IKEA (earned grade F, lowest possible score)

From the IKEA Environmental Impact Report (EIR) - Significant Impacts to Air Quality, Biological Resources, Greenhouse Gases, Noise, and Transportation/Traffic. See pages of 26, 28, 36, 46, and 54 respectively of the EIR. The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays. The study projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA will be open from 10:00 am to 9:00 pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1616 trips per hour, on average. This means there will be about 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the busy weekends.

The EIR states that many of the patrons of IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin & Pleasanton traffic and inconvenience Dublin, Pleasanton & Livermore residents. The proposed IKEA hub would be on one large block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. Hacienda also is used by cars going to BART and the water slide, when it is open. Dublin Blvd. will have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system ie. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli, Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" (1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).
I believe the proposed IKEA would cause severe traffic problems. It would also be a horrible blue and yellow eyesore. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings. This project is not appropriate for Dublin.
Individuals

Tom Cignarella (CIGNARELLA)

Response to CIGNARELLA-1
The author expressed objection to the project because of traffic congestion. Refer to Master Response 1.

Response to CIGNARELLA-2
The author provided a summary of the SEIR's conclusions regarding traffic. Refer to Master Response 2.
From: Liana deWit-Smith <smithcampers@comcast.net>
Sent: Thursday, March 15, 2018 4:53 PM
To: Amy Million: City Council
Subject: IKEA Comments

From the IKEA Environmental Impact Report (EIR) - Significant Impacts to Air Quality, Biological Resources, Greenhouse Gases, Noise, and Transportation/Traffic. See pages of 26, 28, 36, 46, and 54 respectively of the EIR. The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays. The study projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA will be open from 10:00 am to 9:00 pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1616 trips per hour, on average. This means there will be about 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the busy weekends.

The EIR states that many of the patrons of IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin traffic and inconvenience Dublin residents. The proposed IKEA hub would be on one large block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. Hacienda also is used by cars going to BART and the water slide, when it is open. Dublin Blvd. will have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system i.e. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli, Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. I must say I am skeptical. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" (1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).

I believe the proposed IKEA would cause severe traffic problems on Dublin Blvd., our only cross town street and on the surrounding freeways. It would also be a horrible blue and yellow eyesore. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings. This project is not appropriate for Dublin.
Please say no to IKEA.

Liana de Wit-Smith

Resident of Dublin for 35 years
Liana deWit-Smith (DEWIT-SMITH)

Response to DEWIT-SMITH-1
The author provided a summary of the SEIR’s conclusions regarding traffic and expressed objection to the project. Refer to Master Responses 1 and 2.
From: Steve And Tammy <sficarra3@aol.com>
Sent: Wednesday, February 21, 2018 4:36 PM
To: Amy Million
Subject: IKEA

I have concerns regarding the proposed IKEA in Dublin, CA.

As many have mentioned, the IKEA will bring in traffic to an already congested area. Dublin Blvd is the only road that goes from East to West Dublin. On this road Dublin is in the process of building 2,000 more homes to add to this congestion. With this comes 2,000 more vehicles with the potential to go up to 4,000 vehicles.

Right now, the 580/680 freeway is a traffic nightmare. With many vehicles exiting off the freeway at either Fallon or San Ramon Valley Blvd to avoid sitting on the freeway. How has the spillage of these cars been calculated into the EIR? There is a new waterpark and government center as well that have been added since IKEA has started the CEQA. How have you calculated these vehicles? Plus Dublin is building thousands more homes on the West side of Dublin. How have these cars been calculated in the CEQA?

I also understand the rating for the traffic is an F. Will then the City Planner recommend that IKEA not be built?

The tax dollars are minimal compared to what IKEA will cause to the environment and quality of life that the residents of Dublin deserve.

I am not alone in my thoughts and opinions on IKEA.

Sincerely,

Tammy Ficarra
Tammy Ficarra (FICARRA)

Response to FICARRA-1

The author expressed objection to the project because of traffic congestion. Refer to Master Response 1.
THIS PAGE INTENTIONALLY LEFT BLANK
Ms. Million,

This e-mail contains my concerns related to the IKEA EIR.

Specifically, I have major concerns in the following areas, which I do not believe have been properly mitigated:

1) Traffic - impact of additional vehicles from out of the Tri-Valley on 580, 580/680 interchange, Hacienda Dr, and Dublin Blvd. As the 580 East to 680 South interchange is far overdue to be improved, an IKEA drawing several thousands of additional cars out of the area (unlike other retail that draws mainly locally) will cause significant additional traffic delays. Truck deliveries will have significant and intolerable impact on traffic, even at night.

2) Traffic - "Potentially significant impact" associated with traffic as identified in the EIR will likely cause east dublin residents (over half of Dublin's population) to shop in Livermore and Pleasanton. Although the economic loss may not be subject to the EIR, the impact of traffic is.

3) Aesthetics - A blue and yellow building is out of character with the rest of the buildings in the IKEA proposal and does not fit the area, or any area in Dublin. This needs to be changed to a neutral color scheme.

4) Noise - Impact due to truck deliveries is a major concern on both traffic and noise levels.

5) Air Quality - Impact due to the thousands of extra out of the area vehicles will increase Dublin's carbon footprint significantly.

Thank you,

Jeff Gebel
Dublin Resident
Jeff Gebel (GEBEL)

Response to GEBEL-1
The author does not provide any evidence in support of his claim that traffic impacts on I-580, I-680, Hacienda Drive, and Dublin Boulevard have not been properly mitigated. Refer to CALTRANS-3 for further discussion of traffic analysis and mitigation, particularly with regard to freeway impacts.

Response to GEBEL-2
Both Livermore and Pleasanton have established retail nodes\(^1\) that are within close driving distance of Dublin and, thus, Dublin residents are making existing trips to these outlets. As such, these traffic patterns are captured in the Draft SEIR’s existing and Existing Plus Project traffic analyses (Impacts TRANS-1) in Section 3.6, Transportation. To the extent that these residents would continue to make these shopping trips in the future, this would represent the continuation of an existing condition.

IKEA primarily retails furniture and housewares and, thus, only competes with outlets in these categories. Thus, the development of an IKEA would not eliminate the need for Dublin residents to shop at outlets that serve other retail categories.

Although the Draft SEIR indicates that traffic conditions would deteriorate on local and regional roadways under Near-Term with Project and Cumulative with Project conditions, attempting to predict how this would influence non-IKEA retail traffic pattern trips is too speculative to predict because it would require information that is not currently available (the types of outlets that would exist in the future, shopping preferences of residents in the future, etc.). CEQA Guidelines Section 15145 indicates that if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.

Response to GEBEL-3
Impacts on the existing visual character of the project site were adequately addressed in the Eastern Dublin EIR and no further analysis is required. Thus, the project would not represent a substantial visual impact under CEQA standards. However, the design and coloring of the building is subject to City zoning regulations, including site development review standards, which will be considered by decision-makers.

Response to GEBEL-4
The Draft SEIR’s noise analysis in Section 3.4 Noise specifically accounted for truck noise in terms of roadway noise and delivery loading and unloading noise; refer to pages 3.4-18; 3.4-20 through 3.4-27; and 3.4-29 through 3.4-30. As discussed on those pages, all operational noise impacts (including truck noise) were found to be less than significant.

Response to GEBEL-5
Project-related greenhouse gas emissions impacts were evaluated in Section 3.1, Air Quality/Greenhouse Gas Emissions on pages 3.1-59 through 3.1-67. Although the proposed project would result in a net increase in daily vehicle trips, the State’s adopted greenhouse gas reduction policies (e.g., Pavley I motor vehicle emission standards, Low Carbon Fuel Standard, Pavley II Advanced Clear

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\(^1\) Livermore nodes include the San Francisco Premium Outlets and Costco. Pleasanton nodes include Pacific Pearl, CarMax/Stoneridge Chrysler/Jeep/Dodge, Rose Pavilion, Metro 580, etc.
Cars Program) would apply to the vehicle fleet and serve to reduce greenhouse gas emissions over time. The proposed project also includes features that would reduce greenhouse gas emissions such as being designed to meet the United States Green Building Council’s Leadership in Energy and Environmental Design Silver standard, being accessible to bicycles and transit, and the use of a photovoltaic solar system for electricity production. The Draft SEIR found that the proposed project would achieve the State’s 40 percent emissions reduction target set forth in SB 32 and, thus, impacts would be less than significant. Because the proposed project would be consistent with the State’s greenhouse gas reduction objectives, it would not be considered to increase Dublin’s carbon footprint.
Good afternoon. I know you've heard lots of reasons why it is not a good idea for IKEA to be built here in Dublin. I'm voicing my concern for the animals because no one seems to care what happens to them. I will be there voice. There are raptors who nest and hunt in that open space. All raptors are protected in California. I've seen owls in flight hunting and there are white-tailed kites, who are on the endangered species list. Why are people so selfish? Why doesn't anyone care about the most sacred "beings" on this earth? Please say NO to IKEA. Please help protect these beautiful birds of prey. Thank you for your time. Kind regards,

Chenin Gonzales

The word "raptor" is the term used for a group of birds consisting of hawks, falcons, kites, eagles, vultures and owls. Raptors, also referred to as "birds of prey", are a valuable resource to the State of California, and therefore are protected under State law (See Fish and Game Code, Sections 3503, 3503.5, 3505 and 3513, and California Code of Regulation, Title 14, Sections 251.1, 652 and 783-786.6). There are over 30 species of raptors that inhabit California at some point in their life cycle.
Chenin Gonzales (GONZALES)

Response to GONZALES-1

The Draft SEIR referenced the applicable federal and state statutes that pertain to avian species on pages 3.2-11 through 3.2-14, including the white-tailed hawk and western burrowing owl. Section 3.2, Biological Resources Impact BIO-1 evaluated impacts on special-status bird species and noted that the project site provides suitable habitat for nesting birds, the western burrowing owl, and bat species; as such, Mitigation Measures BIO-1b, BIO-1c, and BIO-1d were set forth to mitigate impacts on these species. In summary, the Draft SEIR did evaluate the potential presence of special-status aviation species and set forth mitigation to reduce impacts to a level of less than significant.
Dear Ms. Million

I believe that certain factors discussed in the EIR prove that the proposed IKEA would have severe negative impacts on the City of Dublin. These impacts cannot be mitigated.

The EIR discusses significant and unavoidable traffic impacts on local roads and freeways that cannot feasibly be mitigated in some cases.

The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays but that is also a busy shopping day. The report projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA would be open from 10:00am to 9:00pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1,616 trips per hour, on average. This means there will be 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the weekends.

The EIR states that many of the patrons of the proposed IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin traffic and inconvenience Dublin residents. The proposed IKEA would be on one long block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. These streets are also used by cars going to BART and the water slide (when it is open). Dublin Blvd. will also have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system i.e. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the proposed IKEA. The reports identifies segments that would have Level of Service (LOS) F ratings indicating “extreme traffic delays”. Many of the most commonly used segments of the Dublin road system are near the proposed IKEA and would have LOS category E and F ratings, if an IKEA is built (3.6-101 and 3.6-102). The freeways would also be affected. Fifteen of nineteen segments of eastbound I-580 would be rated LOS F and several others LOS E at peak-hours (3.6-152 and 3.6-153).

The proposed IKEA would also cause parking nightmares. IKEA is planning 1,026 parking spaces for the store and 568 spaces for the retail/restaurant shops, for a total of 1,594 spaces (2-12). An average of 1,616 cars per hour will be trying to enter and leave IKEA’s parking spaces. Information provided on Google for the Emeryville store (which the EIR uses as a model for the Dublin location) indicates that customers typically spend 45 minutes to two hours in the store. If they visit the others shops and restaurants, their stays will be longer. The parking lot will soon be completely filled. By peak-hours there will be 1,000 cars an hour trying to enter the already full parking facilities. This will surely cause traffic gridlock. Since most of the potential customers will have come a long distance to shop at IKEA, they are not likely to give up. They will try to find a place to park in the already overcrowded Persimmon Place. Some will park at Hacienda Crossings and slow traffic on Hacienda as they used the crosswalks. Others will try to use the BART lot. I do not believe that a public facility should subsidize parking for IKEA.
The EIR states that the project should “Impove the overall visual appearance of the area ...”. The IKEA would be a huge blue and yellow eyesore that does not fit in with other buildings in the community. The building is not even compatible with the additional shops and restaurants proposed. The IKEA structure certainly would not improve the appearance of the area which is a gateway to the city.

These severe negative impacts cannot be mitigated and make the proposed IKEA inappropriate for Dublin.

Thank you for your consideration of my concerns.
John Heyer

Sent from my iPad
John Heyer (HEYER)

Response to HEYER-1

The author provided a summary of the SEIR’s conclusions regarding traffic and expressed objection to the project. Refer to Master Responses 1 and 2.
From: mike kaube <mike.kaube@gmail.com>
Sent: Friday, March 16, 2018 4:02 PM
To: Amy Million
Cc: City Council
Subject: IKEA Project - Impact Concerns
Attachments: IKEA Area.jpg

Principle Planner, City of Dublin:

Amy:
I am writing to express my concerns and disagreement with the Impact assessment published:
Specifically Section 16: Transportation/Traffic.
f) - Conflict with adopted policies, plans, programs regarding public transit, bicycle ...
Yes it maybe true that Dublin has a shallow and poor bicycle policy and that there is no consideration to this aspect, but I would like to express that since the presence of Persimmon Place, the area that once was acceptable is now a very dangerous area for cyclist to commute in the area mostly because of the many driveways allowing or forcing automobiles to cross bicycle paths. Based on the little that is the Ikea proposal is going to change in this area, this situation will become much worse.

I am a daily bicycle commuter that lives in the immediate area and I am very concerned of my ability to stay as a bicycle commuter due to the large traffic impact that will result in the area without changes to improve the bicycle lanes and allowances. I believe this should be a primary consideration due to the proximity of the BART station and that ikea will be physically be located between and the BART and large residential community. Note that this issue has also become a larger challenge since the residential construction along Dublin Blvd. has been allowed to displace cyclists for almost a year and it is still continuing. With this I give Dublin a very poor grade for bicycle considerations even though they have spent much effort in past few years in the 'downtown' corridor. Note that due to the location of Camp Parks, Dublin Blvd is the ONLY path between west and east Dublin and currently is poorly attended to. Please, consider to improve the, traffic, pedestrian and cycling situation with for any facilities near a major Transit center (i.e. BART). Allowing Ikea to enter the area with out further improvements for pedestrian traffic and cyclist will be a major setback for Dublin as a growing community.

See attached diagram. Red is the trouble spots currently. It is very challenging today and will become much worse with more traffic brought in the area (i.e. Ikea). As a cyclist I fear riding this area now do to the concentration of traffic the area has generated. Black are the areas that will become very impossible for a cyclist or vehicle when Ikea is added... Blue is the noted typical commute path for residents to the transportation hubs. Note that there is no bypass away from Dublin Blvd to get around Camp parks to commute between east and west Dublin. Ikea will make this worse.

So until improvements are proposed as part of the area’s development to improve the traffic situation in the area and improve access between BART and the community, I will always be against any further development to this area of Dublin and I see you failing as our city's planner.

Thank you,
Michael Kaube
4673 Finch Way, Dublin, CA 94568.
Michael Kaube (KAUBE)

Response to KAUBE-1
The Initial Study in Appendix A served as a preliminary assessment of impacts on public transit, bicycles and pedestrians. A more detailed assessment of bicycle circulation is provided in Draft SEIR Section 3.6, Transportation, Impact TRANS-8, and identified several improvements to enhance the convenience and safety of cycling in the project vicinity (Mitigation Measures TRANS-8a, TRANS-8b, and TRANS-8c). After implementation of these mitigation measures, the Draft SEIR concluded that impacts on bicycles were less than significant. The author did not provide any specific comments on the Draft SEIR's analysis or mitigation measures.

Response to KAUBE-2
As noted in Response to KAUBE-1, the Draft SEIR provided a detailed assessment of bicycle and pedestrian circulation and set forth improvements as mitigation measures.

Regarding the poor condition of the Class I bicycle/pedestrian path along the north side of Dublin Boulevard, this is a result of the development of the Boulevard Project that restricted access to portions of this facility. That project will be required to restore the Class I bicycle/pedestrian path to satisfactory condition. Note that the IKEA Retail Center project does not propose any changes to this facility.

Response to KAUBE-3
Refer to Response to KAUBE-1 and -2.

Response to KAUBE-4
The author stated that he will be opposed to any further development in the project vicinity until the traffic situation is improved. This comment is noted and will be provided to City decision-makers. No response is necessary.

Response to KAUBE-5
This comment consists of a diagram referenced by the author in his comments. No response is necessary.
Sent from my iPad

Begin forwarded message:

From: Lianne Marshall <marshall.lianne@gmail.com>
Date: February 24, 2018 at 9:36:16 AM PST
To: council@dublin.ca.gov
Cc: amy.million@dublinca.gov
Subject: IKEA

Dear Mayor/Council Members

I am writing to request that you reject the IKEA project.

The EIR traffic assessment shows that there would be significant traffic impacts on our local roads and freeways that cannot be mitigated. Nearly 10,000 trips on weekdays and nearly 18,000 trips on weekends will cripple highway exits and key intersections and roads in town, including Dublin Blvd., the City’s only cross-town street. Most of these trips will be drawn from Stockton, Modesto, Manteca, Tracy and other cities, not local residents. It will cause critical intersections to degrade to “F”. Anyone who has to travel on Dublin Blvd. during peak hours knows that it can’t handle this much more traffic. And, this is before the 2000 homes at Dublin Crossings add thousands more cars to the roads.

I attended the meeting regarding to the project’s design and aesthetics. While the smattering of small shops and restaurants are attractively designed using neutral colors and materials, IKEA’s insistence on the hideous blue and yellow color scheme creates an enormous eyesore that does not fit in with anything around it, and it does not conform with the Eastern Dublin Specific Plan, which calls for attractive buildings that create a coherent and harmonious environment.

IKEA does not primarily serve the local community. It will have tremendous negative impacts on our roads, and create visual blight that will permanently damage the image of Dublin. The community rejected IKEA once before, and knowing that, it is very disappointing that this Council allowed the EIR to move forward. It is time for the Council to listen to the people it was elected to represent and stop the IKEA project.

Sent from my iPad
Lianne Marshall (MARSHALL)

Response to MARSHALL-1
The author provided a summary of the SEIR’s conclusions regarding traffic and expressed objection to the project. Refer to Master Response 1.

The author also expressed objection to the design and appearance of the proposed project. Impacts on the existing visual character of the project site were adequately addressed in the Eastern Dublin EIR and no further analysis is required. Thus, the project would not represent a substantial visual impact under CEQA standards. However, the design and coloring of the building is subject to City zoning regulations, including site development review standards, which will be considered by decision-makers.
Hi Amy,

I want to provide my feedback related to the IKEA supplemental EIR.

This assessment scares me a lot

"The project has the potential to generate approximately 140,000 VMT on an average daily basis, accounting for longer trip lengths and greater levels of trip generation on weekends compared with weekdays, and accounting for patrons, employees, and deliveries. However, as noted in the Technical Advisory, "lead agencies should analyze the effects of a retail project by assessing the change in total VMT because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns"."

To add to it, the following table 6-6 states the city population is 50k whereas the city data discussed in the city council meeting states it is 57k.

With 7k difference a year ago the vehicles count will be more that what is state there.

I would like to get that correct and provide a accurate picture of the vehicle traffic.

The traffic impact without a report is easier to see in the weekends now where the roads are grid locked between 84 and 580/680 junction.

Thanks
Jega
Jegadheesa Murugesan (MURUGESAN)
Response to MURUGESAN-1
The author provided a summary of the SEIR’s conclusions regarding vehicle miles traveled and expressed objection to the project. Refer to Master Response 1.

The author stated that the SEIR in Table Page 6-6 underreported the City’s population as 50,000 and asserted that this should be corrected in order to get an accurate picture of traffic impacts.

Table 6-6 indicates that the City’s “existing population” is 50,970. That number represents a calculation of residential population based on the number of households in the base year model with different housing types having different household sizes. The model base year is 2015, so this number reflects the population for that year. It should be noted that the population for the City of Dublin for modeling purposes does not include the Santa Rita Jail facility, which has a capacity of 4,000 people or Federal Correctional Institution Dublin, which has a capacity of 990.
Dear Sirs,

This IKEA project will severely affect the quality of living in Dublin and impact usage of the 580 and 680 corridors.

We would request that this project suffer significant changes to reduce its impact on Dublin residents and the Freeway users, whilst we understand that many of these cannot be mitigated to a satisfactory level. Should this be the case, the project should be rejected.

From the Draft EIR we have,

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system ie. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli, Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" (1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).
I believe the proposed IKEA would cause severe traffic problems.

Thank you,

Chris Page
Chris Page (PAGE)

Response to PAGE-1
The author provided a summary of the SEIR’s conclusions regarding traffic and expressed objection to the project. Refer to Master Responses 1 and 2.
Hello,
I'm definitely against this project and hope it will never pass. Our beautiful city does not need extra traffic with extra crowd.
Regards,

Feroza

From the IKEA Environmental Impact Report (EIR) - Significant Impacts to Air Quality, Biological Resources, Greenhouse Gases, Noise, and Transportation/Traffic. See pages of 26, 28, 36, 46, and 54 respectively of the EIR. The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays. The study projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA will be open from 10:00 am to 9:00 pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1616 trips per hour, on average. This means there will be about 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the busy weekends.

The EIR states that many of the patrons of IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin traffic and inconvenience Dublin residents. The proposed IKEA hub would be on one large block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. Hacienda also is used by cars going to BART and the water slide, when it is open. Dublin Blvd. will have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system ie. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli,
Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. I must say I am skeptical. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" (1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).

I believe the proposed IKEA would cause severe traffic problems on Dublin Blvd., our only cross town street and on the surrounding freeways. It would also be a horrible blue and yellow eyesore. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings. This project is not appropriate for Dublin
**Feroza Solaiman (SOLAIMAN)**

*Response to SOLAIMAN-1*

The author provided a summary of the SEIR’s conclusions regarding traffic and expressed objection to the project. Refer to Master Responses 1 and 2.
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I think this is a terrible project as currently structured:
1) 580W is already a disaster at almost all hours and this is going to bring lots of additional traffic on the highway -- we need a project that primarily draws people from the local area like Persimmon Plaza or high tech office or medical facility.
2) Traffic will be a disaster getting into and around the project according to EIR. Again we need a project that serves local people with a diverse traffic pattern.
3) We need high paying jobs to keep people from having to commute not 100's of low paying jobs that will be filled by people who live in other cities and commute into Dublin.
4) This is a terrible project to place next to Bart as it has very limited synergy with BART commuters because of the size of most purchases
5) They should not have a warehouse in the location, big delivery trucks are the worst type of traffic. Warehouses should be in remote locations.
6) Big box retail is doomed and we will end up with a giant empty blue box at some point. The future is small box outlets for pickup of online orders and for browsing linked to online warehouse distribution. As soon as Ikea gets their online strategy in order in the next few years, I can gaurantee they will abandon these big stores and push forward more aggressively with their recently launched small outlet approach.

It is said we are letting one of the last big blocks of space be used for such a bad project. This project should be blocked but at a minimum Ikea needs to scale back the store by 50% so we can have a better diversity of tenants on the property. I lived in Dublin for 18 years and I have seen a lot of short sighted decisions but this will definitely go down as one of the worst if it is approved as is.

Rupert Young  
5307 Asterwood Dr, Dublin CA.
Sent from Outlook
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Rupert Young (YOUNG)

Response to YOUNG-1
The author expressed objection to the project because of traffic congestion and land use compatibility. Refer to Master Response 1.

Impacts on land use were addressed in the initial study, which was included as Appendix A of the EIR. As discussed, the proposed project consists of the development of commercial-retail center. The City of Dublin General Plan designates the project site as “General Commercial,” while the Eastern Dublin Specific Plan zones the site as “General Commercial,” which permits the construction of retail-commercial uses. Development on-site would be required to comply with all applicable General Plan policies and Specific Plan regulations, and would be reviewed by the City prior to approval of the necessary permits. As such, impacts would be less than significant and no further analysis is required. Thus, the project would not result in a significant impact in terms of land use. The design and coloring of the building is subject to City zoning regulations, including site development review standards, which will be considered by decision-makers.
Non-Draft SEIR Comments

Table 3-2 summarizes the individuals that submitted comments that pertained to the proposed project, but did not specifically address any aspect of the Draft SEIR’s analysis. The letters are reproduced following the table. Please refer to Section 2, Master Responses for a response to these comments.

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<th>Signatory</th>
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<tr>
<td>J. Alexander</td>
<td>Melissa Alexander</td>
<td>Angie [Full Name Not provided]</td>
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<td>Sandi Arajs and Tom Rogers</td>
<td>Joe Banchero</td>
<td>Dean Barnes</td>
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<td>Lisa Burks</td>
<td>Maijargal Burrows</td>
<td>Catherine Byron</td>
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<td>Brian Cardella</td>
<td>Marlon Cardenas</td>
<td>Kerrie Chabot</td>
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<td>Daniel Chen</td>
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<td>Sean Cohen</td>
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<td>Ewa David</td>
<td>Lianna de Wit-Smith</td>
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<td>Diana DeMeo</td>
<td>Mindy Destro</td>
<td>Satpal Dhillon</td>
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<td>Susan Dunnegan</td>
<td>Ernesto Eugenio</td>
<td>Jennifer Farber and John Hanson</td>
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<tr>
<td>Tammy Ficarra (3 letters)</td>
<td>Susanne Frey</td>
<td>Vasantha Ganesan</td>
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<td>Michelle Gebel</td>
<td>Jay Gill</td>
<td>Sumeet Gore</td>
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<td>Patrick Graham</td>
<td>Perrin Guess</td>
<td>Roger Gupta</td>
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<td>Akansha Gupta</td>
<td>Rajesh Gupta</td>
<td>Roger and Nancy Haddad (2 letters)</td>
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<tr>
<td>Patty Hansen</td>
<td>Sunil Hariani</td>
<td>Pam Harvey</td>
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<td>Heidi [Full Name Not Provided]</td>
<td>Gretchen Hellmann</td>
<td>Jennet Herdman</td>
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<td>John Heyer</td>
<td>Wendy Jemo</td>
<td>Jim R. and Elena G. (Full Names Not Provided)</td>
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<td>Teresa Johnson</td>
<td>Gerry Judd</td>
<td>Nina Kamatani</td>
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<td>Kamlesh Kamdar</td>
<td>Alex Kao</td>
<td>Sepi Katz</td>
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<td>Stefani Katz</td>
<td>Pearl Ko</td>
<td>Vaidy Krishnamurthy</td>
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<td>Pawan Kumar</td>
<td>William and Katherine Kuo</td>
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<td>Linda Leonard</td>
<td>Cheryl LeValley</td>
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<td>Gina Lindauer</td>
<td>Weifeng Liu</td>
<td>John Lumm</td>
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<td>Mahesh [Full Name Not Provided]</td>
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<td>Kiran Maskey</td>
<td>Marlene Massetti</td>
<td>Leonie Meima</td>
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<td>Rowena Morgan</td>
<td>Kazuko and Masahiro Morimoto</td>
<td>Gargi Mukherjee</td>
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<td>Jegadheesa Murugesan</td>
<td>Hilary Nindorf</td>
<td>Chris Page</td>
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Table 3-2(cont.): Non-Draft SEIR Comments

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<tr>
<td>Katie Palomares</td>
<td>Carmen Pappas</td>
<td>Ashish Paralkar</td>
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<td>Annissa Park</td>
<td>Ivan Pysarevskyy</td>
<td>Ramya Ramakrishnan</td>
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<tr>
<td>Brian Roudabush</td>
<td>Johan Rydell</td>
<td>Nithya Sakthirajan</td>
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<tr>
<td>Edlyn Sammanasu (2 letters)</td>
<td>Lucretia Samuels</td>
<td>Satar [Full Name Not Provided] (2 letters)</td>
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<tr>
<td>Jenny Scheinpflug</td>
<td>Thomas Schindler</td>
<td>Allen Shaw</td>
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<tr>
<td>Monica Silva</td>
<td>Jennifer Situ and Vick Tran (2 letters)</td>
<td>Feroza Solaiman</td>
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<tr>
<td>Vanessa Sotelo</td>
<td>Suico [Full Name Not Provided] (2 letters)</td>
<td>Diane Tarin</td>
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<td>Nhuly Tran</td>
<td>Debbie Wagner (2 letters)</td>
<td>Janeen Wheeler</td>
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<tr>
<td>Heather Whiting</td>
<td>Barbara Wilson</td>
<td>Rupert Young</td>
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</tbody>
</table>

Source: City of Dublin, 2018.
Why is IKEA moving forward when residents DON'T want it?

I need an explanation.

J Alexander
Dublin resident
From: Melissa Alexander <malex9702@gmail.com>
Sent: Friday, March 16, 2018 9:10 AM
To: Amy Million; City Council
Subject: Concern over IKEA proposal

Hello, I am writing out of serious concern about the prospect of an IKEA in Dublin. I am firmly against building an IKEA in our area due to the already overwhelming amount of traffic the tri valley corridor receives every day. The EIR shows the terrible effects an IKEA would have on our highways and city road. No IKEA in Dublin, please!

Thank you,
Melissa Alexander
Amy Million

From: angie <angieft@me.com>
Sent: Monday, March 12, 2018 9:55 AM
To: Amy Million
Subject: NO TO IKEA

Amy,

IKEA is a bad idea for the city of Dublin. Traffic continues to congest Dublin Blvd going from the transit center either going east or west on Dublin Blvd, once the homes are finished at the Boulevard it will be worst.

The city council and city planners do not seem to care about the residents of Dublin.

If you have to have an IKEA in Dublin, please move it to the far end of east Dublin at the Livermore/Dublin City line. No one traveling on BART will do any “real” shopping at IKEA because we all know you need a car for IKEA purchases, maybe someone traveling from Oakland to IKEA on BART would buy a table top vase but then I guess that person would also probably drive to Emeryville’s IKEA.

NO TO IKEA! NOT GOOD FOR THE CITY OF DUBLIN!

Please share this post to protect west/downtown Dublin businesses.
Please excuse any typos...

Thanks!
Angie

Sent from Angie's iPad
Dear Ms. Million,

We are writing to let you know that we strongly oppose the concept of an IKEA facility at the 580/Hacienda Drive location. (Actually, in Dublin in general.) We live the neighborhood and traffic is already horrendous, and this will make it even worse. In addition to the traffic issues, a huge, ugly eyesore is not the way we want to have Dublin represented.

Also, it is our understanding that there will also be a warehouse, which means additional big-rig traffic, which is already bad enough on 580. If you look at the other IKEA locations in the Bay Area, they are in more industrial areas (e.g., Emeryville, East Palo Alto.) The proposed site is just a block away from residential neighborhoods.

Finally, the recent EIR gave the proposed project an "F." Why on earth would we still continue to even consider such a monstrosity?

Thanks for listening.

Sandi Arajs & Tom Rogers
Amy Million

From: joseph banchero <huck-162@comcast.net>
Sent: Monday, February 19, 2018 5:12 PM
To: Amy Million
Subject: Ikea

Amy,

I would like to go on record as NOT wanting Ikea or any large project that will bring many more cars into our city.

We need to finish projects already approved and take a lot at how our roads and QUALITY of life in our city are affected. Traffic on our arteries most days from 11 am to 7pm on most days has become a nightmare. To allow 9,630 trips on weekdays and 17,780 on Saturdays will only have a negative impact on the citizens of Dublin.

For those of us that don't want Ikea what are the options. Is it already a done deal? Will there be meetings where the public can voice their opinion on this project?

Thanks you Joe Banchero
Hi Amy,

Please do not approve IKEA to come to Dublin. The Freeway and Dublin Blvd traffic are already atrocious in terms of traffic, as is Dublin Blvd - I know because I try any way I can to get to work as quickly as I can (580 to 680, Dublin Blvd to 580 to 680, Dublin Blvd to 680, Dublin Blvd to Village Parkway to Alcosta, Dublin Blvd to Dougherty, or even the backroads through Windemere. This weekend, I drove from Tassajara Blvd, picked up 580 and then off at Dougherty/Hopyard exit. This was a Saturday when you would think traffic would be less. The four way intersection at Dublin Blvd and Dougherty was packed. The turn from Dougherty (from the Freeway) to go onto Dublin Blvd was backed up all the way to the West 580 Freeway exit and Dougherty/Hopyard. I sat in two cycles of the light before I finally got through - five minutes. Then, it was backed up all the way to the Dublin sports park. To go from My house near Tassajara, to 580 to Dougherty, to Dublin Blvd to the post office took me about twenty four minutes (Google said that was the fastest route) 5 miles one way. It's horrible. I can't believe the city of Dublin, after reportedly seeing the impact study is still considering this project.

During the week, I drive from Tassajara Blvd to West 580, to North 680 to go to San Ramon between 8:30AM and 10:30AM (my timing for going to the office varies). I also saw an excerpt from Ikea that said their hours would be after 9:00AM in the morning when traffic has subsided. I can assure you, traffic is pretty bad throughout the day, but it is not any clearer between 8:30AM and 10:30AM that I have noticed.

Residents, as I also understand, have been very clear being against this project, or at least a majority of residents seem to be. I beg you, please listen to the residents and do not allow this project to move forward.

Mayor Lockhart tried to bring IKEA to Dublin years ago back around 2004 I think it was. As I understood from a member of the city council then, Tony (something), IKEA tried to wine and dine the council. I was given details I won't go into, but one thing I will say is I was told they invited Dublin council members to come see their property in Emeryville on a weekday to see that traffic around the building would be light. This council member, Tony, declined their limo ride and opted to go on the weekend. He said the traffic was bad. He vehemently opposed IKEA back then. I emailed Mayor Lockhart back when IKEA wanted to come to Dublin. I told her how I felt about that project and that I, as a resident of Dublin, didn't want it. You know what her response was to me - it'll be good, you'll see. I hope the current city leaders listen to residents now. We are not buying into the 'light' traffic claims and other claims that IKEA is proposing.

There must be something else we can put there - can't we get some tech companies to have an office out here? Facebook, Yahoo, Google, Oracle, someone? Their demographics must show that their employees come from somewhere around this area and further east. Having an office here could be a boon for them. I don't know how easy it is to bring them in, but please, not Ikea.

I do shop at IKEA, but not that often. I'm not against IKEA as a company, just don't want it in my backyard.

I've lived in San Ramon and Dublin for 41 years, this is not the way Dublin should be constructed. I can't imagine anyone who cares about our city, driving down the road, sitting it traffic, and saying "I approved this. This is my legacy for a great city"...

thank you,
Dear Amy and Council Members,

I have been a resident of Dublin for almost 18 years and I wanted to make my voice heard in regards to the new IKEA that the city is trying to bring to Dublin. I have not been thrilled about the thought of this enormous store coming to our town because of the traffic issues that it will create. We already have so much traffic on the 580 freeway as well as Dublin Blvd. With no solutions that I have heard of to our already very clogged roads how can we even think about adding this kind of a retail shopping center to our city. Then I heard today that the planned Dublin IKEA is not only going to be a showroom but also a hub/truck distribution center! That just makes no sense to me at all. I do not want IKEA coming to Dublin, I believe the negatives far out way the positives that would come from this being in our city.

Thank you for taking the time to listen to my opinion and I truly hope that the City of Dublin listens to it's community members.

Sincerely,
Lisa Burks
Hello Amy,

As a resident of Dublin, I am opposed to IKEA coming to Dublin. I read the environmental report and see so many F grades on how IKEA impacts our city. Traffic will be horrific, air quality is going to diminish. Traffic congestion not only will take away productivity from Dublin residents as they sit in gridlocked traffic, it is also not SAFE. Safety is a huge concern, because people get impatient in bad traffic. I strongly oppose this project and the only way to mitigate it is not bring IKEA to Dublin.

Sincerely,

Maijargal Burrows
Dear Amy,

Although extremely busy, had to get my opposition in for IKEA. I helped fight it the first time and was relieved when it went away and now dread everyday the thought of IKEA in Dublin coming into fruition. EVERYONE I KNOW who lives here feels the same. PLEASE don’t destroy our neighborhood, our home! Can’t bear the thought of dealing with the traffic it will bring, not only to us but for everyone having to pass through 580, the only highway outlet to get to the east and and SoCal, for most of Bay Area!!!!

Catherine Byron

Sent from XFINITY Connect Mobile App
Hi Amy,

I’m a longtime Dublin resident sharing my frustration with the proposed IKEA in Dublin. A decision to proceed is a decision to permanently destroy the already cramped thoroughfares in our city. I think this is a very bad idea.

Thank you for taking my comment,
Brian Cardella
Concerned Resident
please do not let this happen, IKEA is a place you dont need to have so close to the current location. the 580/680 is already a nightmare situation even on weekends and this will severely impact quality of life
My name is Kerrie Chabot, 18 year resident of Dublin. I am completely against the IKEA proposal for Dublin. The draft EIR shows the adverse impact this project would have on our city. It received a grade F at several points of the study.

I do not see Sunday included in the report and I believe Sundays would be a very important day to study traffic pattern.

I would like IKEA to come back and cut the size of their footprint by 2/3, building only a showroom-without storage warehouse, without truck hub. They should also adjust the colors of their building to our city surroundings, a neutral color.

There should be more connectivity to Hacienda Crossings and Persimmon Place.

There is not enough parking.

Please confirm this comment is included in the report.

Sincerely,
Kerrie Chabot
Dear Ms. Million, Mr. Mayor and Dublin City Council Members (Mr. Haubert, Mr. Gupta, Mr. Goel and Ms. Hernandez),

First and foremost, we would like to express our condolences to the Biddle Family.

Secondly, thank you for allowing the residents of Dublin to have a voice in matters such as this. We are writing to express our thoughts on the possibility of bringing IKEA to Dublin. Thank you in advance for taking the time to read this.

We have been residents of Dublin for almost six years and have grown to enjoy living here. We have two young children and moved here with the intent to permanently settle. We looked at homes in multiple Bay Area cities before settling here. We like that more retail and commercial sites are coming to our city, however, we are strongly against having IKEA in this city for several reasons:

1. Traffic is already heavy on Dublin Boulevard as it is on Highway 580 at any given day or time. Having an IKEA at the proposed location will make the area congested beyond belief and create such a disservice to residents. Any type of retail in this area will increase traffic to some degree, but if there are retail establishments that can cater more to Dublin and local city residents, then traffic can be kept to a minimum.
2. Dublin has grown into a highly sought after city to live in with climbing home prices. Having an IKEA in this city would make this community less desirable and could potentially decrease the value of homes. If an IKEA were already here when we were searching for a home, it would’ve deterred us from settling here. Dublin has evolved into a community where IKEA just does not belong. East Palo Alto and Emeryville are very easy to get to for those with IKEA needs.
3. The proposed location is possibly the worst that it can be. Dublin is a relatively small city in size and the most busy area is right there with Persimmon Place, Hacienda Movie Theatres and shops and corporate businesses all along Hacienda. Dublin Boulevard will be heavily impacted and it is literally the only street that goes through the city. Neighboring cities will also be heavily impacted.
4. Should IKEA ever go out of business, it would be a challenge to identify a new occupant for such a vast building.

We would love to see family friendly retail plazas on Martinelli that include high end dining at the proposed site so that we, as residents, can enjoy them and keep giving our local businesses continued support. With the way the demographics of Dublin are trending, it is time for high end restaurant establishments to be a part of this growing city. Other Tri-Valley residents and nearby corporations can benefit from these types of retail/business areas as well and provide continued economical support. Corporations with executives and employees that come into town currently have to drive to Pleasanton,
Danville and even Livermore due to the lack of “fine dining” in Dublin. It would be nice and beneficial to Dublin if these employees can stay in their own city to host their executive teams and other team members for regular dinners or holiday dinners, etc. Many Dublin residents now have to travel outside of our city for moderate to fine dining.

An outdoor mall or plaza with stores, boutiques, high end and casual dining and dessert with outdoor seating areas with heating lamps, water fountains, play areas and open, safe areas to walk around with no immediate traffic around would serve our city and countless young families best. This will bring the tax revenues that you seek, all while limiting the extreme traffic and other issues that an IKEA would bring.

Thank you again kindly from the bottom of our hearts for taking time in your busy schedules to take these points into consideration. As fellow residents of Dublin, we hope that you will have our best interests at heart, all while focusing on tax revenue for the city. Please reject the IKEA project from entering our city.

Best Regards,

J.C.
Dear Amy,

My name is Daniel, and I live in one of the condos in Elan at Dublin Station. While we do shop at IKEA and enjoy their meat ball plates once awhile, we are not in favor of having IKEA in our neighborhood. The two existing locations of East Palo Alto and Emeryville having the reputation of industrial cities and are not exactly the desirable locations for comfortable community living. I am afraid that City of Dublin may obtain such reputation if we allow IKEA to move in.

Thank you,

Daniel
Dear Mayor Haubert, City Council members Abe Gupta, Arun Goel, Melissa Hernandez and Principal Planner Amy Million:

I am writing to you all to let you know that I, as well as the vast majority of Dublin citizens DO NOT want to have an IKEA in our city. The people of Dublin have been yelling and screaming this message to you all loud and clear ever since the IKEA proposal was brought to us again last year. Yet here we are desperately begging you to listen to the people who you are supposed to represent, the people of Dublin.

Having an IKEA in our city will bring people from all over the entire Bay Area. Ask yourself this question: When was the last time you shopped at an IKEA? When did you every say to yourself "Man I wish I had an IKEA close by so that I can buy that sofa that I desperately need"? I'm going to guess your answer is similar to mine and the majority of people in Dublin and that is we rarely, if ever shop at IKEA. With the internet, brick and mortar stores are closing down every day. Macy's, Circuit City, JC Penny, Sears, Toys R Us...all of these large chains have closed hundreds of locations in just the past few year or so. Why on God's earth would be want to build a gigantic blue and yellow colored brick and mortar store in our community when the future of shopping is going to be done online?

Unless you don't live in Dublin, which I'm assuming all of you do I hope, you all are aware of the major traffic congestion issues we already have on 580 freeway and Dublin Blvd. Whether it's a weekday, weekend, evening, morning or afternoon, there is always traffic congestion on the 580 Freeway but especially between Hacienda and Dougherty Road exits. Imagine what the freeway and Dublin Blvd traffic congestion will be like when hundreds and thousands of shoppers from all over the entire Bay Area come here to shop at IKEA? We are already having major traffic issues on 580 freeway with people coming through Dublin to shop at the Livermore Outlets. Every holiday season, I'm not even able to use the freeway exit that leads to my house because of the Livermore Outlets so I have to use alternate routes.

I took a close look at the EIR for the IKEA project that was recently released and to say I was absolutely shocked would be an understatement. I'm going to assume you all as well have reviewed the EIR by now. It doesn't take an engineering degree to realize that the EIR is speaking volumes on how IKEA will impact our environment negatively, especially our traffic on freeways and local roads. The city of Dublin spent $55,000 on a very involved Commercial Task Force just a few years ago. The final report, after months of study was an overwhelming recommended NO to Big Box at this prime Bart location. The city used the report several times during council meetings in order to support other projects. Why isn't the city using the task force report this time?

I am not opposed to having more retail in our city so as long as it's done tastefully and it benefits the people of Dublin. IKEA is not the right retail business to bring here and IKEA does not belong in our city. We do not want to be known as the city that everyone goes to because of IKEA. Besides the aesthetics problems with having an IKEA store in Dublin, the traffic issues it brings with it affects our way of life and just being able to live comfortably and happily. We want to be able to drive, walk, ride our bikes without having to worry about fighting traffic every minute. Our city is growing like a wildfire uncontrollably and having an IKEA will only add more fuel to that fire.
Listen, let's be very frank here. This is not rocket science everyone and it's clear as day! I am 1000% positive that you see the problems with having an IKEA here yet you all are not willing to acknowledge it. The people of Dublin are speaking out loud and we DO NOT WANT AN IKEA HERE! Plain and simple! Why won't you acknowledge that and accept the truth? You all were elected to represent us, the citizens of Dublin California and do what's in OUR best interest and this is not currently happening. Because of the poor judgment and decision making from present and past governing body members, we are seeing more and more people moving out of Dublin everyday because they are so frustrated with your poor decision making from past and present. I personally know of 3 families who have moved out of Dublin simply because it's becoming too over populated and the school system is suffering from it. I am also considering moving out of Dublin for these exact same reasons but more importantly I want to live in a city where I can trust my Mayor and City Council members and have faith in them. Right now I don't have that faith in most of you.

So if you truly represent the city of Dublin like you say you do, then please vote against the IKEA project. The people of Dublin are watching and observing all of your actions closely right now and we are ready to make some changes in office come next election period. Your actions will determine whether or not a lot of us will vote for you all again. It's time for everyone here, including the planning department, to start listening to the people of Dublin and stop working toward your own agendas. Do what's right for the people. Do what you know is right in your heart. PLEASE VOTE NO TO IKEA! Thank you for listening.

Sincerely,

Young Cho
Dublin Resident
From: Tom Cignarella <tom.cignarella@gmail.com>
Sent: Thursday, March 15, 2018 4:06 PM
To: Amy Million; City Council
Subject: No to IKEA - Bad before, bad now. The EIR says so.

Folks,

Please do the right thing and don’t move forward with this awful idea.

The traffic is a nightmare now, The report confirms it would be MUCH worse.

Just say no.

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The Environmental report shows Dublin & Pleasanton exits (Hacienda, Santa Rita, Hopyard to Owens will be affected by proposed IKEA (earned grade F, lowest possible score)

From the IKEA Environmental Impact Report (EIR) - Significant Impacts to Air Quality, Biological Resources, Greenhouse Gases, Noise, and Transportation/Traffic. See pages of 26, 28, 36, 46, and 54 respectively of the EIR. The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays. The study projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA will be open from 10:00 am to 9:00 pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1616 trips per hour, on average. This means there will be about 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the busy weekends.

The EIR states that many of the patrons of IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin & Pleasanton traffic and inconvenience Dublin, Pleasanton & Livermore residents. The proposed IKEA hub would be on one large block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. Hacienda also is used by cars going to BART and the water slide, when it is open. Dublin Blvd. will have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system ie. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli, Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" 1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).
I believe the proposed IKEA would cause severe traffic problems. It would also be a horrible blue and yellow eyesore. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings. This project is not appropriate for Dublin.
Dear Amy and respective city council members:

As a Dublin resident for over four decades, I’ve watched a small town progress into a prosperous city, which recently has found itself dealing with a number of significant challenges. I have read the IKEA EIR report in its entirety and am appalled that, once again, city management is actually considering approving a project that will have such incredibly negative impacts on Dublin & the area’s already abhorrent traffic situation.

In addition to the increased burden on already entirely overwhelmed I-580, the thousands of additional cars referenced in the EIR will be attempting to navigate Dublin’s also incredibly burdened street system, including a significant adverse impact on Dublin Blvd traffic. With no ingress/entrance to the gigantic IKEA site on the sides facing Hacienda and I-580, the massive hourly influx of cars would ALL have to use driveways on Martinelli and Arnold Dr. Obviously, council members are aware that Martinelli is a very short street absent a viable capacity for the excessive number of cars referenced in the EIR. These roads are already busy servicing Persimmon Place and Hacienda Crossings. Hacienda is also a main conduit to BART and the water slides in season. Dublin Blvd. will also have to accommodate the vehicles from the thousands of new homes going in at Dublin Crossing on the former Camp Parks property. Traffic on Dublin Blvd. is already absolutely intolerable, owing to spill over traffic from I-580. The additional traffic will be make an already horrible situation an absolute disaster.

I highly encourage you to view the IKEA development for what it is, a travesty for our already completely overwhelmed city & interstate I-580- infrastructure.

Please do not allow this project to break ground!

Respectfully,

Sean A. Cohen
(925) 785-3413
Amy Million

From: Danielle Cooper <danielleemcdonald2001@yahoo.com>
Sent: Thursday, March 15, 2018 12:08 AM
To: Amy Million; City Council
Subject: IKEA

Amy,
I’d like to add my thoughts to the many others you’ve received regarding IKEA. I’m sure the overwhelming consensus is that Dublin residents do not want an IKEA in the middle of town. Someone posted recently, on a community page, that he moved here from New York and when he first saw Dublin from the freeway, it looked like his idea of hell. However, once inside the neighborhoods, he loves it here. I can only imagine how much worse Dublin will look with a huge blue box off the freeway. I think of IKEA as being in depressed areas like Sacramento and East Palo Alto. I will be embarrassed to live in a city that is known for IKEA.

The traffic will be a nightmare and will impact residents’ day to day life. We only have one road to get across town. I make multiple trips back and forth each day, taking my husband to BART and child to DHS. The freeways are constantly backed up as it is and can’t handle thousands more cars each hour.

In addition, IKEA will bring undesirable people to our city and more crime. Revenues of other stores will decline and property values will go down.

There are so many reasons NOT to approve IKEA. Please do the right thing for people who love Dublin and want to stay here and raise our families.
Sincerely,
Danielle Cooper

Sent from Yahoo Mail for iPhone
Hi -

I would like to voice my concern about the proposed IKEA in Dublin. IKEA is definitely not the right fit for this community - and definitely not with a hub/truck distribution center attached. The people of Dublin deserve a vote in this decision. IKEA will impact our daily lives. The constant over-building and over-crowding of Dublin is chipping away at our beautiful suburban town and lifestyle. We already have a constant flow of traffic and many bottleneck issues surrounding us. Why would we want to add more. This is not a decision that a few people on the Council should make. Let the voices of the community be heard. Let this be a vote. We live in a democracy, and the council should stand up and support us. It's time for us - the tax-paying people of Dublin to take our city back.

Thanks for your time,

Ewa David
From: Liana deWit-Smith <smithcampers@comcast.net>
Sent: Thursday, March 15, 2018 4:53 PM
To: Amy Million; City Council
Subject: IKEA Comments

From the IKEA Environmental Impact Report (EIR) - Significant Impacts to Air Quality, Biological Resources, Greenhouse Gases, Noise, and Transportation/Traffic. See pages of 26, 28, 36, 46, and 54 respectively of the EIR. The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays. The study projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA will be open from 10:00 am to 9:00 pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1616 trips per hour, on average. This means there will be about 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the busy weekends.

The EIR states that many of the patrons of IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin traffic and inconvenience Dublin residents. The proposed IKEA hub would be on one large block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. Hacienda also is used by cars going to BART and the water slide, when it is open. Dublin Blvd. will have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system ie. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli, Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. I must say I am skeptical. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" (1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).

I believe the proposed IKEA would cause severe traffic problems on Dublin Blvd., our only cross town street and on the surrounding freeways. It would also be a horrible blue and yellow eyesore. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings. This project is not appropriate for Dublin.
Please say no to IKEA.

Liana de Wit-Smith

Resident of Dublin for 35 years
Parking and traffic are already a complete nightmare at Persimmon Place. There is no room for IKEA! Instead, build another BART parking structure which we actually need! This is so unnecessary for our city. I wish the city council would actually listen to their constituents for once!!!!

Dublin Resident Vanessa Dellon.
Dear Amy,

I have been a resident of Dublin for 20+ years. I am dismayed by what the city planners have allowed to happen to Dublin. We are now the laughing stock of the Bay Area - the place where cheap housing and discount shopping come to roost. The recent growth has destroyed the pleasure of living in Dublin.

I do not support the Ikea project due to the increased traffic and environmental concerns. We do not need another discount big box store.

Thank you for listening.

Regards,
Diana DeMeo
Zandol Ct., Dublin CA 94568
Dear Ms. Million,

I am very concerned about the projections in the IKEA EIR. The traffic issues IKEA brings, according to the report, will severely impact vehicular access across our city. The 580-680 Corridor is already a nightmare. This project will, without doubt, negatively impact the lives of local residents. It will also strangle future growth and development, including driving other businesses away. I cannot support a project that will have such a negative impact on the quality of life in Dublin. I hope our City Council has the best interests of Dublin in mind when voting on this project.

Sincerely,

Mindy Destro
Dublin resident
Hi Amy,

We all strive to make Dublin - the city we live in - a better place. Lot has been achieved if past few years.

However, proposed Ikea will not be a right step in this direction.

Over last few years a side affect of growth has been congestion and pollution. With Ikea this is going to grow many fold. It will just get worse for people like me who are very susceptible to pollution & rely on medication.

And 580, the highway we all use to get to work is already congested and Ikea will make it worse.

I will kindly request you to not allow IKEA in Dublin which we all know will not be in line with what majority of residents want to see in their city.

Regards,

Satpal Dhillon
2369 Cantalise Dr
Dublin - CA - 94568
Amy Million

From: Susan Dunnegan <susicaljane@yahoo.com>
Sent: Friday, March 16, 2018 8:46 AM
To: Amy Million
Subject: IKEA

Amy - I completely support the IKEA Dublin project and look forward to shopping there.

Thank you,

Susan Dunnegan
Pleasanton resident

Sent from my iPad
Amy Million

From: Ernesto Eugenio <eeugeniogri@gmail.com>
Sent: Wednesday, March 14, 2018 8:24 AM
To: Amy Million
Subject: IKEA

Amy,

The traffic will be unbearable if IKEA move forward to build in Dublin.

Regards,
Ernesto
As Dublin homeowners and residents, we implore you to reject the proposed IKEA project. The IER on the project speaks clearly to the added congestion and consequent decreased quality of life to the residents of this city. Any projected revenue to the city, as well as the associated low-paying jobs, cannot offset the havoc this project would wreak on our already overburdened infrastructure. An EIR which received a grade F should not be considered for our city.

Dublin deserves better!

Jennifer Farber & John Hanson
I have concerns regarding the proposed IKEA in Dublin, CA.

As many have mentioned, the IKEA will bring in traffic to an already congested area. Dublin Blvd is the only road that goes from East to West Dublin. On this road Dublin is in the process of building 2,000 more homes to add to this congestion. With this comes 2,000 more vehicles with the potential to go up to 4,000 vehicles.

Right now, the 580/680 freeway is a traffic nightmare. With many vehicles exiting off the freeway at either Fallon or San Ramon Valley Blvd to avoid sitting on the freeway. How has the spillage of these cars been calculated into the EIR? There is a new waterpark and government center as well that have been added since IKEA has started the CEQA. How have you calculated these vehicles? Plus Dublin is building thousands more homes on the West side of Dublin. How have these cars been calculated in the CEQA?

I also understand the rating for the traffic is an F. Will then the City Planner recommend that IKEA not be built?

The tax dollars are minimal compared to what IKEA will cause to the environment and quality of life that the residents of Dublin deserve.

I am not alone in my thoughts and opinions on IKEA.

Sincerely,

Tammy Ficarra
I am writing to express my opposition to IKEA in Dublin. Based on the EIR the roads around the proposed IKEA site have been given an F rating. Along with traffic comes the noise, pollution and safety. Given this fact alone the City Council should vote no. If not you are doing the City of Dublin a great disservice.

I am attaching a video of traffic on Dublin Blvd showing traffic congestion on a Friday night. The music that I couldn't take out is from the Hamilton Soundtrack courtesy of my daughter. Enjoy.

Tammy Ficarra

Sent from AOL Mobile Mail

Shared via the AOL App
I am sending you the link to watch the video. I understand that it hasn't been going thru but hopefully this will do the trick. I want this video to be part of my comments for IKEA.

https://www.facebook.com/tammy.ficarra/videos/10207711492717584/

Thanks for your patience.

Tammy Ficarra
Good morning Amy,

After reviewing the Draft Supplemental Environmental Impact Report (EIR) dated January 31, 2018 I strongly oppose the development of the proposed IKEA given it’s significant adverse impact on the traffic in the local area.

I understand the need for economic development but believe that alternative development options are available for the subject site that don’t come at such a high cost for the residents in the area.

Thank you for your consideration and best regards,

Susanne Frey
Resident of Pleasanton, CA
Hello,

We want our Dublin to be a proper residential city with balanced level of shopping. We respect our mom and pop shops and ikea will wash them out, So NO to IKEA.

Cheers,
Vaas
Sent from my iPhone
Ms. Million,

I have some major concerns related to the IKEA EIR.

I do not feel the following concerns have been mitigated:

1) Traffic - As the 580 East to 680 South interchange is far overdue to be improved, an IKEA drawing several thousands of additional cars out of the area) will cause significant additional traffic delays on Dublin streets and nearby freeways. Truck deliveries will have significant impact on traffic, regardless of time of day.

2) Noise - Impact due to truck deliveries and thousands of additional cars on streets and freeways is a major concern on both traffic and noise levels.

3) Air Quality - Significant negative impact on Dublin's carbon footprint.

Thank you,

Michelle Gebel
Dublin Resident
Hi Amy, Respected Mayor Haubert and Council Members,

My name is Jay Gill and I am a resident of Dublin. As we all know, IKEA has expressed interest in developing a new store near Hacienda Blvd. At some point in the relatively near future, you will be asked to make a very important decision regarding approving/disapproving the IKEA project. The scale of this project would cause an adverse impact on traffic. As per the EIR, having an IKEA at this location will bring thousands of residents from neighboring cities (Livermore, San Ramon, Pleasanton, Walnut Creek, etc) and some far flung cities like Tracy/Modesto/Stockton. With the local Dublin roadways and I580 already bursting at the seams, this project has the potential to cripple an already overwhelmed infrastructure. Furthermore, the land purchased by IKEA sits on a very desirable piece of land, easily accessible by bart. This area could benefit from a corporation setting up office at this location, thus benefiting both the city of Dublin and providing employment opportunities to Dublin residents.

I have spoken to several neighbors, friends, family, and an overwhelming majority of Dublin residents oppose IKEA. As leaders of Dublin, I urge you to stop this project and help keep IKEA out of Dublin.

Thanks
Dear Amy and City Leadership,

Let's be real, this proposed store will be an abject nightmare for Dublin residents. Traffic will jam to a halt. It's already very busy around this corridor. We don't need more traffic at Hacienda. The entire Persimmon/Hacienda Crossings Area will oversaturate with idling cars. I've been to Emeryville. It takes a long time to flow thru there. No traffic study in favor of the store will change the reality.

The visual nightmare of IKEA's blue and yellow store will be a total blot on Dublin.

We can't keep chasing city revenue. There is already plenty from all the residential development and other planned redevelopments of downtown Dublin. We don't have a 2nd high school. But we put in an Ikea? Please stop. The priorities and respectability of the city leadership will be severely compromised if this plan is approved to proceed. Don't sell out the residents of Dublin with this certain failure. Let them find another less populated area away from here to build their store.

Sumeet
Amy Million

From: Patrick Graham <pgraham99@gmail.com>
Sent: Thursday, March 15, 2018 6:14 PM
To: Amy Million; City Council
Subject: IKEA

Amy & Council Members,
Please take this email as my feedback on the Dublin IKEA proposal. I'm a Dublin resident and actually enjoy shopping at IKEA. With that said, I go to IKEA maybe once a year and when I need to, Emeryville is a short drive away. I traffic impact from the shopping center will be too much for our small community to bare and could have the adverse impact of driving consumers away from the rest of the businesses in the vicinity as no one enjoys being stuck in traffic.

My hope is that based on the Environmental Impact Report, you will not approve the construction of IKEA.

Regards,
Patrick Graham, Dublin Resident
Hi Amy,

I'm writing you again as I believe another EIR was issued at the end of January. I won't regurgitate the highlights for you as I'm sure you are well aware degradation the Ikea project would bring to Dublin transportation. I will only note that as many roadway and highway segments will degrade to "F" level of service (LOS) and mitigation could potentially raise them to "D" LOS, what would be the mitigation process if the Ikea project creates unforeseen degradation?

I ask using the example of the 580/680 interchange; it has been problematic for quite sometime. However reports indicate that the Alameda County Transportation Authority is just now considering to study possible improvements. Source: https://www.mercurynews.com/2018/02/09/roadshow-changes-coming-to-580-680-interchange-in-dublin/

Would this be the same fate for unforeseen degradation caused by the Ikea project? Has the city considered/studied the following:

- What percentage of residents will be negatively impacted by changes in the federal tax legislation? (Residents may be less inclined to support increased taxes to fix avoidable costly transportation concerns)
- What is the risk of ikea mitigation if a SB1 recall passes/fails? (I truly don't know but would love to be informed)
- Reciprocity (at least perceived): city government officials get additional tax revenue, Ikea gets returns on invested capital and Dublin residents get...? (The answer shouldn't be the opportunity to conveniently purchase Swedish furniture. Residents have been pleading for a second high school, planned downtown, corporate hub, etc. for quite sometime. Will their needs be addressed at any point in the near future.)

The push for Ikea appears to be very short-sided given all the negative outcomes that come with it. It makes one question the "true" motivation/intent of the city leaders who support the project.

Perrin

On Sat, Sep 16, 2017 at 8:04 AM, Perrin Guess <perrin.guess@gmail.com> wrote:

Amy,

As a resident of Dublin I have no formal training in urban planning processes, permitting or planning amendments. However living in the city I believe the roadway infrastructure is insufficient for more extensive commercial use off of I-580. My experiences may be subjective but I'm sure if I ask any Dublin resident they will have express similar experiences.

I have read Ikea's claims that their stores are empty during the day and high traffic only occurs on the weekend. Even if that is the case it is still undesirable. 580 (Hopyard to Fallon) is consistently congested at the moment during midday and afternoons on the weekend. I have also read IKEA's claims that distribution will occur during off peak hours. It's hard for me to believe that with certainty given the fact that I have personally seen other commercial retail stores (Target and Lowes) off of 580 receive distribution during peak hours.
From an aesthetic point of view, Ikea stores' physical appearance is the epitome of visual pollution. Not saying this is a risk but what if Ikea went out of business. Dublin would be left with a big blue empty warehouse for sometime. The physical building would not be easily repurposed.

Lastly, do you have any detail as to what percentage of commercial planning request the city of Dublin has said "No" to in the past 5 years? From the looks of the rapid construction, not much I would guess.

In summary I am against the Ikea for the obvious reasons. Its big, ugly and unnecessary. Additionally as a resident it does feel like other planning interest, i.e. 2nd high school, within the city are going by the wayside and commercial interest are fast tracked.

Perrin
I am very very concerned about the IKEA big box development due to the significant adverse impact it will have on the traffic in Dublin.

The environmental impact study reinforces the adverse impact that all my friends and neighbors have feared. This study should be the basis for summarily disapproving the proposed IKEA Development in Dublin.

Regards,
Roger
Dublin Resident
Please register a NO on building this monstrosity in the city I live in and love since 2007.
We don’t need the traffic and the megastore occupying such a key piece of real estate. NO !!!
Thanks
Akansha Gupta
Dublin Resident since 2007
I am very concerned about increased traffic and gridlock, poor aesthetics, and negative impact on Dublin’s image with the IKEA Project.

My friends and neighbors have expressed the same sentiments. Please reject this project completely.

Thanks,
Rajesh G
Dublin Resident
Dear Ms. Million:

We are writing to let you know that we strongly oppose the construction of an Ikea store in Dublin. We oppose it for a few reasons amongst which is the report that came as a result of the EIR study detailing the severe traffic impact an Ikea store will have on the streets of Dublin, Pleasanton and on I-580.

We hope you listen to the people of Dublin and recommend not to go ahead with the proposed plan of building an Ikea store in Dublin.

Sincerely,
Roger & Nancy Haddad
4306 Jordan Ranch Dr., Dublin, CA 94568.
Dear Ms. Million:

We are writing to let you know that we strongly oppose the construction of an Ikea store in Dublin. We oppose it for a few reasons amongst which is the report that came as a result of the EIR study detailing the severe traffic impact an Ikea store will have on the streets of Dublin, Pleasanton and on I-580.

We hope you listen to the people of Dublin and recommend not to go ahead with the proposed plan of building an Ikea store in Dublin.

Sincerely,
Roger & Nancy Haddad
4306 Jordan Ranch Dr., Dublin, CA 94568
Dear Ms. Million,

Please reconsider plans to put IKEA in the middle of Dublin. It will be an eyesore and will surely make out traffic problem worse. It is not an appropriate type of store to build so close to BART.

Thank you,
Patty Hansen
13 year Dublin resident.

Sent from my iPhone
Hi Amy,

As others have noted, the traffic projections as a result of adding an IKEA are very disturbing. We already have significant traffic on 580 (despite 6 lanes!) as a result of standard commuting, the 680 bottleneck, the existing malls/stores in Dublin, Livermore and Pleasanton, the growing population, and the weekenders headed to Tahoe/Yosemite. It would be shortsighted to add such a large retail draw benefiting everyone except the residents that have to live around the project when Dublin already has allowed for significant development.

And for what purpose? Residents are not clamoring for the land in question to be developed. Dublin has a significant commercial tax revenue base already.

Please stop this project.

Regards
Sunil Hariani
Resident
To those in Govt. At the City of Dublin;

I am sending this email to let the City of Dublin know I am 100 percent against having IKEA "in our All American Backyard". Come to think of it, the only backyards in this town are on the West side.
The reason I am opposed is because of the horrendous traffic that will impact our entire City. Dublin Blvd is already a nightmare with locals and passers coming through to catch BART not to mention commuters to the Central Valley taking any and all shortcuts they can and I might add, at any cost and speed.
Please, Please, do not allow this. I will leave you with this.... I am 5th generation Dublin, Ca. My ancestors crossed the Sierra's in a covered wagon and are buried in the Pioneer Cemetary. I lived on the grandparents cattle ranch as a child and loved it. I moved back in 1999. Worked for the City in Parks and Rec at the Dublin Heritage Center and Museums 2005-2013 as a Senior Facility and the pride and joy I had working there was once in a life time.
I know this doesn't matter much to any of you, but it matters to me and my family and so many many others who have called Dublin home and do so today. I'll leave this right here.
Do the right thing Dublin.... NO IKEA

Thank you for your time as I sit here at my work at Bankhead Theater backstage waiting for the Irish group to perform

Pam Harvey
Hansen/Martín Great granddaughter
Artist Hospitality Coordinator at the Bankhead Theater 3/16/18

Sent from Gmail Mobile
Hello,

Reasons to be a Dublin resident are quickly disappearing. I moved to Dublin to live close to my parents almost 20 years ago and have found this to be a great place to live, convenient to everything important to my life in the Bay Area. A couple of years ago, I attended a neighborhood watch meeting at Shannon Community Center and many concerned citizens asked about Dublin's growth. A speaker said at that time, all housing projects that would be built in Dublin have already been approved and we would not see anything new in the future. Really?? We see new projects up for approval regularly.

IKEA? We are truly destroying all reasons to move to and to live in Dublin. I live in West Dublin, myself and the neighbors who I’ve spoken to all feel IKEA in Dublin is a big negative and the environmental impact report proves it.

PLEASE vote against IKEA in Dublin! If it were Costco, it would serve our community, IKEA, not here to serve our community! PLEASE VOTE AGAINST IKEA!

h.
Sent from my iPhone
Amy Million, Principal Planner  
City of Dublin Community Development

Amy,

As a family that chose to make Dublin our home back in 2003, we were excited for the city that Dublin seemed it was going to become. As time has gone by, we still believe Dublin has a chance to be a great city. IKEA will be the deciding factor. Therefore, I strongly encourage you to NOT approve IKEA development.

IKEA will display to the world that Dublin values:

- materialism over healthy lifestyles.
- traffic and pollution in exchange for (minimal) tax revenue, and
- people that don't live in Dublin rather than their own residents.

Traffic alone is a reason that IKEA should not move forward. We shop on the East side of town today and are frustrated every time we get on 580 because of the traffic. And yet Dublin Blvd provides no relief from 580 traffic. With IKEA traffic will be a NIGHTMARE and we will then take our shopping to Pleasanton, San Ramon or even Danville.

Another piece that Dublin needs to consider in general is the effect nature has on people. Study after study after study shows that being in and around nature (real nature, not developed parks) provides people with healthier, less stressful lifestyles. And it shows in cities scoring well in best places to live. Seeing Dublin as likely becoming the best place to live years ago is why we invested here. I'd like to see Dublin recognize the value of open spaces, trees with a balanced tax income is where I want to live. Seeing an IKEA come in, coupled with the overcrowding schools will be enough for us to move and get out.

I trust that you and our City officials will make the right, informed decision.

Thank you,
Gretchen Hellmann
To Amy Million:

I am beyond concerned regarding the extra traffic IKEA will bring to Dublin. We already are at gridlock on a regular basis on 580 and I understand there may be up to 10,000 more cars over the weekends. This is incomprehensible to me and it can't possibly be a positive impact for anyone other than IKEA.

I believe the sheer amount of traffic brought upon by IKEA will cause such a major impact to our city that not only will people choose to move from the city but traffic will affect the local businesses in a negative way.

Already my brother's family refuses to visit us in Dublin most days and times due to the existing traffic. They live in Alameda. We have to choose to fight the traffic to visit them instead. This is a major existing issue already, and adding a MAJOR IKEA complex to the area can only be a detriment to our quality of life in Dublin.

It seems logical and probable that people will steer clear of this area to shop due to the extreme traffic in Dublin. This affects other local businesses. People will avoid coming to Dublin because they will want to avoid the gridlock on the local roads. In addition, I don't think it is a draw for new people to move to the area.

I am a teacher in the community and I know of at least 5 different families that have moved away the last three years because of ONE reason: Traffic gridlock. I have had the conversation with a few people who care greatly about this community and we have shared that there is a time when we will also take this step. We will move if the traffic causes our quality of life to become less than acceptable. I believe that point will come if IKEA brings the traffic that is expected.

I don't know how you can circumvent the traffic. I don't think there is a magic wand you can use. But I do know, if you go ahead with this plan it will ruin our city and affect surrounding towns as well.

We only have one chance to get this decision right. Don't ruin our city.

A very concerned citizen,
Jennet Herdman
Dear Ms. Million

I believe that certain factors discussed in the EIR prove that the proposed IKEA would have severe negative impacts on the City of Dublin. These impacts cannot be mitigated.

The EIR discusses significant and unavoidable traffic impacts on local roads and freeways that cannot feasibly be mitigated in some cases.

The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays but that is also a busy shopping day. The report projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA would be open from 10:00am to 9:00pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1616 trips per hour, on average. This means there will be 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the weekends.

The EIR states that many of the patrons of the proposed IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin traffic and inconvenience Dublin residents. The proposed IKEA would be on one long block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. These streets are also used by cars going to BART and the water slide (when it is open). Dublin Blvd. will also have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system i.e. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the proposed IKEA. The reports identifies segments that would have Level of Service (LOS) F ratings indicating “extreme traffic delays”. Many of the most commonly used segments of the Dublin road system are near the proposed IKEA and would have LOS category E and F ratings, if an IKEA is built (3.6-101 and 3.6-102). The freeways would also be affected. Fifteen of nineteen segments of eastbound I-580 would be rated LOS F and several others LOS E at peak-hours (3.6-152 and 3.6-153).

The proposed IKEA would also cause parking nightmares. IKEA is planning 1,026 parking spaces for the store and 568 spaces for the retail/restaurant shops, for a total of 1,594 spaces (2-12). An average of 1,616 cars per hour will be trying to enter and leave IKEA’s parking spaces. Information provided on Google for the Emeryville store (which the EIR uses as a model for the Dublin location) indicates that customers typically spend 45 minutes to two hours in the store. If they visit the others shops and restaurants, their stays will be longer. The parking lot will soon be completely filled. By peak-hours there will be 1,000 cars an hour trying to enter the already full parking facilities. This will surely cause traffic gridlock. Since most of the potential customers will have come a long distance to shop at IKEA, they are not likely to give up. They will try to find a place to park in the already overcrowded Persimmon Place. Some will park at Hacienda Crossings and slow traffic on Hacienda as they used the crosswalks. Others will try to use the BART lot. I do not believe that a public facility should subsidize parking for IKEA.
The EIR states that the project should “Improve the overall visual appearance of the area ...”. The IKEA would be a huge blue and yellow eyesore that does not fit in with other buildings in the community. The building is not even compatible with the additional shops and restaurants proposed. The IKEA structure certainly would not improve the appearance of the area which is a gateway to the city.

These severe negative impacts cannot be mitigated and make the proposed IKEA inappropriate for Dublin.

Thank you for your consideration of my concerns.
John Heyer

Sent from my iPad
My husband and I are Dublin residents. We DO NOT want IKEA in Dublin. It was defeated previously and you brought it back again. Traffic is already unbearable and this will make it worse. Please stand up for the quality of life in Dublin and do not allow it to be built in our wonderful city. You can find another business that will add much more to the community.

Thank you,

Wendy Jemo
Hello,

My wife and I live in East Dublin and after reviewing this study we do not believe the IKEA project is appropriate for anywhere in Dublin. The proposed IKEA would cause severe traffic problems on Dublin Blvd., our only cross town street and on the surrounding freeways. It would also be aesthetically very displeasing. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings.

This project is not appropriate for "The New American Backyard".

Regards,

Jim R and Elena G.
Please stop the over development of Dublin by stopping the Ikea. It causes traffic jams in our streets and it is not a vendor we need out here! Thank you. Teresa Johnson
Amy Million

From: Gerry Judd <gajudd@comcast.net>
Sent: Sunday, March 11, 2018 9:24 PM
To: Amy Million
Subject: IKEA in Dublin

Ms. Million,

I say no to an Ikea store in Dublin. I feel that a massive store like this will only create a large amount of traffic and security problems for all of us living in Dublin. Please do not allow this to happen.
Thank you from a long time Dublin/Tri Valley home owner.

Regards,

Gerry Judd
925-953-4309
We do not need more traffic. We do not want IKEA.

Nina Kamatani

Sent from my iPhone
Amy Million

From: Kamlesh Kamdar <kamlesh.kamdar@gmail.com>
Sent: Sunday, February 18, 2018 1:26 PM
To: Amy Million
Subject: IKEA

Dear Amy,
I strongly oppose IKEA in Dublin. There is already heavy traffic on Dublin Blvd, 580 as well as 680.
Most of the time it takes over 20 minutes for 2-3 miles. This also pollutes environment.

I and 3 other citizen of Dublin/USA want your support to reject the proposal.
Kind Regard

Kamlesh Kamdar
kamlesh.kamdar@gmail.com
Cell: 925-324-2742
Hi Amy,

I used to think Dublin is a perfect city for my two kids to grow up. Not any more now, overcrowd housing has caused the traffic and not enough resource from school system. The 2nd high school has not even start to build yet.

Could you even image how bad the traffic will be after IKEA has moved in to Dublin? I think it is about time to move out of Dublin if this City sucks at planing and careless about its resident.

Best Regards,
Alex Kao
Hello
I have been a resident and home owner in the city of Dublin for the past 15 years.
Over these years the quality of life in our city has declined due to over crowding and building of more and more homes.
The last thing this city needs is a business like IKEA which will bring thousands of out of town shoppers/vehicles into this city.
I am strongly opposed to having IKEA in Dublin and am hopeful that our city government officials take this opposition into consideration.
Thank you
Sepi Katz

Sent from my iPhone
I like IKEA, but only shop their once or twice a year. I'm happy to go to the existing Bay Area stores, I don't need one a mile and half from my house. But what I don't need even more is the horrible traffic or degraded air quality that will come from building an IKEA in Dublin as documented in the EIR. In an area choking on it's own traffic, in which Dublin has built an unprecedented number of residences and retail spaces in the last ten years ignoring the impact to neighboring communities or the environment, would this project even by considered? It boggles the mind.

Please do not approve the building of this unnecessary, area damaging, unsightly monster of a development.

Thank you,
Stefani Katz
Greg Steele
Sam Steele
(925)699-5902

Sent from my iPhone
Please consider not to build an IKEA in Dublin. This may have negative impact to real estate price.

I believe the proposed IKEA would cause severe traffic problems on Dublin Blvd., our only cross town street and on the surrounding freeways. It would also be a horrible blue and yellow eyesore. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings. This project is not appropriate for Dublin.

Thanks,
Pearl
Dear City of Dublin Planner and elected city officials:

As a resident of Dublin, CA I would like to share my concern about allowing IKEA store to come up at the corner of Hacienda and 580. I live in Dublin and drive to Redwood city on weekdays for work and on weekends I drive to Fremont and beyond. Traffic around 580-680 junction is already terrifying. There are so many accidents over the last few months and traffic jams are normal than rare. For me to just join 580 West and move to left lane from Hacienda ramp takes 5-8 mins. Taking 680 south from 580 west is another huge challenge owing to traffic. EPA report was alarming as well.

It would be lack of civic duty and responsibility on the part of the city planner and officials if the project is allowed to proceed.

I am not against IKEA. They can locate their store any other place than the planned junction of 580 and Hacienda.

I hope common sense prevails and the project is scrapped.

from a concerned Dublin resident and homeowner
Vaidy Krishnamurthy
I am against IKEA coming in Dublin, CA.

P.K.
Dear Mayor Haubert, City Council and Amy,

Thank you for making public the EIR for the IKEA project. Based on that report, we are against the proposed IKEA retail center.

We would like to see more corporate partners in Dublin and are wondering why SAP left Dublin. We are also wondering why it is taking so long to find a replacement company to take that building. It seems to be in a prime location, able to take advantage of BART. Why is it still empty?

We hear citizens asking for corporate/business parks but are wondering if we can not even find a business or businesses to take the old SAP building, how can Dublin attract more businesses?

Please say NO to Ikea Retail Center.

Sincerely,

William and Catherine Kuo
Hi Amy,
Thank you for taking public comments into consideration on this crucial development in Dublin.

After carefully considering the EIR, we ask that you turn down any ikea project that includes any warehouse or significant inventory storage.

It is clear Ikea would bring an almost devastating increase in traffic to Dublin city streets, exacerbating what is already a longer intra-city commute.

We would like to see more retail to match Persimmon Place, or corporate business such as One Park Place and Zeiss.

If Ikea can come back with a small, showroom only design, to match the scale of Persimmon Place, that would be worthy of the City of Dublin.

Thank you,

William & Catherine Kuo
From: Eric Lam <eric.l.lam@gmail.com>
Sent: Wednesday, March 14, 2018 1:58 PM
To: Amy Million
Subject: I live in Dublin Ranch and do NOT want the IKEA

It cheapens the neighborhood and creates way too many issues around traffic, congestion.

We already have too many houses being built and the neighborhood is way overcrowded.

Eric Lam
Amy Million,

I have been a resident of our beautiful valley since 1973, and have witnessed too much "out of control" growth. An IKEA monstrosity so close to the 580/680 exchange is irresponsible, and will create a traffic nuisance to the people who have to travel these freeways. This will cause residents like I am, to avoid Dublin like the plague, and create resentment when we have to use this interchange. Please do not let this happen!

Thank you,
Linda Leonard
Danville, CA.

Sent from my iPhone
Well we have see the EIR and it’s horrible. Please listen the your constituents and please listen to the EIR. IKEA in that location will mean a huge downgrade to the quality of life for Dublin Residents. We can do better than this. Traffic is already challenging and adding an IKEA will make living here in this area, an utter nightmare. I have not heard one positive about putting IKEA in that location. And the majority of constituents do not want it there.

Thank you,
Cheryl LeValley
4978 Houlton Ct
Dublin, CA
Dear Sirs,

I strongly oppose the new IKEA in Dublin! We not need it in our city. People can go shop in emeryville if they want cheap furniture. We don’t need more traffic from Central Valley.

I have lived in Dublin since 9/03 and have seen the insane growth and overcrowding the city has taken. The schools are extremely overcrowded as are roads, BART. I have taken Bart to SF and every year it gets worse. Entire 7floors or parking garage is full by 7:20am.

City has to STOP approving more homes as developers are ripping us off and Robbing our children of quality education. What sense is it to build tons of small townhomes that just add more kids to school, traffic. It takes 45mins to drive from Dublin ranch to Dublin high in the am.

Please don’t drive us out of our city and homes. I want commercial and retail not more homes or cheap retail.

Been very disappointed w/ the reckless housing growth the city has approved. I was hoping it would be a new Irvine which it clearly has not.

Best regards,

James Lin
2826 Southwind lane
Dublin CA 94568
650 440-1400

Sent from my iPhone
Dear Ms Million & Dublin City Council,

I'm a concerned citizen of Dublin and I'd like you to consider this e-mail as feedback that I do NOT think putting IKEA in Dublin is a good idea. We do not have adequate infrastructure in our roads to be able to handle the traffic IKEA would bring. Our traffic to get from one side of town to the other during non-rush hour times is getting longer and longer and even worse during rush hour. We do not need any more traffic. If the traffic gets worse my family and I and many others in Dublin will go to Pleasanton or San Ramon and spend our money on stores and restaurants in those areas. We’d do this just to avoid the traffic Dublin and I’ve heard many other residents say the same thing.

I also saw that the EIR report came in with a grade F due to traffic concerns in the area. Please say NO to IKEA in Dublin.

Sincerely,
Gina Lindauer (Dublin Resident)
Amy Million

From: W Liu <l_wf@hotmail.com>
Sent: Friday, March 16, 2018 1:56 PM
To: Amy Million; City Council
Subject: Fw: TOMORROW-Comments due to IKEA project manager City of Dublin by 3/16/18!

Hello Dear Mrs Million, City Council members,

This email is to express my concerns of having IKEA at Dublin. From the IKEA environmental impact report (EIR), significant impacts to air quality, biological resources, greenhouse gases, noise and traffic have been identified. I have the first hand experience on the traffic, as I drive from I 580 to I 680 each day. Traffic jam has become a normality from I 580 ramping up to I 680. I also have witnessed so many traffic accidents, sometimes involving big rigs, at the intersection between I 580 and I 680. With IKEA at that place, this will only make the traffic much worse.

A poll at the nextdoor community found that most Dublin residents are against having IKEA at the city. There are also some supporters as well, however, if you pay closer attention, you will find most of the supporters are from neighboring cities, such as San Ramon (Windermere) and Pleasanton, not from Dublin. I hope that the city mayor and council members can make a wise decision rejecting the application from IKEA, responsible for the call of Dublin residents, not from outsiders.

Thank you for your consideration.

Weifeng Liu
Dublin resident

From: Tom Cignarella via Change.org <change@mail.change.org>
Sent: Thursday, March 15, 2018 9:08 PM
To: l_wf@hotmail.com
Subject: TOMORROW-Comments due to IKEA project manager City of Dublin by 3/16/18!
Tom Cignarella shared an update on *Dublin City Council : Say no to IKEA in Dublin California* Check it out and leave a comment:

**PETITION UPDATE**

**TOMORROW-Comments due to IKEA project manager City of Dublin by 3/16/18 !**

PLEASE take a minute to send an email of concern amy.million@dublin.ca.gov council@dublin.ca.gov From the IKEA Environmental Impact Report (EIR) - Significant Impacts to Air Quality, Biological Resources, Greenhouse Gases, Noise, and Transportation/Traffic. See pages of 26, 28, 36, 46, and 54 respectively of the EIR. The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on...

Read full update

You signed Tom Cignarella's petition, "*Dublin City Council : Say no to IKEA in Dublin California*", on Mar 18, 2016

The person (or organization) who started this petition is not affiliated with Change.org. Change.org did not create this petition and is not responsible for the petition content. Click here to stop receiving updates about this petition.

Unsubscribe · Manage your email preferences · Privacy policy
This email was sent by Change.org to l_wf@hotmail.com, because you registered as a Change.org user on 11/10/2014. We'd love to hear from you! Send us feedback or contact us through our help center.

Change.org · 548 Market St #29993, San Francisco, CA 94104-5401, USA
Enough traffic. Enough congestion in our city and overcrowding. Enough building in Dublin without considering how it impacts the traffic congestion and the environment. No to IKEA in Dublin.

Sent from my iPhone
Dear Amy,

As a citizen of Jordan Ranch community in Dublin I would like the city to not go ahead with the proposal.

Thank you.
Please note that this project is injurious to this area on the basis that
A) it will cause large logjams in car traffic along the 580 corridor in the Dublin area. The EIR projects thousands of car trips
B) this will increase amount of air pollution in this area. This area already has one of the worst air quality levels in the Bay Area
C) this area really doesn't need it. This is an attractive area but is being ruined by over development. I along with others in the area like it here but are thinking of leaving due to over development, traffic congestion and pollution issues

Ravinder Mangat
Resident for 9 years
11601 Alegre Drive
Dublin
CA 94568

Sent from my iPhone
From: Lianne Marshall <marshall.lianne@gmail.com>  
Sent: Saturday, February 24, 2018 10:30 AM  
To: Amy Million  
Subject: Fwd: IKEA  

Sent from my iPad  

Begin forwarded message:  

From: Lianne Marshall <marshall.lianne@gmail.com>  
Date: February 24, 2018 at 9:36:16 AM PST  
To: council@dublin.ca.gov  
Cc: amy.million@dublinca.gov  
Subject: IKEA  

Dear Mayor/Council Members  

I am writing to request that you reject the IKEA project.  

The EIR traffic assessment shows that there would be significant traffic impacts on our local roads and freeways that cannot be mitigated. Nearly 10,000 trips on weekdays and nearly 18,000 trips on weekends will cripple highway exits and key intersections and roads in town, including Dublin Blvd., the City’s only cross-town street. Most of these trips will be drawn from Stockton, Modesto, Manteca, Tracy and other cities, not local residents. It will cause critical intersections to degrade to “F”. Anyone who has to travel on Dublin Blvd. during peak hours knows that it can’t handle this much more traffic. And, this is before the 2000 homes at Dublin Crossings add thousands more cars to the roads.  

I attended the meeting regarding to the project’s design and aesthetics. While the smattering of small shops and restaurants are attractively designed using neutral colors and materials, IKEA’s insistence on the hideous blue and yellow color scheme creates an enormous eyesore that does not fit in with anything around it, and it does not conform with the Eastern Dublin Specific Plan, which calls for attractive buildings that create a coherent and harmonious environment.  

IKEA does not primarily serve the local community. It will have tremendous negative impacts on our roads, and create visual blight that will permanently damage the image of Dublin. The community rejected IKEA once before, and knowing that, it is very disappointing that this Council allowed the EIR to move forward. It is time for the Council to listen to the people it was elected to represent and stop the IKEA project.  

Sent from my iPad
I am a registered concerned citizen that has lived in Dublin for over fourteen years. Over these years, I have seen many positive growths and some negatives ones as well. I am writing to voice my concern about the Ikea project.

I see many negative effects with a potential Ikea project.

- This is a prime location that could be used for other mix projects that would appealing to Dublin and as a matter of fact draw other businesses/campuses to come to Dublin.
- The infrastructure that is laid out currently cannot handle the volume of traffic that will be generated by Ikea. Even with any modification and additional over 7000 homes being built nearby, traffic will be nightmare. Currently Dublin Blvd is a mess already. It has taken double amount of time just to get to Bart Station in the morning from last five years.
- Ikea draws mostly customers from outside vicinity and do not contribute to local businesses. Most of the customers will drive to Ikea and leave after picking up their purchases.
- Other mix projects could generate same amount of tax revenue to the city but with less impact to the local residents.
- EIR report indicates this is not a good fit for Ikea and air quality would be compromised. I urge everyone that will be involved in the decision making to seriously consider recommendation listed on EIR report.

These are just some of my concerns but I am pretty sure you have heard from many concerned residents with their oppositions to Ikea. While I accept the fact that any business that opens in that location will draw additional traffic but City or its elected officials can determine to what extent it will have an impact on the local traffic and, it is their fiduciary duty to look after its resident’s best interest.

Thank you.

Kiran M.

Concerned Resident
Mayor Haubert, Council Members Goel, Gupta, Hernandez:

The sales tax revenues realized from IKEA will not mitigate the damage done to Dublin if the project is approved.

The Environmental Impact Report (EIR) identifies in staggering detail the significant impacts IKEA will have to air quality, biological resources, greenhouse gases, noise, and transportation.

The cost to our community is too great a price to pay given the significant, permanent environmental impacts we will incur if the project is approved.

Council should reject the project now without further consideration on the basis of the EIR.

Marlene Massetti
Dear City of Dublin Representatives,

The many “F” traffic ratings in the IKEA EIR should be sufficient information to reject the proposed IKEA project in Dublin. There are no reasonable traffic mitigation strategies that are likely to be effective near term or long term. Moreover, as Dublin’s (and California’s) population grows, traffic will only get worse, not only within the city, but also along the already horrible 580/680 corridor, and this issue has not been addressed. The City of Dublin will be a prime contributor to abysmal traffic conditions along 580/680 if it allows IKEA to build on a BART accessible transit site.

I am resending the note I sent to you March 28, 2016 outlining additional problems with locating IKEA at the proposed site in Dublin.

MARCH 2016 Letter:

I am writing to express my concerns regarding the proposal to locate an IKEA store on the property opposite Persimmon Place along Martinelli Way. My concerns are as follows:

1. **Sub-optimal use of a public transit (BART) accessible site:** This property is situated within walking distance of BART, and locating an IKEA at this site will limit the potential for using the site for business uses that could better benefit from the proximity to public transit. It is highly unlikely that the majority of IKEA customers will be taking BART to shop for large, heavy IKEA furniture that would be unwieldy to carry back to BART, and then onto BART.

2. **Sub-optimal economic development for the city of Dublin:** The city must begin to consider revenue sources other than housing and retail for its long-term economic development, and the site of the proposed IKEA could be fundamental to achieving this goal.

Key points for using the proposed IKEA site to expand and diversify the economic base for Dublin that extends beyond retail and housing are as follows:

a. Although Dublin has many big box retail stores, it could diversify its economic base further by creating economic incentives for technology and biotech companies to open corporate offices/campuses in Dublin. This site, with its proximity to BART, is ideally located for employees that may reside in cities located to the south and west of Dublin. For residents of Dublin that are
currently commuting 1.5+ hours per day one way to the South Bay, to the Peninsula or San Francisco, having technology and biotech companies located in Dublin would eliminate the horrendous commute for many, and improve their quality of life. Dublin residents would also be spending their lunch money here in Dublin, rather than spending it in cities located elsewhere.

b. Company lunches, dinners and catered events could keep meal dollars in Dublin, thereby bringing additional revenue to the city.

c. Reverse commuters may choose to do their shopping and errands in Dublin during their lunch break or after work since so many retail shops are already conveniently located in Dublin, again, another opportunity to expand revenues.

d. Corporate offices could be located adjacent to retail and other business, creating a good flow of foot traffic between retail and corporate offices.

3. **Sub-optimal city identity**: Dublin is currently known as a city without a downtown and has a reputation for poor city planning. A common refrain from residents and planning professionals in the Bay Area with knowledge of Dublin’s city planning process is “whatever you do don’t do what Dublin has done”. The implied message behind this comment is that there is no cohesive planning strategy, and the end result of the planning process is almost always less than desirable. Dublin residents are growing weary of this process. We do not want the city of Dublin to be synonymous with IKEA.

4. **Negative publicity and potential reduction of property values**: Placing an IKEA store in such a prominent location along the freeway, better suited to other transit oriented uses, would only serve to solidify the poor city identity of Dublin. Dublin has already been publicly criticized throughout the Bay Area for its over crowded school system and the construction of a controversial water park during a drought. Placing an IKEA store at this transit accessible site is not aligned with current needs to address traffic congestion problems throughout the Bay Area, it could exacerbate traffic problems in Dublin, not to mention along the already very crowded 580 corridor.

Mayor Haubert and City Council Members, I strongly encourage you to begin listening to your constituents, and reconsider any thoughts you may have of allowing IKEA to move forward with their proposal to build an IKEA store opposite Martinelli Way.

The citizens of Dublin would like an attractive, pedestrian friendly, pedestrian scale, downtown to give their city a sense of identity they can relate to; the majority do not want IKEA to become synonymous with the city of Dublin.

Sincerely,
Amy Million

From: rowenamusic@gmail.com on behalf of Rowena Morgan <rowena@musictogether.net>
Sent: Sunday, March 11, 2018 9:16 PM
To: Amy Million
Cc: City Council
Subject: Re Public comments on planned IKEA

Hi, I am an 18 yr resident of Dublin currently living in Dublin Ranch since December 2000.

I do NOT want the huge yellow and blue eyesore store front of IKEA in my face every day as I drive around Dublin and on the 580.

I do not want the smog of delivery trucks - our summer heat traps the smog - you can see a brown strip over the 580 already every summer - the heat is only going to get worse in coming years and IKEA traffic of all sorts will add an additional amount of pollution.

Dublin is already regarded by residents of nearby cities as an example or what NOT to do in city planning. Please give our city one last chance to redeem itself for its residents and do not allow IKEA here.

Sincerely,

Rowena Morgan
Amy Million

From: Kazuko Morimoto <kmori21@aol.com>
Sent: Tuesday, March 13, 2018 9:39 PM
To: Amy Million

Amy,

My husband and I are clearly against IKEA coming to Dublin, especially that traffic congestion would be so much worse around here because of shoppers would come to IKEA from all over the east bay and beyond.

Thank you.

Kazuko (& Masahiro) Morimoto
5382 Eaglebrook Terrace
Dublin, CA 94568
Hi Amy,

I want to send in my feedback and comment before the deadline and let you know that as a Dublin resident and homeowner, I strongly oppose IKEA coming to Dublin.

Dublin is already congested enough and adding such a large store will potentially bring in hundreds of additional vehicles which the environment can ill afford.

Please do everything you can to prevent such a move.

Thanks
Gargi Mukherjee
Hi Amy,

I want to provide my feedback related to the IKEA supplemental EIR.

This assessment scares me a lot

"The project has the potential to generate approximately 140,000 VMT on an average daily basis, accounting for longer trip lengths and greater levels of trip generation on weekends compared with weekdays, and accounting for patrons, employees, and deliveries. However, as noted in the Technical Advisory, "lead agencies should analyze the effects of a retail project by assessing the change in total VMT because retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns"."

To add to it, the following table 6-6 states the city population is 50k whereas the city data discussed in the city council meeting states it is 57k. With 7k difference a year ago the vehicles count will be more that what is state there.

I would like to get that correct and provide a accurate picture of the vehicle traffic.

The traffic impact without a report is easier to see in the weekends now where the roads are grid locked between 84 and 580/680 junction.

Thanks
Jega
Ms Million:

My family is extremely concerned about siting an IKEA in Dublin. Over the last seven years that we’ve lived in town, we’ve become increasingly alarmed by the unchecked growth - both commercial and residential - we’ve witnessed. Worse traffic, noise pollution and wear n’ tear on our town are making us rethink whether we want to raise our family here. Please put a stop to this trend, and don’t allow an IKEA in Dublin. Making Dublin a destination to buy low-priced furniture is not consistent with keeping Dublin an attractive place to live.

Thank you,

Hilary Nindorf
Sirs,

This IKEA project will severely affect the quality of living in Dublin and impact usage of the 580 and 680 corridors.

We would request that this project suffer significant changes to reduce its impact on Dublin residents and the Freeway users, whilst we understand that many of these cannot be mitigated to a satisfactory level. Should this be the case, the project should be rejected.

From the Draft EIR we have,

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system—highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli, Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" (1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).

I believe the proposed IKEA would cause severe traffic problems.

Thank you,

Chris Page
From: Katie Palomares <jonical@comcast.net>
Sent: Friday, March 16, 2018 10:59 AM
To: Amy Million
Subject: IKEA

Hello Ms Million
I am a Dublin resident. While I enjoy shopping at IKEA, I am extremely concerned about the predicted environmental impact an IKEA store built in Dublin would bring. Traffic issues already impacts quality of life in Dublin. I can not imagine how our streets and freeways would safely accommodate the increased traffic.
I urge you to say NO to IKEA in Dublin
Kathleen Palomares

Sent from Katie's iPhone
Dear Ms Million

IKEA will severely impact our daily life, with all the traffic we already have plus the thousands of new homes coming up the traffic will be a nightmare, absolutely, there is no room in our city for this company

Sincerely
Carmen Pappas

Sent from Yahoo Mail on Android
Amy Million

From: par ash <paralkar_ash@hotmail.com>
Sent: Wednesday, March 14, 2018 6:37 PM
To: Amy Million
Subject: IKEA EIR impact concerns

Amy,
I live off Hacienda and summer glen drive in Dublin and I am concerned with the EIR impacts on air quality, noise, traffic congestion and biological impacts cited in the report.

I am alarmed at the consequences to the quality of life impacted by IKEA coming into city, and the direct consequences for someone who resides on Hacienda boulevard.

I strongly behoove the city staff from allowing IKEA project being approved in the city of Dublin.

Thanx
- Ashish Paralkar
Resident of Dublin.
Hello Amy Million,

I am a resident of Dublin, CA and am very concerned about an IKEA coming to our city. The streets are already busy as it is and with an IKEA bringing more cars onto our city streets would cause a headache of traffic, which will mean more accidents. Our city has a sweet suburban vibe and with the traffic the retail store would bring in, it will change the whole dynamic of the city.

My other concern is with not a ton of IKEA's, this store would bring in a lot of outer city visitors meaning probably a lot more crime. The demographic of the outer cities this store would attract makes me nervous about the overall safety within the streets local to the shop and our home.

Please take the concerns and worries of the Dublin residents into deep consideration, we truly appreciate it.
Amy Million

From: Ivan Pysarevskyy <ivan.pysarevskyy@gmail.com>
Sent: Thursday, March 15, 2018 4:27 PM
To: Amy Million
Subject: IKEA in Dublin?

Amy - the negative impact of having IKEA in Dublin outweigh any benefits.

Any intellectually honest person would see it.
Are you one of them?

:)  

Cheers!
Ivan
Hi Amy,

I want to send in my feedback and comment before the deadline and let you know that as a Dublin resident and homeowner, I strongly oppose IKEA coming to Dublin because of a long list of environmental concerns including traffic and congestion.

Thanks.

Ramya Ramakrishnan
Hi,

My wife and I have been living in Dublin for many years now and we want to let you know that we do not want Ikea to come to Dublin. The cons far outweigh the pros (are there any?). That kind of store just does not fit in with what Dublin represents. The people who actually live in Dublin will not shop there, because we are largely upper middle class families, not millennials fresh out of college.

Please say "no" to Ikea!

-Brian Roudabush
Burnham Way, Dublin.
Hi,

I have read a lot about this and live very close to this proposed site. I drive past it at least 4 times a day. I'm always able to make the traffic lights. Even if I can see people complaining about the traffic, it isn't that bad. The IKEA store hours and the traffic impact will probably be much less than ANY other alternative?

1. Fast food restaurants with drive thru options. This will generate traffic during commute hours and evenings. Look at the Pleasanton In-N-Out and Chick-Fil-A area. The number of cars in line and on the streets are bad.
2. Food like Safeway, Target etc. Even if I don't see them there, this option will generate more traffic per Hour as they only stay a short time at the store.
3. More houses? This will generate traffic at the peak Hours.
4. Office buildings. Office buildings will probably only be needed if the SAP building will be transformed to apartments and condos. The biggest impact by far will then be the new traffic from SAP.

So my conclusion is that there are NO other good alternatives for this land. Unless it should be open as today, IKEA is the best option.

1. We should get some extra taxes to the city.
2. No more houses or apartments will be built there instead.
3. The business is very stable and provide jobs locally. Even if it isn't the most/best paying jobs, we have a need for this type of jobs too.
4. The traffic will be spread out over a long time with each car spending time and hopefully money at the store.
5. If you look at the traffic impact/increase hour by hour, you will see that Dublin Blvd will not be as effected as during the morning commute hours. The IKEA store isn't even open then.

Unless we find something better with less impact to both the traffic and the city:

YES to IKEA

Thanks for listening to my inputs,

Johan
The traffic in Dublin is already a big mess.
There is only one main arterial road for Dublin.
Rush hour commute from east to west is already a nightmare.

Adding a monstrous IKEA to it?
And it is going to be a distribution center?

Crime rates have been steadily increasing.
Car break-ins have become very common.
And add to this the transient traffic to and from IKEA?

Oh how can I forget the 580 traffic?
Dubliners are already fighting 2-3 hr drives to and back from work.
You want to add another 1000-2000 cars coming in and going out?
Does the planning committee even realize what this is going to the entry and exit points to 580?

The majority in Dublin says NO for IKEA.
For once please listen to what we are saying.

Thanks
Nithya, on behalf of 100s of neighbors
Hi!

Please do not approve having an IKEA built in Dublin. The traffic is already terrible around here.

Thanks,
Edlyn
Dear Ms. Million,

As a Dublin resident, I hope that you will consider the opinions of the residents who do not want an IKEA here in Dublin. East Dublin needs a new high school, but it does not need an IKEA. The city is already getting congested enough with high-density housing, etc. We have enough traffic issues without having an eyesore like IKEA coming into the area.

I just wanted to share my 2 cents.

Thanks,
Edlyn
Allowing IKEA to build a store in Dublin near 580/680 has to be one of the worst decisions possible for everyone who lives in the area. Traffic is already a nightmare. Why would any sane person make a decision that will drastically increase traffic in an area that already has gridlock most of the time. The answer can only be due to the increase of taxes for the city of Dublin. When will the representatives of the people make decisions that actually benefit the people. We are tired of the constant growth; condos and apartments built, or being built, on every square inch near BART, congested streets, over crowded schools, open space disappearing. Stop!!! You are destroying what used to be a wonderful place to live and raise a family. Do not approve IKEA for this area.

Lucretia Samuels

Sent from my iPhone
Hello Amy - I have been voicing my opposition to this project as others have from the start.

With the EIR complete, this should give the council no option but to block this project completely.

As we all have been indicating, this would create total gridlock 7 x a week.

This project would better serve another city like Tracy where they have ample space.

Please listen to your citizens!!!

Tap to get Yahoo Mail
Hello - As most of the residents of Dublin have already expressed, IKEA is NOT welcome here.

Just to give you an example of what life here on the freeways are...Sat in traffic gridlock at 11:30am on 580 West near Hacienda. Can you imagine what 2000 additional cars would do?

I can't believe that you are even working with IKEA after the 'F' given after the EIR was completed. It clearly states that this project would create chaos. I already have to take the Hacienda exit just to get home because of so much traffic and my exit is Fallon. This must be stopped. Do you even care about what the residents want????

Hopefully IKEA hasn't lined your pockets as any sensible person could understand this scenario is untenable. Why is it that we never hear any concerns from any of you regarding this project? WHY??????

We are angry!! Yes. I am angry and very, very disappointed, and frankly DISGUSTED with the city council who SHOULD BE representing the BEST interests of the city and not their pockets.

We EXPECT to hear from you that this project will be denied. Time to do the right thing. Come election time, we will vote you ALL out. That's a promise.
Hi,

I currently live in East Dublin and traffic has been steadily increasing these past couple years. Based on studies, having IKEA at the proposed site is a terrible idea and would put city traffic at a standstill. We need better planning in this city instead of accepting any revenue project that comes along. Please reject the planned IKEA location. Thank you.

Jenny Scheinpflug
Sent from iPhone
Dear Ms. Million,

This letter is in response to your solicitation of input from residents of Dublin regarding the proposed IKEA project in Dublin. I have lived in Dublin for the last 18 years and in Pleasanton the 17 years prior to that. I moved to Dublin from Pleasanton to Tassajara road in an effort to feel as if I had a little more space around me with the open hills and fewer homes.

Unfortunately, in the last 7 years or so, that open space feeling which I so desperately enjoyed has been continually encroached on by development after development, so that I am now completely surrounded, and the view of the hills and Mount Diablo I once enjoyed, are a distant past.

Along with the loss of my view and the serenity therein, I have also been witness to an exponential increase in traffic so much so, that I feel that Dublin has long built passed the ability of the infrastructure to handle the increase in traffic. What used to be a two minute drive to the freeway is now usually at least 8 minutes and once I get on the freeway (580 or 680) I am confronted with gridlock at most all hours of the day (excluding the middle of the night hours). The traffic has increased so much that it sometimes takes me 45 minutes to an hour just to travel a 10 miles in any direction from my house. My wife’s commute to Alameda often takes an hour and a half each way, much of the time being eaten up in the 6 miles nearest our house.

And, now, in the City’s infinite wisdom, and I think in an effort to forestall a deficit budget, you are considering adding, to what is already a dismal commute pattern, a monstrosity of epic traffic proportions.

If one were simply to read the results from your environmental impact study delineating what is already known to all that live, shop, and travel to and from here, that the addition of IKEA to this would simply be catastrophic to the quality of life of the citizens you are supposed to represent.

As you may have been able to discern, (although I am not sure because you are considering IKEA as a viable option), I AM ADAMANTELY OPPOSSED TO THE APPROVAL OF IKEA. IN FACT, IF IT PASSES, I WILL DEDICATE A SUBSTANTIAL AMOUNT OF MY TIME MAKING SURE THAT ANYONE THAT VOTED FOR THIS DOESN’T HAVE A CHANCE OF RE-ELECTION AND WILL ADD MY
MANPOWER AND BRAIN POWER TO EFFORTS THAT WILL BE ORGANIZED, TO STOP THIS MADNESS.

SO PLEASE HEAR MY VOICE NOW, OR HEAR it LATER, A LOT MORE OFTEN, A LOT LOUDER, AND A LOT LESS POLITELY BECAUSE YOU ARE RUINING THE QUALITY OF THE LIFE HERE IN DUBLIN FOR ALL THAT CALL THIS THEIR HOME.

Sincerely,

Thomas H Schindler
Hi Amy,

I'm sure you receive way more emails than you're even able to get through - so I'll make this brief. I'm hoping you'll really take a minute to hear out the majority of the residents in Dublin opposed to the IKEA proposal.

A quick background - my wife, 2 year-old son and I just moved to Dublin at the beginning of the year from San Mateo. We've loved the city immensely so far, but the one thing that was evident from the start, is the growing traffic congestion problem along the 580 stretch where this IKEA proposal will fall.

We moved here from San Mateo and loved how forward-thinking the city proceeded with all their new development proposals, in making them really transit (public transportation, bike, walk) friendly.

IKEA would really seem to be the opposite type of development, in that anyone visiting would almost in every case bring an additional car to the already congested portion of 580.

On behalf of my family and friends, we really hope you will reconsider a more transit friendly development to benefit all the residents of Dublin.

Sincerely,
The Shaw Family
Dear Amy,

I have lived in Dublin for over 24 years. I have seen a lot of growth and changes. Some good and some not so good. One thing for sure is Dublin is a great place to live. Let's try to keep it a great place. With all the new Dublinites it seems that not only schools have not kept with the new people but also services. We used to be able to go out to dinner on a Friday or Saturday night without waiting an hour or more for Chain restaurants. We need more restaurants in Dublin so we do not have to go to neighboring cities for their great restaurants.

This plan will bring in More people to Dublin to use its far-lacking services. Maybe we can think of another idea that would help our residents (and city with tax revenue) with services we can use and need versus trying to bring in more people to our city to clog our roads.

Please think about our citizens and services we need.

Thank you,

Monica Silva

Sent from my iPhone
Amy Million

From: Jennifer Situ <jennifersitu@yahoo.com>
Sent: Thursday, February 22, 2018 7:15 PM
To: City Council; Abe Gupta; Arun Goel; Melissa Hernandez; David Haubert
Cc: Amy Million
Subject: I don't want IKEA to come to Dublin

Dear Mayor and Council members,

My name is Jennifer Situ. I was at last night’s IKEA meeting. After listened to the presentation, I am still convinced IKEA is not the right project at this location. Traffic and size of the building are the two of my biggest concerns. There is no way to mitigate the negative effects on Dublin residents. The increase costs to the city as a result of this project out weights the increase in tax revenue. I strongly urge you please listen to your constituents and vote down this project. Thank you.

Jennifer Situ & Vick Tran
4204 Belcarra Court
Dublin, CA. 94568
16 years residents/
Register voters
Hi Ms. Million,

I am writing to let you know we don’t support IKEA coming to the current proposed location due to traffic concerns.

I listened to your presentation the other day but don’t believe there are enough lanes to absorb the additional traffic coming off the freeway going into IKEA. The lane is too short/close to the off ramp. It most likely lead to backup to neighboring streets. Please don’t approve this project as presented. Thanks for listening to your community.

Jennifer Situ & Vick Tran
4204 Belcarra Court
Dublin, CA 94568
Hello,
I'm definitely against this project and hope it will never pass. Our beautiful city does not need extra traffic with extra crowd.
Regards,

Feroza

From the IKEA Environmental Impact Report (EIR) - Significant Impacts to Air Quality, Biological Resources, Greenhouse Gases, Noise, and Transportation/Traffic. See pages of 26, 28, 36, 46, and 54 respectively of the EIR. The EIR projects 9,630 daily trips to IKEA on weekdays and 17,780 trips on Saturdays. No number is given for Sundays. The study projects a total of 1,934 trips (in and out) in the peak Saturday hours (3.6-36 and 3.6-37). IKEA will be open from 10:00 am to 9:00 pm, eleven hours (2-11). If you divide 17,780 trips by 11 hours, the result is 1616 trips per hour, on average. This means there will be about 2,000 (or slightly less in non-peak hours) extra cars in this small area, each hour, during the busy weekends.

The EIR states that many of the patrons of IKEA would be drawn from Livermore, Tracy, Manteca, Modesto, possibly Stockton, and cities along the I-680 corridor (3.6-37). These patrons would be coming to Dublin specifically to shop at IKEA and would likely not come otherwise. These additional cars would have a significant adverse impact on Dublin traffic and inconvenience Dublin residents. The proposed IKEA hub would be on one large block. There is no entrance to that block on the sides facing Hacienda and I-580. The 2,000 cars per hour would all have to use driveways on Martinelli and Arnold. Martinelli is a very short street and cannot hold many cars. These roads are already busy servicing Persimmon Place and Hacienda Crossings. Hacienda also is used by cars going to BART and the water slide, when it is open. Dublin Blvd. will have to accommodate the vehicles from the 2,000 new homes going in at Dublin Crossing (4-1) on the former Camp Parks property. Traffic on Dublin Blvd. is already often terrible because of spill over traffic from I-580. The additional traffic will be a nightmare.

The consultant used traffic analysis from local transportation agencies to rate the peak-period traffic impact at segments of the road transportation system i.e. highways, on and off ramps, city streets, and intersections controlled by stop lights that would be affected by the IKEA. It rated these segments with a Level of Service (LOS) rating from A to F. A is for "little or no delays" and each level progressively worsens to F being "extreme traffic delays". The EIR indicates that the following intersections would degrade to LOS F at peak hours with the planned IKEA: Hopyard and Owens, Hacienda and Martinelli,
Tassajara and Owens, Santa Rita and I-580 eastbound ramp, and Fallon and Dublin Blvd. Several other segments would degrade to LOS E (3.6-101 and 3.6-102). The report later states that with mitigation the LOS could be repaired to LOS D (3.6-125). The improvement in LOS scores would be achieved by lengthening turn lanes and tweaking traffic light times. I must say I am skeptical. The report itself states "Prior to public review, it was extensively reviewed and evaluated by the City of Dublin" (1-3).

The freeways are also affected. Fifteen of nineteen segments of eastbound I-580 would be rated F and several others E at peak-hours (3.6-152 and 3.6-153).

I believe the proposed IKEA would cause severe traffic problems on Dublin Blvd., our only cross town street and on the surrounding freeways. It would also be a horrible blue and yellow eyesore. At 61 feet tall, the height is equivalent to eight floors with eight foot ceilings. This project is not appropriate for Dublin.
Dear Ms. Million,

After reading the EIR about the proposed IKEA in Dublin I have to say that I am firmly AGAINST having this in our community. It is clear by this report that this site will only negatively affect our community. We are already suffering from congestion and overcrowding and this will only add to it. Where are the EIR's for more infrastructure within our city limits such as roads and schools? Please do what the community is urging and drop this horrendous idea of incorporating IKEA into Dublin. Or, if you must, put it to a vote.

A concerned resident,

Vanessa Sotelo
7690 Canterbury Lane
Dublin, CA
I oppose IKEA in Dublin.
The constituents of Dublin do not want IKEA in Dublin.
I've lived in East Dublin for 13 years.

Sent from my iPhone
From: lsuico <lmsuico@hotmail.com>
Sent: Tuesday, March 13, 2018 8:55 PM
To: Amy Million
Subject: IKEA

No IKEA in Dublin!!

Sent from my iPhone
Dublin residents are frustrated with traffic and poor city planning. Frankly speaking I am totally fed up. IKEA in Dublin is a bad idea. IT DOES NOT HAVE MY VOTE!!!!!
Hello,

I would like to make note of my concern for the impact that IKEA would have on the city of Dublin. I’ve been a resident of Dublin for 7 years. In the past several years I’ve been noticing an increase in traffic congestion with the booming of housing being built. It takes me sometimes 15-20 mins just to go a few miles down the road any day of the week. This is so discouraging I don’t even want to leave my house on the weekends. Without addressing the current horrific traffic problems that we have, building IKEA will only worsen this problem making Dublin less attractive for everyone. Which in turn will bring down our property value and the sense of community.

Please consider addressing the traffic issues prior to the building of IKEA if not having IKEA in Dublin is not an option.

Thank you for your time.
Warm regards,
Nhuly
February 25, 2018

Amy Million

I am writing to express my concerns and feedback on the EIR for the proposed IKEA store in Dublin. It's my understanding the EIR came back as "F" FAILED regarding traffic. The report states that traffic congestion cannot be mitigated and would impacts all freeway exits from Hopyard to Fallon.

IKEA is a huge retailer who will need to draw thousands of shoppers each day from outlying areas to provide the revenue needed to support a store of that size. This store will not be value added for Dublin residents but we will have to tolerate the influx of people and traffic from cities dozens of miles away.

- The sales tax the cities gains can also be gained by smaller retailers that cater to the tri valley residents and not create as much of a demand on traffic. Example, high end restaurants, quaint sidewalk cafés, microbreweries, a dog park or some sort of park area for locals to gather and kids to play since we don't have yards with the high density homes.
- The entire East Dublin was built with strict rules regarding appearances of buildings and homes. I live in Positano and I'm told that if I want to change the color of my home it must be approved by the City of Dublin! East Dublin is all done in neutral, earth tones with lots of beautiful stone or brick work on the buildings. Why would you allow a huge yellow and blue building to be build that does not match the area? It would be a huge eye soar.
- Dublin is and will continue to be the laughing stock and joke for neighboring cities. San Ramon residents were protesting development at a city council meeting and it was quoted in the paper, their tag line was, "we don't want to be like Dublin".
- This entire valley thinks Dublin has gone too far in the building. Dublin needs to stop, take a step back and say no. People are getting tired of the building and traffic and people are electing to move or purchase elsewhere. This will at some point impact property values which will reduce property tax revenue to the city.
- The Livermore outlets has caused grid lock on Fallon exit at certain times of the year. As a resident of Positano I must go down to Santa Rita to get on the freeway due to the back up. If IKEA blocks the remaining freeway exits we will be a prisoner in our own town.
- Ethan Allen moved from Pleasanton because they did not like being in-between the Dollar Store and a gym. If IKEA comes in how many tenants will not renew their lease with Persimmons shopping center because of the new neighbor and the horrible traffic it will bring.
- Persimmons may experience a loss of customers as people shop other places to avoid that area due to traffic.
- I don't care if it's by Bart. No one is going to take Bart to IKEA to buy a piece of furniture and somehow carry it back on Bart. The only ones coming to IKEA on Bart will the additional people looking to create crime. This also happened in Pleasanton at Stoneridge. Look at how the crime has increased at the mall since the addition of Bart. Myself and my friends no longer go to the mall at night as it is too dangerous.

The City of Dublin needs to say NO to IKEA! It does not fit the area. It really belongs out in Tracy where they have thousands of acres of open areas for a store like that.

EIR reports are done for a reason. They are to provide scientific, quantifiable statistic to the City so a decision can be made on facts and not feelings or opinions. **I do not see how the City Council can approve a store that received an F on the EIR report.**
I believe the city also needs to consider what happens if IKEA is approved with receiving an F on the EIR report and someone in the area encounters an emergency and dies because help cannot arrive in a timely manner due to traffic. You can blast sirens all you want but the cars cannot pull over if they have no where to go. Does the city really want another lawsuit on its hands, the water park incident wasn’t enough?

Debbie Wagner
To The Dublin City Council,

As the Environmental Impact Report shows IKEA would not be a good choice for Dublin. As a long time resident of Dublin, traffic has become a big concern. Day to day commuting is a challenge now. Adding IKEA traffic of this magnitude both weekdays and weekends would not be good for Dublin residents. As well as the impact to our air quality. I hope you will all stop this from happening and vote no.

Thank you,
Janeen Wheeler
650-302-0291
I firmly believe we need the revenue. We had an opportunity for a Santana Row type retail area a few years ago but the city turned that down as well.

If we continue to turn away retail developers then we risk nobody wanting to bring their businesses to Dublin.

My 2 cents

Heather M Whiting

Heather m Whiting Photography
510-432-0425

www.heathermwhiting.com
Barbara Wilson <barbsdates@gmail.com>

Wednesday, March 14, 2018 8:52 PM

Amy Million

Ikea in Dublin

Happy to have it. Love the tax revenue
I think this is a terrible project as currently structured:
1) 580W is already a disaster at almost all hours and this is going to bring lots of additional traffic on the highway -- we need a project that primarily draws people from the local area like Persimmon Plaza or high tech office or medical facility.
2) Traffic will be a disaster getting into and around the project according to EIR. Again we need a project that serves local people with a diverse traffic pattern.
3) We need high paying jobs to keep people from having to commute not 100's of low paying jobs that will be filled by people who live in other cities and commute into Dublin.
4) This is a terrible project to place next to Bart as it has very limited synergy with BART commuters because of the size of most purchases
5) They should not have a warehouse in the location, big delivery trucks are the worst type of traffic. Warehouses should be in remote locations.
6) Big box retail is doomed and we will end up with a giant empty blue box at some point. The future is small box outlets for pickup of online orders and for browsing linked to online warehouse distribution. As soon as Ikea gets their online strategy in order in the next few years, I can gaurantee they will abandon these big stores and push forward more aggressively with their recently launched small outlet approach.

It is said we are letting one of the last big blocks of space be used for such a bad project. This project should be blocked but at a minimum Ikea needs to scale back the store by 50% so we can have a better diversity of tenants on the property. I lived in Dublin for 18 years and I have seen a lot of short sighted decisions but this will definitely go down as one of the worst if it is approved as is.

Rupert Young
5307 Asterwood Dr, Dublin CA.
Sent from Outlook
SECTION 4: ERRATA

The following are revisions to the Draft SEIR for the IKEA Retail Center Project. These revisions are minor modifications and clarifications to the document, and do not change the significance of any of the environmental issue conclusions within the Draft SEIR. The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (stricken).

4.1 - Changes to Draft EIR Text

Section ES, Executive Summary

Page ES-1, Project Location

The project address has been corrected.

The project site is located at 5344 and 5144 Martinelli Way in the City of Dublin, Alameda County, California.

Page ES-2, Table ES-1

Table ES-1 has been revised to eliminate a redundant entry for 8,000 square feet of restaurant uses. These uses are captured in the 58,440 square-foot value.

Table ES-1: IKEA Retail Center Project Summary

<table>
<thead>
<tr>
<th>Use</th>
<th>Acreage</th>
<th>Square Feet</th>
<th>Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major 1 (IKEA)</td>
<td>13.65</td>
<td>339,099</td>
<td>2 stories above two-story parking structure</td>
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<tr>
<td>Lifestyle retail-restaurant</td>
<td>13.66</td>
<td>8,000</td>
<td>Freestanding restaurant</td>
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<tr>
<td></td>
<td></td>
<td>34,560</td>
<td>Multiple buildings, retail use</td>
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<tr>
<td></td>
<td></td>
<td>58,440</td>
<td>Multiple buildings, restaurant/food use</td>
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<tr>
<td>Subtotal</td>
<td>27.45</td>
<td>—</td>
<td>—</td>
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<tr>
<td>Proposed/anticipated dedication for BART¹</td>
<td>(0.16)</td>
<td>—</td>
<td>—</td>
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<td>Total</td>
<td>27.31</td>
<td>432,099</td>
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</table>

Note:
¹ Based on Express Bus/Bus Rapid Transit (BRT) Alternative.
Source: GreenbergFarrow, 2017.

Section 2, Project Description

Page 2-1, Project Location

The project address has been corrected.

The project site is located at 5344 and 5144 Martinelli Way in the City of Dublin, Alameda County, California.
**Page 2-10, Table 2-1**

Table 2-1 has been revised to eliminate a redundant entry for 8,000 square feet of restaurant uses. These uses are captured in the 58,440 square-foot value.

<table>
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<tbody>
<tr>
<td>Major 1 (IKEA)</td>
<td>13.65</td>
<td>339,099</td>
<td>2 stories above two-story parking structure</td>
</tr>
<tr>
<td>Lifestyle retail-restaurant</td>
<td>13.66</td>
<td>34,560</td>
<td>Freestanding restaurant</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8,000</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>58,440</td>
<td>Multiple buildings, restaurant/food use</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td>27.45</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>Proposed/anticipated dedication for BART¹</td>
<td>(0.16)</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>27.31</td>
<td>432,099</td>
<td>—</td>
</tr>
</tbody>
</table>

Note:
¹ Based on Express Bus/Bus Rapid Transit (BRT) Alternative.
Source: GreenbergFarrow, 2017.

**Page 2-10**

Text is added to clarify the proposed building height of the structure

**Major 1—IKEA**

The IKEA store would consist of a two-story building located over a two-level parking structure with the lower level partially below grade. The building would be set against the Arnold Road frontage and face Hacienda Drive. The building would stand approximately 61 feet above finished grade. The majority of the building would be at 58 feet 6 inches, while the yellow Ikea Panels would project up to 65 feet in height. The principal loading docks would be located in the rear of the building facing Arnold Road. A recycling and refuse collection area, trash compactor, and emergency diesel generator would also be located at the rear of the store. A two-bay loading dock for home deliveries would be located on the south side of the building facing I-580.

**Section 3.1, Air Quality/Greenhouse Gas Emissions**

**Pages 3.1-43 and 3.1-44, Table 3.1-7**

Table 3.1-7 has been revised to include emissions from export haul trips, which would only occur during the grading phase of construction.
### Table 3.1—7: Construction-Related Criteria Air Pollutant Emissions Prior to Mitigation

<table>
<thead>
<tr>
<th>Construction Activity</th>
<th>ROG</th>
<th>NOX</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^1$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition</td>
<td>3.83</td>
<td>39.78</td>
<td>1.95</td>
<td>1.81</td>
</tr>
<tr>
<td>Grading</td>
<td>5.185.76</td>
<td>59.5979.00</td>
<td>2.633.90</td>
<td>2.422.82</td>
</tr>
<tr>
<td>Combined Building Construction, Paving, and Architectural Coatings</td>
<td><strong>146.06</strong></td>
<td><strong>73.35</strong></td>
<td><strong>3.01</strong></td>
<td><strong>2.83</strong></td>
</tr>
<tr>
<td>- Building Construction</td>
<td>6.29</td>
<td>57.32</td>
<td>2.16</td>
<td>2.03</td>
</tr>
<tr>
<td>- Paving</td>
<td>2.21</td>
<td>14.11</td>
<td>0.75</td>
<td>0.69</td>
</tr>
<tr>
<td>- Architectural Coating</td>
<td><strong>137.56</strong></td>
<td>1.92</td>
<td>0.11</td>
<td>0.11</td>
</tr>
<tr>
<td>CEQA Significance Thresholds</td>
<td>54</td>
<td>54</td>
<td>82</td>
<td>54</td>
</tr>
<tr>
<td>Exceeds Significance Threshold?</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:
1. Exhaust only
2. ROG = reactive organic gases  
   NOX = oxides of nitrogen  
   PM$_{10}$ = particulate matter 10 microns in diameter  
   PM$_{2.5}$ = particulate matter 2.5 microns in diameter  
3. Source: FirstCarbon Solutions, CalEEMod Version 2016.3.2, Appendix B.

---

### Pages 3.1-44 and 3.1-45, Table 3.1-8

Table 3.1-8 has been revised to include emissions from export haul trips.

### Table 3.1-8: Mitigated Construction-Related Criteria Air Pollutant Emissions

<table>
<thead>
<tr>
<th>Construction Activity</th>
<th>ROG</th>
<th>NOX</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^1$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition</td>
<td>0.69</td>
<td>14.98</td>
<td>0.07</td>
<td>0.07</td>
</tr>
<tr>
<td>Grading</td>
<td><strong>4.191.68</strong></td>
<td><strong>49.3438.75</strong></td>
<td><strong>0.111.38</strong></td>
<td><strong>0.110.51</strong></td>
</tr>
<tr>
<td>Combined Building Construction, Paving, and Architectural Coatings</td>
<td>51.41</td>
<td>52.44</td>
<td>0.34</td>
<td>0.34</td>
</tr>
<tr>
<td>- Building Construction</td>
<td>3.37</td>
<td>41.06</td>
<td>0.30</td>
<td>0.30</td>
</tr>
<tr>
<td>- Paving</td>
<td>1.19</td>
<td>10.08</td>
<td>0.04</td>
<td>0.04</td>
</tr>
<tr>
<td>- Architectural Coating</td>
<td>46.85</td>
<td>1.30</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>CEQA Significance Thresholds</td>
<td>54</td>
<td>54</td>
<td>82</td>
<td>54</td>
</tr>
<tr>
<td>Exceeds Significance Threshold?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:
1. Exhaust only
2. ROG = reactive organic gases  
   NOX = oxides of nitrogen  
   PM$_{10}$ = particulate matter 10 microns in diameter  
   PM$_{2.5}$ = particulate matter 2.5 microns in diameter  
3. Source: FirstCarbon Solutions, CalEEMod Version 2016.3.2, Appendix B.
Section 3.3, Biological Resources

Pages 3.2-19 and 3.2-20, Mitigation Measure BIO-1c

Mitigation Measure BIO-1c has been modified to include a requirement for minimum 1:1 replacement.

MM BIO-1c Prior to the first ground-disturbing activities, the project applicant shall implement the following measures that pertain to burrowing owl, as applicable:

1. Conduct a Burrowing Owl Survey and Impact Assessment. Prior to the first ground-disturbing activities, the project applicant shall retain a qualified biologist to conduct two pre-construction surveys for the burrowing owl for the entire site. The first survey shall be conducted no more than 14 days prior to ground-disturbing activities and the second survey shall be conducted within 48 hours of initial ground disturbance. The surveys shall be conducted in accordance with the California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation. If the surveys determine owls are present, then the measures set forth in this mitigation shall be followed.

2. Implement Avoidance Measures. If direct impacts to owls can be avoided, prior to the first ground-disturbing activities, the project applicant shall implement the following avoidance measures during all phases of construction to reduce or eliminate potential impacts to California burrowing owls.
   • Avoid disturbing occupied burrows during the nesting period, from February 1 through 31 August.
   • Avoid impacting burrows occupied during the non-breeding season by migratory or non-migratory resident burrowing owls.
   • Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove shrubs), disking, cultivation, and urban, industrial, or agricultural development.
   • Develop and implement a worker awareness program to increase the on-site worker’s recognition of and commitment to burrowing owl protection.
   • Place visible markers near burrows to ensure that equipment and other machinery does not collapse burrows.
   • Do not fumigate or use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur (e.g., sites observed with nesting owls, designated use areas).

3. Conduct Burrow Exclusion. If avoidance of burrowing owl or their burrows is not possible, prior to the first ground-disturbing activities, the project applicant, in consultation with the CDFW, shall prepare a Burrowing Owl Relocation Plan as indicated and following the CDFW 2012 Staff Report. Monitoring of the excluded owls shall be carried out pursuant to the California Department of Fish and Game 2012 Staff Report.

4. Prepare and Implement a Mitigation Plan. If avoidance of burrowing owl or their burrows is not possible, and project activities may result in impacts to nesting,
occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall consult with the CDFW and develop a detailed mitigation plan that shall include replacement of impacted habitat at no less than a 1:1 ratio, number of burrows, and burrowing owl in a ratio approved by CDFW. The mitigation plan shall be based on the requirements set forth in Appendix A of the CDFW 2012 Staff Report on Burrowing Owl Mitigation and the Plan shall be reviewed and accepted by CDFW and the City prior to the first ground-disturbing activities.

Section 3.6, Transportation

Page 3.6-70, After Third Paragraph

The discussion of Hacienda Drive/Martinelli Way improvements has been amended to acknowledge that Caltrans has jurisdictional control.

Note that the 100-foot extension of the turn pocket would encroach into the Caltrans jurisdiction. The City of Dublin has no control over Caltrans facilities and therefore, the residual significance of this impact is significant and unavoidable.

Page 3.6-125, Table 3.6-19

A typographical error associated with the identification of LOS following the implementation of mitigation is corrected, as shown in Table 3.6-19.

### Table 3.6-19: Cumulative with Mitigation Peak-Hour Intersection Levels of Service

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Control</th>
<th>Peak Hour</th>
<th>Cumulative without Project</th>
<th>Cumulative with Project</th>
<th>Cumulative with Project With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>PM</td>
<td>SAT</td>
<td>Delay</td>
</tr>
<tr>
<td>6. Hopyard Road &amp; Owens Drive</td>
<td>Signal</td>
<td>50.8</td>
<td>95.1</td>
<td>63.7</td>
<td>D</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>PM</td>
<td>SAT</td>
<td>47.7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>AFT</td>
<td>PM</td>
<td>60.3 (141.5)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>AFT</td>
<td>PM</td>
<td>72.2 (275.0)</td>
</tr>
<tr>
<td>11. Dublin Boulevard &amp; Arnold Road</td>
<td>Signal</td>
<td>35.3</td>
<td>44.3</td>
<td>47.7</td>
<td>D</td>
</tr>
<tr>
<td>17. Dublin Boulevard &amp; Hacienda Drive</td>
<td>Signal</td>
<td>36.8</td>
<td>45.5</td>
<td>47.7</td>
<td>D</td>
</tr>
<tr>
<td>18. Hacienda Drive &amp; Martinelli Way</td>
<td>Signal</td>
<td>38.7</td>
<td>37.1</td>
<td>41.9</td>
<td>D</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>AFT</td>
<td>PM</td>
<td>72.2 (275.0)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>AFT</td>
<td>PM</td>
<td>80.8 (345.2)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>AFT</td>
<td>PM</td>
<td>1.01 (2.42)</td>
</tr>
<tr>
<td>21. Owens Drive &amp; Hacienda Drive</td>
<td>Signal</td>
<td>21.0</td>
<td>99.1</td>
<td>24.0</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>PM</td>
<td>SAT</td>
<td>21.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>AFT</td>
<td>PM</td>
<td>21.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>AFT</td>
<td>PM</td>
<td>21.1</td>
</tr>
</tbody>
</table>
Table 3.6-19 (cont.): Cumulative with Mitigation Peak-Hour Intersection Levels of Service

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Control</th>
<th>Peak Hour</th>
<th>Cumulative without Project</th>
<th>Cumulative with Project</th>
<th>Cumulative with Project With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Delay</td>
<td>LOS</td>
<td>Delay</td>
</tr>
<tr>
<td>26. Dublin Boulevard &amp; Tassajara Road</td>
<td>Signal</td>
<td>AM</td>
<td>49.0</td>
<td>D</td>
<td>49.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>1.53 (1.93)</td>
<td>F</td>
<td>1.54 (1.93)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SAT</td>
<td>1.38 (1.98)</td>
<td>F</td>
<td>1.40 (2.06)</td>
</tr>
<tr>
<td>28. Santa Rita Road &amp; I-580 Eastbound Off-Ramp</td>
<td>Signal</td>
<td>AM</td>
<td>35.0</td>
<td>C</td>
<td>35.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>53.0</td>
<td>D</td>
<td>54.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SAT</td>
<td>94.5</td>
<td>F</td>
<td>97.4</td>
</tr>
</tbody>
</table>

Notes:
- Bold text indicates LOS E/F; Bold Italic text indicates impacts due to the proposed project.
- Signal = signalized.
- Average intersection delay calculated using the HCM 2000 methodology.
  - For LOS E signalized intersections in the City of Dublin, average delay is followed by the delay for the worst movement in parentheses.
  - For LOS F signalized intersections in the City of Dublin, overall intersection volume-to-capacity (v/c) ratio is followed by the v/c ratio for the worst movement.


Page 3.6-100, Mitigation Measure TRANS-2c

The improvements listed in Mitigation Measure TRANS-2c are amended to include an additional eastbound left turn or through lane.

**MM TRANS-2c**
Prior to issuance of the first building permit, the project applicant shall provide the City of Dublin documentation that they have worked with the City of Pleasanton and Caltrans to identify and pay the project’s proportionate share for improvements to the intersection of Santa Rita Road/I-580 Eastbound in the City of Pleasanton. The improvements shall consist of modifying the southbound approach to construct a second southbound left-turn lane, and either modifying the northbound approach to construct a third eastbound left-turn lane or modifying the southbound approach to provide a third southbound through lane, in addition to re-timing the traffic signal.

Section 4, Cumulative Effects

**Table 4-1**
An entry has been added to Table 4-1 for the Zeiss Innovation Center Project. The addition of this project to Table 4-1 does not materially change any conclusions in Section 4, Cumulative Effects.
## Table 4-1: Cumulative Projects

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Project</th>
<th>Characteristics</th>
<th>Location</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Dublin</td>
<td>Kaiser Dublin Medical Center</td>
<td>950,000 square feet Kaiser Medical Campus; 250,000 square feet commercial</td>
<td>Dublin Boulevard/Keegan Street</td>
<td>Approved; under construction</td>
</tr>
<tr>
<td></td>
<td>Dublin Crossing/ Boulevard</td>
<td>Up to 1,995 dwelling units; 200,000 square feet commercial; 35 acres parks; 12-acre elementary school</td>
<td>Dublin Boulevard/DeMarcus</td>
<td>Approved; under construction</td>
</tr>
<tr>
<td></td>
<td><strong>Zeiss Innovation Center</strong></td>
<td>Phase 1: 208,650 square feet research and development Phase 2: 224,440 square feet research and development</td>
<td>Dublin Boulevard/Arnold Road</td>
<td>Proposed</td>
</tr>
<tr>
<td></td>
<td>Grafton Plaza Mixed Use</td>
<td>115 dwelling units, 50,000 square feet retail commercial, and 130 room hotel</td>
<td>Dublin Boulevard/Grafton Drive</td>
<td>Proposed; not yet approved or built</td>
</tr>
<tr>
<td></td>
<td>Grafton Station Phase III</td>
<td>133,446 square feet commercial</td>
<td>Dublin Boulevard/Tassajara Road</td>
<td>Approved; unbuilt</td>
</tr>
<tr>
<td>City of Pleasanton</td>
<td>Stoneridge Drive Specific Plan</td>
<td>800 dwelling units (senior); 120,000–200,000 square feet commercial; 331,000 square feet auto mall</td>
<td>El Charro Road/Stoneridge Drive</td>
<td>Approved; under construction</td>
</tr>
<tr>
<td></td>
<td>Johnson Drive Economic Zone</td>
<td>40-acre area envisioned to support up to 535,490 square feet of warehouse club retail (Costco), hotel, general retail, and recreational facilities</td>
<td>7106–7315 Johnson Drive</td>
<td>Proposed</td>
</tr>
<tr>
<td>City of Livermore</td>
<td>El Charro Specific Plan</td>
<td>1.5 million square feet retail; 250 acres</td>
<td>El Charro Road/London Boulevard</td>
<td>Adopted; under construction</td>
</tr>
<tr>
<td></td>
<td>Isabel Neighborhood Plan</td>
<td>1,132-acre area envisioned to support up to 4,300 dwelling units and up to 9,000 jobs</td>
<td>I-580/Isabel Avenue (north side of freeway)</td>
<td>Proposed</td>
</tr>
<tr>
<td></td>
<td>Sage Residential Project</td>
<td>476 dwelling units</td>
<td>Portola Drive/Isabel Avenue</td>
<td>Approved; under construction</td>
</tr>
<tr>
<td>City of San Ramon</td>
<td>San Ramon City Center</td>
<td>Phase 1: 279159 square feet retail; 46,086 square feet cinema Phase 2: 65,679 square feet retail; 169-room hotel; 487 dwelling units</td>
<td>Bollinger Canyon Road/Camino Ramon</td>
<td>Approved; under construction</td>
</tr>
<tr>
<td></td>
<td>Multiple Bay Area Rapid Transit District (BART) Livermore Extension</td>
<td>4.8-mile BART extension from Dublin/Pleasanton Station to I-580/Isabel Avenue</td>
<td>I-580 Median (Dublin to Livermore)</td>
<td>Planned</td>
</tr>
</tbody>
</table>

Source: City of Dublin, 2017; City of Pleasanton, 2017; City of Livermore, 2017.
Appendix B, Air Quality/Greenhouse Gas Emissions Supporting Information

Table 10
The fleet mix in Table 10 has been revised to correct an erroneous entry.

Table 10: Project Vehicle Fleet Mix

<table>
<thead>
<tr>
<th>Building</th>
<th>Vehicle Type</th>
<th>Number of Vehicle Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td>IKEA</td>
<td>Passenger Cars</td>
<td>5,980</td>
</tr>
<tr>
<td></td>
<td>Light-heavy Duty Trucks (2-axles)</td>
<td>20</td>
</tr>
<tr>
<td></td>
<td>Heavy-heavy Duty Trucks (4+axles)</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>Total IKEA Trips</td>
<td>6010</td>
</tr>
<tr>
<td>Retail Center</td>
<td>Passenger Cars&lt;sup&gt;(2)&lt;/sup&gt;</td>
<td>10,830&lt;sup&gt;10,772&lt;/sup&gt;</td>
</tr>
<tr>
<td></td>
<td>Light-heavy Duty Trucks (2-axles)</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Heavy-heavy Duty Trucks (4+axles)</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>Total Retail Center Trips</td>
<td>10,801&lt;sup&gt;10,830&lt;/sup&gt;</td>
</tr>
<tr>
<td></td>
<td>Total Project Trips</td>
<td>16,840</td>
</tr>
</tbody>
</table>

Appendix I:
Supplemental Air Quality Supporting Information
1.0 Project Characteristics

1.1 Land Usage

<table>
<thead>
<tr>
<th>Land Uses</th>
<th>Size</th>
<th>Metric</th>
<th>Lot Acreage</th>
<th>Floor Surface Area</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enclosed Parking with Elevator</td>
<td>1,026.00</td>
<td>Space</td>
<td>4.00</td>
<td>464,212.00</td>
<td>0</td>
</tr>
<tr>
<td>Parking Lot</td>
<td>568.00</td>
<td>Space</td>
<td>10.57</td>
<td>227,200.00</td>
<td>0</td>
</tr>
<tr>
<td>High Turnover (Sit Down Restaurant)</td>
<td>58.44</td>
<td>1000sqft</td>
<td>1.55</td>
<td>58,440.00</td>
<td>0</td>
</tr>
<tr>
<td>Free-Standing Discount Superstore</td>
<td>339.10</td>
<td>1000sqft</td>
<td>9.65</td>
<td>339,099.00</td>
<td>0</td>
</tr>
<tr>
<td>Strip Mall</td>
<td>34.56</td>
<td>1000sqft</td>
<td>1.55</td>
<td>34,560.00</td>
<td>0</td>
</tr>
</tbody>
</table>

1.2 Other Project Characteristics

<table>
<thead>
<tr>
<th>Urbanization</th>
<th>Urban</th>
<th>Wind Speed (m/s)</th>
<th>2.2</th>
<th>Precipitation Freq (Days)</th>
<th>63</th>
</tr>
</thead>
<tbody>
<tr>
<td>Climate Zone</td>
<td>4</td>
<td></td>
<td></td>
<td>Operational Year</td>
<td>2020</td>
</tr>
<tr>
<td>Utility Company</td>
<td>Pacific Gas &amp; Electric Company</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO2 Intensity (lb/MWhr)</td>
<td>519.21</td>
<td>CH4 Intensity (lb/MWhr)</td>
<td>0.023</td>
<td>N2O Intensity (lb/MWhr)</td>
<td>0.005</td>
</tr>
</tbody>
</table>

1.3 User Entered Comments & Non-Default Data
Project Characteristics - PG&E Intensity Factors reduced by 19%.

Land Use - Land uses provided by applicant.

Construction Phase - 10 days Demo, 45 days Grading, 290 days Building Construction, 35 days Paving, and 45 days Painting.

Off-road Equipment -

Off-road Equipment - Building Construction equipment hours = 1.5 x default hours to account for the shortened Building Construction period.

Demolition - 147 tons building material + 290 tons of paving debris = 437.20 total tons of demolition debris

Architectural Coating - Non-Residential Interior and Exterior VOC set to 45 g/L.

Vehicle Trips - Trip Rates and Trip Length adjusted to match TIA.

Energy Use - electricity usage for IKEA reduced by 29%.

Construction Off-road Equipment Mitigation - All equipment Tier 4 Interim. Water exposed area.

Mobile Land Use Mitigation - Mit TRANS-7A - Busstop 0.05 miles (Martinelli Wy); Project Design Feature 1 - Improve pedestrian network on project site and connecting off-site;

Area Mitigation - Use low VOC Paint on non-res interior, 45 g/L.

Energy Mitigation - 42 percent renewable energy generated

Water Mitigation - Install low-flow fixtures and water-efficient irrigation systems.

Waste Mitigation - 50 percent waste diverted.

Operational Off-Road Equipment -

Fleet Mix - Fleet mix updated to account for 70 2-axle trucks and 18 4-axle.

Stationary Sources - Emergency Generators and Fire Pumps - 1 backup generator at IKEA, run 0.5 hours, 6 hour/year, 2,923 HP; load factor 0.5.

Grading - 95,000 cy cut and 73,700 cy fill = 21,300 cy exported offsite

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Dublin IKEA Retail Center Mitigated - Alameda County, Winter

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## 2.1 Overall Construction (Maximum Daily Emission)

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### Percent Reduction

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2.2 Overall Operational

Mitigated Operational

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3.0 Construction Detail

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Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 14.57

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 648,149; Non-Residential Outdoor: 216,050; Striped Parking Area: 41,485 (Architectural Coating – sqft)

**OffRoad Equipment**
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3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment
Water Exposed Area

3.2 Demolition - 2018

Unmitigated Construction On-Site

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### 3.2 Demolition - 2018

**Unmitigated Construction Off-Site**

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**Mitigated Construction On-Site**

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## 3.3 Grading - 2018

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### 3.3 Grading - 2018

**Unmitigated Construction Off-Site**

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**Mitigated Construction On-Site**

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### 3.3 Grading - 2018

#### Mitigated Construction Off-Site

| Category  | ROG  | NOx   | CO    | SO2   | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2   | NBio- CO2 | Total CO2 | CH4  | N2O  | CO2e  |
|-----------|------|-------|-------|-------|---------------|--------------|------------|----------------|---------------|-------------|------------|------------|-----------|----------|-------|-------|-------|
| Hauling   | 0.5726 | 19.4079 | 3.3809 | 0.0475 | 1.0356        | 0.0738       | 1.1093     | 0.2840        | 0.0706        | 0.3545      | 5.042.988  | 2          | 5.042.988 | 0.2830  | 5.049.995 |
| Vendor    | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000        | 0.0000       | 0.0000     | 0.0000        | 0.0000        | 0.0000      | 0.0000     | 0.0000    | 0.0000   | 0.0000   | 0.0000 |
| Worker    | 0.0926 | 0.0722 | 0.6786 | 1.6400e-003 | 0.1643       | 0.1150e-003  | 0.1655     | 0.0436        | 0.0446        | 0.0882      | 163.405 | 163.405 | 5.2000e-003 | 0.0736 | 163.5666 |
| Total     | 0.6652 | 19.4801 | 4.0595 | 0.0492 | 1.1999        | 0.0749       | 1.2748     | 0.3275        | 0.0716        | 0.3992      | 5,206.418  | 7          | 5,206.418 | 0.2855  | 5,213.556 |

### 3.4 Building Construction - 2019

#### Unmitigated Construction On-Site

| Category  | ROG  | NOx   | CO    | SO2   | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2   | NBio- CO2 | Total CO2 | CH4  | N2O  | CO2e  |
|-----------|------|-------|-------|-------|---------------|--------------|------------|----------------|---------------|-------------|------------|------------|-----------|----------|-------|-------|-------|
| Off-Road  | 3.6169 | 32.4319 | 26.3207 | 0.0413 | 1.9800        | 1.9800       | 1.9800     | 1.8606        | 1.8606        | 3,980.735  | 0          | 3,980.735 | 0         | 0.9765  | 4,005.148 |
| Total     | 3.6169 | 32.4319 | 26.3207 | 0.0413 | 1.9800        | 1.9800       | 1.9800     | 1.8606        | 1.8606        | 3,980.735  | 0          | 3,980.735 | 0         | 0.9765  | 4,005.148 |
### 3.4 Building Construction - 2019

#### Unmitigated Construction Off-Site

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### 3.4 Building Construction - 2019

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### 3.4 Building Construction - 2020

#### Unmitigated Construction On-Site

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<th>Exhaust PM2.5 (lb/day)</th>
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<th>NBio- CO2 (lb/day)</th>
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<th>CH4 (lb/day)</th>
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<td><strong>1.7144</strong></td>
<td><strong>1.7144</strong></td>
<td><strong>1.7144</strong></td>
<td><strong>1.6113</strong></td>
<td><strong>1.6113</strong></td>
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3.4 Building Construction - 2020

Unmitigated Construction Off-Site

| Category   | ROG   | NOx  | CO   | SO2  | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|------------|-------|------|------|------|---------------|---------------|------------|---------------|---------------|------------|-----------|----------|-----------|----------|-----|-----|------|
| Hauling    | 0.0000| 0.0000| 0.0000| 0.0000| 0.0000        | 0.0000        | 0.0000     | 0.0000        | 0.0000        | 0.0000     | 0.0000    | 0.0000   | 0.0000    | 0.0000  |     |     |      |
| Vendor     | 0.7115| 21.5923| 5.0273| 0.0500| 1.2467        | 0.1012        | 1.3480      | 0.3990        | 0.0968        | 0.4558     | 5,278.457 | 5,278.457 | 0.3254    | 5,286.593|     |     |      |
| Worker     | 1.6600| 1.2179| 11.7171| 0.0336| 3.5734        | 0.0239        | 3.5973      | 0.9476        | 0.0220        | 0.9698     | 3,343.881 | 3,343.881 | 0.0873    | 3,346.063|     |     |      |
| Total      | 2.3715| 22.8101| 16.7444| 0.0836| 4.8201        | 0.1251        | 4.9452      | 1.3068        | 0.1188        | 1.4256     | 8,622.339 | 8,622.339 | 0.4127    | 8,632.657|     |     |      |

Mitigated Construction On-Site

| Category   | ROG   | NOx  | CO   | SO2  | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|------------|-------|------|------|------|---------------|---------------|------------|---------------|---------------|------------|-----------|----------|-----------|----------|-----|-----|------|
| Off-Road   | 0.8192| 16.7175| 27.4418| 0.0413| 0.1284        | 0.1284        | 0.1284     | 0.1284        | 0.1284        | 0.1284     | 3,920.913 | 3,920.913 | 0.9638    | 3,945.008|     |     |      |
| Total      | 0.8192| 16.7175| 27.4418| 0.0413| 0.1284        | 0.1284        | 0.1284     | 0.1284        | 0.1284        | 0.1284     | 3,920.913 | 3,920.913 | 0.9638    | 3,945.008|     |     |      |
### 3.4 Building Construction - 2020

#### Mitigated Construction Off-Site

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<th>NBio-CO2</th>
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<th>N2O</th>
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### 3.5 Paving - 2020

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### 3.5 Paving - 2020

#### Unmitigated Construction Off-Site

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#### Mitigated Construction On-Site

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### 3.5 Paving - 2020

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### 3.6 Architectural Coating - 2020

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### Mitigated Construction On-Site

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<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
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<th>CH4</th>
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4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility

Improve Pedestrian Network
### 4.2 Trip Summary Information

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<th>Average Daily Trip Rate</th>
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<td>5,978.33</td>
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<td>Strip Mall</td>
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### 4.3 Trip Type Information

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<td>H-S or C-C</td>
<td>H-O or C-NW</td>
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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Percent of Electricity Use Generated with Renewable Energy

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<th>LDT2</th>
<th>MDV</th>
<th>LHD1</th>
<th>LHD2</th>
<th>MHD</th>
<th>HHD</th>
<th>OBUS</th>
<th>UBUS</th>
<th>MCY</th>
<th>SBUS</th>
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<td>0.000000</td>
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<tr>
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<td>0.122000</td>
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<tr>
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<td>0.616000</td>
<td>0.045000</td>
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<tr>
<th>Category</th>
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<th>SO2</th>
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<th>Exhaust PM10</th>
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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
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<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tbody>
<tr>
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<td>0.2661</td>
<td>0.2661</td>
<td>0.2661</td>
<td>0.2661</td>
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<td>4.201.153</td>
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<tr>
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<td>4.201.153</td>
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### 5.2 Energy by Land Use - Natural Gas

#### Unmitigated

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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5 Total</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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<tbody>
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<tr>
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### 5.2 Energy by Land Use - Natural Gas

**Mitigated**

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<th>NaturalGas Use</th>
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<th>NOx</th>
<th>CO</th>
<th>SO2</th>
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<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
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</thead>
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<td>Enclosed Parking with Elevator</td>
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<tr>
<td>Free-Standing Discount Superstore</td>
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<tr>
<td>High Turnover (Sit Down Restaurant)</td>
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### 6.0 Area Detail

#### 6.1 Mitigation Measures Area

Use Low VOC Paint - Non-Residential Interior
### 6.2 Area by SubCategory

#### Unmitigated

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<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
</tr>
</thead>
<tbody>
<tr>
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7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet
Install Low Flow Kitchen Faucet
Install Low Flow Toilet
Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

9.0 Operational Offroad
### 10.0 Stationary Equipment

#### Fire Pumps and Emergency Generators

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#### Boilers

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#### User Defined Equipment

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### 10.1 Stationary Sources

#### Unmitigated/Mitigated

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<th>SO2</th>
<th>Fugitive PM10</th>
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<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
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<th>Total CO2</th>
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**Total** | 1.6428 | 7.3463 | 4.1887 | 7.8900e-003 | 0.2417        | 0.2417       | 0.2417     | 0.2417        | 0.2417       | 840.3766   | 840.3766 | 0.1178   | 843.3222 |

### 11.0 Vegetation
1.0 Project Characteristics

1.1 Land Usage

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1.2 Other Project Characteristics

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CO2 Intensity (lb/MWhr) 519.21  CH4 Intensity (lb/MWhr) 0.023  N2O Intensity (lb/MWhr) 0.005

1.3 User Entered Comments & Non-Default Data
Project Characteristics - PG&E Intensity Factors reduced by 19%.

Land Use - Land uses provided by applicant.

Construction Phase - 10 days Demo, 45 days Grading, 290 days Building Construction, 35 days Paving, and 45 days Painting.

Off-road Equipment -

Off-road Equipment - Building Construction equipment hours = 1.5 x default hours to account for the shortened Building Construction period.

Demolition - 147 tons building material + 290 tons of paving debris = 437.20 total tons of demolition debris

Architectural Coating - Non-Residential Interior and Exterior VOC set to 45 g/L.

Vehicle Trips - Trip Rates and Trip Length adjusted to match TIA.

Energy Use - Electricity usage for IKEA reduced by 29%.

Construction Off-road Equipment Mitigation - All equipment Tier 4 Interim. Water exposed area.

Mobile Land Use Mitigation - Mit TRANS-7A - Busstop 0.05 miles (Martinelli Wy); Project Design Feature 1 - Improve pedestrian network on project site and connecting off-site;

Area Mitigation - Use low VOC Paint on non-res interior, 45 g/L.

Energy Mitigation - 42 percent renewable energy generated

Water Mitigation - Install low-flow fixtures and water-efficient irrigation systems.

Waste Mitigation - 50 percent waste diverted.

Operational Off-Road Equipment -

Fleet Mix - Fleet mix updated to account for 70 2-axle trucks and 18 4-axle.

Stationary Sources - Emergency Generators and Fire Pumps - 1 backup generator at IKEA, run 0.5 hours, 6 hour/year, 2,923 HP; load factor 0.5.

Grading - 95,000 cy cut and 73,700 cy fill = 21,300 cy exported offsite

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2.0 Emissions Summary
2.1 Overall Construction (Maximum Daily Emission)

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CalEEMod Version: CalEEMod.2016.3.2
Page 10 of 33
Dublin IKEA Retail Center Mitigated - Alameda County, Summer

Date: 4/6/2018 10:18 AM
### 2.2 Overall Operational Mitigated Operational

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### 3.0 Construction Detail

#### Construction Phase
## Dublin IKEA Retail Center Mitigated - Alameda County, Summer

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<th>Num Days Week</th>
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**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 112.5**

**Acres of Paving: 14.57**

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 648,149; Non-Residential Outdoor: 216,050; Striped Parking Area: 41,485 (Architectural Coating – sqft)

**OffRoad Equipment**
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<th>Load Factor</th>
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<tr>
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3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment
Water Exposed Area

3.2 Demolition - 2018

Unmitigated Construction On-Site

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<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
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<th>CO2e</th>
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### 3.2 Demolition - 2018

#### Unmitigated Construction Off-Site

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#### Mitigated Construction On-Site

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| Total        | 0.5841  | 13.5576 | 24.6739 | 0.0388 | 0.3649 | 0.0616 | 0.4265 | 0.0552 | 0.0616 | 1.169  | 0.0000 | 3,871.766 | 5 | 3,871.766 | 5 | 1.0667 | 3,898.434 | 4
### 3.2 Demolition - 2018

**Mitigated Construction Off-Site**

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<th>SO2</th>
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### 3.3 Grading - 2018

**Unmitigated Construction On-Site**

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### 3.3 Grading - 2018

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#### Mitigated Construction On-Site

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## 3.3 Grading - 2018

### Mitigated Construction Off-Site

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|----------|-----|-----|----|-----|---------------|--------------|------------|---------------|--------------|------------|----------|---------|----------|----------|-----|-----|------|
| Hauling  | 0.5563 | 18.9415 | 3.0741 | 0.0484 | 1.0356 | 0.0725 | 1.1080 | 0.2840 | 0.0693 | 0.3533 | 5,134.910 | 7 | 0.2597 | 5,141.403 |
| Vendor   | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker   | 0.0885 | 0.0880 | 0.7112 | 1.7800e-003 | 0.1643 | 1.1500e-003 | 0.1655 | 0.0436 | 0.0460 | 0.0446 | 177.5748 | 3 | 0.0000 | 177.7122 |
| Total    | 0.6448 | 18.9996 | 3.7653 | 0.0502 | 1.1999 | 0.0736 | 1.2735 | 0.3275 | 0.0704 | 0.3979 | 5,312.485 | 5 | 0.2632 | 5,319.115 |

## 3.4 Building Construction - 2019

### Unmitigated Construction On-Site

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|----------|-----|-----|----|-----|---------------|--------------|------------|---------------|--------------|------------|----------|---------|----------|----------|-----|-----|------|
| Off-Road | 3.6169 | 32.4319 | 26.3207 | 0.0413 | 1.9800 | 1.9800 | 1.8606 | 1.8606 | 3,980.735 | 0 | 0.9765 | 4,005.148 |
| Total    | 3.6169 | 32.4319 | 26.3207 | 0.0413 | 1.9800 | 1.9800 | 1.8606 | 1.8606 | 3,980.735 | 0 | 0.9765 | 4,005.148 |
### 3.4 Building Construction - 2019

#### Unmitigated Construction Off-Site

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#### Mitigated Construction On-Site

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### 3.4 Building Construction - 2019

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3.5 Paving - 2020
Mitigated Construction Off-Site

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3.6 Architectural Coating - 2020
Unmitigated Construction On-Site

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<td>1.0598</td>
<td>1.8324</td>
<td>2.9700e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>0.0000</td>
<td>281.4481</td>
<td>281.4481</td>
<td>0.0218</td>
<td>281.9928</td>
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<tr>
<td>Total</td>
<td>46.5195</td>
<td>1.0598</td>
<td>1.8324</td>
<td>2.9700e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>3.9600e-003</td>
<td>0.0000</td>
<td>281.4481</td>
<td>281.4481</td>
<td>0.0218</td>
<td>281.9928</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
3.6 Architectural Coating - 2020

Mitigated Construction Off-Site

| Category     | ROG  | NOx  | CO   | SO2  | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|--------------|------|------|------|------|--------------|--------------|------------|---------------|--------------|------------|----------|----------|----------|---------|-----|-----|------|
| Hauling      | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000       | 0.0000       | 0.0000     | 0.0000         | 0.0000       | 0.0000     | 0.0000   | 0.0000   | 0.0000   | 0.0000 |
| Vendor       | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000       | 0.0000       | 0.0000     | 0.0000         | 0.0000       | 0.0000     | 0.0000   | 0.0000   | 0.0000   | 0.0000 |
| Worker       | 0.3183 | 0.1959 | 2.4818 | 7.2900e-003 | 0.7147       | 4.7700e-003 | 0.7195     | 0.1896         | 4.4000e-003 | 0.1940     | 726.7647 | 726.7647 | 727.2303 |
| Total        | 0.3183 | 0.1959 | 2.4818 | 7.2900e-003 | 0.7147       | 4.7700e-003 | 0.7195     | 0.1896         | 4.4000e-003 | 0.1940     | 726.7647 | 726.7647 | 727.2303 |

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Increase Transit Accessibility
Improve Pedestrian Network
### 4.2 Trip Summary Information

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Weekday</th>
<th>Saturday</th>
<th>Sunday</th>
<th>Annual VMT</th>
<th>Annual VMT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enclosed Parking with Elevator</td>
<td>30.78</td>
<td>30.78</td>
<td>30.78</td>
<td>347,322</td>
<td>306,338</td>
</tr>
<tr>
<td>Free-Standing Discount Superstore</td>
<td>5,978.33</td>
<td>5,978.33</td>
<td>5,978.33</td>
<td>18,438,751</td>
<td>16,262,979</td>
</tr>
<tr>
<td>High Turnover (Sit Down Restaurant)</td>
<td>7,400.84</td>
<td>7,400.84</td>
<td>7,400.84</td>
<td>10,298,804</td>
<td>9,083,545</td>
</tr>
<tr>
<td>Parking Lot</td>
<td>56.80</td>
<td>56.80</td>
<td>56.80</td>
<td>496,205</td>
<td>437,633</td>
</tr>
<tr>
<td>Strip Mall</td>
<td>3,370.98</td>
<td>3,370.98</td>
<td>3,370.98</td>
<td>6,092,242</td>
<td>5,373,357</td>
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<tr>
<td><strong>Total</strong></td>
<td>16,837.74</td>
<td>16,837.74</td>
<td>16,837.74</td>
<td>35,673,323</td>
<td>31,463,871</td>
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</table>

### 4.3 Trip Type Information

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Miles</th>
<th>Trip %</th>
<th>Trip Purpose %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enclosed Parking with Elevator</td>
<td>15.00</td>
<td>0.00</td>
<td>100</td>
</tr>
<tr>
<td>Free-Standing Discount Superstore</td>
<td>15.00</td>
<td>13.20</td>
<td>27.50</td>
</tr>
<tr>
<td>High Turnover (Sit Down Restaurant)</td>
<td>9.00</td>
<td>8.50</td>
<td>19.00</td>
</tr>
<tr>
<td>Parking Lot</td>
<td>24.00</td>
<td>0.00</td>
<td>100</td>
</tr>
<tr>
<td>Strip Mall</td>
<td>9.00</td>
<td>16.60</td>
<td>19.00</td>
</tr>
</tbody>
</table>

CalEEMod Version: CalEEMod.2016.3.2
Date: 4/6/2018 10:18 AM
5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Percent of Electricity Use Generated with Renewable Energy
## 5.2 Energy by Land Use - Natural Gas

### Unmitigated

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Natural Gas Use</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enclosed Parking with Elevator</td>
<td>0</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Free-Standing Discount Superstore</td>
<td>2201.82</td>
<td>0.0238</td>
<td>0.2159</td>
<td>0.1813</td>
<td>1.3000e-003</td>
<td>0.0164</td>
<td>0.0164</td>
<td>0.0164</td>
<td>0.0164</td>
<td>259.0378</td>
<td>259.0378</td>
<td>4.9600e-003</td>
<td>4.7500e-003</td>
<td>260.5771</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High Turnover (Sit Down Restaurant)</td>
<td>33283.6</td>
<td>0.3589</td>
<td>3.2631</td>
<td>2.7410</td>
<td>0.0196</td>
<td>0.2480</td>
<td>0.2480</td>
<td>0.2480</td>
<td>0.2480</td>
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<td>3,915.715</td>
<td>5.0751</td>
<td>0.0718</td>
<td>3,938.984</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Parking Lot</td>
<td>0</td>
<td>0.0000</td>
<td>0.0000</td>
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<td>0.0000</td>
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<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Strip Mall</td>
<td>224.403</td>
<td>2.4200e-003</td>
<td>0.0220</td>
<td>0.0185</td>
<td>1.3000e-004</td>
<td>1.6700e-003</td>
<td>1.6700e-003</td>
<td>1.6700e-003</td>
<td>1.6700e-003</td>
<td>26.4004</td>
<td>26.4004</td>
<td>5.1000e-004</td>
<td>4.8000e-004</td>
<td>26.5573</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>0.3851</td>
<td>3.5010</td>
<td>2.9408</td>
<td>0.0210</td>
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<td>0.2661</td>
<td>0.2661</td>
<td>0.2661</td>
<td>0.2661</td>
<td>4,201.153</td>
<td>4,201.153</td>
<td>6.0805</td>
<td>0.0770</td>
<td>4,226.119</td>
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</table>

CalEEMod Version: CalEEMod.2016.3.2  
Date: 4/6/2018 10:18 AM  
Dublin IKEA Retail Center Mitigated - Alameda County, Summer
## 5.2 Energy by Land Use - NaturalGas Mitigated

<table>
<thead>
<tr>
<th>Land Use</th>
<th>NaturalGas Use</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio- CO2</th>
<th>NBio- CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enclosed Parking with Elevator</td>
<td>0</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
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<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
</tr>
<tr>
<td>Free-Standing Discount Superstore</td>
<td>2.20182</td>
<td>0.0238</td>
<td>0.2159</td>
<td>0.1813</td>
<td>1.3000e-003</td>
<td>0.0164</td>
<td>0.0164</td>
<td>0.0164</td>
<td>0.0164</td>
<td>259.0378</td>
<td>259.0378</td>
<td>4.9600e-003</td>
<td>4.7500e-003</td>
<td>260.5771</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>High Turnover (Sit Down Restaurant)</td>
<td>33.2836</td>
<td>0.3589</td>
<td>3.2631</td>
<td>2.7410</td>
<td>0.0196</td>
<td>0.2480</td>
<td>0.2480</td>
<td>0.2480</td>
<td>3,915.715</td>
<td>3,915.715</td>
<td>0.0751</td>
<td>0.0718</td>
<td>3,938.984</td>
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<tr>
<td>Parking Lot</td>
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<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
<td>0.0000</td>
</tr>
<tr>
<td>Strip Mall</td>
<td>0.224403</td>
<td>2.4200e-003</td>
<td>0.0220</td>
<td>0.0185</td>
<td>1.3000e-004</td>
<td>1.6700e-003</td>
<td>1.6700e-003</td>
<td>1.6700e-003</td>
<td>26.4004</td>
<td>26.4004</td>
<td>5.1000e-004</td>
<td>4.8000e-004</td>
<td>26.5573</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>0.3851</td>
<td>3.5010</td>
<td>2.9408</td>
<td>0.0210</td>
<td>0.2661</td>
<td>0.2661</td>
<td>0.2661</td>
<td>0.2661</td>
<td>4,201.153</td>
<td>4,201.153</td>
<td>0.0805</td>
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<td>4,226.119</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

Use Low VOC Paint - Non-Residential Interior
### 6.2 Area by SubCategory

#### Unmitigated

<table>
<thead>
<tr>
<th>SubCategory</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
<th>lb/day</th>
</tr>
</thead>
<tbody>
<tr>
<td>Architectural Coating</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consumer Products</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Landscaping</td>
<td>0.0196</td>
<td>0.2082</td>
<td>2.0000e-005</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
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</tr>
<tr>
<td>Total</td>
<td>10.8250</td>
<td>1.9200e-003</td>
<td>0.2082</td>
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<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
<td>7.5000e-004</td>
</tr>
</tbody>
</table>
6.2 Area by SubCategory

Mitigated

| SubCategory          | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|----------------------|-----|-----|----|-----|----------------|--------------|------------|----------------|--------------|------------|----------|----------|----------|---------|-----|-----|-----|
| Architectural Coating| 0.8609 |     |    |     | 0.0000         | 0.0000       | 0.0000     | 0.0000         | 0.0000       | 0.0000      | 0.0000   |          |          |        |     |     |     |
| Consumer Products    | 9.4918 |     |    |     | 0.0000         | 0.0000       | 0.0000     | 0.0000         | 0.0000       | 0.0000      | 0.0000   |          |          |        |     |     |     |
| Landscaping          | 0.0196 | 1.9200e-003 | 0.2082 | 2.0000e-005 | 7.5000e-004 | 7.9000e-004 | 7.5000e-004 | 0.4434         | 0.4434       | 7.5000e-004 | 7.5000e-004 | 7.5000e-004 | 7.5000e-004 | 0.4434 | 0.4434 | 1.1900e-003 | 0.4731 |
| Total                | 10.3723 | 1.9200e-003 | 0.2082 | 2.0000e-005 | 7.5000e-004 | 7.5000e-004 | 7.5000e-004 | 0.4434         | 0.4434       | 7.5000e-004 | 7.5000e-004 | 7.5000e-004 | 7.5000e-004 | 0.4434 | 0.4434 | 1.1900e-003 | 0.4731 |

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet
Install Low Flow Kitchen Faucet
Install Low Flow Toilet
Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

9.0 Operational Offroad
## 10.0 Stationary Equipment

### Fire Pumps and Emergency Generators

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Number</th>
<th>Hours/Day</th>
<th>Hours/Year</th>
<th>Horse Power</th>
<th>Load Factor</th>
<th>Fuel Type</th>
</tr>
</thead>
<tbody>
<tr>
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<td>2923</td>
<td>0.5</td>
<td>Diesel</td>
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</table>

### Boilers

<table>
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<th>Number</th>
<th>Heat Input/Day</th>
<th>Heat Input/Year</th>
<th>Boiler Rating</th>
<th>Fuel Type</th>
</tr>
</thead>
</table>

### User Defined Equipment

## 10.1 Stationary Sources

### Unmitigated/Mitigated

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>Fugitive PM10</th>
<th>Exhaust PM10</th>
<th>PM10 Total</th>
<th>Fugitive PM2.5</th>
<th>Exhaust PM2.5</th>
<th>PM2.5 Total</th>
<th>Bio-CO2</th>
<th>NBio-CO2</th>
<th>Total CO2</th>
<th>CH4</th>
<th>N2O</th>
<th>CO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Generator - Diesel (750 - 9999 HP)</td>
<td>1.6428</td>
<td>7.3463</td>
<td>4.1887</td>
<td>7.8900e-003</td>
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<td>0.1178</td>
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<td>Total</td>
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<td>4.1887</td>
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<td>0.2417</td>
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<td>840.3766</td>
<td>0.1178</td>
<td>843.3222</td>
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</tr>
</tbody>
</table>

## 11.0 Vegetation